

Department of Transport and Planning
1 Spring Street
MELBOURNE 3000

Emailed to:

16 March 2026

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**Re: Response to Pre-Application Comments
Proposed Residential Hotel
2/13 International Drive, Tullamarine**

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Dear

We refer to your email to our office dated 11.03.26 confirming that our client's response to the Department's initial urban design comments was constructive and that there is comfort with the project's design direction.

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. For this reason, our client asks that the recommendation be reconsidered.

Otherwise, we confirm our client's earlier design amendment undertakings (provided by email to Adam Williams dated 24.02.26) will be included in the plans when the application is lodged after receipt of the anticipated eligibility letter.

We also note the City of Hume's response to your invitation to comment on the draft application material. We are very pleased to provide the response as follows, which is provided in the same order as the City of Hume's letter dated 06 March:

- The matter of land use compatibility is addressed in the Upco letter that was part of the pre-application material.

It is respectfully submitted that Council's concerns about land use compatibility are overstated, if not exaggerated. The area hosting the subject site is in a Commercial 2 Zone (as opposed to an Industrial

Zone) and accordingly, the neighbourhood's character has 'light industrial' qualities. This is attributed to a combination of more passive land uses (mostly warehousing associated with logistics companies which benefit from proximity to Melbourne Airport). These land uses pose no adverse impacts on the temporary accommodation offered by the proposed residential hotel. Existing uses in the area are to be contrasted against uses of land that do have potential adverse amenity impacts - which are managed at Clause 53.10 and require separation distances.

Further, it is apparently lost on the Council that a Residential hotel is a use listed in Section 2 of the Table of uses at Clause 34.02-1, whereas it is prohibited in the Industrial 1, 2 and 3 Zones where there is otherwise real potential for land use conflict. When our application is formally lodged for consideration, our letter will be updated to highlight other Residential hotels that have been approved in the Commercial 2 Zone, including the Mantra which operates in this Commercial 2 Zone (at the corner of the Melrose and Trade Park Drive).

As Council correctly observes in its letter, the nature of existing uses in the area is such that they mainly operate during the day and therefore have limited, if any, potential to impact a hotel guest's amenity, including their overnight amenity.

- The Council's comments about traffic cannot be taken seriously as, in the first instant, it has not provided any evidence that would underpin its concerns. The Ratio letter (23 January 2026) which our client provided as part of pre-application materials succinctly addresses the matter of traffic generation and unequivocally states that it can readily be accommodated in the surrounding road network. That same letter addressed the adequacy of on-site parking noting that some guests will want to pre-book a parking space with their room (in which case they will not be needing off-site parking) and others will be arriving and departing the hotel using taxis or ride share services meaning they will not require car parking at all.

To assist you further, Ratio has prepared another succinct memo on the matter of traffic generation, the adequacy of the surrounding road network, the proposal in relation to car parking and the adequacy of the on-site supply, and the matter of pedestrian amenity (refer Memorandum attached and dated 16.03.26).

- The proposed hotel's operator has committed to the area based on its expectation that the key generator of demand will be visitors undertaking business in the area or other areas within the environs of the airport. The operator is not expecting the hotel to be attractive to tourists which would sensibly seek out other accommodation which is more central to the places they wish to enjoy on a visit to Melbourne. For this reason, it is not necessary for the area to offer what the Council describes as 'visitor economy amenity'.

Respectfully, the expected profile of guests of the hotel indicates that they will have no reason to walk the local streets, particularly at night. As the Council explains, other than for the symbiosis with surrounding businesses, there are no activities within the neighbourhood which would encourage pedestrian activity. A footpath (suggested as required by the Council for pedestrian amenity) would have limited utility for hotel guests, and otherwise, we have observed no pedestrian activity in the area on the occasions of our many site visits.

- Yes, the scale of the building does contrast with the otherwise low rise scale of the area but is this really a serious consideration in this Commercial 2 Zone? While the observation Council makes about height is plain, the difference in scale of the hotel and its heightened visibility per se is not a

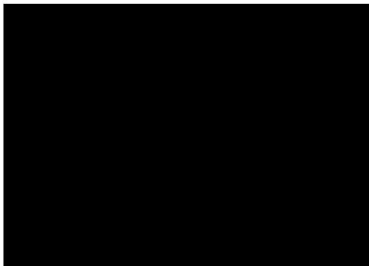
defensible reason to oppose the development. VCAT has established that visibility (or degrees of it) is not a relevant planning test. In our view, the matter of compatibility with neighbourhood character in this Commercial 2 Zone should also not be a serious planning consideration.

The subject site is not part of an area that is sensitive to height and the building's scale (including its height) does not have demonstrable adverse impacts on any land use activity or development (including in relation to public land) in the surrounding area. The nearby Mantra hotel was approved by the Hume City Council and, based on the granting of a permit for that site, it is plain the matter of the building's height (which is of similar height to the building proposed by this permit applicant) was not a reason to not approve a permit in that circumstance.

Finally, we are pleased to confirm that the building's height is below the prescribed airspace levels for both Melbourne and Essendon Airports. While we note this matter is not a relevant planning consideration you will observe that the building's height is below the prescribed airspace of Tullamarine Airport (157.5AHD) and Essendon Airport (123.5AHD).

We look forward to receiving our eligibility letter soon.

Yours sincerely



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