

ADVERTISED PLAN

[REDACTED]
State Planning Assessment & Facilitation
Department of Transport & Planning
1 Spring Street
MELBOURNE VIC 3000

Submitted via online portal

17 June 2026

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**Re: Application for Planning Permit
Proposed Residential Hotel
Lot 11 (International Square) on Registered Cluster Plan 001458X and adjacent parts of Common
Property No.1, Tullamarine**

Dear [REDACTED]

Urban Planning Collective (UPco) continues to act on behalf of SMA Projects (our client). More specifically we act for SMA No.21 Pty Ltd as trustee for the SMA No.21 Trust, the permit applicant in relation to the land at Lot 11 (International Square) on Registered Cluster Plan 001458X and adjacent parts of Common Property No.1, Tullamarine (the subject site).

Our client seeks planning approval to use and develop the land for a residential hotel.

To assist the Department with its assessment, we enclose and/or attach the following:

- Copy of notice to the owner of part of the land (**Attachment 1**)
- Copy of the relevant and recently searched Certificate of Title (**Attachment 2**)
- Copy of the Metropolitan Planning Levy (MPL) Certificate (**Attachment 3**)
- Re-establishment, Features and Levels Survey prepared by Farren land Surveyors (**Attachment 4**)
- Urban Context Report and Design Response prepared by Hayball Architects (**Attachment 5**)
- Complete set of plans of the development also prepared by Hayball Architects (**Attachment 6**)
- Supporting materials including:
 - A Traffic Engineering Letter prepared by Ratio Consultants (**Attachment 7**)
 - A Green Travel Plan prepared by Ratio Consultants (**Attachment 8**)
 - An Acoustic Report prepared by Renzo Tonin & Associates (**Attachment 9**)
 - An Aviation Impact Assessment (**Attachment 10**)
 - A Waste Management Plan prepared by Ratio Consultants (**Attachment 11**)
 - A Sustainability Management Plan (including a Stormwater Management Plan and an Integrated Water Management Plan) prepared by Lid Consulting (**Attachment 12**)
 - An Arboricultural Report prepared by Arbortecture (**Attachment 13**)
 - A Landscape Concept Plan prepared by memLa (**Attachment 14**)
- Quantity surveyor report prepared by WT Australia that provides an estimate of the development cost (**Attachment 15**)
- Upco Response to City of Hume Referral Comments (**Attachment 16**)
- Payment of the applicable application fee

We are also pleased to provide the following details of the proposal and an assessment of its merits having regard to the relevant controls, provisions and policies in the Hume Planning Scheme (**the Scheme**).

1.0 PROJECT SNAPSHOT

This application proposes an eight storey Residential hotel (**hotel**) on the subject site. Located within the City of Hume, the subject site is:

- In the Commercial 2 Zone
- Not affected by overlay controls
- Not in a Bushfire Prone Area
- Not a site of Aboriginal Cultural Heritage Sensitivity.

A planning permit is required to:

- use the subject site as a Residential hotel
- development the buildings and works and
- erect and display two illuminated, high-wall business identification signs.

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In summary, the hotel will offer:

- 164 guest rooms
- Ground level parking for 37 cars (including 2 accessible spaces)
- Modest provision of onsite business and conference facilities.

The hotel will face International Square (east) where provision for taxi and ride share drop-off is proposed from a new circular driveway. Guests using the hotel's enclosed ground level car park will enter the car park from International Square (west).

The application is made by the purchaser of the land (under contract), a company associated with SMA Projects. The owner of the subject land and the Owners Corporation which manages common property have been notified of the application (refer **Attachment 1**).

2.0 SUBJECT SITE BASICS

2.1 LOCATION

The subject site is in a privately owned and managed business park called International Square – Tullamarine. It is part of a 'light' industrial area to the south of the Tullamarine Freeway bounded by Melrose Drive, Post Office Street, Airport Drive, and Trade Park Reserve. Refer Figure 1 on next page.

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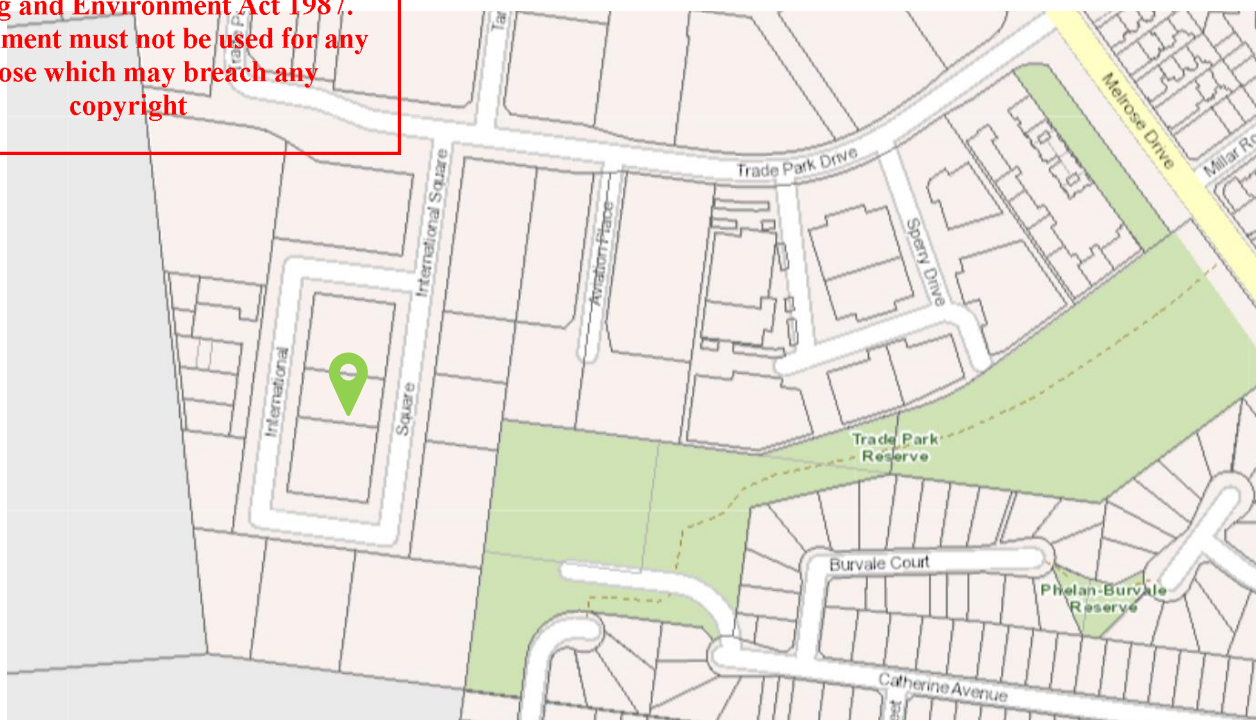


