

Ruby Dawes-Robb

Senior Planner, Development Assessment
Department of Transport and Planning (DTP)
1 Spring Street
MELBOURNE VIC 3000
via email: ruby.dawes-robb@transport.vic.gov.au

25 March 2026

Dear Ruby

Planning Permit Application PA2504156 – Response to Request for Further Information

Tract Consultants acts on behalf of 107 High Street Pty Ltd (*the 'Applicant'*), a subsidiary of Up Property, in relation to 107-123 High Street, Belmont (*the 'Site'*).

On behalf of the client, we are pleased to provide a response to the Department of Transport and Planning's (DTP) request for further information, dated 9 February 2026. In addition to the following written response provided overleaf, the below documents are included:

- Updated Architectural Plans, prepared by Clarke Hopkins Clarke (CHC) and dated 25 March 2026.
- Letter of Advice in relation to Wind, prepared by ViPac and dated 24 March 2026.
- Acoustic Report, prepared by Acoustic Logic and dated 24 March 2026.
- Letter of Advice regarding daylight assessment, prepared Sustainable Development Consultants (SDC), dated 4 March 2026
- Updated Traffic Engineering Assessment, prepared by Traffix Group dated 13 March 2026.
- Updated Waste Management Plan prepared by Traffix Group, dated 16 March 2026.

We trust that the above information assists in addressing the items raised by DTP, as well as providing better clarity on the merits of the proposed development. Noting the extensive pre-application discussions and responses provided to date, we respectfully request the proposal proceed to notice, as detailed comments from Council and DTP have been received and responded to.

Thank you for your assistance to date, and we look forward to continuing to work with DTP as the application progresses.

Yours sincerely

**Claire Whelan**

Principal Town Planner
Tract
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Response to RFI

A response to each of the RFI items raised in DTP's letter dated 9 February 2026 is set out in the table below.

RFI Item	Response
<i>Further Information Request</i>	
1. <i>An affordable housing report as required by Clause 53.23-3 demonstrating how the affordable housing will be delivered. This has not been satisfactorily addressed.</i>	<p>The Applicant have confirmed they will provide a cash contribution equal to 3% of the development cost of the residential component of the development to the Social Housing Growth Fund, in line with DFP eligibility requirements.</p> <p>Accordingly, an Affordable Housing Report is no longer required.</p> <p>The Applicant will work with DTP and the Department of Treasury and Finance (DTF) to ensure payment is made at the appropriate time and supports the inclusion of a condition on Permit requiring a Section 173 Agreement be entered into in accordance with the provisions of Clause 53.23.</p>
2. <i>An Acoustic Report prepared by a suitably qualified acoustic engineer to demonstrate how the proposal will comply with relevant noise legislation and minimise amenity impacts on existing and proposed dwellings.</i>	<p>The Acoustic Report prepared by Acoustic Logic concludes that internal noise levels within the development will primarily result from transmission through lighter building elements, namely windows, doors and roof structures, rather than through walls.</p> <p>Apartment external walls proposed in concrete or masonry construction, as well as concrete roofs, are considered sufficiently robust and will not require additional acoustic treatment.</p> <p>Townhouses, which are proposed to incorporate lightweight construction, will require targeted acoustic measures, including sealing all ceiling penetrations (e.g. light fittings) with flexible, gap-free sealant and acoustically treating any ceiling ventilation openings to maintain acoustic performance.</p> <p>To protect residential amenity for future occupants and nearby sensitive receivers, all mechanical plant and equipment must be designed to comply with the EPA Noise Protocol – Part 1.</p> <p>Refer to the Noise Impact Assessment prepared by Acoustic Logic for further detail.</p>
3. <i>A letter from a registered land surveyor confirming that the proposed easement extinguishment can proceed in accordance</i>	<p>Following submission of the application to DTP, the easement has been removed from the land in question, and the Certificate of Title has been updated to reflect the change.</p>

