
Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

Mark Woodland

Email address: *

mark@echelonplanning.com.au

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting.

Miami Hotel Group request to be heard verbally at tomorrows C309 committee meeting.

Submissions will not be accepted after 10am.

The uploaded correspondence is for background. We do not wish to rely solely on this letter for our verbal submission.

If times are allocated we would like to request a time after 4:30pm.

Yours Sincerely,

Mark Woodland (Echelon Planning) on behalf of Miami Hotel Group

Alternatively you may attach your written submission by uploading your file here:



[200331_miami_psa_request_letter.pdf](#) 1.65 MB · PDF

Please indicate whether you would like to address the Committee live via a virtual link in support of your submission *

Yes

31st March 2020

Lord Mayor and Councillors
90-120 Swanston Street
MELBOURNE VIC 3000

Dear Lord Mayor and Councillors,

Re: Planning Scheme Amendment Request: Miami Hotel Group

Echelon Planning acts for the Miami Hotel Group (Miami Hotel) with respect to planning matters relating to their land holdings at 599 & 601, 605-609 King Street and 13-27 Hawke Street West Melbourne (the property). The Miami Hotel is a family-owned hotel operation that has continuously provided low-cost hotel accommodation on the site since 1970.

The purpose of this letter is to request Council support for the preparation of a new Planning Scheme Amendment (PSA) to introduce new planning controls to a portion of the land.

Background to this request

The Miami Hotel property is located within the West Melbourne Precinct Structure Plan area.

The Miami Hotel has been a conscientious participant in the West Melbourne Structure Plan process since April 2017, having prepared a number of submissions and also presenting expert evidence at the Planning Scheme Amendment C309 (C309) panel hearing held in July 2019.

Amendment C309 has not addressed the Miami Hotel's fundamental concern, which is that they need to redevelop the existing 1970's building in order to remain commercially viable in the highly competitive present-day visitor accommodation market.

The ongoing viability of the Miami Hotel requires the site redevelopment to deliver approximately 100 rooms together with 25 serviced apartments which (when taking into account the need to sensitively design the building alongside its heritage interfaces) will require the construction of a 6 storey building.

Prior to changes being made to the residential zones by the State Government in March 2017, discretion existed for a permit to be granted for a building of this scale on this site.

The Miami Hotel was in the final stages of preparing a town planning application for a hotel development on the land at that time.

However, the State Government zoning changes imposed a mandatory 11m height control on the site (which is lower than the height of the existing building) as well as an onerous 'garden area' control on the land.

These changes were introduced just prior to the Miami Hotel permit application being lodged with Council.



The opportunity existed for the drafting of Amendment C309 to address this situation, and Miami Hotel made a number of submissions to Council requesting that they review the zoning controls on the land. However, the exhibited Amendment C309 did not incorporate any changes to the zoning of the land.

The independent Panel that considered Amendment C309 last year essentially agreed with Miami Hotel's submissions that the existing controls were unreasonable in the circumstances, and that the land is capable of accommodating more intensive built form than allowed under the current residential zoning of the land.

This view was also shared by Council's expert witness in their evidence at the Panel hearing.

However, the Panel observed that because the controls requested by Miami Hotel were not included in the original amendment exhibited by Council, it would be necessary to prepare a separate new amendment to implement the requested revised controls.

It is Miami Hotel's strong preference that this situation be addressed as part of completing Amendment C309, but they accept the Panel's conclusions that this issue now needs to be addressed via a separate planning scheme amendment process.

It is in the above circumstances that the Miami Hotel now formally requests that Council support the preparation of a new Planning Scheme Amendment (PSA) to introduce new planning controls to a portion of the land.

We have attached further background information in relation to this request to this letter.

Requested changes to the Melbourne Planning Scheme:

On behalf of the Miami Hotel Group we request that the Council adopt the findings of the C309 Panel report in respect to the Miami Hotel site by resolving the following:

That Council support in-principle the preparation of a Planning Scheme Amendment to introduce a new zoning and built form control to a portion of 599 & 601, 605-609 King Street and 13-25 Hawke Street, West Melbourne which achieves the following:

- *Deletes the mandatory height control and provides for the construction of a 6 storey building on the land; and*
- *Removes the minimum garden area requirement imposed by the current General Residential Zone.*

There are a number of options for how the planning controls could be drafted (refer to **Attachment 1** for details) and we propose to work with Council officers to agree on a preferred planning control format following confirmation that Council supports in-principal the preparation of a Planning Scheme Amendment to introduce a new zoning and built form control to the Miami Hotel site.

We look forward to your favourable consideration of this request.

We also request the opportunity to present this submission at the forthcoming Special Committee Meeting which is to be convened to consider Amendment C309 to the Melbourne Planning Scheme.

Should you have any questions in relation to this submission, please do not hesitate to contact me on 0488-373-925.

Yours Faithfully

Antony Duffill
Principal Urban Planner



Attachment 1 – Background Material

The Miami Hotel Site

The existing Miami Hotel has been in continuous operation since August 1970, being under the direction of a single family during this entire period.

The site includes parcels with frontages to both Hawke and King Street, as shown in **Figure 1**. The consolidation of these parcels creates a large site of approximately 2,400sqm which includes frontages to King and Hawke Streets as well as access from both existing laneways/easements. In addition, site access is available from Jones Place to the south.

The landholding comprises the following:

- Two Victorian terraces at 599 & 601 King Street;
- A three-storey early 1970's brick hotel building that covers the majority of 13-25 Hawke Street with at-grade car parking, site servicing and vehicle access;
- A single-storey terrace at 27 Hawke Street;
- Vacant land at 605-609 King Street (subject to a recently approved planning permit for demolition and construction of 12 serviced apartments (TP-2017-862, issued 2 March 2018).

Whilst the site is adjacent to low density Victorian terrace housing, it is a large site capable of accommodating significant built form. It is also adjoining the Errol Street Activity centre and opposite a recently completed 6 storey apartment complex.

The land owner's proposal to redevelop the site for a new hotel has been prepared with input from experienced and well credentialed architects and heritage experts. It is a design which is responsive to the adjoining heritage context.

The proposal will allow for the rejuvenation and ongoing use of the site for a hotel with related employment opportunities. It would incorporate shared community spaces including meeting facilities, wellness centre and a ground level cafe that will directly address and activate Hawke Street as well as benefit the residents of North and West Melbourne.