Figure 1: Location of the subject site

2.2 MORE DETAILS

The principal part of the subject site is at 1B/13 International Square, Tullamarine. It is otherwise known and referred to as Lot 11 CS1458X (Parent Title Volume 09648 Folio 906). The Certificate of Title for the subject site (refer **Attachment 2**) confirms this. It also confirms that this part of the subject site is not impacted by a covenant or other restriction that would prevent the issue of a planning permit for the proposed use and development, including restrictions set out at the Scheme of Development and Schedule 1.

The principal part of the subject site has 'frontage' to International Square (East) of 30.03 metres. The rear boundary is at International Square (West) and measures 30.03 metres. Lot 11's side boundaries are each 50 metres long. Accordingly, the principal part of the subject site has an area of just over 1500 square metres (1501.5 square metres) and is ostensibly viewed and appreciated as being level.

Beyond the front and rear boundaries of Lot 11 is what a passer-by would identify as nature strips adjacent to the paved International Square. These 'nature strips' and the 'road' identified as International Square are common property (Common Property No.1 in CS1458X). These parts of the common property, to the extent they are adjacent to the front and rear boundaries of the principal part of the subject site bring the total area of the subject site to approximately 2130 sqm. Hayball Drawing No.TP01.00 Rev C explains the different parts of the subject site.

2.3 EASEMENTS

The Re-establishment, Features and Levels Survey prepared by Farren Surveyors (refer **Attachment 4**) identifies a 1.5 metre wide electricity easement (running east-west) affecting central parts of the subject site. The Certificate of Title shows same. See extract at Figure 2.

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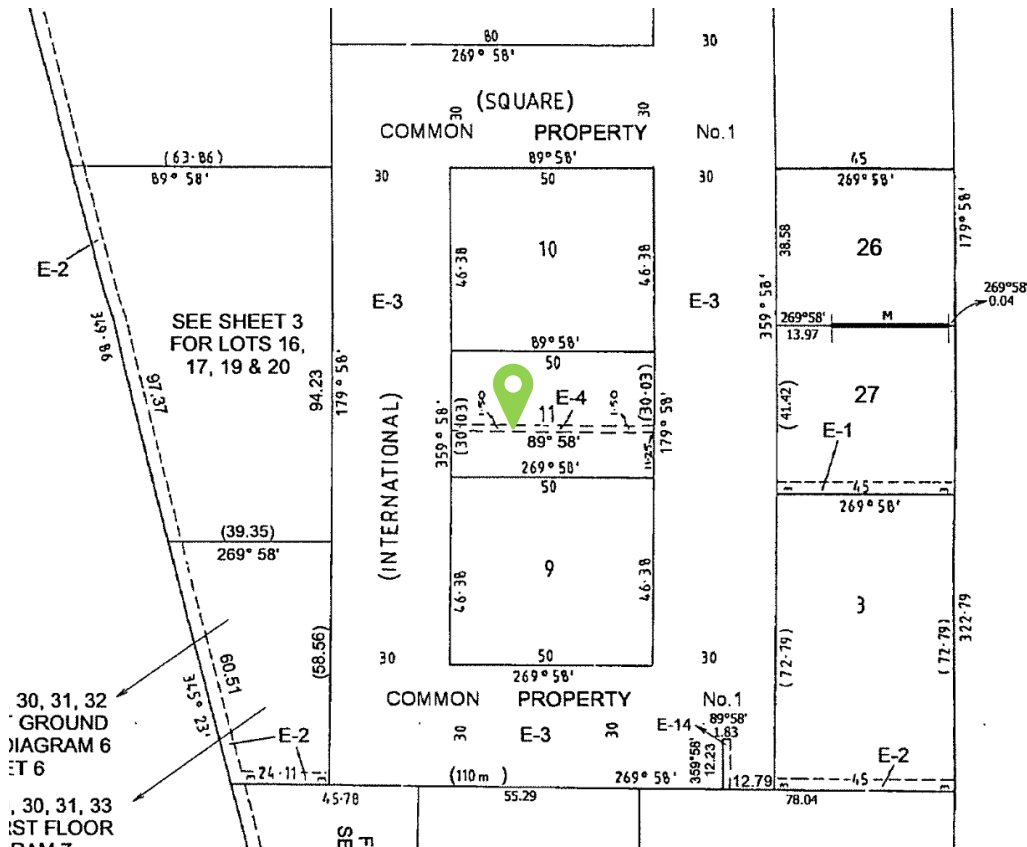


Figure 2: Extract from the Certificate of Title identifying E-3 (Common Property) and E-4 (Electricity)

The easement is for the benefit of other lots in the cluster plan and does not benefit a drainage, sewerage or electricity supply authority. It does not contain infrastructure but access to the easement has been accommodated in the design of existing development at the site and is accommodated in the design response.