with Sections 73 and 73B of the Transfer of Land Act 1958. Not been provided.	Refer to Certificate of Title, dated 24 March 2026.
4. <i>A written agreement with the Council (or other method to the satisfaction of DTP) which details the proposed public works and how these will be implemented through the permit process (i.e. permit conditions or a Section 173 agreement).</i>	City of Greater Geelong have advised their referral comments will be sent directly to DTP within the next 24 hours, and that these comments will address this item.
5. <i>Provide additional overlooking diagrams demonstrating the relationship between apartments located in the south-facing inner corner of Tower 2 (e.g. Apartments 2.01 and 2.02 toward 2.12). The diagrams must:</i> <ul style="list-style-type: none"> ○ <i>show lines of sight between relevant windows and private open space;</i> ○ <i>identify proposed screening/shroud treatments; and</i> ○ <i>specify the depth and extent of the shrouds and demonstrate how they effectively limit overlooking.</i> 	Refer to the Architectural Plans prepared by CHC. An additional diagram has been included at Page TP416 which shows views will be limited and within reasonable expectations.
6. <i>A scaled wind tunnel study or CFD simulation to be conducted and detailed, as recommended by Vipac in their Wind Impact Assessment dated 30 April 2025.</i>	<p>Vipac have prepared memorandum of advice in relation to this matter. Due to the proposed building height relative to surrounding development, the proposal is more exposed to prevailing north-westerly winds, with potential downwash effects resulting in elevated wind conditions along High Street. However, the incorporation of a canopy and the tower setback design are expected to substantially mitigate these adverse wind impacts.</p> <p>Wind conditions along adjacent footpaths are anticipated to remain within the walking comfort criterion, while the main building entrances are expected to achieve conditions suitable for standing.</p> <p>The proposed landscaping to the level 1 communal terrace is also expected to provide additional wind amelioration benefits. Private terraces and balconies are generally anticipated to meet the recommended walking comfort criterion.</p> <p>Gust wind speeds across the site are expected to remain within accepted safety thresholds. Overall, the environmental wind conditions within and around the proposed development are considered suitable for their intended use. Any potential localised wind issues are expected to be addressable through minor wind control measures rather than built-form modification.</p>

On this basis, Vipac conclude that a wind tunnel study is not required at this early design stage.

Refer to Memorandum prepared by Vipac, dated 24 March 2026.

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7. **The Traffic Engineering Report amended to:**
- a) **Clarify the bicycle parking location and access arrangement for as differentiated between visitors, staff, and residents; and**
 - b) **Further consider the safety for pedestrian traffic along the footpath fronting the underground carpark entry.**
- In response to the items relating to the Traffic Engineering Report, the following matters are noted:
- a) In terms of bicycle parking and locations the following matters are noted:
 - o 69 bicycle spaces in Basement 1 within a secure room.
 - o 30 bicycle spaces in a central, secure bicycle room at ground level.
 - o 53 bicycle spaces accessed at ground level adjacent pedestrian access on the site's western side.
 - o 14 bicycle spaces at ground level, external to the building.
 - b) The carpark entrance is provided with a pedestrian sight triangle as required by Clause 52.06-9. Traffix are satisfied that the design of the access point complies with the relevant standards and is safe for pedestrians.
- Only 24 resident and 4 staff spaces are required by Clause 52.34. Accordingly, residents and staff could have separate rooms or share the same areas.
- Residents would let visitors into residential bicycle stores, if required. Customers and casual visitors are expected to use the on-street rails.
- Refer to the updated Traffic Impact Assessment, prepared by Traffix Group.

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8. **The Sustainability Management Plan prepared by Sustainable Development Consultants and dated July 2025 amended to include computer simulated daylight modelling demonstrating the apartments meet the BESS or Green Star Buildings daylight requirements.**
- In response to the Department of Transport and Planning (DTP) comments, SDC have prepared further advice which notes that the proposed development has been assessed using the BESS best-practice simple daylight assessment methodology, applying the Green Star Daylight Hand Calculations method. This assessment demonstrates that 94% of apartments achieve a daylight factor greater than 1% in living rooms, while 100% of bedrooms achieve a daylight factor greater than 0.5%. On this basis, the proposal comfortably achieves a passing Indoor Environment Quality (IEQ) category score under BESS.
- SDC have advised that while detailed daylight modelling would provide more precise outcomes and assist in refining apartment layouts and optimising design performance, it is not required at this stage to demonstrate overall compliance with the relevant

standards. Such modelling is more appropriately undertaken during the detailed design phase.

