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**Request to be heard?:** No

**Precinct:** General

**Full Name:** Dean Thornton

**Organisation:** Jacobs Group

**Affected property:** Level 11, 452 Flinders Street

**Attachment 1:** Jacobs\_Letter\_-\_F

**Attachment 2:**

**Attachment 3:**

**Comments:** Please refer to attached letter

December 14, 2017

Planning Panels Victoria  
Planning.panels@delwp.vic.gov.au

Project Name: Fishermans Bend Framework – Draft for Consultation

## **Subject Comments on Draft Framework**

To whom it may concern

### **Overview**

Over the past few weeks, staff from Jacobs have attended consultation and information sessions conducted by Consult Australia and the Property Council of Australia, hearing first hand from members of the Fishermans Bend Taskforce, DELWP, the Ministerial Advisory Committee and consultants involved in the preparation of the draft Framework. Jacobs' staff in attendance come from backgrounds in planning, urban design, engineering, water management and project management.

We would like to congratulate all parties involved in the preparation of the Framework and acknowledge the challenges of preparing such a document following the rezoning of the majority of the precinct, in what could be described as 'reverse order' to best practice planning. The unfortunate premature rezoning of the precinct has largely removed the ability for value capture that would have assisted in the delivery of essential infrastructure and public realm outcomes.

### **Opportunities**

Perhaps due to this issue, in our view, the weakest elements of the Framework are around the commitment to infrastructure timing (including funding) and detail around a Development Contributions Plan. Whilst some of this work may be occurring or in place, the document itself does not go into enough detail around these essential items.

#### **1. Integrated transport and land use planning**

For example, Sustainability Goal No. 1 states that *Fishermans Bend.....must integrate transport and land use planning*. This is commendable but must be backed up with stronger commitments to do so in the document. The language used in the document when discussing these transport items tend to be vague and rather non-committal, such as '*seek to extend the tram network*', '*explore opportunities to support....*', as well as noting that infrastructure funding is to align with government budgetary processes (and business cases), so again, no guarantees. On the other hand, land use

changes are already occurring and development will only accelerate as planning certainty is provided in the final framework. If essential transport items are not funded and delivered, will development still be allowed to proceed?

## ***2. Improved granularity in the Employment Precinct***

While we acknowledge that the Employment Precinct is running to a different timeframe, the light touch it is given in the framework document could be misconstrued. For example, we would expect that there would be a finer grain of streets throughout this precinct, not just the extension of Turner Street as shown on several plans. The plans should either show something indicatively (with disclaimers) or remove any plan information from a precinct that is yet to undergo detailed investigation.

## ***3. Clarity on the Green Star Communities rating***

A Green Star Community rating is a commendable aspiration for the precinct, however the document does not appear to state what level of rating is being targeted, who would be seeking the rating given the large private ownership issue, for how many years the rating will be maintained and how this relates to the Green Star Design and As-Built tool for buildings that was mentioned in the briefings (targeting 4 star).

## ***4. Holistic view of freight line impact***

The indicative overhead freight line shown on Figure 9 will impact significantly on Wirraway and the Employment Precinct, however the detailed plans for these precincts does not show this freight line (e.g. Figure 22). It is essential that the impact of this is considered, such as buffers and possible relocation of sensitive uses. Figure 17 shows improved pedestrian and cycling links to the employment precinct, the amenity of which may be negatively impacted when an overhead freight line is installed.

## ***5. Embedding Liveable Housing Australia guidelines***

Several of the sustainability goals and specific objectives relating to liveable communities refer to issues of liveability and adaptability for all ages, for dwellings, workplaces and public realm. A suggestion to strengthen this aim could be to embed Liveable Housing Australia guidelines into the Framework. We also note that the Better Apartments Design Standards also partially address adaptable housing outcomes.

## ***6. Improved clarity of Floor Area Ratios strategy***

Jacobs commends the adoption of Floor Area Ratios in the draft Framework. This approach is likely to provide increased certainty for land values in particular, hopefully removing some of the speculative land transactions that the precinct has seen to date. A couple of comments for consideration include; clarity for who pays for the open space delivery if land is provided on an owner's site; acknowledgement that site coverage of 100% would not be permitted if compliance with Better Apartments Standards is considered, allowing for deep soil zones; Clause 1.11.3 should state that additional affordable housing units should have the same number of bedrooms as the additional eight private dwellings; rephrase clause 1.11.4 as its meaning seems contradictory.



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### ***7. Working to incentivise employment***

We support the strategy to require minimum employment floor area to support Objective 2.1, however note the strategy to require a minimum employment floor area is a 'stick' rather than 'carrot' approach. We suggest that early delivery of public transport would be the best way to incentivize the market to deliver employment uses. Further, this requirement may be unviable in the early years until a critical mass of population is in existence. Perhaps allowing for flexible spaces that could adapt to employment uses in time would be a more successful strategy for the short term, revisiting this later as the population increases. Lessons from Docklands shows the difficulty in enforcing non-residential uses with often empty retail tenancies being the result.

### ***8. Wind Modelling***

The framework appears to not address wind modelling requirements. For a precinct of this size, there may be value in taking a precinct approach to wind modelling that could potentially identify opportunities to manage wind at a more strategic level. This may further inform direction around plot ratios and building heights.

We thank Planning Panels Victoria and the Fishermans Bend Taskforce for the opportunity to make this submission and hope that our constructive comments are helpful in finalizing the Framework.

Yours sincerely

**Dean Thornton**  
Principal Urban Design Leader