

12 June 2026

Nic Watson
Senior Planner
Department of Transport and Planning
Level 17, 1 Spring Street
Melbourne VIC 3000

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Dear Nic,

Proposed Planning Permit Application PPA-1398 7-15 Horne Street Elsternwick Clause 53.23 Application Cover Letter

Urbis continues to act on behalf of Auyin Property Development Pty Ltd in support of a planning permit application for a mixed-use development at 7-15 Horne Street, Elsternwick.

Following our previous submissions, pre-application discussions and project eligibility confirmation, this submission seeks to formally lodge the planning permit application associated with this site.

The lodgement of this application follows an extensive and thorough pre-application process with the Development Facilitation Program that commenced in 2025. Following this, several design reviews took place, with the DFP confirming eligibility to apply for a planning permit under Clause 53.23 on 6 May 2026.

Following confirmation of DFP eligibility, we now seek to formally lodge the planning permit application under Clause 53.23 of the Glen Eira Planning Scheme. Acknowledging the preliminary feedback and recommendations for further information within DFP's eligibility letter, this cover letter aims to provide a response to the changes requested.

As discussed with planning officers, the original package lodged on 11 May had not responded to the matters raised in the urban design memorandum, dated 20 April 2026. Following further resolution of the detailed design, and a meeting with DTP's urban design team on 21 May 2026, a revised design has now been prepared which responds to the commentary raised. In this regard, we seek to lodge a Section 50 amendment to this application to supersede the previous plans with the fully resolved design. A summary of the changes proposed are noted below.

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Along with this covering letter, we submit the following documentation to assist the Department with their assessment and determination of this application:

1. Current Certificates of Title
2. Planning Report prepared by Urbis, dated 12 June 2026
3. Urban Context Report prepared by CBG Architects, prepared June 2026
4. Massing Studies prepared by CBG Architects, prepared March 2026
5. Architectural Plans including Development Summary, BADS Analysis and Shadow Diagrams prepared by CBG Architects, dated 5 June 2026
6. Urban Design Memo prepared by Urbis, dated 12 June 2026
7. Community Benefits Report prepared by Urbis, dated 6 March 2026
8. Affordable Housing Report prepared by Urbis, dated February 2026
9. Economic Benefits Assessment prepared by Urbis, dated March 2026
10. Landscape Concept Plan prepared by Urbis, dated 2 June 2026
11. Traffic Impact Assessment prepared by Urbis, dated 12 June 2026
12. Waste Management Plan prepared by Urbis, dated 12 June 2026
13. Sustainability Management Plan prepared by Waterman, dated 4 June 2026
14. Acoustic Report prepared by O'Callaghan Consulting Engineers, dated 5 June 2026
15. Wind Impact Assessment prepared by Vipac, dated 10 June 2026
16. Preliminary Aboriginal Heritage Test (PAHT) approved on 7 March 2019
17. Environmental Audit Report prepared by Environmental Earth Sciences dated 20 April 2021
18. QS Report prepared by Wattle Construction Cost Consultants, dated June 2026
19. DFP Eligibility Confirmation Letter dated 6 May 2026.
20. MPL Certificate MPL003199 pertaining to the proposed development.
21. Copy of Planning Permit *GE/PP-32409/2018* and endorsed documents.

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Section 50 Amendment

As noted above, following a design workshop with the DTP Urban Design team on 21 May 2026, we are seeking to lodge an amended set of architectural plans and supporting reports for the proposal. The amended package looks to address the matters raised in the Urban Design memo dated 20 April 2026.

The tower façade and development's materiality schedule has been updated as below, in response to the commentary that it did not achieve design excellence, and required a greater residential presentation.

- Introduction of a visual massing break on the north-west and south-east facades.
- General reduction of glazing to the tower to provide a greater residential presentation.
- Introduction of solid concrete balustrading to balconies, and vertical massing appearances, to introduce more depth.
- Introduced accentuated concrete band every three levels to amplify the banding and add movement to façade.
- Greater variation in materiality to provide visual interest.
- Use of lighter brick materials in the podium to provide a more welcoming appearance.

In addition, the ground floor façade has been updated to activate the rear wall of the public space, as well as updating the Lois Lane façade to include fluted, off-formed concrete aiming to prevent Graffiti.

We consider the amended package appropriately responds to the urban design matters raised by DTP in the pre-application phase, with all supporting reports updated for consistency between application documents. We're hopeful this will allow DTP to make their full assessment of the proposal, and proceed to public notice of the application.

Response to Preliminary Commentary

Within the Department's eligibility confirmation letter dated 6 May 2026, there were several preliminary comments provided along with items of further information required to be submitted within our lodgement submission to the Department. The table below seeks to provide responses to each of the Department's preliminary comments.

No.	Item	Urbis Comment / Action Required
Preliminary Comments		
1.	<u>Urban Design</u> <i>It is expected that the matters raised in the Urban Design memorandum (dated 20 April 2026) are addressed to the satisfaction of DTP Urban Design as part of the planning permit application package.</i>	Please see information relating to the Section 50 amendment for our response to the matters raised in the urban design memo.