LEGEND

- TITLES HELD BY MIAMI HOTEL GROUP
 - A 13-25 HAWKE STREET*
 - B 27 HAWKE STREET*
 - C 605-609 KING STREET*
 - D 601 KING STREET*
 - E 599 KING STREET*
- *ACCOMMODATION OFFERINGS AS PART OF THE MIAMI HOTEL

Figure 1: Miami Hotel Group landholding extents



Figure 2: Miami Hotel (existing frontage to Hawke Street)



Figure 3: Hawke Street looking north (new 6 storey mixed use to left, Miami to right)



Figure 4: New 6 storey mixed use to west of Miami (King Street frontage)





Figure 5: Miami Hotel, Goldsmiths building and new 6 storey mixed-use (from north)

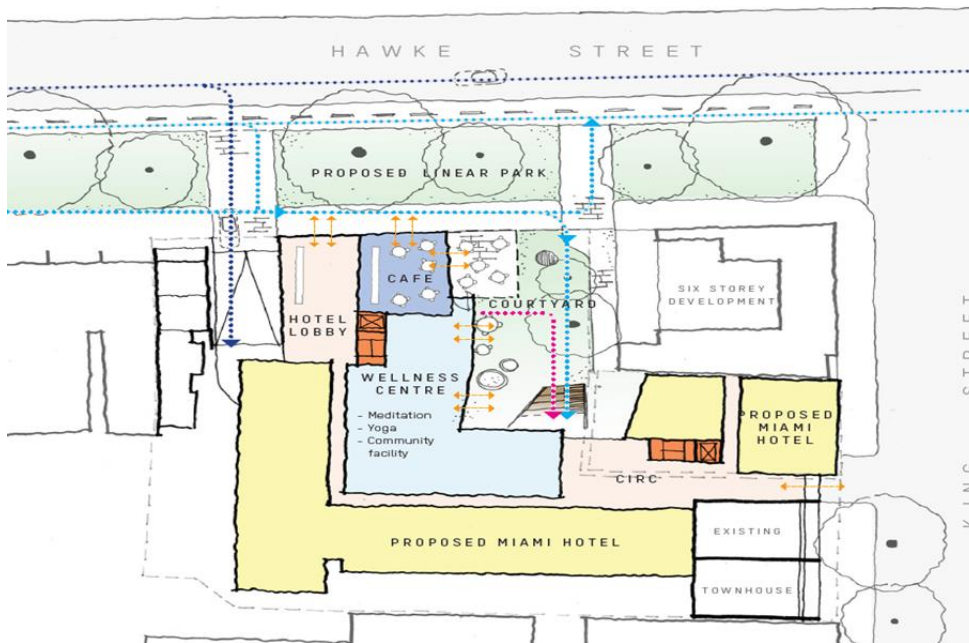


Figure 6: JCB Ground Floor Concept Plan for Miami Redevelopment



Amendment C309 Panel Findings

The independent Panel that considered the West Melbourne Structure Plan has supported the preparation of a separate planning scheme amendment to introduce new controls to the subject land.

The Panel acknowledged and agreed with the expert heritage and urban design evidence that the Miami site is a strategic development site in a good location that is capable of accommodating more intensive built form than currently exists or that would be allowed under the existing General Residential Zone (refer to P.4 and P.187 of the Panel Report).

The Panel suggested that more work be undertaken to inform the exact form of alternative controls for the site, and that their introduction should occur through a separate planning scheme amendment. They noted that this would enable proposed changes to the controls to be exhibited to neighbouring properties that may be impacted (refer to P.4 of the Panel Report).

The Planning Scheme Amendment Request

The Miami Hotel Planning Scheme Amendment (PSA) request is for the introduction of a new planning control to the land that will enable building heights to be considered up to 6 storeys through removing the 11m mandatory height control and the minimum garden area requirements for residential buildings (both imposed by the current General Residential Zone Schedule 1 control applying to the land).

We seek Council's views in terms of the final form of the new control introduced by the proposed PSA. However, we suggest that a new schedule to the General Residential Zone could be introduced. A new maximum height control can be introduced to a GRZ Schedule at Clause 3.0 (say 21m for a six storey building) and there are several examples in the Melbourne Planning Scheme. An exemption to the minimum garden requirement can be introduced under Clause 2.0.

Another potential approach was suggested in the C309 Panel Report, this being retention of the existing zoning and applying a site specific control under Clause 45.12 (Specific Controls Overlay). Applying such a control can allow land to be used or developed in accordance with a specific control contained in a corresponding incorporated document in a manner that would otherwise be prohibited. This approach has been utilised in a number locations within the City of Melbourne.

From: Marshall waters <marshall@rewine.com.au>
Sent: Monday, 27 April 2020 6:31 PM
To: CoM Meetings
Subject: Fwd: Re West Melbourne Ammdement C309

Marshall Waters
ReWine.

Begin forwarded message:

From: Marshall waters <marshall@rewine.com.au>
Date: 27 April 2020 at 6:29:48 pm AEST
To: Deborah Payne <Deborah.Payne@melbourne.vic.gov.au>
Subject: Fwd: **Re West Melbourne Ammdement C309**

Debbie.

Given my time constraints I figured it was best to tell the councillors basically what I told the planning panel.

Marshall Waters
ReWine.

Begin forwarded message:

From: Marshall waters <marshall@rewine.com.au>
Date: 27 April 2020 at 6:27:40 pm AEST
To: Nicholas Reece <Nicholas.Reece@melbourne.vic.gov.au>, susan.riley@melbourne.vic.gov.au, jackie.watts@melbourne.vic.gov.au
Subject: **Re West Melbourne Ammdement C309**

To the councillor as addressed

I have been an active participant in the very long process for the development of a new planning scheme for West a Melbourne. The residents are nearly exhausted by this marathon in contrast with the other interested parties who have a vested interest in keeping the current “grey” eras of the existing scheme.

Let me congratulate the CoM planning dept for a very well researched and developed planing ammdement C309 that addresses some very complex issues. I believe that they have reached a very even handed outcome that allows the existing residents to continue to live in the area they like and development opportunities that allow for sensible development and a much

needed increase in population density in the inner Melbourne area that may slow the inexorable urban sprawl.

The main issue is Certainty For everyone.

I intend to use the example of the Don Kyatt building and the Gadsden project to support each point. Both of these applications went to VCAT at great expense to the applicant, the residents and the CoM.

1. Certainty for Residents,

Since mid 2015 the residents have been involved in developing this planning scheme and they deserve to be listened to. The CoM planning office has spent nearly four years consulting and responding to residents and developers who chose to be involved.

I have attended no less than six occasions where the CoM sought input then presented and workshopped ideas and finally presented the proposed C309 scheme.

The single major issue that continually drew strong response from the attendants was building height and the current flexibility in enforcement of any height limits. The introduction of the concept of floor area ratios in the later stages of this process was very widely applauded. The near unanimous support for mandatory floor area ratios and mandatory height restrictions was always very evident at these meetings.

Referring to the Don Kyatt building, if the height limit for the Adderley sector was mandatory at the time we would not have been faced with this original eight story planning application.

1. Certainty for Developers

Developers have been enthusiastic under the old regime to push the boundaries that are “ recommended” . Many projects finish up at VCAT which has become an expensive lottery for the developer and the residents alike.

