



Urban Design Expert Evidence

Planning Scheme Amendment c433
Pakington Street Urban Design Frameworks

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Amendment No.	C433ggee
Prepared for	City of Greater Geelong
Instructed by	Harwood Andrews
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1.0 Introduction

1.1 Background and Involvement

1. This statement of urban design expert evidence has been prepared by Amanda Roberts, Director of LatStudios. LatStudios is an independent urban design practice based at Level 2, 358 Lonsdale Street, Melbourne.
 2. I hold qualifications in Architectural Studies, Landscape Architecture and Urban Planning.
 3. In December 2025, I was instructed by Harwood Andrews to undertake an urban design review of Planning Scheme Amendment C433ggee - Pakington Street Urban Design Framework (the Amendment). The Amendment seeks to implement the Pakington Street and Gordon Avenue Urban Design Framework and the Pakington North Urban Design Framework (City of Greater Geelong, 2024) (together, the Urban Design Frameworks or UDFs). It does so through changes to local planning policy, rezoning land for commercial and residential purposes, and the application of the Design and Development Overlay (DDO) and Environmental Audit Overlay (EAO) to specific properties.
 4. The purpose of the urban design review was to inform consideration of the Amendment by an independent Planning Panel. The Urban Design Frameworks establish an overarching vision and guiding principles for growth and development along and adjacent to Pakington Street and Gordon Avenue, Geelong West. The study area comprises three precincts: Gordon Avenue, Heritage Core, and Pakington North. The frameworks set out built form objectives, guidelines and actions for each precinct, facilitating increased residential density and commercial opportunities within the Gordon Avenue and Pakington North precincts, while ensuring appropriate transitions to the Heritage Core precinct and surrounding residential areas. The Amendment applies to all land within these three precincts, which collectively form the Urban Design Framework study area.
 5. On 20 June 2025, a delegate of the Minister for Planning authorised the preparation of the Amendment, subject to conditions. The Amendment was publicly exhibited between 31 July 2025 and 1 September 2025, in accordance with section 19 of the Planning and Environment Act 1987.
 6. Council received a total of 51 submissions in response to the exhibition of the Amendment. Of these, 13 submissions supported the Amendment, 34 opposed it, and four provided comments without expressing support or opposition. The key urban design-related issues raised in submissions include:
 - Objections to the proposed scale of development and maximum building heights, particularly within the Pakington North Precinct
 - Requests to increase maximum building heights, particularly within the Gordon Avenue Precinct
 - Concerns regarding a lack of green space
 - Objections to proposed rezonings to the RGZ and C1Z
 - Requests for changes to the Urban Design Frameworks, including matters relating to wayfinding and connectivity to Central Geelong and the waterfront
 7. The Amendment proposes to:
 - Introduce Clause 11.03-6L-06 Pakington Street Geelong West, applying to land within the Pakington Street Urban Design Framework Plan. The plan identifies the Pakington North, Heritage Core, Gordon Avenue, and Pakington Strand precincts. The clause seeks to enable a vibrant, compact and thriving urban village; support housing diversity while respecting surrounding residential amenity and heritage values; facilitate sustainable development outcomes, including urban greening, increased canopy cover, and water-sensitive urban design; create safe and accessible pedestrian and cyclist environments; enhance identity and sense of place; and strengthen connections between precincts and to key destinations such as Central Geelong.
 - Remove Clause 15.01-1L-02 Pakington Street North Urban Design.
 - Amend Clause 16.01-1L-01 Integrated Housing and Housing Diversity to introduce the Pakington North and Gordon Avenue Key Development Area Maps, supporting medium- and higher-density housing within identified areas.
 - Amend Clause 16.01-1L-02 Increased Housing Diversity Areas by adjusting the Geelong West, Manifold Heights and Newton map to remove the Pakington North and Pakington Street and Gordon Avenue precincts.
 - Introduce Clause 16.01-2L Social and Affordable Housing, applying to land within the Pakington North and Gordon Avenue precincts, to encourage social and affordable housing contributions through section 173 agreements for mixed-use and residential development.
- Amend DDO17 Latrobe Terrace and Western Beach Areas by removing references to the Latrobe Terrace Area, including associated design objectives, preferred building heights and setbacks.
 - Introduce DDO56 Gordon Avenue Precinct to implement the Pakington Street and Gordon Avenue Urban Design Framework. DDO56 seeks to establish a vibrant, sustainable mid-rise precinct with diverse building typologies; ensure high-quality architectural design with integrated landscaping, appropriate solar access and wind conditions; support activated street frontages and landscaped residential interfaces; and ensure appropriate transitions to heritage areas, open space, and established low-scale residential development.
 - Introduce DDO57 Pakington North Precinct to implement the Pakington North Urban Design Framework. DDO57 seeks to support urban renewal, commercial development and increased housing density; deliver a vibrant mixed-use precinct; promote high-quality medium- and higher-density built form with appropriate transitions to sensitive interfaces; establish a high-quality public realm supporting multi-modal movement; and protect the amenity of key public spaces from adverse impacts such as overshadowing.

