1. These submissions are made on behalf of the following property:
   131.5 The Jane Property Group
   332 Plummer Street and 21 Smith Street, Port Melbourne
   (Document 48, p.25 – 28) Sheppard p.27

2. The site abuts three streets. Its Plummer Street address is adjacent to the proposed tram route and it is within one block of the Wirraway Station.

3. Plan Melbourne nominates Wirraway as one of its priority precincts for major urban renewal on Map 4. Direction 2.2 seeks to “deliver more housing closer to jobs and public transport”.

   Policy 2.2.1 seeks to:
   “Facilitate well-designed, high-density residential developments that support a vibrant public realm in Melbourne’s central city.

   ...

   A number of major urban renewal precincts have been identified in the central city (as shown Map 4). Maximising development opportunities of these precincts will minimise the need to increase residential densities in other parts of the city. The sequencing of infrastructure within these precincts will maximise their development potential and provide timely services and amenities for residents.

   There is a need to find ways to give the market some flexibility to maximise development opportunities. …”

4. The opening general submission identified the fallacy underpinning the genesis of the UDS and FAR approach adopted in the Amendment. Rather than Wirraway being equated to major urban renewal precinct with its own potential station and tram route through its middle, it is being treated as the suburban cousin, Kew East, Hampton or Pascoe Vale South and is dismissed as a low to medium rise development area.

5. There is no differentiation in Plan Melbourne between Wirraway and the other precincts in Fishermans Bend. The only reason the population densities and FAR’s are so low is the spread of Ms. Hodyl’s population distribution dictated by her UDS assumptions.
6. The submissions on behalf of the City of Port Phillip seek to compound this proposition by condemning Wirraway to a low-medium rise medium density appendage to its bigger neighbours.

7. Plan Melbourne designates Wirraway as having work to do to achieve the aspiration of minimising the need to increase residential densities in other parts of the city. As observed in the opening general submission, the city is not going to miraculously stop growing in 2050. We do not want to be putting “sold out” signs on major urban renewal precincts because of the failure to properly apply the appropriate policy that should dictate the eventual built form of this precinct. There is clearly no appetite on the part of the Taskforce¹ or the City of Port Phillip to undertake the necessary work to do this.

8. Wirraway will be an extension of the central city of Melbourne. It is 3 kilometres from the CBD. Its proximity to the employment cluster to its immediate north and the other precincts via Plummer Street gives it locational attributes craving to be developed with high density mixed-use. To not to do so would be perverse.

9. The Jane Property is an exemplar of the underlying flaws inherent in the Framework, the UDS and the FAR. It is to be located in core and non-core components of the Framework, zoned Capital City Zone and have its northern half able to reach 24 storeys whilst its southern half can only reach six before the heavy hand of the FAR regime further burdens it down. The only justification for doing so is to somehow accommodate Ms. Hodyl’s population distribution limited as it has been to its 80,000 capacity.

10. In the Minister’s closing response to changes – Montague submission of 8 May, the following response was made to submissions concerning non-core areas:-

   “18. Amend DDO 30 and CCZ 1 to change 134 Buckhurst Street and 95 – 117 Buckhurst Street to non-core areas (see Figure 49).”

   18.1 The Minister does not accept this recommendation.

   18.2 The core areas in Montague are informed by their proximity to public transport, the site size and number of street frontages. These two sites meet this criteria.”

The Jane Property is a large site, it abuts three street frontages and abuts the tram track and is a block from the proposed station. Its northern half is within the core area but for some reason its southern half is not. Applying the above criteria the exclusion of the southern half of the site is perplexing and would seem a logical extension of its core neighbour immediately to the east of Smith Street.

¹ Minister’s Response to Proposed Changes – Montague [38.2]

"However it is not proposed to revisit the Floor Area Ratios or heights as part of the Precinct Plan process."
11. The submissions made in the opening general submission are adopted together with the submissions made on behalf of other parties concerning the inappropriate methodology underpinning the Amendment. Mr. Sheppard highlights the impact the proposed changes would have on this site and makes general comments concerning the inadequacy of the density and built form proposed and the opportunities lost by the draft Framework.

12. As previously submitted in the opening general comments, what is proposed for Wirraway is clearly "inappropriate" and needs to start again. The Panel should so recommend.

9 MAY, 2018

C. J. WRÉN
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