The Don Kyatt building was originally approved by CoM planners to the dismay of residents. With more than 90 objectors gathered together to take it to VCAT. The developer chose not to compromise with the residents at the compulsory conference stage and elected to take the fast track to a major project hearing at VCAT.

This forced the residents to spend \$30K on employing a planning consultant to contest this application. In the end the project application was refused and the residents then conducted an extended consultation with the developer that produced an outcome that was acceptable to everyone finally passed by CoM.

This process was expensive for the residents and even more so for the developer at about \$250K for their hearing costs in addition to holding costs for a \$15 mill site and finally missing the best of the apartment market in 2011/18. The costs proved to be so debilitating that The developer was subsequently forced to sell the undeveloped building because of liquidity issues caused by the delays. The building remains vacant and undeveloped to everyone who was involved detriment.

If the mandatory height controls and floor area ratios were in place when the building was purchased and the first application was made this building would now be suitably developed for both the owner and the neighbours benefit.

1. Certainty for CoM planners

Presently CoM planners have to work with rules that are recommended and undefined leaving them open to criticism from both residents and developers. This creates mistrust and anger directed at the planning dept. and the CoM more generally. This has the very undesirable outcome that the residents don't trust the CoM to be acting in the best interests of the ratepayers.

At a minimum it breeds disenchantment and lack of involvement and at worst it can be seen as low level corruption or favouritism towards developers. If the planning rules are made mandatory the CoM planners will be able to do their job much better and apply their resources in generating good outcomes with developers and residents instead of spending time and money defending decisions based on loose planning rules.

1. Certainty of Good Planning outcomes.

Good outcomes seem to be the last thing that occurs when rules are subject to a lottery of decisions from different planners and different Commissioners at VCAT.

There is no consistency and poor precedents are set when erratic decisions come from wildly divergent opinions of a Commissioner or Planner.

A classic case is the differences of opinion expressed by the original CoM Planner and the VCAT Commissioner over the Don Kyatt Project. The Planner passed it with very few recommendations for change but the Commissioner threw the whole project out with no recommendations for change at all as there were too many negative issues with the whole concept.

1. Certainty that VCAT does not become the de facto planning authority

There have been 15 applications determined at VCAT since 2010. VCAT was supposed to be an inexpensive way for challenges to decisions of public authorities. Where the rules are clear it works well but when the West Melb planning rules are as indistinct as they have been, it becomes an all too frequent pathway to extended and expensive hearings the are a gamble for everyone involved. The residents are pitted against developers who have deep pockets because they have very high stakes in the outcome. It also produces outcomes that may be suitable for the particular project but lack the overall appreciation of effects on the whole precinct. Sometimes this is because it is precedent setting like the CBus building near the North Melb Station and other times they disregard the effects on adjacent heritage buildings even if they are in some way meeting the loose rules of the current planning scheme. The CBus building set the precedent that led to the application from the PDG group for the Gadsden building at 11 stories.

This was compromised in negotiation with the residents with lower levels delivered near most adjacent heritage buildings.

Conclusion.

I commend the Proposed scheme to the Council and implore you to make the various planning controls mandatory rather than recommended.

The private developers submissions to this Stage have almost universally sought to soften the height and floor area ratios from mandatory to recommended. This will only take us back to the expensive and vigilance demanding process of the last 15 years. It will also make sure that the many planning consultants and lawyers remain employed pursuing this compromised process so I guess you could say they have a vested interest in the recommended rather than mandatory planning regulation.

Finally The provision of low cost housing and special use zones should not be used to soften these rules. Why should the provision of much needed low cost housing and the preservation of heritage be used as an excuse to allow poor planning outcomes. This provision would only introduce another “grey” area to allow for compromise of good development and open up another process of dispute and expense in the resolution.

Other mechanisms like municipal rate relief or other fee reductions should be used to encourage good outcomes to these needs rather than compromise of good planning guidelines.

I commend C309 as presented and look forward to its immediate implementation in full.

Marshall Waters

West Melbourne.

Marshall Waters
ReWine.

Jody Brodribb

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, 27 April 2020 8:29 PM
To: CoM Meetings
Subject: Amendment C309 West Melbourne Structure Plan [#7]

Privacy acknowledgement: I have read and acknowledge how Council will use and disclose my personal information.

*

Name: * helen sweeting

Email address: * hl.sweeting@gmail.com

Please write your submission in the space provided below and submit **by no later than 10am on the day of the scheduled meeting.** Submissions will not be accepted after 10am.

Submission 27th April 2020

Amendment C 309

We wish to reiterate our in-principle support for the inclusion of Amendment C 309 – known as the West Melbourne Structure Plan – in its entirety, into existing planning regulations. We would therefore support the committees' decision to recommend that Amendment C309 be sent to the Minister for Planning for approval.

This amendment was developed within the context of a rapidly developing city and the need for a clearer guide on how growth and development in West Melbourne – a suburb adjacent to the inner city – should continue, in the face of significant pressures for development. The overarching goals of C 309 are to:

- Create a mixed-use suburb – a place where people live, work, and thrive
- A community which is reflective of the diversity of greater Melbourne
- Pay homage to West Melbourne's past and preserve its heritage
- Mitigate the effects of climate change

We wish to thank the individual architects of amendment C309 and Melbourne City Council in their efforts in bringing the amendment to its final hearing before being sent to the minister for approval

Kind regards

Helen Sweeting and Gerard Rodgers

Please indicate **No**
whether you
would like to
address the
Committee live via
a virtual link in
support of your
submission *

Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

Simon Mitchell-Wong

Email address: *

simon.mitchell@gmail.com

Alternatively you may attach your written submission by uploading your file here:



[c309_submission_-_simon_mitchellwong.pdf](#) 295.18 KB · PDF

Please indicate whether you would like to address the Committee live via a virtual link in support of your submission *

Yes

To whom it may concern,

My name is Simon Mitchell-Wong, and thank you for taking the time to read this submission. My family and I live in the Flagstaff precinct of West Melbourne (covered by DDO33), at Royal Flagstaff apartments, where I have been Chair of the Owners Corporation for about a decade. I have participated throughout this process and write this submission on behalf of the Royal Flagstaff Owners Corporation, my family and myself. We support planning certainty, transparency and an efficient and effective planning process.

The primary focus of my submission relates to certainty around mandatory Floor Area Ratio (FAR), Bonus Floor Area and 'additional floor area' controls. When the Planning Panel added incentives for non-residential and social housing developments, they left the uplift values for Council to address. The need for certainty was discussed by the Planning Panel. I support Council's proposed changes and values which address that temporary gap in Mandatory Controls.

However, firstly I wish to again congratulate Melbourne City Council staff, Councillors and the Planning Panel on an extensive and comprehensive process. The West Melbourne Structure Plan (WMSP) Phase 1 consultations began with the participation of hundreds of residents and businesses in 2015. The resultant WMSP and now the C309 amendments were based on solid modelling and balanced multiple and often conflicting perspectives from residents, developers and land owners. *No party got all they wanted, though the position arrived at is far more generous to developers than existing overlays.* The process has been consultative, extensive, thorough, grounded in strong research, and in line with the vision and objectives of the Victorian Planning Scheme.