1.2 Structure

8. My assessment has been undertaken with reference to the following documents and supporting material:

- Planning Scheme Amendment C433ggee, including:
 - Clause 11.03 Planning for Places
 - Clause 15.01 Built Environment
 - Clause 16.01 Residential Development
 - Schedule 17 to Clause 43.02 (DDO17 Western Beach Area)
 - Schedule 56 to Clause 43.02 (DDO56 Gordon Avenue Precinct)
 - Schedule 57 to Clause 43.02 (DDO57 Pakington North Precinct)
- Pakington St & Gordon Ave Urban Design Framework (City of Greater Geelong, 2024)
- Pakington North Urban Design Framework (City of Greater Geelong, 2024)
- Comprehensive Built Form Testing Pakington North Precinct February 2025

9. My discussion is structured as follows:

- An initial assessment of Clause 11.03-6L-06 Pakington Street Geelong West, Clause 16.01-1L-01 Integrated Housing and Housing Diversity, Clause 16.01-1L-02 Increased Housing Diversity Areas, and Clause 16.01-2L Social and Affordable Housing
- An assessment of Design and Development Overlay Schedule 17 (DDO17 - Western Beach Area)
- An assessment of Design and Development Overlay Schedule 56 (DDO56 - Gordon Avenue Precinct)
- An assessment of Design and Development Overlay Schedule 57 (DDO57 - Pakington North Precinct)

10. The assessment of DDO56 (Gordon Avenue Precinct) and DDO57 (Pakington North Precinct) follows the structure of the clauses and is organised under the following headings:

- Design objectives
- Buildings and works
 - Building and floor heights
 - Floor area ratios
 - Interfaces
 - Building separation
 - Building design
 - Active frontages
 - Solar access, wind and weather
 - Access, parking and services
 - Site coverage

- Decision guidelines
- Conclusion including a summary of recommendations.

11. In my opinion, the key urban design issues raised by the Amendment include, but are not limited to, building height, building mass, overshadowing, provision of green space, and setbacks, particularly in the context of the emerging character of the Pakington North and Gordon Avenue precincts and their interfaces with sensitive areas.

12. Further details of my qualifications and experience are provided in Appendix A. A summary of the relevant policy context and physical characteristics of the site, from an urban design perspective, is provided in Appendix B.

2.0 The Proposal

13. My understanding of the key physical parameters of the proposal, as relevant from an urban design perspective, is as follows:

- The City of Greater Geelong seeks to implement the Pakington Street and Gordon Avenue Urban Design Framework (2024) and the Pakington North Urban Design Framework (2024) through amendments to the Greater Geelong Planning Scheme. This includes updating and introducing several policies and clauses to ensure consistency with the Urban Design Frameworks, including:
 - Clause 11.03-6L-06 Pakington Street Geelong West
 - Clause 15.01-1L-02 Pakington Street North Urban Design
 - Clause 16.01-1L-01 Integrated Housing and Housing Diversity
 - Clause 16.01-1L-02 Increased Housing Diversity Areas
 - Clause 16.01-2L Social and Affordable Housing
 - Clause 43.02 Design and Development Overlay - Schedule 17 Western Beach Area (DDO17)
 - Clause 43.02 Design and Development Overlay - Schedule 56 Gordon Avenue Precinct (DDO56)
 - Clause 43.02 Design and Development Overlay - Schedule 57 Pakington North Precinct (DDO57)

- The Amendment introduces preferred and mandatory built form controls, through DDO56 and DDO57, that regulate development outcomes across the precincts, including controls relating to:
 - Building and floor heights
 - Floor area ratios
 - Interfaces
 - Building separation
 - Building design
 - Active frontages
 - Solar access, wind and weather
 - Access, parking and services
 - Site coverage