Accordingly, it is considered appropriate that any requirement for daylight modelling be addressed through a condition of the planning permit rather than prior to approval.

Refer to Memorandum prepared by SDC.

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| <p>9. <i>The Waste Management Plan amended to address how medical centre waste disposal will meet the requirements of the Environment Protection (Industrial Waste Resource) Regulations 2009.</i></p> | Refer to Waste Management Assessment prepared by Traffix Group, which has been updated to include an additional section at 3.1.1 (Page 3) 'Medical Waste Disposal'. |
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| <p>10. <i>Provide details of the proposed staging of the development and how staging will be implemented. This must include:</i></p> <ul style="list-style-type: none">○ <i>clarification of staging arrangements in accordance with Council's referral dated 19 August 2025;</i>○ <i>plans clearly identifying staging boundaries and sequencing; and</i>○ <i>plans showing the staging and delivery of public realm works.</i> | Refer to the Architectural Plans prepared by CHC. Specifically, page TP 004 had been updated to show the Staging arrangements. We note all public works are proposed to occur as part of Stage 1 of the development, with Stage 2 limited to the construction of the townhouses. |
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Statutory Planning Assessing Officer Comments

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| <p>1. <i>Functional separation between commercial and residential servicing and access.</i></p> <p><i>While a door has been introduced separating the primary residential lobby from commercial tenancies, the layout continues to allow interaction between residents and commercial servicing movements via the pedestrian link.</i></p> <p><i>Further information is required demonstrating how conflicts between residential occupants and commercial servicing, loading and waste movements will be avoided, including any operational management measures or design refinements.</i></p> | <p>The Applicant appreciates DTP's review of the plans and its assessment of the proposed amalgamation of uses on the Site.</p> <p>After considering DTP's request in the context of the proposed plans, the Applicant and consultant team are satisfied that the residential lobby and commercial tenancies will operate without any impacts or conflicts.</p> <p>The commercial tenancies in question are located to the ground floor south-west corner of the main building and are approximately 120 square metres and 106 square metres in total floor area.</p> <p>Given the relatively modest size of the commercial tenancies, any associated back-of-house activities such as deliveries, waste removal, or staff movements are expected to be minimal in scale and occur only intermittently. As a result, these operations will be low-intensity and unobtrusive, ensuring they do not interfere with or impede the movement of residents within the lobby area.</p> |
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2. *Provision of additional three-bedroom dwellings*

This matter was previously identified as a concern and continues to raise housing diversity issues, as the response indicates layouts may be combined subject to market demand, which does not represent a design amendment or address housing diversity objectives at Clause 58.02-3 of the Greater Geelong Planning Scheme.

The proposed development includes a limited number of three-bedroom dwellings, seven dwellings or 5.7% of total dwellings have three bedrooms. Based on the Applicant's extensive experience delivering residential projects within the Geelong region, the market demand for three-bedroom apartments has consistently been lower compared with one and two-bedroom dwellings. As such, the inclusion of additional three-bedroom dwellings is not considered feasible for this project at this stage. The proposed townhouses provide five generously proportioned family homes which will provide a three bedroom option. Further, the existing housing stock in Belmont is typically made up of individual dwellings on separate lots. Most of which contain three bedrooms. There are currently many more three bedroom homes in Belmont than there are 1 and 2 bedroom apartments, and the proposal will make a significant contribution to housing diversity by introducing 114 one and two bedrooms homes, which will generally be at a more affordable price point than the existing housing in the area.

Importantly, the development has been designed to allow flexibility to adapt to changes in market demand. The layout and structural configuration allow for the efficient conversion of selected dwellings into three-bedroom formats should market conditions shift and a higher level of demand emerge in the future.