While the latter stages of the amendment have become more technical, more legal, conducted during work hours, and therefore increasingly inaccessible to residents and the general public, the foundations were solid. It's important that the many years of work not become the starting point for re-litigation by those that can afford to do so, at the expense of those who cannot. Those who could benefit from the potential transfer of tens of millions of dollars in wealth through discretion, would do so at a cost to community of loss of public amenity and equitable development. Discretion in land values demonstrably goes against Victorian Planning Objective 1 a "to provide for the *fair, orderly, economic and sustainable* use, and development of land."

Mandatory Floor Area Ratio (FAR), Bonus Floor Area and 'additional floor area' controls

The WMSP and exhibited C309 Amendment supported *mandatory controls* for many good reasons. The Planning Panel described mandatory controls on Page 32 as a "*legitimate tool to use in response to ... development pressure, and can assist in delivering the built form and character outcomes sought for West Melbourne in the Structure Plan. Working with the built form controls, they also have the potential to deliver a range of beneficial outcomes relating to sustainable development, and vibrant, social streetscapes that provide a high quality pedestrian and public realm and foster community.*"

However, there are two methods to vary and exceed the mandatory FAR controls: the 'Bonus Floor Area' and seeking a permit for 'additional floor area' for social housing and non-residential use.

Bonus Floor Area

The Bonus Floor Area incentive is aimed at preserving the special character of buildings, but may only result in the bare minimum retention of special character. I support the maximum 50% Bonus Floor Area (BFA), though believe that achieving it should be dependent on the degree to which the Special Character has been retained and authentically restored. Since a façade contributes no floor area, once a bare minimum hurdle of façade retention and restoration is achieved then benefits accrue for retaining bare concrete floors. The 'yes or no' test provides no further incentive once the hurdle is met. I suggest either a stronger test for meeting the hurdle (preferred) or a spectrum which may provide more leverage. The tests could consider restoration of the original use, carpets, tiles, walls and architraves, to achieve the maximum 50% BFA. I suggest:

1. That the words "up to", which was removed by the Planning Panel, be reinstated.

Bonus Floor Area means up to 50% of the pre-demolition gross floor area of a Special Character Building that is Successfully Retained.

2. That the calculation of Bonus Floor Area and definition of Successfully Retained consider and apportion up to a maximum of 50% relative to the degree in which the pre-demolition gross floor area retains its special characteristics including restoration of the façade without impairment, fixtures, and uses. A restored façade covered by a big McDonald's sign might not achieve the full 50%.
3. That the letter 'r' be capitalised in the definition Successfully retained. I.e. "Successfully ~~r~~Retained means that to ..."

Additional floor area

While the Planning Panel were supportive of the mandatory FAR, the amendments for 'additional floor area' do not specify a mandatory limit, leaving a potential hole. Many problems related to discretion could be introduced through this hole. Without limits, a 5% discretion may end up as a 500% discretion through precedents eroding the scheme. On Page 33 of the report, the Planning Panel are supportive of a fixed maximum but have left the matter for council to resolve. "The more certainty there is regarding the likely level of uplift that could be expected, the greater the likelihood that developers will offer affordable housing contributions."

This is rectified by the Responsible Authority's, Council's, *changes suggested in response to the panel report*. The changes work within existing modelling and allow 1:1 additional FAR for social housing and non-residential development. This is a strong incentive to encourage non-residential and social housing use. Both these uses provide needed community benefit and should be encouraged. However, these uses will more densely accommodate people and generate more use of public amenity for the same developed floor-space. Perhaps some of these impacts are offset by a historic overdevelopment of residential development. The important point is that the alterations generate good community outcomes and provide certainty and transparency in the planning process offered by a cap. Certainty 'levels the playing field' and focuses architectural design on generating value through amenity rather than site maximisation.

Pandemics and FAR

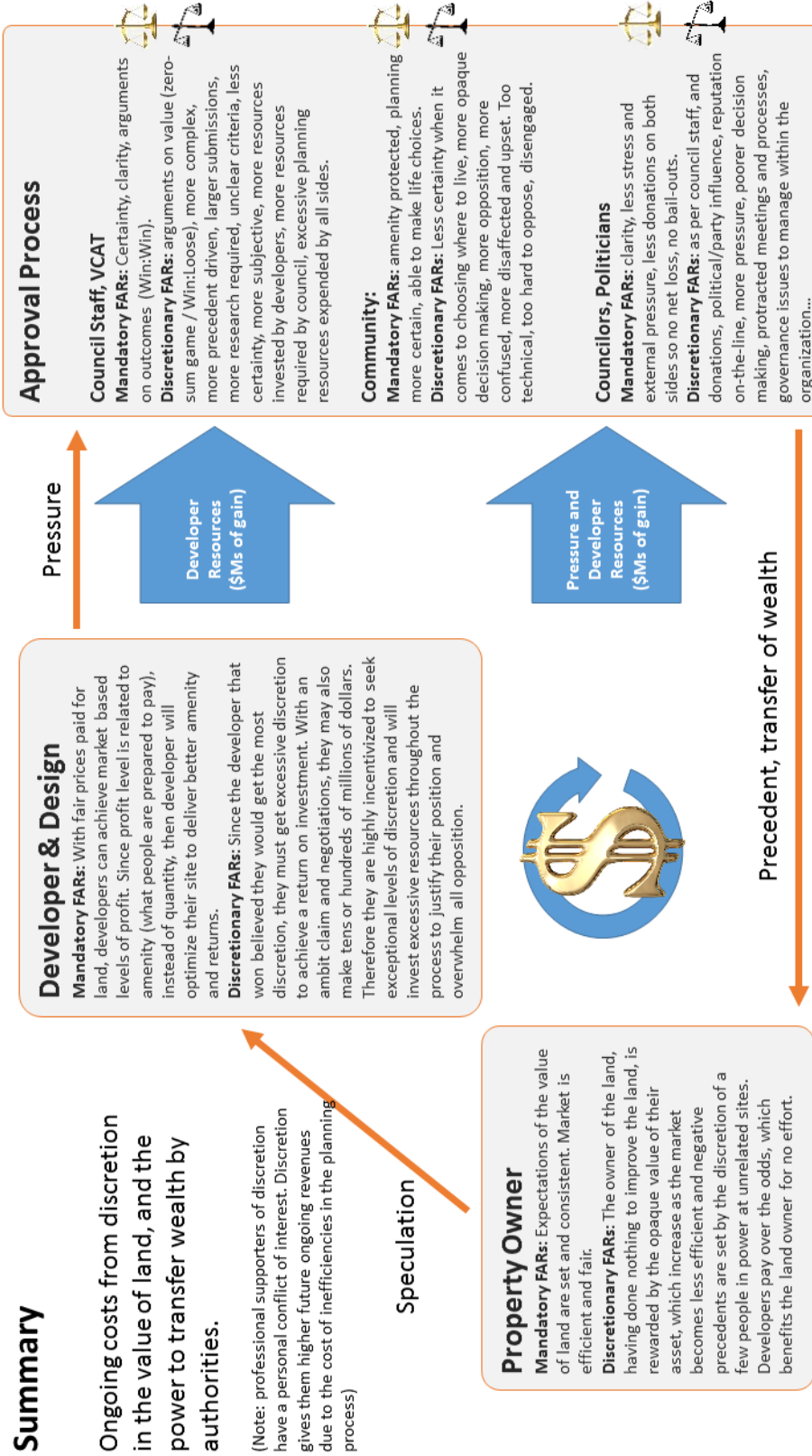
It should be noted that Council's modelling considered FAR in a pre-pandemic context. Increased density of people within specific sites, footpaths, public spaces and infrastructure, has increasingly adverse health consequences in the current situation. In the post-pandemic context, should COVID-19 not die out as many commentators suggest, or as new diseases emerge, then there are uncalculated additional costs of increased density. While I would prefer a lower FAR, I respect the rigour applied by Council within their modelling.