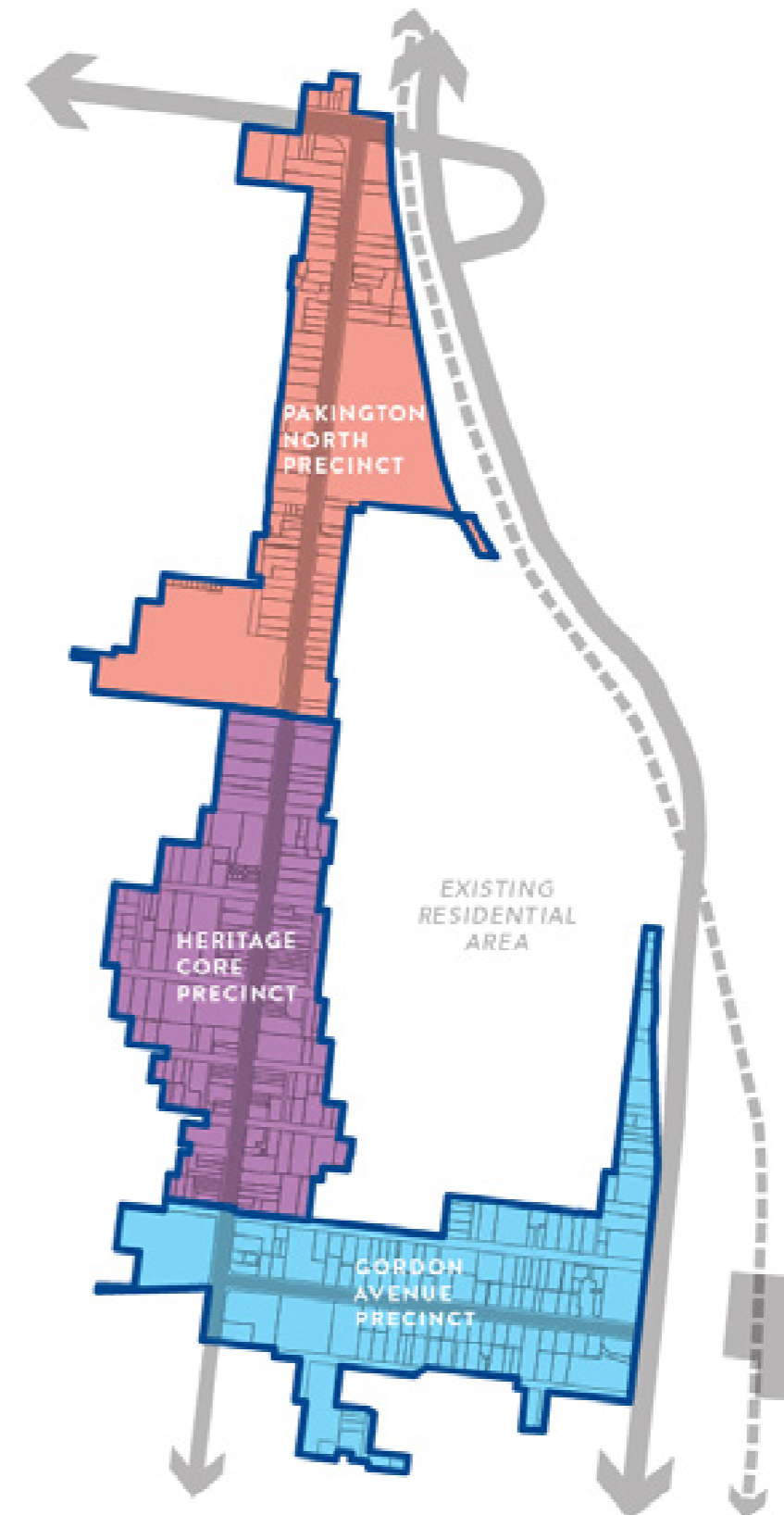


Figure 01: UDF Precincts - Three Precincts as identified in the Final Pakington Street (Geelong West) & Gordon Avenue Urban Design Framework (Pakington North Urban Design Framework p. 10)

3.0 Context

14. The Pakington North and Gordon Avenue precincts (the Study Area) are located within Geelong West, an established inner-urban suburb immediately west of Central Geelong. Geelong West benefits from strong road and rail connections, including Princes Highway and Geelong Railway Station, and is in close proximity to employment and services. Pakington Street functions as the primary commercial spine of the suburb, extending from Rutland Street to Church Street. The area's established commercial vitality, access to movement networks and proximity to Central Geelong make it highly suitable for urban renewal and infill development.
15. The strategic role of Geelong West as a location for infill development has been long recognised. The G21 Regional Growth Plan (Geelong Region Alliance, 2013) identified the need to accommodate population growth through infill development within established urban areas, in order to meet housing demand while protecting the rural character of surrounding areas.
16. Geelong is forecast to accommodate an additional 152,000 people by 2036, based on an average annual growth rate of approximately 2.5 per cent. This growth is expected to generate demand for more than 73,400 additional dwellings. While greenfield development will continue to contribute to housing supply, the proportion of new housing delivered through infill development is expected to increase over time. Targeted infill development is particularly supported in locations with good access to infrastructure, services, employment and public transport, such as Geelong West. For medium- and higher-density housing to be acceptable within established communities, it must deliver high-quality design outcomes and provide a high level of residential and public realm amenity appropriate to the site and surrounding neighbourhood.
17. A portion of the Study Area is identified as an Increased Housing Diversity Area (IHDA) under the Housing Diversity Strategy (City of Greater Geelong, 2007). This designation encourages a mix of high-, medium- and conventional-density housing and reflects the area's capacity to accommodate growth due to its proximity to activity centres and transport infrastructure.
18. The Urban Design Frameworks also align with and support a range of broader Council strategies and policy documents, including Clever and Creative Future (City of Greater Geelong, 2017), the Council Plan 2018-2022, the City of Greater Geelong Retail Strategy 2020-2036 (City of Greater Geelong & SGS Economics and Planning, 2020), and the Settlement Strategy (City of Greater Geelong, 2020). In response to these strategic directions, the Pakington Street and Gordon Avenue Urban Design Framework and Pakington North Urban Design Framework (City of Greater Geelong, 2024) were prepared to guide continued renewal and development in Geelong West.
19. To accommodate a growing population, it is important to reinforce the role of existing inner-urban areas. The Urban Design Frameworks facilitate increased residential density and commercial opportunity within the Gordon Avenue and Pakington North precincts, while ensuring appropriate transitions to the Heritage Core Precinct and surrounding residential areas. The Amendment supports the delivery of more compact and liveable neighbourhoods that are well connected to Central Geelong and capable of providing new housing, employment and lifestyle opportunities.
20. The adoption of the Urban Design Frameworks, together with the introduction of Design and Development Overlay Schedules 56 and 57, will implement clear land use and built form directions for the Pakington North and Gordon Avenue precincts. These controls are intended to facilitate development outcomes while appropriately responding to sensitive residential and heritage interfaces.
21. Within the Planning Policy Framework, Clause 02.03-1 Settlement supports targeted infill development in locations with access to infrastructure, services and public transport. It recognises that medium- and higher-density development must achieve high-quality design and amenity outcomes to be appropriate within established neighbourhoods. The relevant strategic direction includes:
 - Direct and contain growth within identified locations across the municipality.
22. Clause 02.03-6 Housing identifies Increased Housing Diversity Areas as key locations for accommodating residential growth and increasing housing diversity. IHDA's are typically located around activity centres and transport hubs and are well placed to support walking and reduced car reliance. Redevelopment intensity is intended to be highest near activity centre cores and to reduce toward the edges of the IHDA. The clause also recognises the need to diversify housing stock to respond to smaller household sizes, ageing in place, affordability pressures and demand for low-maintenance housing in high-amenity locations. Relevant strategies include:
 - Facilitate infill development to increase its contribution to housing supply
 - Support residential development where density, mass and scale are complementary to the location, role and character of the IHDA
 - Ensure housing diversity in both established and growth area communities
 - Increase the supply of affordable and social housing in Greater Geelong
23. Clause 02.04-3 Housing and Settlement Framework Plan identifies both the Pakington North Urban Design Framework area and the Pakington Street and Gordon Avenue Urban Design Framework area as locations suitable for increased housing diversity, including medium- and higher-density housing.
24. Clause 11.01-1L-01 Settlement - Greater Geelong provides further strategic support by directing the majority of future housing growth to urban Geelong, including established urban areas, and by ensuring development occurs within designated settlement boundaries.
25. Clause 16.01-1L-01 Integrated Housing and Housing Diversity seeks to accommodate medium- and higher-density housing in Key Development Areas and to increase housing diversity through a range of housing types, including mixed-use development, in strategically identified locations.