This approach ensures that the development can contribute to housing diversity and adapt to evolving housing needs while still meeting current market expectations.

3. *Outlook and daylight performance — Apartments B101–B501*

Additional windows have been introduced; however, updated daylight modelling or BESS compliance verification has not been submitted to demonstrate resolution of the previously identified non-compliance. Updated modelling confirming compliance is required.

Refer to Item 8 above for further detail regarding the daylight assessment undertaken to date. As outlined, the proposal has demonstrated satisfactory daylight performance through a BESS-aligned best-practice assessment methodology.

While detailed daylight modelling would provide additional precision and assist in refining internal layouts at a later stage, it is not required at this point to demonstrate overall compliance with the relevant planning and assessment criteria.

Accordingly, it is requested that a condition be included on any planning permit requiring daylight modelling to be completed at the detailed design stage. This approach ensures appropriate daylight is achieved, while allowing the flexibility necessary to optimise the final design outcome.

4. *Built form transition — stepping and setbacks to GRZ4 interface*

Previous advice sought additional stepping and upper-level setbacks to achieve a graduated transition to the residential interface. While written justification has been provided asserting that an appropriate transition is achieved through overall height modulation, separation via Waterloo Street, and intervening townhouse development, no corresponding design amendments or detailed built form analysis have been submitted to substantiate this position. In the absence of further information or design refinement, this matter may necessitate resolution through planning permit conditions.

Additional diagrammatic presentation of the transition in building height had been included at page TP02.03 of the enclosed plans. The design prepared by CHC provides a clear and well-considered transition to the GRZ4 interface.

At its foundation, the proposal achieves an appropriate graduation in scale through deliberate height modulation, the physical separation offered by Waterloo Street, and the location of the intervening townhouse component. This transition is demonstrated in the cross-sectional diagrams prepared by CHC, which show a separation of 35.9 metres from the tower element to the nearest existing dwelling on Glenara Court.

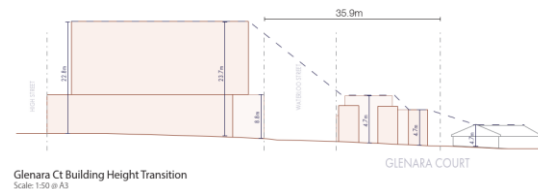


Figure 1 – Glenara Ct Height Transition

In addition to the physical design responses outlined above, the proposal also draws on the strategic guidance established within existing Urban Design Frameworks (UDFs) for comparable commercial centres across the Greater Geelong municipality. These frameworks provide valuable direction on managing interfaces between higher-order commercial development and adjoining residential zones, and they highlight design approaches considered acceptable within a Geelong context.

For example, the Pakington North UDF identifies a preferred setbacks of 7 – 10 metres at upper levels where sites directly interface with residential properties, including GRZ-zoned areas within Geelong West. Where a 6m wide laneway separates the development site and the GRZ-zoned land, a 3m upper level setback is sought. These measures are intended to assist in providing a respectful transition to sensitive residential interfaces. In addition, the UDF recommends a 45-degree setback above 18 metres to reduce visual bulk and mitigate amenity impacts on lower-scale residential neighbourhoods. With a separation of almost 36m from the nearest existing residential property, the proposal would comfortably meet these interface requirements.

When considered within this broader policy context, the proposed development adopts a built form that aligns with the intent of these strategies, whilst responding to the specific context of Belmont and High Street. Despite not replicating the exact UDF parameters, a seven storey tower element separated by over 35m to the nearest existing residential property is a more conservative approach than the interfaces allowed for within the Pakington Street North UDF, and the adopted Pakington Street and Gordon Avenue UDF. While the design does not replicate the heights and setbacks envisaged in Geelong West, the combination of height modulation, the substantial separation provided by Waterloo Street, and the intervening townhouse development results in a transition that achieves the same strategic purpose, namely, reducing visual dominance and protecting residential amenity.

Having considered the strategic context outlined above, The City of Greater Geelong have reviewed the proposal and advised they are supportive of the building height and setbacks proposed.
