
Request to be heard?: Yes

Precinct: Montague

Full Name: Mark Liberman

Organisation: Carri Nominees Pty Ltd

Affected property: 176-188 Gladstone Street, South Melbourne

Attachment 1: 176-188_Gladston

Attachment 2:

Attachment 3:

Comments: See attachment

CARRI NOMINEES PTY LTD
ABN: 67 553 393 848
PO Box 2289
Caulfield North Vic 3161

Planning Panels Victoria
1 Spring Street
Melbourne Victoria 3000

Dear Sir/Madam,

**Submission to Fishermans Bend Draft Framework Plan
176 – 188 Gladstone Street, South Melbourne**

We are the owners of the abovementioned properties and write to lodge a submission in relation to proposed Amendment GC81 to the Port Phillip Planning Scheme and the significant implications it will have on our site.

Proposed Framework Plan

The draft framework identifies the subject site within the Montague Precinct (non-core activity area) for which the following controls will apply:

- Discretionary 8 storey maximum building height
- Floor Area Ratio of 3.0:1
- Maximum dwelling density of 198 dwelling per hectare

The proposed planning controls also contain several built form requirements relating to setbacks and street wall heights, building separations etc.

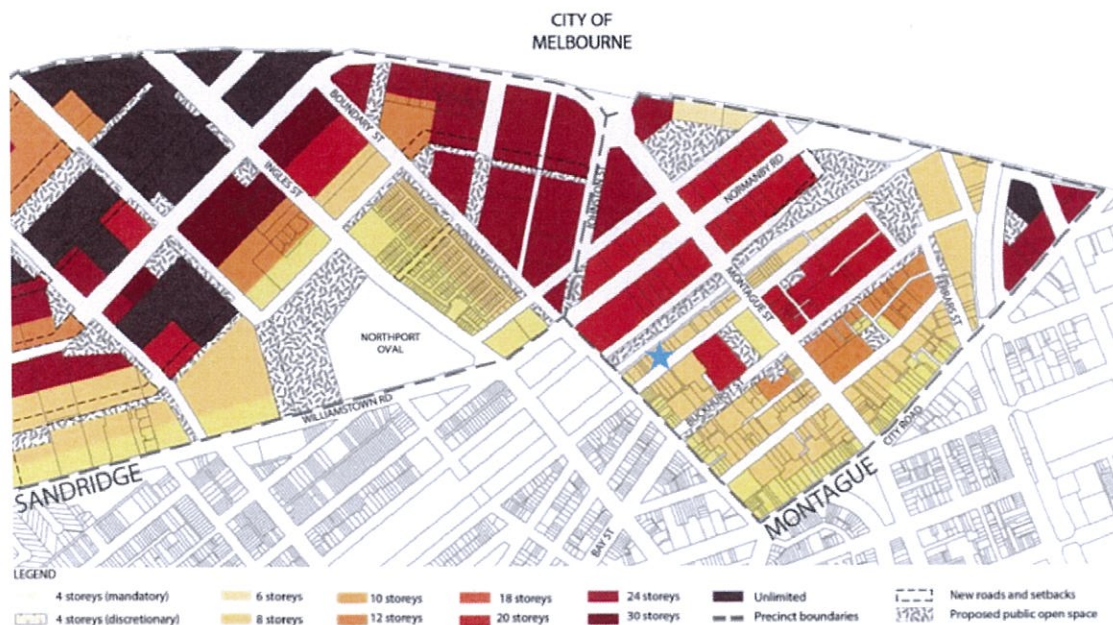


Figure 1 – Proposed Building Heights Map

Submission

We are supportive of the discretionary nature of the proposed height controls however, consider there is a lack of justification for the proposed 8 storey height limit. We consider that that the land along the northern side of Gladstone Street, including the subject site, is strategically located adjacent to the public transport light rail corridor and existing infrastructure and can therefore accommodate higher residential densities.

Further, the configuration of the site provides for excellent connectivity and public surveillance of the public transport corridor, which positively contributes to good urban design and activation principles.

In this regard, we consider that justification for the proposed 8 storey building height is lacking and will significantly limit the development potential of the site.

We consider that a more appropriate building height for the site and surrounding precinct, given its proximity to existing public transport facilities and lack of sensitive interfaces, should be in the order of 20 storeys to match the proposed height controls of the properties immediately to the north of the site (Woodgate Street properties on the opposite side of the tram line) and the approved 20 storey development located to the south-west of the site on Gladstone Street. This height limit should remain discretionary and would be subject to detailed urban context, overshadowing analysis and design principles at the planning application stage to determine appropriate built form outcomes on the site.

We object to the FAR and maximum dwelling densities proposed as these, in conjunction with the proposed building height of 8 storeys, will further reduce the development potential of the site and the surrounding area more broadly.

One of the significant factors determining building heights within a precinct is future dwelling yield. We understand that this has been determined on a population estimate of 80,000 people however, we consider that this is a gross underestimation.

As you will be aware, there are a number of existing non-residential tenants in the precinct with long lease options, and cost associated with environmental matters associated with the site. These factors place a large cost implication on the future redevelopment of the land within the precinct, and it is on this basis that the proposed FARs and maximum dwelling densities need to be more carefully considered.

The proposed FAR and maximum dwelling density for the site unreasonably restricts the scope to which it can be developed, which is particularly concerning given the site represents a prime opportunity to provide much needed housing within close proximity to existing public transport infrastructure.

Further, such stringent controls run the risk of rendering sites as unviable development options which will further delay the development of the Fishermans Bend area.

We are also concerned with the time allotted to provide submission noting that the draft Framework Plan and associated planning controls were released on 21 October 2017. This timeframe, as well as the hearing dates listed for this matter, are extremely limited and condensed given the Christmas and end of year period. This does not allow sufficient time for appropriate representation to be engaged for this matter and we consider there is a question of procedural fairness that should be addressed.

Conclusion

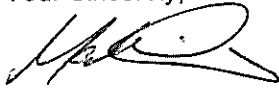
Given the strategic significance of the subject site and the significant implications of the proposed controls, we submit that:

- The site is an excellent candidate for higher density development and should be nominated as 20 storeys (discretionary) to align with the surrounding area.
- The discretionary nature of the proposed maximum building heights should be retained.
- The remaining planning controls should be discretionary in nature as opposed to mandatory to allow for flexibility and consideration of site specific qualities.

- The FARs and maximum dwelling densities are unreasonable and should be reconsidered, specifically as these are based on a population estimate that is grossly inadequate.
- There is a question of procedural fairness with respect to timing associated with the exhibition and panel hearing process that we encourage the Panel to address.

We look forward to your favourable consideration of this matter, and should you have any further queries please do not hesitate to contact me on 0419 575 308.

Your Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Liberman', written in a cursive style.

Mark Liberman
CARRI NOMINEES PTY LTD