Figure 03: Pakington Street looking south (Google maps, 2025)



Figure 04: Gordon Ave, looking east towards Geelong CBD (Google maps, 2025)



Figure 05: Pakington Street, looking southeast (Google maps, 2025)



Figure 06: Autumn Street carpark which is proposed to be converted into open space via Amendment C433ggee (Google maps, 2025).

4.0 Discussion

4.1 Clause 11.03-6L-06 Pakington Street Geelong West

29. All precincts

30. Objectives

- To enable the development of a vibrant, compact and thriving urban village.
- To provide greater housing diversity and a range of housing typologies while respecting the amenity and heritage values of surrounding residential areas.
- To facilitate sustainable development outcomes, including urban greening, green street corridors, increased canopy cover, and water sensitive urban design.
- To facilitate a network of streets and public spaces which offer safe and accessible environments for pedestrians and cyclists.
- To enhance the sense of identity and place throughout the three precincts and improve their connections to each other and key attractors such as Central Geelong.
- Encourage precincts and sub-precincts with distinct identities that contribute to the whole.

Discussion

31. The objectives for all precincts establish a clear and coherent framework to guide growth and change across the area, being Pakington North Precinct, Heritage Core Precinct and Gordon Avenue Precinct. They appropriately balance increased housing diversity and urban intensity with the protection of surrounding residential amenity and heritage values. The emphasis on sustainability, walkability, landscape integration and identity supports the delivery of a compact urban

form that is well-connected, resilient and distinctive, while reinforcing links between the precincts and Central Geelong.

32. Strategies

- Encourage a diversity of housing types, including the provision of social and affordable housing.
- Facilitate active and public transport links to Central Geelong.
- Design buildings that are sensitive to the surrounding context.
- Create engaging streets and laneways that improve pedestrian permeability and encourage opportunities for active and public transport.
- Integrate landscape as a key driver of building design through the provision of functional open spaces (e.g. central courtyards) and landscaped setbacks to the front and rear of buildings.
- Encourage the installation of public art, including event and breakout spaces and on blank facades, to contribute to the identity, activation and interest of streets and open spaces.
- Provide wayfinding and signage to connect pedestrians and cyclists to key destinations including Central Geelong, railway station and the waterfront.

Discussion

33. The strategies provide practical direction for achieving the stated objectives and support coordinated outcomes across housing, movement, public realm and built form. Collectively, they promote a diverse and inclusive housing mix, improved pedestrian and cycling connections, and

