

Metropol Ref. 0651

16 March 2021

Susie Saraiva
Senior Planner
Development Approvals and Urban Design
Department of Environment, Land, Water and Planning

**ADVERTISED
PLAN**

Submitted via Permits Online

Dear Susie,

Planning Permit Application PA2001041 – Former Younghusband Wool Store Complex – 10 Elizabeth Street, Kensington

Metropol Planning Solutions continues to act on behalf of Impact Funds Management Pty Ltd, landowner and permit applicant for Stage 2 of the redevelopment of the former Younghusband Wool Store Complex located at 10 Elizabeth Street, Kensington.

We write in response to the request for further information dated 6 January 2021.

A full set of amended architectural plans and a revised urban context report has been prepared by the project architect Woods Bagot to respond to each of the items of further information requested and the matters raised in the preliminary assessment. The following supporting documents are also provided to respond to the items of requested information and matters raised in the preliminary assessment:

- Revised *Planning Assessment Report* prepared by Metropol Planning Solutions
- Revised *Heritage Impact Statement* prepared by Michael Taylor Architecture & Heritage
- *Universal Design / DDA / Accessibility Principles and Concept Design Report* prepared by Morris Goding Access Consulting
- *Preliminary Air Quality Assessment of Allied Mills Site* prepared by CETEC (in 2017 for the Stage 1 planning permit application)
- Updated *Transport Impact Assessment* prepared by GTA Consultants
- Updated Features & Levels Survey prepared by Realserve
- Confirmation of Gross Floor Area by Rider Levett Bucknall
- Revised Town Planning ESD Statement by Cundall
- Environmental Wind Speed Assessment prepared by MEL Consultants

1.0 Further Information Requested

The following responses are provided to address each of the items of further information requested:

1. Confirmation of the proposed floor area prepared by a Quantity Surveyor

Please find enclosed correspondence from Rider Levett Bucknall (quantity surveyors) which confirms that the total Gross Floor Area of the proposal well exceeds the 25,000m² threshold set out in the Schedule to Clause 72.01 of the Melbourne Planning Scheme. We trust that this correspondence confirms that the Minister for Planning is the responsible authority for our planning permit application.

**ADVERTISED
PLAN**

2. Amended planning application form to include a response under the 'Site information' section including the 'district' and 'area of site'.

We would be pleased to amend our 'application form' upon being advised how to do so. We submitted our application via the Permits Online system which involves completing the application details electronically rather than completing an application form per se.

3. Amended site survey plan to identify the subject site only.

Please find enclosed an updated Feature & Level Survey prepared by Realserve (land surveyors) which is limited to 10 Elizabeth Street, Kensington and provides up to date features and levels information.

4. Amended architectural plans to show...

Please find enclosed updated (Revision B) architectural drawings prepared by Woods Bagot which now show the requested additional details. We also note that additional drawings have been added to the drawing set in the form of Ground Plane Elevations and Ground Plane Sections (drawings SK 2 3360 Rev A & SK 2 3362 Rev A respectively) to respond to further information requested in item 4.

5. Urban Context Report amended to include...

Please find enclosed updated Urban Context Report prepared by Woods Bagot which now more clearly differentiates between the wider project area (masterplan area) and the Stage 2 portion of the site which is the subject of our planning permit application.

With regards to item 5 b) we note that the distance to the nearest residential areas is now identified on drawing SK 2 1100 Site Plan – Existing. This drawing now identifies that the closest point of the Stage 2 site to the residential zoned land to the west (across the railway corridor) is approximately 51 metres and to the north, across Chelmsford Street, is approximately 97 metres.

With regards to item 5 c), the tenure and operation of the urban farm is not yet resolved but may be linked to the adjoining Food and drink premises proposed for Level 04 with either local community or social enterprise involvement.

6. Planning report amended to include...

No street trees will be impacted upon by the proposal. The front elevation on the Elizabeth Street frontage (and its footings which would preclude tree root growth into the site) is to be retained. There are no changes to the existing crossovers onto Elizabeth Street and no works proposed beyond the property boundary. The location of street trees is clearly shown on the Features and Levels Survey and the architectural plans.

