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18 September 2024

Lachlan Forsyth  
Manager – Development Facilitation Program  
Department of Transport & Planning  
GPO Box 2392  
Melbourne VIC 3001

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Dear Lachlan,

## **TOWN PLANNING SUMMARY ENQUIRY PPA-2 | 11-27 DORCAS STREET, SOUTH MELBOURNE PROPOSED CLAUSE 53.23 PERMIT APPLICATION**

Urbis Ltd continue to act on behalf of Middleton Lane Development Partnership Pty Ltd (the permit applicant) in support of a proposed permit application pursuant to the provisions of Clause 53.23 of the Port Phillip Planning Scheme, relating to 'Significant Residential Development with Affordable Housing'. The planning permit is proposed at 11-27 Dorcas Street, South Melbourne (herein referred to as 'the subject site') and the notionally proposed development of a 19-storey mixed use building containing 243 dwellings and ground floor Retail Premises, with complementary car parking, amenities and services.

The lodgement of this application follows an extensive and thorough pre-application process with the Development Facilitation Program that commenced in November 2023. Of note, the preliminary design was presented to the Office of the Victorian Government Architect (OVGA) for their views, with comments received 15 April 2024. Following this, the formal pre-application package was lodged on 7 June 2024, with the DFP confirming eligibility to apply for a planning permit under Clause 53.23 on 29 July 2024.

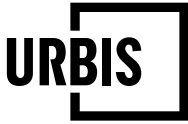
Following confirmation of DFP eligibility, further development has been undertaken to the design in order to resolve key parameters, as well as to respond to the preliminary feedback issued by DFP within the eligibility letter. This cover letter aims to provide clarification as to further information provided in response to the preliminary feedback. In addition, it provides an outline on the key design changes that have occurred since 7 June 2024, and an update with respect to the delivery of affordable housing.

## KEY DESIGN CHANGES

As noted above, the preparation of detailed Town Planning Application Plans have progressed following the submission of documents to the DFP on 7 June 2024. In concurrency with the statement of changes prepared by Bates Smart Architects, we note the following list of key changes made to the architectural design since June 2024:

- Total number of dwellings has increased from 224 to 243, in response to an alteration of apartment diversity mix and floor layout plans.
- Total podium height has been increased by 100mm to 19.13m RL, to provide a compliant balustrade height.
- Balcony locations have been modified to the majority of dwellings, and particularly to the north-eastern and north-western dwelling corners, assisting with the overall visual bulk and façade design response.
- Reduction of basement to reduce the depth of excavation by 1.1 metres. The basement will remain at 3 levels with a reduction of total car parking spaces from 258 to 223.
- Rationalisation of podium car parking areas due to relocation of columns.
- Roof height reduced by 250mm in response to amended roof parapet detailing. The total development height will remain at 70 metres AHD.
- Façade design has been amended inclusive of the below:
  - Modifications and rationalisation of the coloured aluminium horizontal banding.
  - Incorporation of vertical mullions to the northern façade in response to reflectivity requirements, and to increase articulation by reducing glazing extents.
  - Incorporation of façade 'sun-shade' projections to each slab edge interface at each level, in response to reflectivity requirements. Sun shades will measure 450mm (d) x 400mm (w), and will be spaced at 3.6 metres.
  - Removal of vertical aluminium portals in response to a rearrangement of structural column locations.
  - Removal of façade notches in a simplification of the façade.
- Rationalisation to sky bridge design to remove curved glazing in favour of rectilinear glazing lines, and increased landscaping opportunities.
- Depth of the entry crescent portal has been reduced pertaining to existing footpath levels and DDA access requirements.
- Residential amenities room has been amended to insert a gym, and concurrent reduction of swimming pool size.

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## DELIVERY OF AFFORDABLE HOUSING

The proponent team appreciates that the ability for assessment under Clause 53.23 provisions requires that the development application make a contribution toward the delivery of affordable housing, via either an on-site sale of housing to a registered housing provider, or a cash-in-lieu contribution to the Social Housing Growth Fund.

Pursuant to the delivery mechanisms permitted under Clause 53.23, the permit applicant will be seeking to make a cash contribution to the social housing growth fund, at an amount equal to 3% of the estimated cost of development. Pursuant to the Metropolitan Planning Levy Certificate, the estimated development cost is \$165.5 million.

We understand that the value of the cash contribution payable, as well as payment arrangements, are to be set out in a Section 173 agreement. Accordingly the permit applicant will continue to work with the Department throughout the assessment process to facilitate an appropriate outcome in this regard.

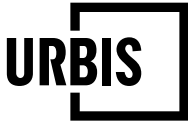
## RESPONSE TO PRELIMINARY COMMENTARY

Within the Department's eligibility confirmation letter dated 29 July 2024, we acknowledge there were several preliminary comments and suggestions for clarifications and further information to be provided within our lodgement submission to the Department. The table below seeks to provide responses to each of the Department's preliminary comments.