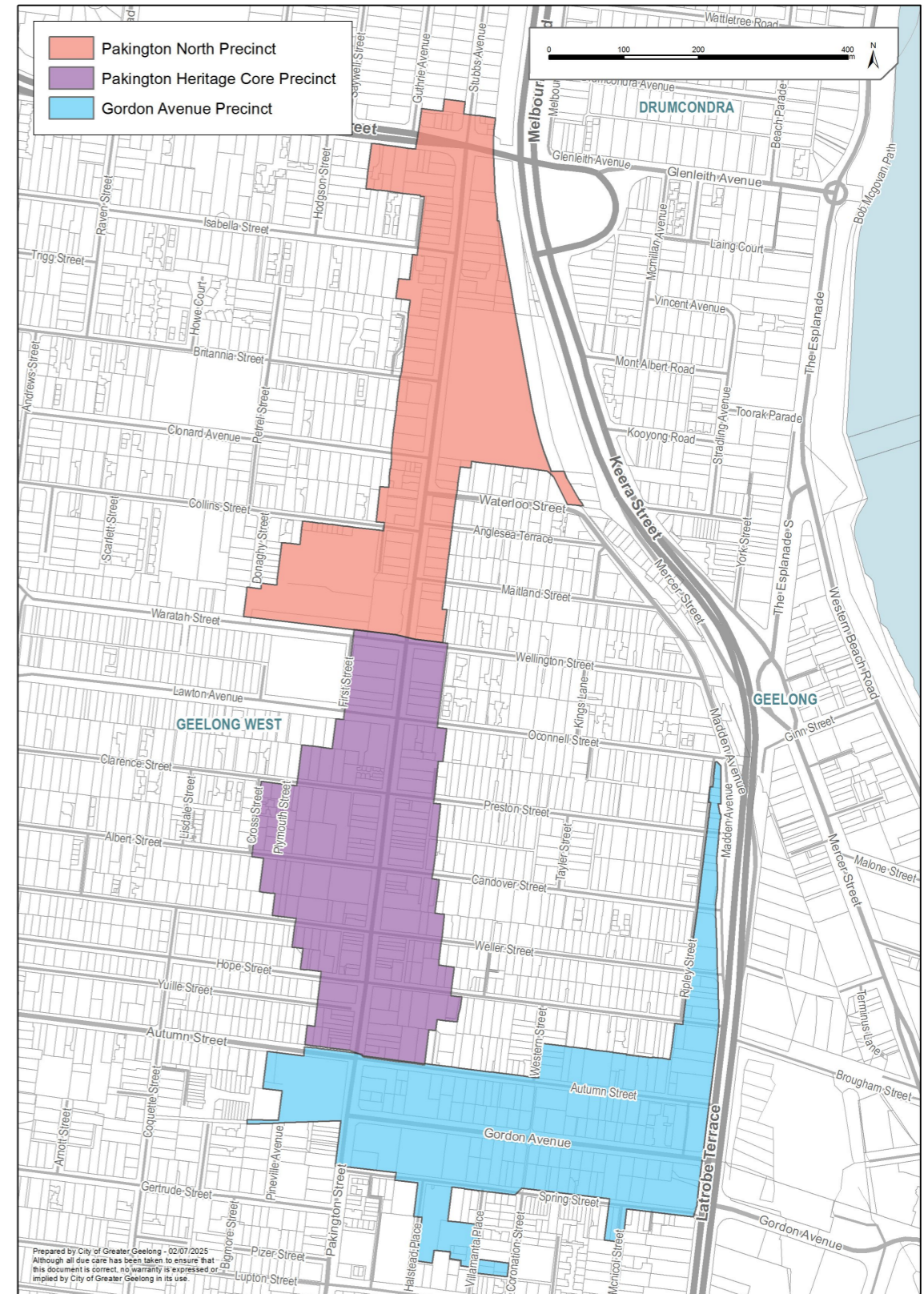
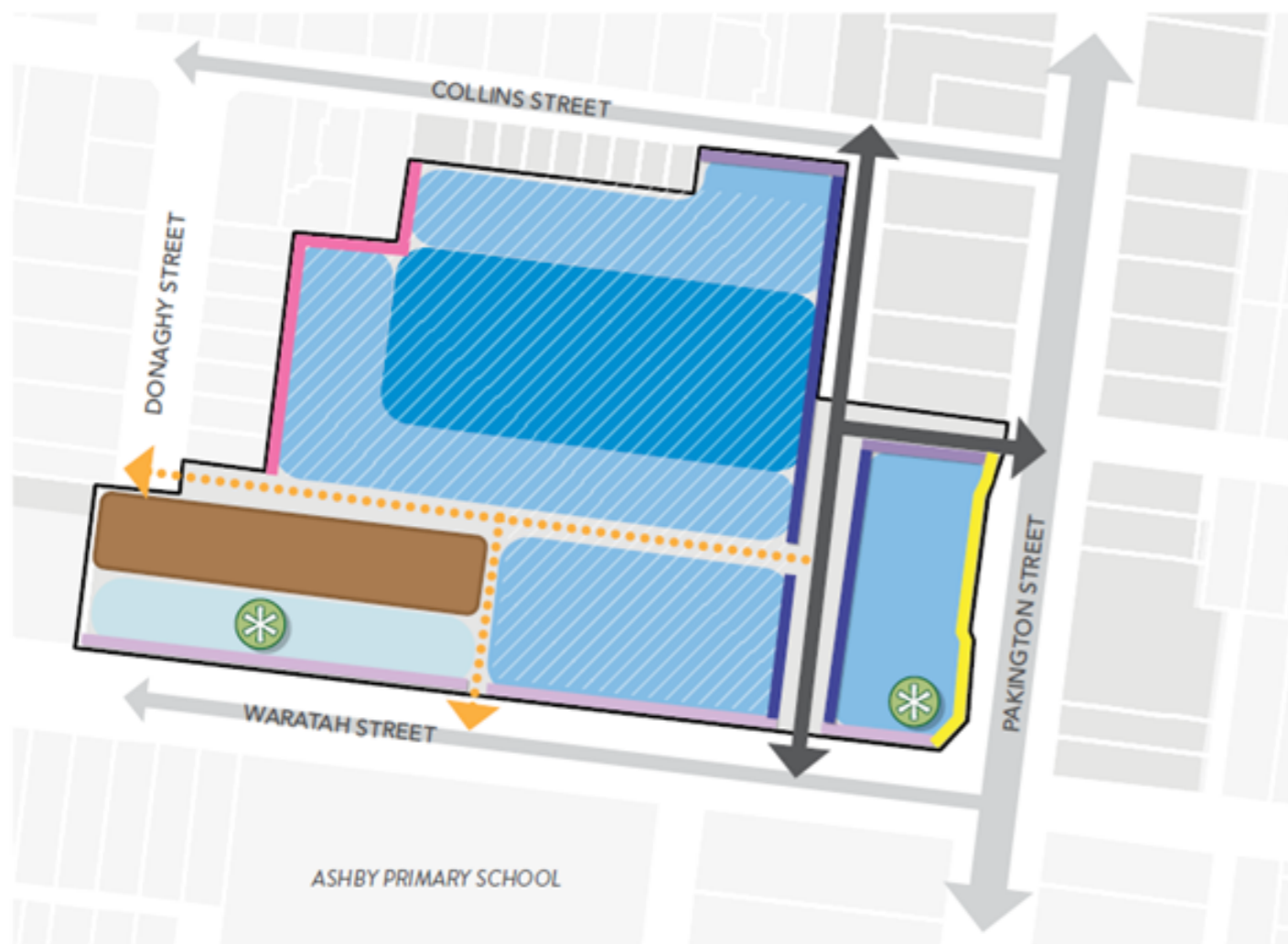


Figure 07: Pakington Street Urban Design Framework Plan Map (Clause 11.03-6L-06 Pakington Street Geelong West)



Map 12. Indicative concept plan for Pakington Strand



Figure 08: Map 12: Indicative Concept Plan for Pakington Strand (Clause 11.03-6L-06 Pakington Street Geelong West)

high-quality design responses that are sensitive to context. The integration of landscape, public art and wayfinding strengthens legibility, activation and sense of place across the precincts, while supporting sustainable transport and urban design outcomes.

34. Pakington North Precinct

35. Objectives

- To support a vibrant mix of retail, entertainment, services, and residential functions which establishes the Pakington North Precinct as a destination and strengthens its connection to the remainder of Pakington Street, Geelong West.
- To provide a transition to the low scale character of the surrounding residential area and to the Heritage Core Precinct.
- To facilitate new public open spaces and pedestrian connections.
- To protect the rail sidings yard at 28-64 Pakington Street as an essential site for the operation of rail services in Geelong.

Discussion

36. The objectives for the Pakington North Precinct appropriately recognise its role as a mixed-use destination while managing its interface with surrounding residential areas and the Heritage Core Precinct. The emphasis on transition, public open space and pedestrian connectivity supports a balanced approach to intensification that reinforces local character, improves accessibility, and strengthens the relationship between Pakington North and the broader Pakington Street corridor.