The Planning Assessment Report now includes a new section (1.4) which better explains the planning permit for Stage 1 of the Younghusband project and its relationship with this application for Stage 2, including the requirement for 60 car parking spaces to be provided on S5 (where Stage 3 of the project is planned to be delivered in the future). These 60 car parking spaces are to be relocated to the proposed basement which forms part of this planning permit application and will be more convenient and readily accessible to the tenants of Stage 1 (when compared to the S5 location).

A note is now provided in Table 1 of the Planning Assessment Report to clarify that the figures contained in the table exclude the floor area of the two levels of basement and common areas, which form part of the calculation of the Gross Floor Area (as defined in the Melbourne Planning Scheme). This table does not provide Gross Floor

Area figures but rather has been provided to enable an assessment of existing and proposed future net floor areas for particular land uses.

The purpose of providing the report titled *Supporting Creative Industries at Younghusband* report is to demonstrate our client's commitment to supporting emerging and established artists, craftsmen, entertainment professionals and micro enterprises within the Younghusband project. Extensive community consultation and tenant consultation was undertaken prior to the submission of the Stage 1 application and again prior to submission of the Stage 2 application and this consultation has confirmed the strong community support for retention and encouragement of these uses. We are not suggesting that it would be appropriate for conditions on the planning permit to specifically address these matters.

**ADVERTISED
PLAN**

7. Update the Traffic Impact Assessment to reflect the permit application plans dated 30 November 2020 and any subsequent changes that have occurred since consideration of the plans dated 4 June 2020.

Please find enclosed an updated Transport Impact Assessment prepared by GTA Consultants which now more clearly articulates the status and relevance of the masterplan documents prepared previously. We acknowledge that these documents did not form part of the Stage 1 approval but were provided for information purposes so as to convey to the City of Melbourne and local residents and businesses the overall intention for the staged development of our client's landholdings.

8. Update the Heritage Impact Statement to...

Please find enclosed an updated Heritage Impact Statement prepared by Michael Taylor Architecture & Heritage which addresses the requested matters. We confirm that the Heritage Impact Statement addresses Amendment C258 to the Melbourne Planning Scheme given that this amendment is reflected in the current provisions of the planning scheme including Clause 22.04 (*Heritage Places outside the Capital City Zone*).

9. Update the Town Planning ESD Statement to include a sustainable design response that is specific to the current proposal...

Please find enclosed an updated Town Planning ESD Statement prepared by Cundall which now includes an Executive Summary clearly setting out the ESD commitments which form part of the application. The Statement has also been updated to capture recent changes in the name of certain certification programs that have occurred, e.g. Climate Active rather than National Carbon Offset Scheme.

It should be noted that the Statement has been prepared to reflect an outcome focused approach to sustainability commitments rather than adopt the typical "preliminary design potential" approach that is taken by other developments within the remit of the City of Melbourne, with much stronger environmental commitments including:

- Formal One Planet Living (OPL) certification as part of overall precinct redevelopment - rather than just benchmarking against Green Star.
- Entering into a Commitment Agreement for the development's target 5-Star Base Building NABERS Energy Office rating - rather than just demonstrating the development potential to achieve this performance as called for by the Melbourne Planning Scheme.
- Commitment to attain certified carbon neutrality under the Climate Active program, formerly the National Carbon Offset Scheme (NCOS).
- Commitment to not just meeting the water efficiency requirements of the Melbourne Planning Scheme, but committing to attaining potable water neutrality through the Odonata Water Offset Program.
- Use of Life Cycle Assessment (LCA) to inform material selections to minimise the environmental impact of construction materials and finishes.
- Expanding on the waste efficiency requirements of the Melbourne Planning Scheme by committing to a range of other operational and construction waste minimisation initiatives.

In summary the proposed development is committing to a much stronger outcome focused sustainable design solution that goes above and beyond the energy, water and waste efficiency requirements than are called for under the Melbourne Planning Scheme.

