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**Request to be heard?:** Yes

**Precinct:** Montague

**Full Name:** Sam D'Amico

**Organisation:** Ratio Consultants

**Affected property:** 168-172 Gladstone Street, South Melbourne

**Attachment 1:** 14919L001\_-\_Sub

**Attachment 2:**

**Attachment 3:**

**Comments:** Please see attached.

Dear Sir/Madam,

15 December 2017

**City of Melbourne GC81  
Fishermans Bend Framework**

Department of  
Environment, Land, Water  
and Planning  
Amendment GC81

*Submitted online via  
Engage Victoria*

We act on behalf of Osten Pty Ltd, the owner of the land at 168-172 Gladstone Street, South Melbourne.

On behalf of our client we have prepared the following submission in response to the proposed Amendment GC81 to the Port Phillip Planning Scheme.

This submission relates to the subject site and the implications of this amendment on the development potential of this property. Our main point is centered around the mandatory nature of the proposed controls, which in our submission, are too onerous and not strategically justified in a location which is earmarked for significant growth.

Ratio commends certain aspects of the proposed Fishermans Bend Framework, including the emphasis on sustainable transport modes, community infrastructure and environmental sustainability. It is clear that strategic direction for this area is long overdue and we support, in principle, the development of a holistic vision for this important urban renewal area. We also support the proposal for height limits to be discretionary in nature, allowing for site responsive design

Notwithstanding, we question the strategic justification for a number of the mandatory provisions proposed.

We support the more contextual approach to street wall height and side setbacks. The consideration of the location of habitable room windows, balconies, and overall building heights area all welcome inclusions. However, we would question the justification

for these being included as mandatory requirements, noting there will always be exceptions to the common rule where minor variations could be considered appropriate. The “one size fits all” approach will have a negative impact on the potential development of sites like the subject site which has the capacity to accommodate a number of towers in a variety of different layouts. These site have the potential to accommodate significant growth and the inclusion of mandatory setback requirements without a detailed study of the potential tower/podium layout of each site is short sighted and not appropriate in an area with a number of lots that vary significantly in size, shape, dimensions and interfaces such as Fishermans Bend.

We look forward to your consideration of our submission. If you have any queries regarding the above, please do not hesitate to contact me on 9429 3111 or email [samd@ratio.com.au](mailto:samd@ratio.com.au).

Yours Sincerely,

A handwritten signature in black ink, appearing to be 'SD' with a long horizontal flourish extending to the right.

**Sam D'Amico**  
**Director: Planning**  
**Ratio Consultants Pty Ltd**