37. Strategies

- Facilitate opportunities for new open spaces within large sites such as Pakington Strand and Rail Sidings Yard.
- Encourage retention of existing heritage design elements in buildings and street infrastructure, whilst encouraging sympathetic feel in creating Pakington North's own distinct character.

Discussion

38. The strategies for the Pakington North Precinct provide high level guidance to support the delivery of new open space and a distinct character through the retention of existing heritage elements. The provision of new open space should be delivered in collaboration with Council to meet the communities current and future needs. These open space investigation areas have been identified in the UDF maps and the indicative concept plan for Pakington Strand included in the Clause. I recommend that the wording of the strategies could be further refined to clarify the intent. This could be as follows:

- Facilitate new open spaces within large sites including Pakington Strand and the Rail Sidings Yard.
- New development should strengthen Pakington North's distinct character through the retention of existing heritage elements and design responses that positively contribute to the precinct.

39. Heritage Core Precinct

40. Objective

- *To provide attractive and comfortable urban public spaces and support the precincts function as a community hub and meeting place.*

Discussion

41. The objective for the Heritage Core Precinct appropriately prioritises the quality of public spaces and reinforces the precinct's role as a civic and community focus. By emphasising comfort, attractiveness and functionality, the objective supports the ongoing role of the area as a meeting place and strengthens its contribution to the social and cultural life of Geelong West.

42. Strategies

- *Retain and enhance the built form elements that contribute to the recognised urban design character of the Heritage Core Precinct.*
- *Encourage high-quality public realm outcomes through upgraded kerb and channel, footpath paving, landscaping, bicycle parking and street furniture that do not negatively impact existing on-street parking supply.*
- *Provide a pocket park in the area between the Town Hall and Library and upgrade the existing pocket park on Yuille Street.*

Discussion

43. The strategies provide direction to protect and enhance the valued built form and streetscape characteristics of the Heritage Core Precinct. Public realm upgrades, when sensitively designed, will improve amenity and accessibility without undermining existing character

or parking supply. The provision and enhancement of pocket parks further support community use, greening and activation of the precinct. I note that these strategies are particularly focused on public realm improvements which are primarily Council-led. I support the inclusion of these in the scheme as a commitment by Council to work with developers, development contributions and ongoing design work to deliver a high quality public outcome.

44. Gordon Avenue Precinct

45. Objectives

- *To create a vibrant, mid-rise precinct which transitions from the low scale character of the surrounding residential area to the future high-density scale of Central Geelong.*
- *To develop a safe and attractive connecting corridor between Central Geelong and Geelong's established western suburbs.*

Discussion

46. The objectives for the Gordon Avenue Precinct establish its role as a transitional corridor between Central Geelong and the western suburbs. The focus on mid-rise development, safety and amenity supports increased residential density while responding to surrounding lower-scale areas.

47. Strategies

- *Encourage fine-grain retail frontages in the west end of the precinct.*
- *Facilitate the transition of the central area into a diverse residential precinct with complementary retail*

and commercial uses to increase the resident population and activity.

- *Provide landscaped setbacks to Gordon Avenue which can support a canopy tree in the residential centre of the precinct.*
- *Encourage landscaped setbacks along Latrobe Terrace to protect internal amenity at the ground floor and contribute to the improvement of the public realm along major traffic routes.*
- *Encourage opportunities for pedestrian permeability and public open space.*

Discussion

48. The strategies for the Gordon Avenue Precinct support a gradual and sensitive transition in scale, use and character. Encouraging fine-grain retail, residential intensification and landscaped setbacks contributes to improved street amenity, internal building amenity and increased canopy cover. Enhanced pedestrian permeability and opportunities for public open space strengthen walkability and improve connections between Central Geelong and surrounding neighbourhoods.

49. DDO56 (Gordon Avenue Precinct) includes objectives to "provide landscaped setbacks to Gordon Avenue which can support a canopy tree in the residential centre of the precinct" and to "encourage landscaped setbacks along Latrobe Terrace to protect internal ground-floor amenity and contribute to the improvement of the public realm along major traffic routes." However, where minimum or preferred setbacks are not specified for these locations and where guidance is not provided on

the meaning of 'landscape', the ability to deliver meaningful, green, biodiverse landscaped setbacks is limited. Without clear parameters, these objectives risk remaining aspirational rather than being translated into built form outcomes, or the setbacks may be provided but used for off-street car parking and minimal 'soft' landscaping or canopy trees. Greater alignment between the DDO, the Urban Design Framework and the relevant planning scheme clauses would strengthen these provisions and provide clearer, more effective direction for implementation.

50. Pakington Strand

51. Objective

- *To encourage a coordinated, master planned approach to the redevelopment of Pakington Strand as a Strategic Site informed by the Indicative Concept Plan.*

Discussion

52. The objective for Pakington Strand appropriately recognises the site's strategic importance and supports a coordinated, master planned approach to redevelopment. Requiring development to be informed by the Indicative Concept Plan provides a level of certainty and helps ensure that future development delivers integrated built form, public realm and access outcomes.

53. Strategies

- *Deliver landscaped areas surrounding the Ropeworks Shed ensuring activation and responding to the heritage context.*

4.2 Clause 16.01-1L-01 Integrated Housing and Housing Diversity

- Ensure opportunities to deliver car parking for public use within the basement, rear or podium of new developments.

Discussion

54. The strategies for Pakington Strand provide guidance to balance activation, heritage response and functional requirements. The emphasis on landscaped areas and activation around the Ropeworks Shed supports high-quality public realm outcomes, while the integration of car parking within basement, rear or podium levels minimises visual impacts and supports efficient use of the site. I recommend that podium level car parking is coupled with the requirement for any podium car parking to be wrapped with active uses on its primary interface with the public realm/street and for other visible podium car parking to be designed to positively contribute to the quality and character of the building.