Summary

I, on behalf of Royal Flagstaff Apartments, am supportive of Council's changes, and make the suggestions above in relation to Bonus Floor Area.

Costs of discretion

Below is a summary of problems associated with discretion in land values that I raised at Panel.



Discretion on site development potentially creates great social, political, administrative and legal costs and inequity. As long as there is discretion to alter land value, there is a potential to transfer great wealth (\$10M-\$100+M). Directors of a Developer have a fiduciary duty to expend great amounts of money and pressure (\$100k-\$1M) per ambit claim or application, to maximize benefits for shareholders. There are tangible costs caused by ambiguity and increased arguments, and intangible costs such as community disengagement. The additional money spent on influence is inefficient, uneconomic, and creates no real lasting value. Pressure is expended against communities, councils, planning departments, councilors, politicians, etc. This expenditure results in increased legalism and technical arguments, which strongly favors developers ahead of councils, planners, and the community. Only the developers have a financial business case. At the same time, the taxation system is ripped-off by discretion when the taxable land value does not account for the gifting of discretion which transfers real value to a site at the expense of neighboring sites. The discretion to selectively transfer wealth is intrinsically not fair, the ambiguity caused is not orderly, the lack of a transparent market value for land is uneconomic, and the erosion of planning through precedent is unsustainable. Discretion goes against Victorian Planning Objective (1a) "to provide for the fair, orderly, economic and sustainable use, and development of land; ..."

C309 FAR values have been tuned to public infrastructure capacity and amenity. FAR Discretion either decreases the development potential of other land (inequitable development), or reduces community and public amenity. "Very dense environments ... produce oppressiveness and increase negative emotion¹." Discretion in FAR goes against Victorian Planning Objective (1c) "to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria."

Myth: Discretion stifles innovation. Where discretion on development potential exists, the challenge for developers is to increase returns and profit (at the expense of all other criteria) with pencil towers providing great examples of the results on the northern edge of the CBD. With necessity being the mother of invention, a mandatory FAR constraint encourages more creative responses which can consider site context within the flexible build forms offered by FAR. With the value of land capped by FAR, the competition to purchase land will be based on the developer's ability to innovate on quality and generate profits through higher sale prices and additional facilities.

Summary

We support the C309 amendment as it will save the community, council, VCAT and developers much effort and cost, provide economic certainty around the development potential of other land, and allow a greater focus on delivering value through better amenity. The Amendment is an improvement that better delivers the Victorian Planning objectives.

Other minor changes:

I disagree with the removal of the following wording from Floor Area Ratio "Voids associated with lifts, car stackers and similar service elements should be considered as multiple floors of the same

¹ - <https://www.theguardian.com/sustainable-business/2017/mar/16/cities-depression-stress-mental-health-high-rises-urban-design-london-toronto>

height as adjacent floors or 3.0 metres if there is no adjacent floor.” The wording provides additional clarity and certainty, and helps align with the FAR site modelling. I believe the Floor Area Ratio definition needs to go further too. Consider the case where someone builds a 60m concrete cube with no levels inside. Would it be assessed as having a FAR of 1:1 despite exceeding all visual impacts of site modelling due to the lack of internal levels? The definition should not allow large internal voids to affect the “amount of clay” available to the developer (to use an analogy of FAR much earlier in the process).

Photomontage Requirements

While the intent of a photomontage is to gain a sense of the buildings impact on a space, many developers use highly selective renderings of improbable views to present their buildings in an unrealistic and unrepresentative way. Developers will naturally pick even the most impossible angles, to hide aspects of their building behind trees and other buildings, to present the building at its most invisible. In relation to development at 488 La Trobe St, I’ve seen rendered drawings taken from inaccessible parts of Flagstaff Gardens so as to hide the scale of the building partly behind another, and other photos taken from the bike-lane with head turned back at 110 degrees at the moment the largest tree on the street is directly between the camera and the building. I’ve also seen virtual trees in front of buildings that would be many times higher than the real trees.

While I don’t suggest Council prescribe every view, I do suggest that it prescribe a minimum set of views for inclusion in the Photomontage studies. I suggest that in addition to the developer’s set, a standard set of photo/renders include the unobstructed point nearest to:

- directly opposite the development, with trees showing winter leaf coverage, in the middle of the pedestrian path at eye level (say 1.5m),
- one 30m in either direction, on the opposite side of the street, pointing toward the site with camera facing horizontal to the ground at eye level, and/or
- at the opposite corner of the intersections, at eye level and pointing to the middle level of the building, for all intersections adjacent to a section of road where the building has a frontage.

If the photomontage shows the building being obstructed, then the applicant should describe why an unobstructed view could not be provided instead.

The summer view can more easily be derived from the winter than the reverse. We can all imagine leaves. Imagining leaves is much easier to do than imagining the building behind the leaves. Imagining the building is why renders are asked for in the first place.

Final Summary

I strongly support the WMSP, C309, the Planning Panel process, and Council’s amendments to provide planning certainty around the development potential of sites. The C309 amendment with Council’s changes will result in a fairer, more orderly, more economic and sustainable use and development of land. It will reduce corrupting influences and excessive administration and legalism. Mandatory FARs and capped uplifts proposed by Council support the equitable development of land, understanding that community amenity and public infrastructure is finite, and provides a clever incentive for social and mixed uses lacking under the current scheme, to balance the present and future interests of Victorians.

To quote the Planning Panel, mandatory FARs working with the built form controls “have the potential to deliver a range of beneficial outcomes relating to sustainable development, and vibrant, social streetscapes that provide a high quality pedestrian and public realm and foster community.”