### PRELIMINARY COMMENT

### RESPONSE

<p>1. <i>Vehicle movements</i></p> <p>a. <i>Access to basement and podium level car parking needs to be shown to be safe and efficient. The submitted plans illustrate vehicle turning circles that appear to show multiple movements are required to enter and exit the basement and podium car parks. Clarification on whether there is sufficient space for vehicles to pass in Middleton Lane is also required. The submitted plans appear to show that two vehicles will use Middleton Lane at the same time but the turning circles provided on the plans do not show that there is much room for two vehicles to be able to pass each other.</i></p> <p>b. <i>The plans show that several bike rails are to be constructed on public</i></p>	<p>A response to the preliminary comments and concerns raised by the DFP has been included within Section 4.3.1 of the updated traffic report prepared by Traffix Group.</p> <p>A summary of the points is included below and within the Assessment section of Urbis Town Planning Report. We consider the response to vehicle movements and access are appropriate, with revised Swept Path plans considered to be industry best practice:</p> <ul style="list-style-type: none"><li>Post development, both the southern right of way and Middleton Lane will be afforded 6.1 metres width given the laneway setbacks proposed by this development. This will allow two way passing movements in each direction for vehicles.</li><li>A 'prop and pass' arrangement is required for vehicles turning from Middleton Lane to the right of way, however, is considered acceptable given the low levels of traffic completing this manoeuvre and that they</li></ul>
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*land. This requires discussion and coordination with the City of Port Phillip, which we encourage.*

will generally be made with those familiar with the conditions.

- The swept path plans prepared identify that appropriate access will be provided to car parking spaces, with aisle widths and turning movements sufficient to cater for two-way vehicle movement.
- While we appreciate that single movement turns are preferable and should be targeted, the suggested arrangements have been proposed in order to ensure that an appropriate provision of car parking spaces can be provided for residents. The swept path movements shown in the plans are representative of a worst case scenario, and remain wholly serviceable and practical for future residents.

We acknowledge that the bicycle spaces located in the verge area of Wells Street will require engagement and approval by the City of Port Phillip, and will endeavour to undertake this throughout the referral process.

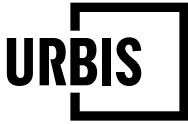
1. *A 3D model in format of FBX OBJ or 3DM, as per the attached 3D Digital Model Submission Guide for the current application as well as the approved development 11-17 Dorcas Street, South Melbourne (Council reference 217/2019A).*

We confirm that 3D Models have been prepared and are contained within the submission documentation, for both the proposed development and the previous planning permit granted over the 11-17 Dorcas Street site (21/2019/A).

2. *Revised architectural plans showing finished floor levels of tenancies, footpath and paved areas and natural ground levels. Please include cross section drawings at grade entrances from the public realm to private tenancies.*

The lower ground and upper ground drawing sheets TP03.0LG & TP03.0UG identify finished floor levels for both the retail tenancies and the adjoining natural ground levels of paved footpath areas. The finished floor levels of Retail 02 and 03 tenancies will be slightly higher than the adjoining footpath, however the entries will be graded down so that they are at grade. The café and retail 04 tenancies will be at grade with the adjoining footpaths.

Entry sections to the Retail 01 tenancy and the residential lobby have been prepared on



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Sheets TP11.301 & TP11.304 per DFP's request. These are considered typical design detail to all private tenancy spaces.

3. *1:50 or similarly scaled drawings to demonstrate how high-quality design detail, depth, and visual interest will be achieved at key pedestrian interfaces including shop fronts, residential lobbies, porte-cochere, bicycle parking, and building services. Where possible, ensure infrastructural elements such as booster and service cabinets are integrated into the façade design. We encourage commensurate design detail and attention is provided to all four building interfaces, including the rear laneway which at this stage, requires some additional attention.*

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1:50 scaled site plans and elevations have been prepared and are contained within the architectural set as Sheets TP11.301 to TP11.304.

The 1:50 plans include the entirety of the Wells Street and Middleton Lane interfaces, as well as the key entry interface points to Dorcas Street and the rear right of way, being the residential lobby entry and the porte cochere & loading bay spaces.

As identified within the sheets, the material selections are varied to ensure appropriate articulation, and will be of a high quality to ensure a robust façade appearance. Service cabinets are mostly directed to Wells Street and the rear right of way, and will be architecturally integrated into the design.

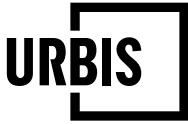
We consider the key pedestrian interfaces will be highly activated through the use of active edges and glazing to encourage passive surveillance.