3.0 EXISTING SITE CONDITIONS

The principal part of the subject site (ie Lot 11) is presently occupied by two buildings.

Each building comprises a single storey and each has a factory-like appearance characterised by their basic utilitarian form and presentation. Both buildings have flat roofs. They are occupied by Savino del Bene, which identifies itself as a global logistics and forwarding company. The M & K Café (a food and drink premises) previously occupied a small part of the larger building and faced International Square (west). This premises is now vacant.

The larger of the two buildings at the subject site is built in the southern half of Lot 11 and is constructed to Lot 11's front boundary and along much of the subject site's southern boundary. It is set back from the rear boundary. The smaller of the two buildings is constructed to the northern boundary of Lot 11 and shares a wall with the larger building. It is positioned centrally along the northern boundary of the subject site.

The balance of the subject site is a combination of hard stand area accommodating car parking and loading activities variously located in the buildings' front and rear setback areas and contained within Lot 11.

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Figure 3: Front of the subject site at International Square (East)



Figure 4: Rear of the subject site at International Square (West)

As will be observed from a site visit and the photographs at Figures 3 and 4, some vegetation is planted in Lot 11 and in adjacent 'nature strips' (Common Property No.1). None of the vegetation at the subject site is

considered significant. It will also be observed from the survey and the photograph at Figure 3 that a eucalypt is located on the adjacent lot to the south, approximately 3 metres inside the boundary. The canopy of this tree is partially contained within that site.

Four car parking spaces, a paved crossover and a business sign are located in the International Square (East) 'nature strip' (Common Property No.1). A paved crossover is in the common property in International Square (West). Both 'nature strips' are host to a light pole, which includes a security camera.

The use of parking spaces is not restricted, but they are subject to Owners Corporation Rules. They are typically be used by those visiting the businesses conducted at the site. This has been observed at our site visits.

4.0 CHARACTER OF THE SURROUNDING AREA

Existing conditions in the area surrounding the subject site are best understood when visiting the area. The photographs provided in this report also assist an understanding of the area's 'light' industrial character.

International Square is in the southwest corner of the area. It is approached using Trade Park Drive which connects to Melrose Drive. A multi-level Mantra hotel is located at the western corner of the intersection.

Another hotel has been approved on the site behind (ie to the west of) the Mantra Hotel at 4-6 Trade Park Drive, Tullamarine. The permit is understood to be current but not yet acted on.



Figure 5: The Mantra Hotel at the corner of Melrose and Trade Park Drive

Trade Park Drive is developed with a variety of buildings which are all in the suburban low profile factory style. See Figures 6, 7 and 8.

Many of these buildings have expansive floor plates and expansive areas set aside for parking of vehicle at the front and side of buildings, as well as provision for the loading and unloading of goods.

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Figure 6: Examples of development types in Trade Park Drive

The extent and type of landscaping is variable. This character is quite typical of International Square, too. The distinguishing feature, however, is that International Square is privately owned and its roadways privately constructed and maintained. Its roadways are paved and so, too, are its roadside car parking spaces.



Figure 7: Photographs showing the character of development in Trade Park Drive and International Square

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Figure 8: Further photographs showing the character of development in Trade Park Drive and International Square

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5.0 PROPOSAL

The use and development proposal is described in the Urban Context Report which includes a Design Response prepared by Hayball (**Attachment 5**). This material is accompanied by a complete set of application plans (**Attachment 6**).

5.1 BUILDINGS AND WORKS

In summary, the proposed hotel has been designed to the requirements of a widely recognised provider.

The hotel will be constructed to all the Lot 11 boundaries at ground level.

The ground level will accommodate the hotel's lobby and reception, car and bicycle parking and provision for building services, plant and equipment. The existing substation at the site is maintained at the southeast corner of Lot 11.

The hotel's reception engages with the site's frontage to International Square (East) and the application seeks to modify the part of the subject site that is common property adjacent to the Lot 11 frontage by removing the existing business sign and 4 existing car parking spaces and introducing a circular drive and 2 drop-off spaces for the convenience of guests using taxi and ride share or other transport services. An existing deciduous tree in this part of the common property will be retained, and the existing light pole repositioned.

The hotel's car park will be accessed from International Square (West) and requires that the existing driveway and light pole be repositioned to align with the design of the car park.

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The floor plan at Level 1 in part contracts (approximately 5.7 metres) from the southern and northern boundaries and hosts guest suites and the hotel's business centre and guest facilities, including a gym. The business centre offers hotel patrons some basic, small scale conference facilities. There is a very small setback from the common property at the front of the site with expressed columns in the front façade abutting the Lot 11 boundary.