Kind Regards,

Simon Mitchell-Wong

Chairperson, Royal Flagstaff Apartments

Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

Reto Hofmann

Email address: *

rhofmann@rigbycooke.com.au

Alternatively you may attach your written submission by uploading your file here:



[submission_to_special_meeting_28.04.2020.zip](#) 1.01 MB · ZIP

Please indicate whether you would like to address the Committee live via a virtual link in support of your submission *

Yes

Our ref: **RAH: 20191412**

Your ref:

Direct dial: 03 9321 7889

Direct email: rhofmann@rigbycooke.com.au

Page: 1/3

28 April 2020

Amendment C309 West Melbourne Structure Plan Committee
City of Melbourne
Council House 1
200 Little Collins Street
MELBOURNE VIC 3000

By email

Dear Committee

Submission on behalf of Multifield Constructions Pty Ltd to the Special Meeting of the Amendment C309 West Melbourne Structure Plan Committee

Rigby Cooke acts for Multifield Constructions Pty Ltd, the owner of land at 91-99 Dudley Street, West Melbourne and a submitter to Planning Scheme Amendment C309 (**the amendment**).

We repeat the matters raised in our letter of 21 April 2020 requesting that the Special Meeting to consider the amendment be rescheduled to a later date for the following reasons:

- 1 The amendment will have a devastating impact on the viability of our client's land for any development and has similar impacts on West Melbourne more broadly. This is a direct result of the mandatory floor area ratios and also the minimum non-accommodation floorspace requirements.

Mandatory floor area ratios have had a detrimental impact on development in the central city which has dropped significantly since Amendment C270 was introduced. The ratios prioritise liveability over viability and work in theory only.

We echo the executive summary of the Panel Report for the amendment where it paraphrases submissions made:

... the Amendment 'undercooks' the growth and development potential of West Melbourne, primarily through the introduction of mandatory floor area ratio limits...

... the Amendment [will] result in an underutilisation of the land and a missed opportunity to accommodate growth in this important strategic location.

- 2 In the current circumstances a final decision on the amendment is not time critical and will not alter the relevant considerations for planning decisions in the short term. Crucially it leaves the door open for flexibility in the short-term response to current issues;
- 3 Most relevant are these current issues. We are experiencing unique and challenging times that simply cannot be ignored. The State of Emergency and COVID-19

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pandemic have forced Melbournians into a different way of life, both at home, at work and in their leisure time. This is expected to have lasting impacts on the way in which Melbourne evolves and develops. This was identified by Councillor Reece in his opinion piece in the Age on Sunday April 26:

Another fascinating challenge for urban planners is whether the pandemic-induced working-from-home revolution will permanently shift large parts of the workforce into telework from home or another location. This could have a profound impact on where people chose to live, what sort of homes they want to live in and ultimately what shape our cities take. These new public behaviours could challenge decades of urban policy work towards denser living and the take-up of mass transit public transport.

Beyond the immediate crisis the pandemic could provide an opportunity for cities to reset on some important fronts.

That is why the decisions made in the next 6 months will decide the future of Australia's cities for the next decade.

It must be acknowledged that the amendment and Panel report are a product of a different social and urban context to that which we are likely to pursue into the future. It has exposed and brought to the fore new challenges.

It is very likely that a more nimble and flexible planning framework will be preferred to highly prescriptive controls which seek to dictate very specific land use and built form outcomes. It is sensible to give considered thought to the type and nature of controls best suited to manage change in a less certain environment or one which can adapt very quickly.

Finally, this is definitely not the time to be experimenting with planning controls that will clearly limit opportunity and growth. In this regard, the language adopted by the panel is of great concern:

*The **Amendment is ambitious** in its scope, and proposes a number of **innovative approaches** to managing growth in West Melbourne. It proposes mandatory floor area ratios, minimum non-accommodation floor area requirements, and affordable housing contributions that are **relatively novel in the metropolitan Melbourne context**. It proposes to apply the Special Use Zone to wide areas within West Melbourne to deliver the suite of controls required to ensure that growth is managed in accordance with the Structure Plan's vision.*

"Ambitious", "innovative" and "novel" planning controls may be acceptable in times of prosperity and economic boom, but right now they merely signal risk and uncertainty to a crucial sector of the economy that will be carrying a heavy burden in the recovery from COVI-19 induced recession.

In light of all the above, we respectfully request the Committee delay any decision on Amendment C309 to a future meeting date when it is afforded the opportunity to assess whether the proposals put forward under the amendment are in fact those best equipped to manage growth and change post-COVID-19. Indeed, it is difficult to see how the Committee

RIGBY COOKE LAWYERS

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can be making an informed decision on this very important amendment on the future of West Melbourne when no one can say when we will be able to freely catch-up with friends and family for a social catchup without fear of infection or fine.

Thank you for the opportunity to make a submission.

Yours faithfully

Reto Hofmann
Rigby Cooke Lawyers

Cc: com.meetings@melbourne.vic.gov.au

The crisis provides an opportunity for cities to reset and reimagine, writes **Nicholas Reece**.

They are the pictures of Melbourne you never wanted to see – the clocks at Flinders Street Station with nobody under them, the MCG empty on the weekend, St Kilda Beach deserted on a sunny day, playgrounds with no children.

On a weekday almost a million people crowd together in the central city in Melbourne. That's the way it should be, cities are for people. But the COVID-19 pandemic has turned Australia's big cities into ghost towns, leading some to speculate whether they will ever be the same again.

The good news from history is that cities do bounce back after pandemics. Whether it was Athens after the plague of 430BC, European capitals after the Black Plague of the 14th century, or Australian cities after the Spanish Flu just over a century ago. The economic, social and cultural benefits of the metropolis have a strong magnetic pull that inevitably brings people back in ever greater numbers.

The more complex story from history is that public health crises and similar events do leave a major mark on cities and shape the course of their development.



More positively and proactively, it is time to ask: what do we want life in Melbourne to look like on the other side?

Milan in Lombardy, Italy has been hard hit by COVID-19 and is a month ahead of Melbourne in terms of the trajectory of the pandemic. Last week, mayor Giuseppe Sala outlined initiatives to address the social and economic fallout from the pandemic, built around the principles of strengthened community health, social justice and environmental transition. The city is working to mitigate the immediate consequences of the crisis while also thinking in the long term.

This includes an ambitious scheme to transform 35 kilometres of its roads and cut congestion and air pollution with wider footpaths, new cycle lanes and lower speed limits. City leaders describe it as an opportunity to reimagine Milan.

It is a similar story in Dublin, where the city government is

In Auckland, mayor Phil Goff is also expanding footpaths and rolling out temporary cycleways to help people keep two metres apart after New Zealand's severe lockdown measures are lifted.

Auckland has embraced "tactical urbanism", built around low-cost, small-scale interventions often in the form of pilots and pop-ups to improve local neighbourhoods and gathering places. They are making it safer and easier for people walking and cycling in the city.