10. *Update the Environmental Wind Assessment prepared by MEL Consultants to...*

Please find enclosed an environmental wind speed assessment report prepared by MEL Consultants. This report has been prepared following a wind tunnel assessment of the project. This report finds that the wind impacts associated with the project are in keeping with relevant standards and no design changes are required to mitigate wind impacts either within or external to the subject site.

11. *Details of the consideration of the Disability (Access to Premises-Buildings) Standards 2010, particularly regarding proposed public realm areas.*

Please find enclosed a *Universal Design / DDA / Accessibility Principles and Concept Design Report* prepared by Morris Goding Access Consulting. This report confirms that sufficient consideration has been given to DDA accessibility at town planning stage to ensure that not only compliance is achievable but functional design will also be delivered.

12. *A 3D model of the proposal is required in accordance with the Department's 3D Modelling Practice Note.*

Please find enclosed the requested digital model prepared in accordance with the relevant practice note.

**ADVERTISED
PLAN**

2.0 Preliminary Assessment

In addition to the items of further information requested, as set out above, we provide the following responses to the matters raised in the Preliminary Assessment of our application:

1. Heritage protection and conservation

We submit that the extent of demolition proposed will result in an acceptable and appropriate outcome in terms of heritage considerations, notwithstanding that the extent of demolition is outside the normal expectations of local heritage policy.

The proposal should be considered in the context of the overall outcome for the former wool store complex, which includes the retention of the significant form and fabric of the wool store complex. The statement of significance for the subject site identifies that the heritage place is significant for the overall high consistency of scale, architectural expression, form and materiality which combine to give the complex an imposing quality and visual prominence, particularly when viewed from the railway line and in views from the north, north-west and west. The proposal will ensure that these identified heritage values are maintained and not diminished to any significant degree.

The proposal retains the contributory elements of Wool Store No. 3 (fronting Elizabeth Street) including the majority of the external fabric of the east (Elizabeth Street) and south elevations, window openings and the sawtooth roof profile. The retention of the south elevation and part of the north elevation will maintain an understanding of the three-dimensional form of the original building. Historic elements such as remnant painted signage and window frames to the Elizabeth Street facade are also proposed to be retained. The elements to be demolished, comprising the west facade, part of the north facade and the roof fabric are all internal to the site and are not visible in views to the building from the public realm. While the proposed new window and door openings will result in the loss of original building fabric and will alter the Elizabeth Street facade, the proposed new openings will generally maintain the rhythm and dimensions of the existing facade fenestration.

2. Mix of uses

The proposed mix of land uses are not considered sensitive and are highly unlikely to be impacted upon or result in land use conflict with the adjoining flour mill operation. As part of the planning permit application for Stage 1 of the Younghusband project an assessment of dust, odour and air quality was undertaken by CETEC (titled *Preliminary Air Quality Assessment of Allied Mills Site* – please find copy attached). This assessment included a survey of nearby residents and businesses and concluded that the flour mill operations do not result in off-site odour or dust impacts.

In regards to noise, the most significant external noise source in proximity to the subject site is the railway corridor located to the immediate west of the site. We are not aware of any significant noise emissions from the flour mill operations. The proposed buildings will be designed to attenuate noise impacts from the railway corridor to

achieve satisfactory internal amenity for future occupants and these noise attenuation measures are expected to mitigate any noise associated with flour mill operations.

3. Compliance with Schedule 63 to Clause 43.02 Design and Development Overlay (DDO63) Height

The proposed building to be located at S4 does not exceed the absolute maximum building height of eight storeys set out in DDO63. The sectional drawing SK 2 3351 titled *Section – East to West 02* should be referred to for confirmation of the number of storeys at any point of the building. We note that DDO63 specifically excludes plant rooms and architectural features from the specified building height limit subject to certain criteria being satisfied. We submit that these criteria have been satisfied given the lack of additional overshadowing caused and appropriate design of the roof top plant and equipment. The community benefits of the proposal are significant in terms of generating employment, economic activity and revitalisation of an underutilised complex of heritage buildings. Stage 2 of the Younghusband project will support the economic viability of Stage 1 of the project which comprises an exemplar project for adaptive reuse of heritage buildings.