At Levels 2-7 the floor plan is completely set back from the subject's site's northern and southern boundaries (5.83 metres to the glazing line and 5.1 metres to the expressed slab edge). A canopy is proposed above the entry for weather protection.

The front façade at Level 2 is set back 1.45 metres to the glazing line with expressed columns abutting the Lot 11. The front setback matches the setback at ground level. At Levels 2-7 the front setback increases slightly.

Floors 2-7 are almost wholly occupied by guest suites but accommodates linen stores for the convenience of hotel housekeeping staff and provision for 2 stairwells and a pair of lifts.

The roof will host a 20kW photovoltaic solar array.

The lifts service all floors of the hotel. One fire stair is co-located with the lifts and the other is at the hotel's southwest corner.

The building will be just under 28 metres tall with an AHD to the roof of 117.25 and 117.26 to the top of plant screening. This is below the prescribed airspace for Tullamarine (AHD157.5) and Essendon (AHD 123.5) Airports.

Building materials, finishes and colours are explained in a schedule prepared by Hayball.

5.2 LAND USE ACTIVITY

The hotel is expected to operate 24-hours every day of the year. The use is a relatively passive one and, consistent with Clause 34.02-2, it will not detrimentally affect the amenity of the neighbourhood through the:

- Transport of materials goods and commodities to or from the land
- Appearance of the building, related works and materials
- Emission of noise, artificial light, vibration, smell, fumes, smoke, vapour, steam, soot, ash, dust, wastewater, waste products, grit or oil.

The commercial (as opposed to industrial) zoning of the subject land has ensured that there are no uses in the surrounding area that generate off-site impacts which could conflict with the proposed hotel or, conversely, that would pose potential for conflict that could impose future constraints on operations or expansion of surrounding businesses which are recognised as valuable employment generators and positive contributors to the economy.

Similarly, the hotel will have no adverse impacts on the nearest sensitive land use being the residential community established to the west side of the Tullamarine Freeway and south of Trade Park Reserve (refer Figure 2) which includes the Tullamarine Tennis Club. The nearest dwelling is more than 160 metres to the southeast.

The hotel is expected to create 25-30 new and ongoing jobs directly which will be attractive to and accessible for residential populations in Melbourne's inner northern suburbs.

The developer anticipates that the construction of the hotel, in the first instance, will create about 150 jobs.

5.3 SIGNS

In addition to the proposed use and development of the land, the permit application seeks approval for two internally illuminated high-wall business identification signs.

The signs will be located at the top right corner of the eastern (front) façade of the building and at the top left corner of the western (rear) faced of the building.

Both signs are proposed to the same specification. They will be confined to a notional rectangle measuring 2700 X 3300mm (8.91 sqm). The sign comprises an internally illuminated stylised maple leaf logo light box of orange colour. Below the logo will be the business name – Punt Hill Apartment Hotel.

The logo and lettering below it will be 'invisibly' mounted to the facades with halo style illumination with Lux levels to be finally resolved with commissioned lighting designer in due course. The signs will have a maximum projection from the facades of 300mm and will not project into adjacent Common Property No.1.

6.0 RELEVANT PLANNING CONTROLS

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6.1 ZONES

In addition to implementing the Municipal Planning Strategy and the Planning Policy Framework the purpose of the Commercial 2 Zone is:

To encourage commercial areas for offices, appropriate manufacturing and industries, bulky goods retailing, other retail uses, and associated business and commercial services.

To ensure that uses do not affect the safety and amenity of adjacent, more sensitive uses.

(Our emphasis)

A review of the provisions of the Hume Planning Scheme confirms that pursuant to the provisions of the Commercial 2 Zone, a permit is required to:

- Use the land for the purpose of a Residential hotel. It is a Section 2 – Permit required use in the Table of uses at Clause 34.02-1. The Residential hotel is not identified as being subject to a condition or conditions.
- Construct a building (and to construct and carry out associated works) pursuant to Clause 34.02-4.

The latter permission is exempt from notice and review as the development satisfies the locational criteria set out at Clause 34.02-6 of the Hume Planning Scheme. That is, the subject site is not within 30 metres of land (not a road) which is in a residential zone, land used for a hospital or an education centre or land in a Public Acquisition Overlay to be acquired for a hospital or an education centre.

6.2 OVERLAYS

As the subject site is not affected by overlay controls and otherwise not in an area of planning sensitivity:

- A permit is not required to demolish the existing buildings
- A permit is not required to remove existing vegetation
- There are no quantifiable parameters identified in respect of proposed building form, height, scale or appearance.

6.3 PARTICULAR PROVISIONS

Signs

Provisions in the Commercial 2 Zone nominates the Category 1 sign control as applying to area.

The Purpose of Category 1 sign control at Clause 52.05-11 of the planning scheme is:

To provide for identification and promotion signs and signs that add vitality and colour to commercial areas.

The illuminated, high-wall business identification signs (2) proposed on each of the eastern and western elevations (ie using the sign terms at Clause 73.02) are Section 2 signs (refer to Clause 52.05-11) requiring a permit pursuant to Clause 52.02-2.

Car parking

A Residential hotel is a use of land that is not specified in Table 1 at Clause 52.06-5. Clause 52.06-6 of the planning scheme requires that before a new use commences, car parking spaces must be provided to the satisfaction of the responsible authority.

Clause 52.06-8 requires that before a new use commences, a car parking plan must be provided and must address the Design standards for car parking at Clause 52.06-9, unless the responsible authority agrees otherwise.