In all these examples, the expansion of footpaths and bike lines is to provide alternatives to public transport, which city planners are worried people may be less inclined to use in the short term.

These interventions provide perfect short-term stimulus because they generate work quickly since they do not have long lead times for design, planning and approval.

Elsewhere, cities like New Delhi, Seoul, Wuhan and Mumbai suffer

factories and banning cars from roads is not a smart or sustainable solution to tackle climate change, it is pushing city planners towards new ways to preserve healthier air conditions.

These include supporting green deals in government stimulus packages, shifting towards sustainable sources of energy for power generation, rethinking production and consumption patterns for goods and opting for cleaner modes of transportation.

The risk for cities is that the pandemic shifts people away from mass transit and back towards cars. This is not sustainable for a city like Melbourne, given the numbers of people who live and work in the city every day.

Another fascinating challenge for urban planners is whether the pandemic-induced working-from-home revolution will permanently shift large parts of the workforce into telework from home or another location. This could have a profound impact on where people choose to live, what sorts of homes they want to live in and ultimately what shape our cities take. These new public behaviours could challenge decades of urban policy work towards denser living and the take-up of mass transit public transport.

Beyond the immediate crisis the pandemic could provide an opportunity for cities to reset on some important fronts.

That is why the decisions made in the next six months will decide the

Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

James Winstanley

Email address: *

james@fusionpm.com.au

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting.

We act on behalf of Blue Earth Group, the recent purchasers of 102 Jeffcott Street West Melbourne.

Submissions will not be accepted after 10am.

Please see the attached submission by Blue Earth Group in relation to proposed Amendment C309 to the West Melbourne Structure Plan.

Feel free to contact me with any queries in relation to this submission.

James Winstanley

Fusion Project Management

Alternatively you may attach your written submission by uploading your file here:



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155.99 KB · PDF

Please indicate whether you would like to address the Committee live via a virtual link in support of your submission *

No



28.04.20

City of Melbourne
Council House 1, 200 Little Collins Street
Melbourne VIC 3000

Submission on behalf of Blue Earth Group to Amendment C309 West Melbourne Structure Plan Committee- Proposed adoption of Planning Scheme Amendment C309

Blue Earth Group are the new owners of 102 Jeffcott Street, West Melbourne which is located within the Flagstaff Precinct. We recently purchased this site, following the release of the panel report and with a planning permit in place issued by the Minister for Planning (Permit No. PA1800480). We were encouraged by the independent Panel's recommendations regarding the potential for floor area uplifts and purchased the site with the intention of seeking some minor improvements to one of the approved buildings on site. The current planning permit has a Floor Area Ratio (FAR) of just over 6:1 (which is the proposed FAR for the Flagstaff precinct).

We commend the City of Melbourne for their commitment to ensuring that an appropriate balance is struck between the need accommodate our growing population and employment floor space needs, and maintaining strong public amenity through appropriate building siting and massing. Notwithstanding the above, having reviewed the Amendment C309 Panel Report and proposed Amendment C309 as set out in Attachment 4 of the Agenda, we do not believe that the Panel recommendations have been given appropriate and necessary weight or consideration by officers. The dismissal of key recommendations without any further or detailed investigation is entirely inappropriate and shows a disregard for the integrity of the panel process which is essential to ensuring that amendments have been thoroughly and independently scrutinised. Whilst it is open for the Committee to not adopt Panel recommendations, the reasons for this should demonstrate that a rigorous exploration of the recommendation has been undertaken.

In particular, we consider that decision to largely set aside the Panel recommendations to allow floor area uplift for social housing contributions and to allow for floor area uplift in Flagstaff where the minimum employment floor area ratio is exceeded, are particularly remiss.

In these cases, the justification provided amounts to an admission that the officers do not wish to delay the amendment by undertaking further work necessary to explore the recommendation.

Whilst the property at 102 Jeffcott Street may benefit from some limited allowance for Floor Area Uplift, the proposed uplift provisions (available only to sites within the Flagstaff Precinct south of Dudley Street which comprise solely commercial uses) are so limited in their application that they are unlikely to result in the delivery of any meaningful amount of affordable housing provision.

We share the following views of the Panel:

Affordable housing contributions are only sought in three of the five precincts, and only where residential development consists of 10 or more dwellings. The provisions are voluntary, and the Panel is not persuaded that there are likely to be so many applications providing affordable housing that uplift would necessarily result in unacceptable built form and character outcomes.

The dismissal of the Panel recommendation represents a significant missed opportunity to increase the incentive for practical provision of affordable housing within the City of Melbourne and is entirely inconsistent with recent strategic work undertaken by Council including the Draft Affordable Housing Strategy.

Similarly, whilst it is proposed that a portion of the Flagstaff Precinct south of Dudley Street be eligible for floor area uplift where the entire development is commercial, this is a significant diversion from the Panel recommendation which suggested that floor area uplift be provided throughout all of Flagstaff Precinct where the 16.6% employment floor area is exceeded.

Further, we note that whilst the Panel supported the application of mandatory floor area ratios throughout the amendment area, this was in conjunction with (and we would suggest contingent upon) the opportunity for Floor Area Uplift provisions.

In terms of transition provisions, whilst we acknowledge that the Panel commented on this as follows:

"The Panel was not persuaded that transitional provisions should be included for current applications. The development of the Structure Plan has been underway for some years, and was subject to extensive community consultation. The Amendment reflects the Structure Plan, and potentially affected parties have had considerable notice of the likely changes. No examples were brought to the Panel's attention of situations where applicants had spent significant amounts of time or money on live applications that meet the current controls, but that could not proceed when the Amendment comes into force. The Panel

acknowledges that some of the live applications brought to its attention would require minor amendments to comply with the new controls, but this does not justify broadly applicable transitional provisions.”

As with the comments above, this comment needs to be read having regard to the totality of the panel’s recommendations.

That is, the panel made this comment in the context of also making specific recommendations about extensions to the floor area uplift provisions.

The officer recommendation before this committee to not accept key panel recommendations begs the question as to whether the panel would have held the same view on transitional provisions if this were the proposition before them. We would suggest that they would have taken a more liberal view of transitional provisions if all discretion was removed (as the officers are now suggesting).

The mandatory floor area ratios, coupled with the extremely limited (and unsupported by the panel) floor area uplift provisions and the lack of any transitional provisions (noting that the control is drafted in such a way as to prohibit any changes to existing permits that would result in even a miniscule increase in floor area beyond the stated FAR) represent an unreasonable constraint to development, particularly in the current environment where the potential for development is financially constrained and the development industry has been recognised as critical to the economic recovery of the State.

Whilst we appreciate that there is a desire to ‘push forward’ with this amendment, we consider that the officers in this case have not appropriately responded to the Panel recommendations.

