

29 October 2024

ADVERTISED PLAN

Ruby Dawes-Robb
Senior Planner
Development Approvals and Design
Department of Transport and Planning

**251-265 LYGON STREET, BRUNSWICK EAST AND 1A PITT STREET, BRUNSWICK
PLANNING PERMIT APPLICATION NO: PA2403218
RESPONSE TO FURTHER INFORMATION REQUEST**

Dear Ruby,

In response to your further information request dated 8 October 2024, please find attached documents as follows:

- Updated Architectural plan and Urban Context Report prepared by Pace Architects;
- Updated Affordable Housing Report prepared by Urbis;
- Updated Planning Report prepared by Urbis; and
- Computer 3D model (provided separately).

In response to each of the points raised in the further information request:

Further Information

Point	Action/Response
<p>Confirm whether the accommodation portion meets the minimum cost requirement outlined in Clause 53.23 of the Merri-bek Planning Scheme as the cost of development provided is inconsistent with the Quantity surveyor report prepared by Napier and Blakely and dated 9 May 2024.</p>	<p>I understand that your concern is that if you delete the retail cost listed in the N&B cost report (\$3.25 million) from the MPL development cost (\$52.24 million) the construction cost (\$48.99 million) is below the required \$50 million minimum. While we understand this approach, it does not take into account the sharing of resources required in a mixed use building. The structure and services which form part of the retail component simultaneously services the residential component (for example the structural columns run through the retail tenancies but are required to support the residential part of the building, the retail floor is the ceiling of the residential basement etc). We estimate that approximately 50% of the retail cost is actually for components which service (at least in part) the residential component and therefore should be included within the residential cost. The cost</p>

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	of the residential component of the development therefore exceeds \$50 million.
Planning report amended to: a) Correct any inconsistencies throughout the material. The affordable house report references the provision of affordable housing for 10 years, whereas the planning report references 15 years etc.	The planning report has been updated to be consistent with the affordable housing report.
Amended Affordable Housing report to: a) Provide sufficient information to clarify the affordable housing offering. The information does not substantially clarify how this will be managed moving forward or how it responds to the relevant option. The current offering would be calculated as Option 3 as detailed on the Development Facilitation page.	It is confirmed that the offer is for Option 3, being a 25% discount to the rental rate for 25% of stock over a 15 year period. The report has been amended to be consistent with the planning report.
A 3D model of the proposal to assist with the assessment of overshadowing impacts.	A 3D model has been included.

Preliminary Assessment

Issue	Response
<p>Clarification of Accommodation Development Cost Threshold (Clause 53.23)</p> <p>a) Pursuant to Clause 53.23 of the Merri-bek Planning Scheme, the estimated cost of the accommodation portion of the development, as specified in the Quantity Surveyor Report, must exceed \$50 million. However, there appears to be a discrepancy between the estimated cost of development provided in the application form, the submitted MPL, and the Quantity Surveyor Report prepared by Napier and Blakeley, dated 9 May 2024.</p> <p>b) According to the report, the retail portion of the development is estimated to cost \$3.25 million, which suggests that the accommodation portion would fall below the required \$50 million threshold. Please confirm whether the accommodation portion meets the minimum cost requirement outlined in Clause 53.23.</p>	<p>As above, the construction cost of the residential component of the development will exceed \$50 million.</p>
<p>Affordable Housing Offering</p> <p>a) There are inconsistencies between the affordable housing proposal submitted and what was presented to the DFP team during the pathway recommendation. The current proposal seems to follow Option 3 from the DFP website, reflecting a 4.2% offering based on the development cost.</p> <p>b) Please clarify the specific details of the affordable housing commitment, as this discrepancy may affect the Department's</p>	<p>The inconsistencies have been rectified. The offer is for Option 3 and has been increased from 10 years to 15 years (6.3% of development cost).</p> <p>It is noted that the development has a planning permit with no requirement for affordable housing. The additional yield which is expected to be attained through this process would go</p>

position on the additional levels previously supported.	entirely to the affordable housing component of the development.
Clause 58.04-2 (Internal Views Objective) a) Apt Nos 115 and 101 second bedrooms directly face the light court located on the western boundary and have a separation of 2.3m. Windows should limit views into the habitable room windows of dwellings within a development.	Obscure glass has been added in this and other similar circumstances.

In addition to the above, two minor voluntary changes have been made to the plans as follows:

- The substation has been slightly relocated on the advice of the servicing authority. The extent of activation of this frontage remains unchanged (but locations are adjusted).
- The upper level façade materiality has been adjusted due to the complexity of the previous design. The renders have been updated to reflect this change and are included within the updated Urban Context Report. A high quality standing seam finish is included and the quality of the appearance (and the architectural composition) remain unchanged.
- There have been slight changes to the apartment and balcony areas at the upper levels. These are minor and inconsequential.

The voluntary changes have been clouded on the amended plans (enclosed).

Yours Sincerely,



Tarquin Leaver
Head of Planning
Pace Development Group

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