55. Strategies

- Accommodate medium and high-density housing in Key Development Areas as identified by the Key Development Area maps in this clause.
- Locate retirement accommodation in urban areas, preferably close to existing or proposed activity centres and public transport facilities.
- Support social housing in areas with good access to services and facilities.

Discussion

56. The Amendment introduces the Pakington North and Gordon Avenue Key Development Area Maps to identify Key Development Areas for medium and higher-density housing, consistent with the strategies to

accommodate increased housing diversity in strategically identified locations. I support this amendment.



Figure 09: Gordon Avenue Key Development Area Map (Clause 16.01-1L-01 Integrated Housing and Housing Diversity)

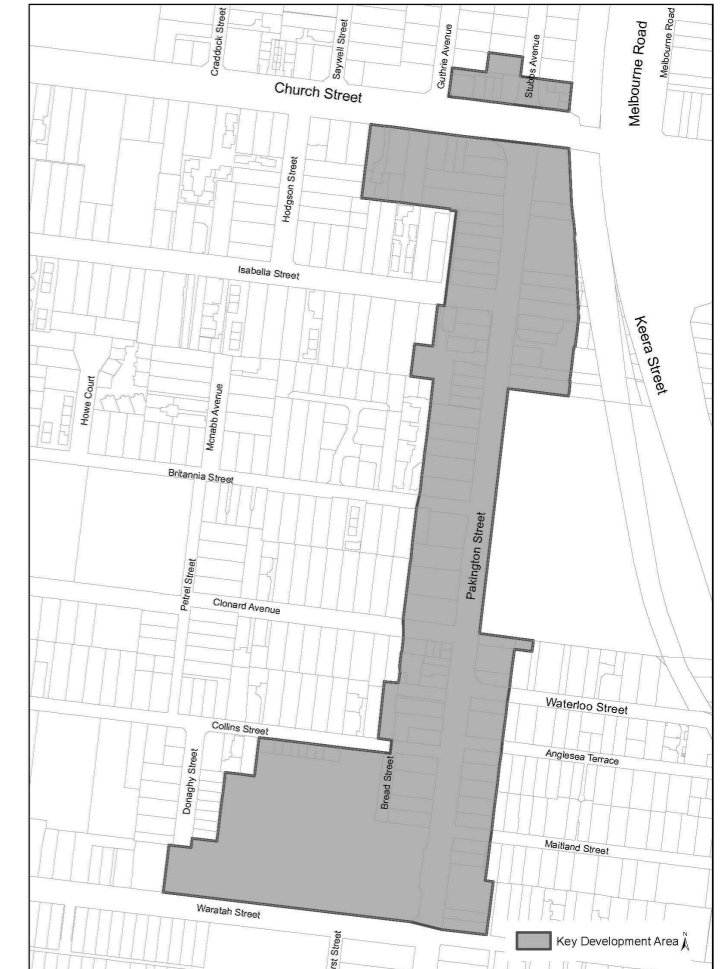


Figure 10: Pakington North Key Development Area Map (Clause 16.01-1L-01 Integrated Housing and Housing Diversity)

4.3 Clause 16.01-1L-02 Increased Housing Diversity Areas

57. Objectives

- To evolve the character of Increased Housing Diversity Areas (IHDA) through more intensive development.
- To support development that makes a positive architectural and urban design contribution to the IHDA.
- To maintain streetscape character in heritage areas.
- To promote pedestrian safety within the IHDA.

58. General strategies

- Maximise opportunities for housing in IHDA by accommodating:
- High density housing in the activity centres consistent with their primary commercial and retail role.
- Medium density housing in residential areas with more intensive development being located closest to the core of activity centres.
- Encourage a diversity of housing types to cater to a variety of lifestyle needs.
- Encourage development to provide a high level of on-site amenity for future residents.

59. Built form strategies

- Encourage development that incorporates a combination of horizontal and vertical articulation, materials, textures and colours to create visual interest.
- Encourage a sympathetic design response when addressing any unique characteristics such as heritage places, significant vegetation, topography and

public spaces.

- Discourage storage areas located within the minimum area of secluded open space.
- Support development that does not reduce opportunities for neighbouring sites to reasonably develop.

60. Built height strategies

- Design development to recess upper levels to reduce dominance of the building from adjoining properties and the streetscape.
- Design development on interface properties, between an IHDA and other residential areas, so that the height and bulk is responsive to the adjoining character and provides a transition in the built form between areas.

61. Building height policy guidelines

- Consider as relevant:
 - Encouraging development of up to three stories. Three storey development should be located on larger sites abutting the activity centre or where the amenity of adjoining properties will not be unreasonably impacted.
 - Encouraging the recessing of third storeys to reduce dominance of the building from adjoining properties and the streetscape.

62. Subdivision and consolidation strategies

- Encourage the consolidation of lots to increase development potential.
- Discourage the fragmentation of sites and underdevelopment of sites.

63. Car parking strategies

- Locate car parking structures behind the line of the front façade and design them to form a visually unobtrusive part of the building to minimise their visual prominence.
- Minimise the number of vehicle crossings and where possible, provide access from lower order roads and rear laneways.

64. Car parking policy guideline

- Consider as relevant:
 - Where more than one car space is provided, encouraging the use of a single-width garage or carport and a tandem parking space on existing or proposed lots with a frontage of less than 10.5 metres.

65. Heritage strategies

- Design development adjacent to heritage places to respect and be sympathetic to the significance of the place.
- On sites adjacent to a heritage place, set back building elements above one storey in height behind the roof ridge-line of the heritage buildings.

Discussion

66. The Amendment adjusts the Geelong West, Manifold Heights and Newtown map to remove the Pakington North and Pakington Street and Gordon Avenue Precincts. I support and endorse this amendment.