The justification provided for this is wholly inadequate and we urge the Committee to defer this item and direct that further investigation be undertaken to understand whether there is further capacity for a floor area uplift provision within the amendment area or at the very least to defer this item until further consideration has been given to specific transitional provisions for existing planning permits and pre-existing planning applications.

Finally, there is another substantive matter that the Committee must have regard to. This State (and indeed this Country), faces an unprecedented health and economic challenge as a result of COVID-19. This State in particular will need to substantially rely upon the development industry to generate the revenue that it will require to meet the COVID-19 legacy of Government debt.

These unprecedented challenges require a pause and potential reset. There is no doubt that this amendment, whether it is approved in accordance with the Panel's recommendations or in accordance with Officer recommendations, will add significant financial impost on development. It will apply new mandatory controls and introduce policies which will significantly constrain development to an extent which will not be in the net community interest. For this additional reason, the Committee should defer a decision on the amendment and direct Officers to undertake a review not only having regard to the Panel recommendations but also to the broader considerations that arise in light of the health and economic challenges that this State faces.

Yours Sincerely

Michael Dib | Managing Director

Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

Eliza Minney

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Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting.

See attached correspondence

Submissions will not be accepted after 10am.

Alternatively you may attach your written submission by uploading your file here:



[mcpe0001_200144_029.pdf](#) 109.14 KB · PDF

Please indicate whether you would like to address the Committee live via a virtual link in support of your submission *

No

Contact: Eliza Minney
Direct line: 03 9691 0205
Email: eminney@besthooper.com.au
Principal: John Cicero
Our Ref: JDC:EZM:200144



28 April 2020

Attention: Deborah Payne
Strategic Planner
Melbourne City Council

Via online portal

Proposed Amendment C309 to the Melbourne Planning Scheme Council meeting scheduled for 28 April 2020

We act on behalf of McPeake Development Pty Ltd, the owner of 505 – 509 Victoria Street, West Melbourne (**Subject Site**) which is to be included in the "Station Precinct" proposed by Amendment C309 to the Melbourne Planning Scheme (**Amendment**).

Our client has owned the site for some time and is currently seeking approval to develop it for the purpose of a multi-storey apartment building with ground floor commercial/retail uses (**Planning Application**). That Planning Application is currently on appeal before the Victorian Civil and Administrative Tribunal (**VCAT**) and listed for hearing commencing 21 May 2020 however due to the COVID-19 closures at VCAT, we are unsure whether the hearing will proceed as scheduled and if not, there is no indication as to when hearings will be relisted.

The development proposed as part of the Planning Application has a Floor Area Ratio (**FAR**) of just over 7:1 (which whilst in exceedance of the proposed FAR for this precinct, is commensurate with existing approvals in the area and has been supported by independent expert witnesses engaged on our client's behalf in the Tribunal proceeding). The proposal otherwise generally accords with the discretionary built form requirements set out in proposed Design and Development Overlay, Schedule 28.

Whilst we understand the overarching intention of the Amendment is to ensure that an appropriate balance is struck between the need accommodate our growing population and employment floor space needs (whilst maintaining strong public amenity through appropriate building siting and massing) having reviewed the Panel Report associated with the Amendment we do not believe that the Panel recommendations have been given appropriate and necessary weight or consideration by officers.

Specifically, the dismissal of key recommendations without any further or detailed investigation is entirely inappropriate and shows a disregard for the integrity of the Panel process which is essential to ensuring that amendments have been thoroughly and independently scrutinised.

In our respectful submission, the mandatory floor area ratios, coupled with the extremely limited (and unsupported by the Panel) floor area uplift provisions and the lack of any transitional provisions (noting that the control is drafted in such a way as to prohibit any changes to existing permits that would result in even a miniscule increase in floor area beyond the stated FAR) represent an unreasonable constraint to development, particularly in the current environment where the potential for development is financially constrained and the development industry has been recognised as critical to the economic recovery of the State.

Whilst we appreciate that there is a desire to 'push forward' with the Amendment, we consider that the officers in this case have not appropriately responded to the Panel recommendations, considered

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the impacts of same nor investigated how those recommendations could be incorporated/supplemented into the Amendment.

The justification provided for disregard of the Panel recommendations is wholly inadequate and we urge the Committee to defer this item and direct that further investigation be undertaken to understand whether there is further capacity for a floor area uplift provision within the Amendment area or at the very least to defer this item until further consideration has been given to specific transitional provisions for existing planning permits and pre-existing planning applications.

Finally, there is another substantive matter that the Committee must have regard to. This State (and indeed this Country), faces an unprecedented health and economic challenge as a result of COVID-19. This State in particular will need to substantially rely upon the development industry to generate the revenue that it will require to meet the COVID-19 legacy of Government debt.

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For this additional reason, the Committee should defer a decision on the amendment and direct Officers to undertake a review not only having regard to the Panel recommendations but also to the broader considerations that arise in light of the health and economic challenges that this State faces.

Yours faithfully

John Cicero
Principal

Eliza Minney
Senior Associate

Enc.

Privacy acknowledgement: I have read and acknowledge how Council will use and disclose my personal information.

*

Name: * Stephen Farrell

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Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am.

I fully support the proposed new planning scheme for West Melbourne that will provide greater clarity and certainty than the current situation that appears to be exploited at present by developers at a cost to the community, and to the frustration I'm sure of council.

I think the C309 planning amendment will achieve the right balance for the community, particularly existing residents to continue to live in the area they like, and for reasonable development opportunities to be pursued in a balanced manner and at a respectful scale.

I note and support the much needed increase in population density in the inner Melbourne area, but in a sensibly planned and non-chaotic 'jungle' based approach. I believe this planning amendment achieves this outcome.

Please indicate whether you would like to address the Committee live via a virtual link in support of your submission * No

Subject:

FW: West Melbourne Amendment C309

From: Karl Hessian [<mailto:karl.hessian@keikosolutions.com.au>]

Sent: Tuesday, 28 April 2020 11:56 AM

To: Sally Capp - Lord Mayor of Melbourne; Arron Wood; Nicolas Frances Gilley; Philip Liu; Rohan Leppert; Kevin Louey; Cathy Oke; Beverley Pinder

Cc: marshall@rewine.com.au

Subject: West Melbourne Amendment C309

My Lord Mayor, Deputy Lord Mayor, and Councillors,

I write in full support of the recommendations proposed by Management with respect to Planning Scheme Amendment C309. I respectfully request the City adopt them as put.

Mr Marshall Waters has written to you most eloquently on why the amendment should be implemented. He is a considered and thoughtful community leader in West Melbourne and I encourage you to put weight on his views. I support everything that he has said about the amendment in his submission to you.

Finally, I should specifically like to acknowledge and thank Emma Appleton, Director City Strategy, and her team in bringing this important work to such an excellent conclusion.

Kind regards,
Karl

Karl Hessian
West Melbourne VIC 3003