In regards to the proposed new built form and its relationship to heritage fabric, we note that the presentation of the existing building fronting Elizabeth Street will be retained and the sawtooth roof form will be maintained. While the design response does not achieve total concealment of the proposed upper-level additions, the proposal will maintain the street wall presentation of the building to Elizabeth Street, with the proposed upper level additions to S3 being recessive and contained within a sight line envelope when viewed directly opposite the site from eye level from the footpath on the opposite side of Elizabeth Street (refer drawing SK 2 3351 – Section East to West 02).

The building height and setback requirements set out in DDO63 are satisfied and the architectural expression of the upper-level additions are contemporary and of an industrial aesthetic in keeping with the heritage fabric.

The new eight storey form of the building that will occupy S4 will be visible in views from Elizabeth Street and from the west of the site, however it is sufficiently removed from the Elizabeth Street frontage of the site so as to not have a direct streetscape presence, and likewise far removed from the Chelmsford Street frontage to ensure it has no such presence.

The considerable setback of the new eight storey form from the main heritage facades of the wool store complex (fronting Chelmsford and Elizabeth streets) will ensure that it does not have a detrimental impact on the values of the heritage place. The heritage fabric of the former wool store complex is of a significant and imposing scale and massing and this presentation will not be diminished or fragmented by the insertion of a new higher element in the location proposed.

The contemporary architectural expression of the eight storey building draws on (in an abstract manner) the industrial context of the surrounding area by adopting industrial forms (silos and an elevated sawtooth roof form) which we submit is an appropriate response to the heritage values of the place.

The revised urban context report prepared by Woods Bagot includes three perspectives along Elizabeth Street (two on page 53 and one on page 55) all taken at pedestrian eye level from the footpath opposite the subject site at various locations along this street frontage. We submit that these perspectives demonstrate that the additions to S3 will be recessive and will not be read as part of the street wall. The proposed eight storey building will be visually separate and far removed from the heritage street wall presenting to Elizabeth Street.

The proposed pedestrian links through the site and with Stage 1 of the project will provide high standards of amenity and accessibility. A series of Ground Plane Elevations and Sections (refer drawings SK 2 3360 & SK 2 3362) are now provided to demonstrate the quality of design of these spaces, including the Artist Laneway proposed along the southern boundary of the site.

The proposed additions to S3 are to be constructed one metre from the southern boundary with the adjoining flour mill site. We submit that this is an appropriate design response which is reflective of the character of the industrial area in which it is located where buildings are typically constructed very close to (if not all the way to) side and rear boundaries.

The eight storey building proposed for S4 is setback 4.5 metres from the southern boundary with the flour mill site, with the exception of encroachments for the curvilinear outer façade and lift and stair core which extends to 2 metres from the common boundary. We submit that these setbacks are appropriate having regard to the character of the area which features limited building setbacks, and will provide for an equitable development

outcome on the adjoining site to the south given that the primary outlooks from the proposed building is to the west, north and east, with the stair and lift core and amenities on each level provided centrally along the southern side of each floor.

The primary outlook of each floor of the proposed building at S3 is to the east with only a secondary outlook to the west, with the stair and lift core and amenities on each floor located centrally along the western side of each floor of this building. The proposed six metre separation between the two buildings will provide sufficient levels of internal amenity for future occupants, having regard to the intended office uses.

**ADVERTISED
PLAN**

4. Detailed Matters

A series of Ground Plane Elevations and Sections (refer drawings SK 2 3360 & SK 2 3362) are now provided to demonstrate the design of the Artist Laneway proposed along the southern boundary of the site. We submit that this laneway will be of a sufficient width and has been designed to provide a high quality pedestrian space and will be accessible to disabled persons.

Should you have any queries regarding this matter please do not hesitate to contact me on 9882 3900 or via email: michael@metropolplanning.com.au.

Yours sincerely,



Michael Dunn

Director

Enc: Refer Above list

cc: File