Ratio has prepared a traffic engineering assessment letter addressing parking supply, design and traffic generation matters (refer **Attachment 7**).

Stormwater management in urban development

Clause 53.18-3 of the planning scheme requires that an application to construct a building or carry out works in the Commercial 2 Zone (amongst others) must be accompanied by proposed stormwater management details, including drainage works and retention, detention and discharges of stormwater to the drainage system.

Stormwater management is addressed in the Sustainable Management Plan at **Attachment 12**.

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7.0 SATISFACTION OF APPLICATION REQUIREMENTS

Consistent with the application requirements set out at Clause 34.02-5 (as appropriate) we have provided a range of materials for the Department's consideration.

7.1 USE REQUIREMENTS

In respect of the proposed use we:

- Have explained *the purpose of the use and the types of activities that will be carried out*
- Explain *the likely effects, if any, on adjoining land* (refer to the Planning considerations at section 9.0 of this report)
- Confirm that all areas of the subject site will be required for the use on completion of construction, negating the need for a *means of maintaining areas not required for immediate use*.

7.2 BUILDINGS AND WORKS

Provided with the application, are Hayball prepared plans drawn to scale which show:

- The boundaries and dimensions of the site
- Adjoining roads; in this case access roads constructed on common property
- The location, height (in storeys) and purpose of buildings and works on adjoining land
- Relevant ground levels which have been taken from survey information
- The layout of existing and proposed building and works
- All driveway, car parking and loading areas
- Proposed landscape areas (refer to memLa landscape concept at **Attachment 14**)
- A landscape layout for the common property 'nature strips' at the front and rear of the site, including a description of the modified driveway access to the hotel's car park and the new circular drive at the hotel's frontage. The layout provides a description of vegetation to be planted, the surfaces to be to be constructed and the method of preparing, draining, watering and maintaining the landscape area (refer **Attachment 14**)
- Elevation drawings to scale showing the colour and materials of the building and associated works in the common property 'nature strips'. Rendered elevations are also provided in the Urban Context Report at **Attachment 5**.

8.0 ENGAGEMENT WITH HUME CITY COUNCIL

Prior to preparing this application, SMA Projects discussed its project with the City of Hume. Planning officers provisionally indicated that they were not willing to entertain approving the proposal based on some propositions (which we submit were unsubstantiated) about potential for land use conflict.

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The permit applicant drew the Council officers' attention to the site being in a Commercial 2, and not an Industrial Zone, the absence of potentially conflicting land use in this industrial neighbourhood and the proposition that there is already another residential hotel operating successfully and without conflict in the neighbourhood.

As a result of the Council's unsubstantiated propositions in respect of land use conflict, officers did not take the opportunity to provide SMA Projects with any other comments about its proposal for the subject site.

Subsequently, we provided a written response to the various matters raised by Council in its response to the DFP's referral of the application earlier in 2026 (see our letter in response dated 16 March 2026 at Attachment 16).

9.0 PLANNING ASSESSMENT

We have structured planning considerations and submissions in respect of them around the decision guidelines at Clause 34.02-7 and 65, *as appropriate*. The considerations and submissions in respect of them are set out in Table 1 of this submission.

In so far as a response is required in relation to planning policy, we do not make submissions that reference policies that have limited or negligible applicability to the application. Instead, we have reviewed and focus on the most relevant of planning policies. These are the policies in the planning scheme which meaningfully assist deciding whether, or not, the application, on balance, is determined as producing an acceptable outcome.

Consideration	Submissions
Municipal Planning Strategy	The proposed use and development of the land for a Residential hotel is consistent with: • Clause 02.02 – Vision as it is aligned with the ambition to <i>Enable economic growth through the creation of local jobs and supporting local industry</i>. • Clause 02.03-5 – Built environment and heritage as the commercial design of the hotel is aimed at delivering quality appearance, amenity and utility to support and influence business and industry investment and people's impressions of the City. Consistent with the ambition to lift environmental standards, the application includes a Sustainable Design Assessment to ensure that the hotel is <i>resilient to the impacts of climate change and to be more resource, energy and water efficient</i>. • Clause 02.03-7 – Economic development as it contemplates a use which will have a complementary role in an established and regionally significant employment area around Melbourne Airport where employment development is growing and intensifying to meet the needs arising from what the planning scheme describes as <i>one of the largest single generators of employment in Melbourne</i>.



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	The complementary commercial nature of the hotel is especially consistent with the strategic direction aiming to <i>Facilitate economic growth and job diversity through the continued <u>support</u> of existing business and the attraction of new businesses.</i> (Our underlining)
Planning Policy Framework	The proposed use and development of the land for a Residential hotel is consistent with: • Clause 11.01-R - Settlement - Metropolitan Melbourne, as it focuses investment and growth in an established urban area and in an established employment area. • Clause 13.05-1S -Noise management, as the hotel will be constructed to ensure a noise environment suitable for short stay accommodation and, conversely, is not a use of land with potential to impact or conflict with the area's other uses (refer to Acoustic Report prepared by Renzo Tonin and Associates at Attachment 9). It is noted too, that the subject site is not within an Aircraft Noise Exposure Forecast area. • Clause 13.07-1S - Land use compatibility, as there is no potential for meaningful conflict with the commercial, light industrial and other employment generating uses as the activity will support, as opposed to compromise, the ability of those uses to function safely and effectively. The area is overwhelmingly observed as one dominated by logistics and freight forwarding businesses, business services (including offices accommodating professional and technical services). • Clause 15.01-1L-04 - Industrial areas and business parks, as (in relevant strategies order) it: – <i>Conceals plant and equipment</i> in a development proposed in a Business Park setting. – The building is <i>constructed in masonry and other materials</i> suited to the type of building and its use with appropriate glazing incorporated into street frontages (and, positively, side boundary elevations, too). – The walls are purposefully not finished with <i>a quality textured coating</i>, as the project architect preferences a natural concrete finish and for which we have provided exemplars in the accompanying Urban Context and Design Response report. – No fencing is proposed – at any boundary.