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2. <u>Clause 58</u> <i>Full compliance with Clause 58 is expected.</i>	The existing planning assessment completed by Urbis, within Appendix A of the Planning Report, identifies substantial compliance with the provisions of Clause 58, with variations required to Standards D6, D8, and D10. As noted within the Planning Report submitted, the proposed design is considered to meet the requisite objectives of Clause 58.
3. <u>Overshadowing</u> <i>It is expected that no additional shadow impact will occur beyond that deemed acceptable by the Glen Eira City Council in the officer recommendation associated with a 12-storey scheme considered under GE/PP-32409/2018.</i>	The revised package to be submitted in response to Item No. 1 will ensure that the design causes no additional overshadowing, when compared to the proposed outcome considered under GE/PP-32409/2018.
4. <u>Car Parking</u> <i>A new planning permit application lodged with DTP for this matter would not benefit from the VC277 transitional provisions and will be assessed under the current Clause 52.06-5 provisions. This should be addressed as part of the planning permit application package.</i>	It is noted that a Parking Overlay applies to the subject site, which applies Column B of the former Clause to all land uses excepting student accommodation, which has specified rates. In addition, the application is being made prior to the transition date, making this a transitional proposal. Accordingly, we consider that Transitional Provision C within Clause 52.06 applies to the proposal. This is reflected within the Traffic Impact Assessment prepared by Urbis.
5. <u>Note(s)</u> <i>The Glen Eira City Council did not provide preliminary referral comments for this matter. As such, the pre-application assessment has proceeded in agreement with the applicant on the understanding that this information will be sought through the planning permit application process.</i>	Noted. The project team would be pleased to review & address any referral comments raised at the appropriate time.
6. <i>It is understood that the applicant intends to enter into an agreement under Section 173 of the Planning and Environment Act 1987 relating</i>	Noted.

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to the shared side laneway, to the satisfaction of the Glen Eira City Council, in accordance with prior agreements.

Further Information

7.	<i>A recent copy of the Certificate of Title pertaining to each land parcel, including any encumbrances, covenants, and agreements (within 3 months).</i>	Copies of the subject site's Certificates of Title, ordered on 13 March 2026, are attached to this submission package.
8.	<i>A valid MPL certificate.</i>	MPL Certificate MPL003199 is attached to this submission, relating to the proposed development.
9.	<i>A QS Report prepared by a suitably qualified person, dated no earlier than 60 days prior to the applications submission, identifying the cost of development associated with the proposed application. This should include materials and labour costs, but should not include contingencies, consultant fees, planning application fees, Metropolitan Planning Levy (MPL), etc.</i>	An amended copy of the Quantity Surveyors Report, dated June 2026, is attached to this submission which confirms the proposed cost of development.
10.	<i>An affordable housing report that outlines how a proposed contribution to the provision of affordable housing is intended to be provided should a permit be granted, as required under Clause 53.23 (Significant residential development with affordable housing).</i>	An Affordable Housing Report has been prepared by Urbis, dated February 2026, which addresses the development's proposed contribution toward the delivery of affordable housing in Victoria.
11.	<i>A copy of any previous planning permits relating to the land, including decision plans, reports, and any associated endorsed documentation.</i>	A copy of the previous planning permit <i>GE/PP-32409/2018</i> , as well as the supporting endorsed documents, is attached to this submission for the Department's review.
12.	<i>An amended Town Planning Report which correlates with the final architectural drawings and:</i> <i>a) Details on the operation of the retail premises, including but not limited to:</i> <i>i. Hours of operation (opening/closing times)</i>	In line with commentary regarding Point 1, information regarding the proposed operation of the retail premises will be provided to the Department at the time the Section 50 amendment is lodged.

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- ii. Number of staff
- iii. Expected number of customers/visitors per day
- iv. Delivery/loading arrangements (frequency, vehicle type, timing)
- v. Any outdoor areas

13. The architectural drawing package should be updated to address DTP Urban Design recommendations.

Comments as per Item 1.

14. Where signage is proposed, the town planning report and architectural plans must be updated to confirm the details of any permit required signage under Clause 52.05 Signs.

We confirm the current proposal for review by the Department does not contemplate any proposed signage.

Should any future signage be proposed, this can form an amendment to any planning permit that may be granted for the site.

15. Supporting subconsultant drawings/reports that correlate with the final revision of architectural drawings, including:

- a) Environmental Audit Report
- b) Preliminary Aboriginal Heritage Test
- c) Landscape Concept Plan.
- d) Environmentally Sustainable Design Report
- e) Traffic Impact Assessment
- f) Green Travel Plan
- g) Waste Management Plan
- h) Stormwater Management Plan
- i) Wind Assessment
- j) Maintenance Plan
- k) Acoustic Report
- l) Any other document required by the Glen Eira Planning Scheme

Note that all the reports listed, excepting a Green Travel Plan and Maintenance Plan for the public space, have been provided as part of this lodgement package.

Acknowledging the nature of the Green Travel Plan & Maintenance Plan are such that details may not be finalised until further on in the detailed design process, we kindly request that the requirement for these reports are conditioned on any planning permit that may be issued for the site.

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16. A 3D digital model in accordance with the DTP submission guide.

The architectural team will a 3D model of the proposed tower scheme for submission at the time the revised architectural concepts, to respond to the Urban Design Memorandum, are submitted for DTP's review.

Conclusion

This letter demonstrates that the preliminary matters identified by DTP at the pre-application stage have been appropriately addressed through the submitted design response and supporting technical documentation at the formal lodgement stage.

The proposal has been informed by extensive pre-application engagement with the DFP and has evolved in direct response to feedback and referral responses received. We acknowledge the outstanding design issues which will need to be addressed, as raised by the Urban Design memorandum dated 20 April 2026.

We are excited to continue working with the Department collaboratively on the proposal as the assessment progresses.

Should you require any further clarification or additional information following preliminary review, please do not hesitate to contact the undersigned to discuss.

Yours sincerely,



Bryn Greenhalgh
Senior Consultant



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