Further, we consider improvements have been made to the porte-cochere and southern interface to improve the architectural appearance and activation of the future space.

4. *Please provide dimensioned, typical dwelling layouts for all dwelling types, showing minimum widths, length and area, demonstrating compliance with standards of ResCode (as demonstrated for Apt 1.2, 2.1, 2.4, 2.6, 2.9, 3.2 and 3.3 in the BatesSmart Urban Context Report).*

The updated BADS compliance package provides detailed apartment layouts for 25 Apartment types within the development, which will provide DTP with a more in-depth assessment of the proposal's overall compliance with Clause 58 of the Port Phillip Planning Scheme.

While we acknowledge the development will contain 48 individual apartment types, we consider the 25 provided represents an



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accurate cross-section of the Apartment types for this dwelling.

Due to the unique architectural design of the building and the facades curved nature, the remaining 23 apartment types yet to be documented are largely identical, with small tweaks to the layout in response to this curvature.

Notwithstanding, we consider the 25 apartment types presented are most typical of the apartments provided within the development, and are representative of the development's overall BADS compliance.

5. *Please provide a BADS compliance summary table showing compliance/noncompliance of the development with the required clause 58 standards.*

In addition to the functional layout plans prepared within the Urban Context Report, as requested a BADS compliance table has been prepared and is contained on Page 151 of the updated Urban Context Report.

6. *Structural support pillars are located within the active use areas within dwellings (e.g. see dwelling types Apt 2.1, 2.4 2.9, 3.2, 3.3). Where they are located within the bedroom and living areas, provide evidence/narrative on how these dwellings will meet the objectives of BADS with these impediments.*

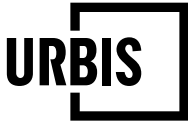
As noted above within Section 1 of this letter, several detailed design developments have been made following the original pre-application submission to DFP on 7 June 2024. This included a detailed review of the structural column locations, which have been rationalised to provide less intrusion into functional spaces.

While it is necessary that some pillars will need to intrude into active use areas, we consider the revised design has minimised this to a point where they are now negligible.

The BADS assessment of Standard D26 within the Town Planning Report provides further justification in relation to these minor intrusions, which are on balance considered to be an appropriate response.

7. *Please provide an Acoustic Report demonstrating how noise impact objectives of standard D16 of clause*

As noted above, an Acoustic Report has been prepared by Watson Moss Growcott to demonstrate the proposal's consistency with Standard D16. As noted within the 'Internal Amenity' Section of the Urbis Town Planning



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*58.04-3 of the Port Phillip Planning Scheme will be achieved.*

Report, it is considered that the proposal can comply with Standard D16, on the provision that the acoustic consultant's recommendations are adopted.

8. *An Arboricultural Report that provides the health status and ecological value/significance of trees (to be removed and retained) and how those to be retained will be protected during construction. Street tree removal may require further approval from the City of Port Phillip.*

An arboricultural report has been prepared by Melbourne Tree Care Pty Ltd, and is attached to this submission package in response to DFP's commentary. Information is provided with respect to each trees arboricultural assessment, as well as protection methods for those trees to be retained throughout construction. This includes the three trees located at the site's western interface to Wells Street, as well as the trees located at neighbouring properties to 145 Wells Street and 336 St Kilda Road.

As noted within the Urbis Town Planning Report, the eight trees located along Dorcas Street are proposed to be replaced as part of this development, with six larger Victorian native trees. Justification regarding the removal of these trees is contained within the 'Landscaping Response' section of the Town Planning Report.

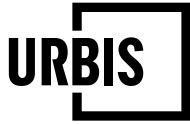
9. *I note that the submitted information confirms the development will commit to the provision of affordable housing, in line with the requirements of Clause 53.23. At the time the request was lodged with DFP, I acknowledge the details around the contribution method were still being confirmed.*

This is acknowledged. Please refer Section 2 of this letter above.

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10. *To reduce the likelihood of receiving a request for further information, I encourage the project team to ensure that detailed design matters (such as building height and setbacks, finished*

The team at Bates Smart Architects and Urbis have thoroughly reviewed the architectural plans in depth to ensure that an appropriate level of design detail and dimensions have been provided on the plans to allow for assessment of the proposal by DTP.



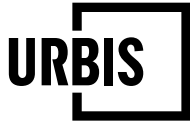
*floor levels, car parking and aisle widths, location of secluded private open spaces etc.) are accurately depicted in the application documents.*

We consider an appropriate level of additional detail has been added to the plans in response to this request.

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Should you wish to discuss or require any further information, please do not hesitate to contact the undersigned, or Vicky Grillakis at [vgrillakis@urbis.com.au](mailto:vgrillakis@urbis.com.au) or +61 3 9617 6617.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Bryn Greenhalgh".

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