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- Parking is provided *in the building*. Four existing car spaces are removed from the common property (at International Square (East)) with the proposed introduction of the circular drop-off facility, and which offers 2 short term parking spaces (patron drop-off) and options for incidental deliveries for the hotel from time to time. The revised ‘nature strip’ arrangements will be landscaped to compliment the hotel and present an attractive and welcoming frontage at the street.
- *Storage areas* (including for storage for waste) have been provided within the building (refer Waste Management Statement prepared by Ratio at **Attachment 11**). There are no formal opportunities for storage to occur in the common property adjacent to the site’s frontage or at the rear and Owners Corporation Rules prevent the storage of bins on any part of Common Property No.1.
- Landscaping will be proportionally scaled in both ‘nature strips’ and will include shade trees. There is a focus on planting native vegetation.
- As to the Policy guideline relating to setbacks, it is submitted that this is an area where existing developments have established an *alternative consistent character*, especially in the ‘island’ created by the paved carriageway named International Square. Existing development in the ‘island’ is observed to have taken advantage of constructing walls to lot boundaries - to the front, rear and side boundaries - and which is compensated by provision of the deep ‘nature strips’ which variously include landscaping.

Clause 15.01-2S – Building design, as a hotel will:

- *Contribute positively to local context and minimises the detrimental impacts on neighbouring properties, the public realm and the natural environment.*
- It has also been designed with energy performance in mind as demonstrated in the accompany Sustainability Management Plan prepared by LID Consulting (refer to **Attachment 12**). It includes *on-site renewable energy generation and storage technology*.
- *Enhance the function and amenity of the public realm, and manages personal safety and property security* noting a clearly defined and wholly visible front entrance to the hotel and secured garage parking at the rear.
- While the building is taller than any of the buildings in the immediate surrounds, there are other examples of newer buildings in the area which are significantly taller than the prevailing height of more typical business park buildings.

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Importantly, the height of the building *does not intrude or otherwise adversely affect valued landmarks, views and vistas.*

- *Safe access and egress* are proposed.
- While one existing tree is planned for retention, there is no imperative to maintain any existing landscaping at the site and *the landscape layout concept* proposed for the site's 'nature strips' *responds to the subject site's context, will enhance the built form, will create safe and attractive spaces and supports the cooling and greening of urban areas.*
- Clause 15.01-2L-01 – Building design – Hume, as the proposal for this hotel (a commercial as opposed to industrial building) *includes architectural treatments and the use of colours, materials and finishes that are visually interesting and engaging.* Parking in a basement is not viable for this development and instead is proposed to be concealed within the building.
- Clause 15.01-2L-03 – Environmentally Sustainable Design – Hume, as the accompanying (and suggested) Sustainability Management Plan (**Attachment 12**) confirms the hotel is an environmentally sustainable planning proposal that *minimises environmental impacts.*
- Clause 17 – Employment, in that the proposed hotel will contribute to and support the *strengthening and diversification of the economy* and employment generating uses in a regionally significant industrial precinct. Specifically, it strengthens an existing employment area and will encourage and support local business and investment in existing and new business, and *create more (local) jobs closer to where people live.*
- Clause 18.02-7S and 18.02-7L relating to Airports (2 in Hume), in that the proposal presents no threats to the ongoing, safe and efficient operations of Melbourne and Essendon Airports because:
 - The height of the building, including an allowance for cranes at their maximum height during construction that is clear of prescribed airspace. Its location is not at the end of runways where there might otherwise be risk to public safety (refer to Aviation Impact Assessment at **Attachment 10**).
 - The subject site is not in an ANEF contour area, and, in any event, its construction will include noise mitigating techniques and materials to ensure internal amenity conditions for patrons consistent with the commercial interests of the business (see Acoustic Report at **Attachment 9**). These measures are also compatible with policies aiming to ensure no activity conflicts with the airports.

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	Accommodation in the environs of the airports, as demonstrated by the airports themselves, is a compatible and complementary activity.
Land use decision guidelines at Clause 34.02-7	Submissions
The effect that existing uses may have on the proposed use.	It is submitted that none of the uses or land use activities conducted in this industrial area will have an adverse impact on the proposed hotel. Conversely, the developer expects that they will have a positive effect and generate hotel business.
The drainage of the land.	There are no known obstacles to the drainage of the subject site as it is already connected to the municipal drainage system. It is anticipated that the developer will have to obtain Council permission for a legal point of discharge, and the permit applicant expects that this matter would be addressed as a condition of the permit.
The availability of and connection to services.	The subject site is already connected to the full range of urban services.
The effect of traffic to be generated on roads.	The Ratio traffic engineering assessment letter accompanying the application confirms that the road network connecting to and surrounding the subject site is readily able to accommodate the traffic expected to be generated by the proposed use.
Buildings and works decision guidelines at Clause 34.02-7	Submissions
The movement of pedestrians and cyclists, and vehicles providing supplies, waste removal, emergency services and public transport.	It is anticipated that the proposed hotel will generate only negligible (if any) pedestrian traffic and the nature of its guests and the hotel's location will be business and not tourist focussed. Provision for vehicle access is logical and rational; to on-site car parking from the International Square (West) and an orderly drop-off and pick-up zone and some short-term parking at the hotel's street frontage at International Square (East). Waste will be collected from the rear of the site, accessed from International Square (West). There are no impediments to access by emergency services.

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	Deliveries will be directed to the rear of the site and can take place from International Square (West). Incidental van or small rigid truck deliveries from time to time could also be made using the circular drop-off and pick-up facilities in the common property at the front of the site (International Square (East)).
The provision of car parking.	The traffic report accompanying the application confirms the proposed supply of 37 spaces at ground floor level is an appropriate supply for the proposed use.
The streetscape, including... access from the street front, the treatment of the fronts and backs of buildings and their appurtenances, illumination of buildings or their immediate spaces and landscaping of land adjoining a road.	The hotel is designed to engage with the streetscape and setbacks above ground level mean that the building has few walls constructed to the site's Lot 11 boundaries. Consequently, all of the hotel's facades (front, back and side elevations) are articulated to ensure visual interest despite it being surrounded by conservatively styled, utilitarian commercial/industrial buildings, established in a well-maintained 'business park' setting.
Defining the responsibility for the maintenance of buildings, landscaping and paved areas.	Maintenance of the building will be a matter agreed by the developer and hotel operator. Common property at the front and rear of Lot 11 and which is part of the subject site will be maintained by the Owners Corporation but, ultimately, delegated to the hotel operator (by arrangement).
The availability of and connection to services.	The subject site is already connected to the full range of urban services.
Any natural or cultural values on or nearby the land.	There are no natural or cultural values of any consequence on or nearby the subject site.
Outdoor storage, lighting, and stormwater discharge.	There will be no outdoor storage. Provision for the hotel's storage needs are accommodated within the hotel and entirely within the Lot 11 part of the subject site.
The design of the building to provide for solar access.	Windows in the development face east and west. Windows in the northern and southern elevations at above ground level levels are generously set back from the northern boundary. Building design and setbacks will ensure that many the hotel's guest suites and its business centre and conference facilities will benefit from solar access in addition to having good daylight access. We note, too, that the extent of the building's roof is sufficiently generous to host a 20kW photovoltaic array.

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Signs decision guidelines (as appropriate) at Clause 52.05-8	Submissions
All signs	The 2 proposed illuminated, high-wall business identification signs are compatible with the <i>character of the area</i>, are of a higher quality than typical of the area and will not create visual disorder or clutter. The signs will not adversely impact on any important <i>views or vistas</i> from the public realm of dominate the skyline and will not impede views to existing signs. The number proportion, scale and form of the proposed signs demonstrate an appropriate and respectful <i>relationship with the streetscape</i> and setting as well as a respectful <i>relationship with host building</i>. The signs are not supported by <i>structures</i> of significance. Decisions regarding the intensity of Lux levels for internal illumination have not been resolved at this time and can be a condition of a permit. The site is not near dwellings, and a reasonable extent of <i>illumination</i> will otherwise not impact the amenity of the commercial area that will host the proposed Residential hotel. The proposed use reasonably <i>needs</i> some identification to assist way finding. The signs are not moving or flashing and distant from runways. The signs have no potential to <i>impact on road safety</i> as they are not proposed in a high traffic generation environment nor are they located in an intensively signed environment. They are of type and in a location that where they cannot be confused with other signs, will not confuse, dazzle or distract drivers by size, design or colouring or illumination, or cause unpredictable driver behaviours which could risk public safety. They do not require close study.
Approval of an application or plan considerations at Clause 65.01 (as appropriate)	Submissions
Any significant effect the environment, including the contamination of land, may have on the use of the development.	There are no environmental matters arising from the proposed use and development that would have a significant effect on the environment.



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The Municipal Planning Strategy and the Planning Policy Framework.	See submissions re the sections of the planning scheme in preceding parts of this table.
The purpose of the zone... overlay or other provision.	The proposal is consistent with the purpose of the zone as it: • Implements the Municipal Planning Strategy and Planning Policy Framework as described in earlier parts of this table. • It is a business and commercial service which can reasonably be considered (and, indeed, is underpinned) by its association with the offices, appropriate manufacturing and industries and other business services in the area. • The proposed use will not affect the safety and amenity of adjacent, more sensitive uses as the subject site has no adjacent sensitive uses. • The proposed signs are consistent with the Purpose of the Category 1 – Commercial areas sign control to the extent that it provides identification signs that add to the vitality and colour of commercial areas.
The orderly planning of the area.	This proposal will provide a complimentary use of land in an established business park setting and is a proposal that can be considered to represent orderly and proper planning having regard to its positive response to multiple relevant planning policies.
The effect of the environment, human health and amenity of the area.	There will be no adverse impacts on the environment, human health or amenity of the area. A hotel is a passive and benign use of land entirely compatible with other uses observed in the surrounding area. An Arboricultural Report (Attachment 13) confirms that none of the trees (or shrubs) being removed to facilitate development of the Residential hotel are significant. Further, none are native to Victoria.
The proximity of the land to any public land.	The land is not proximate to any public land. The nearest public land is the Trade Park Reserve. It is some distance to the south, and any impact would be limited to visibility and in this setting, visibility is acceptable because it will have no unreasonable impacts on the public land. The development will have no impacts on Melbourne's Tullamarine Airport occupying Commonwealth land.

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Whether the proposed development is designed to maintain or improve the quality of stormwater within and exiting the site.	Yes, it has been designed to maintain or improve the quality of stormwater within and exiting the site. Refer to the Sustainability Management Plan at Attachment 12 .
The adequacy of loading and unloading facilities and any associated amenity, traffic flow and road safety impacts.	The hotel has limited loading and unloading requirements and it is expected that they can be managed as needed from time to time, from International Square (East and/or West). The use is not of a type or intensity that will impact area traffic flow or cause adverse road safety impacts. Refer to traffic engineering assessment prepared by Ratio and noting that Ratio has also prepared the requested Green Travel Plan (Attachment 8).
The impact the use or development will have on the current and future development and operation of the transport system.	It is difficult to contemplate any adverse impacts on the current or future development and operation of the transport system. We submit that there will be none.
Crime Prevention Through Environmental Design	Submissions
We are not aware of the basis for a CPTED assessment in this case as there is no requirement for one in the Hume Planning Scheme (except in relation to Schedule 2 to Clause 43.04) and application requirements only reference CPTED in the design of <u>public space</u> (if relevant). We note that all parts of the subject site and adjacent land is privately owned and not part of the public realm. Nevertheless, we provide the following submissions against the four primary CPTED principles.	1. Natural Surveillance The hotel use provides the opportunity for extensive use of glazing and its incorporation in each of the hotel's elevations provides multiple clear sightlines over the subject site's surrounds. This includes glazing across the front of the hotel's lobby at ground floor (east side). In combination with external lighting to be developed as part of the next phase of the design process, these measures will ensure that potential offenders will be readily and constantly observed. 2. Natural Access Control Planning for entry to the hotel has involved strong definition for the hotel's entry including the inclusion of a through driveway and paved drop off point that delivers patrons close to the hotel's air-locked entrance lobby. Patrons arriving by private vehicle will be directed to the rear of the site where a new driveway will take them to a secured car park entrance.

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	3. Territorial Reinforcement The boundary between Lot 11 and the adjacent common property is defined by the hotel's front and rear elevations. Within the limitations of the common property, the developer is proposing to improve these parts of the site with new hard and soft landscaping to foster a greater sense of ownership and demonstrate active and legitimate complementary use of land adjacent the hotel. 4. Space Management and Maintenance The hotel will rely on repeat patronage, recommendations of patrons and the now widespread use of patron reviews for commercial success. For these reasons, the hotel will be maintaining its building and taking responsibility for the actively utilised spaces at its front and rear. These spaces can reasonably be expected to be well-cared for to avoid the appearance of abandonment and neglect as it is in the best commercial interests of the operator.
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10.0 RESPONSE TO PRELIMINARY COMMENTS

The eligibility letter set out 3 metres as part of preliminary comments. For completeness, we respond to these as follows:

- Urban Design

We reiterate the response re further amendments to the western that were expressed in our letter of 16 March 2026. The relevant extract from that letter is reproduced as follows:

We note the further recommendation that the western façade incorporate a shadow line recess at the slab edge at Level 7 and the diagram provided to assist our understanding of that recommendation.

Our client's architect (Hayball) has reviewed the recommendation and notes that its design does not have expressed slab extensions at the upper levels of the north elevation. The intentional absence of this detail at these levels is proposed as an important element of the building's composition. Given this, it is respectfully submitted that the recommended introduction of an expressed slab at Level 7 of the western elevation would create a visually awkward (if not messy) junction at the building's northwest corner which the architect expressly seeks to avoid.

Hayball's opinion in respect of the suggestion for a shadow line remains as it was expressed in our 16 March 2026.

- Airport Related Impacts

Airport related impacts are discussed in section 9.0 of this letter.

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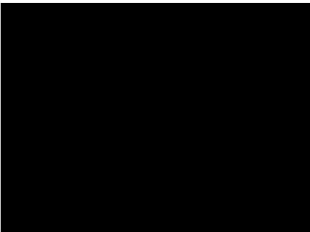
Signs

Approval for two signs is now part of the permit application. They are illustrated on the plans and addressed in sections 5.3 and 6.3 and in the assessment parts of this letter at section 9.0.

11.0 CONCLUSION

We trust this submission and the enclosed material will enable the Department to assess and support this permit application made pursuant to Clause 53.22 of the planning scheme. Should you have any questions, please do not hesitate to contact me on [REDACTED]

Yours sincerely



encl

Attachment 1	Notice to owner of subject land
Attachment 2	Certificate of Title
Attachment 3	MPL Certificate
Attachment 4	Survey
Attachment 5	Urban Context Report and Design Response
Attachment 6	Architectural Plans
Attachment 7	Traffic Engineering Assessment Letter
Attachment 8	Green Travel Plan
Attachment 9	Acoustic Report
Attachment 10	Aviation Impact Assessment
Attachment 11	Waste Management Plan
Attachment 12	Sustainability Management Plan
Attachment 13	Arboricultural Report
Attachment 14	Landscape Concept Plan
Attachment 15	WT QS Report
Attachment 16	Upco Response to City of Hume Referral Comments

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