Figure 11: Geelong West, Manifold Heights & Newton Increased Housing Diversity Areas Map (Clause 16.01-1L-02 Increased Housing Diversity Areas)

4.4 Clause 16.01-2L Social and Affordable Housing

67. Strategy

- Encourage social and affordable housing contributions through agreements with landowners under Section 173 of the Planning and Environment Act 1987 for mixed-use and residential developments.

68. Policy guidelines

- Consider as relevant:
 - Providing at least 5 percent of dwellings as an affordable housing contribution that meets the following requirements:
 - › be delivered within the land to which the planning permit application applies;
 - › be functionally and physically indistinguishable from other dwellings within the development.
 - › be distributed across the development;
 - › provide a mix of housing types, including social housing to respond to local housing needs;
 - › include access to all common facilities within the building at no extra fee for occupants of affordable housing dwellings; and,
 - › allocate one or more bicycle parking space per dwelling for the life of the affordable housing.
 - Encouraging the affordable housing contribution to be provided:

- › as a transfer of dwellings to a Registered Housing Association under the Housing Act 1983 for zero consideration (Primary Obligation); or
- › a monetary contribution to a Registered Housing Association under the Housing Act 1983 or as directed by the Responsible Authority, which is of equal value to the Primary Obligation; or
- › a combination of the above options; or
- › in any other way as agreed between the permit applicant and the Responsible Authority.

Discussion

69. The Amendment introduces Clause 16.01-2L (Social and affordable housing), which applies to land within the Pakington North and Gordon Avenue precincts as identified on the Pakington Street Urban Design Framework Plan at Clause 11.03-6L-6. The clause encourages the delivery of social and affordable housing through voluntary agreements with landowners as part of mixed-use and residential developments. I support this inclusion because it aligns with the strategic objective to increase housing diversity and improve access to well-located housing in areas with good access to services, employment, and public transport.

4.5 Design and Development Overlay - Schedule 17 (DDO17 Western Beach Area)

1.0 Design Objectives

- To encourage excellence in architecture that enhances the streetscape and complements the existing heritage and waterfront character.
- To ensure built form shares key views, respects heritage areas, protects residential amenity and protects the amenity of public spaces.
- To encourage the retention and creation of viable development sites by supporting consolidation and avoiding fragmentation.
- To ensure that the location and design of car parks, loading bays and services areas promotes active street frontages, does not dominate the public domain and supports safe use and access.
- To encourage the use of innovative, best practice urban design and building techniques that incorporate environmentally sustainable design principles.

2.0 Building and Works

70. The following buildings and works requirements apply to an application to construct a building or construct or carry out works.
71. Building height
- New development should comply with the preferred building height requirement specified in column 3 of Table 1 and shown in Map 1 to this Schedule.
 - A permit may be granted to construct a building or carry out works which are not in accordance with the

requirements of this Schedule where the proposal meets the design objectives of Clause 1.0 and Table 1.

- Higher buildings should be located and designed to minimise impacts on adjacent heritage buildings and places and low-scale residential areas.
- Building heights should avoid the overshadowing of major pedestrian routes, parks and other public spaces.
- Building heights should enable the sharing of key views, respect heritage areas, protect residential amenity and the amenity of public spaces, and achieve an overall graduation of built form.
- Building heights should respect the existing waterfront character and avoid dominating the waterfront through excessive bulk and unarticulated built form heights.
- The preferred building height limits as specified in Table 1 do not apply to architectural features (such as domes, towers, masts) and building services (including enclosed stairwells) that do not exceed the preferred maximum height by more than 4 metres. The combined floor area of these features must not exceed 10 per cent of the gross floor area of the top building level.

72. Setbacks

- New development should comply with the setback requirements specified in column 4 of Table 1 to this Schedule.
- Setbacks greater than specified in column 4 of Table 1 should be provided to:

- Share views, from public spaces / major pedestrian routes or from upper floors to Corio Bay and other key views.
- Avoid excessive building bulk.
- Reflect the setback of adjoining buildings.
- Form part of the provision of a pedestrian or service laneway.
- Reflect the heritage values associated with adjoining properties within a Heritage Overlay.
- Ensure adequate light to major pedestrian routes and public spaces.
- Ensure adequate light to adjacent buildings, particularly to windows of habitable rooms and balconies of adjacent dwellings.

- Avoid at grade car parks, especially along street frontages, walkways and within the front setback.
- Conceal parking structures behind or within other buildings and uses.
- Locate and design car park entries to minimise adverse impacts on pedestrians.
- Minimise car access points and garages to the street where it is feasible to consolidate access points and/or provide access to parking spaces and service and loading areas, from rear lanes or basements.

73. Car parks

- Car parks for new development should be designed to:
 - Avoid car parking spaces, structures and access ways dominating street frontages.
 - Ensure car parks, including multi-level parking structures, are designed to achieve a safe and 'open' feel with good sightlines and adequate lighting throughout.
 - Locate car parks near the major road network, to minimise intrusion into areas of high pedestrian usage and distances travelled along other streets.
 - Place car parking underground or in discreetly located multi-deck structures.

74. Public space

- Verandahs and canopies should be provided over footpaths, unless they would conflict with significant heritage buildings.

75. Other

- The ground floor level of buildings should be articulated and modelled using fenestration including recessed windows with reveals, recessed balconies, and architraves, cornices, pilasters and their contemporary equivalents. Articulation of facades above the ground floor should create interesting and attractive streetscapes and reduce the apparent bulk of tall buildings.
- Development should avoid blank walls, specifically when readily viewed from Western Beach Road, Mercer Street and Latrobe Terrace (Princes Highway).
- Plant and equipment and rubbish and storage areas should be screened from the public domain and existing and potential adjacent development.

Discussion

76. The Amendment removes references to the Latrobe Terrace Area, including the associated design objectives, preferred building heights, setbacks, and mapped extent. I support and endorse this amendment as it simplifies and clarifies the operation of the clause.

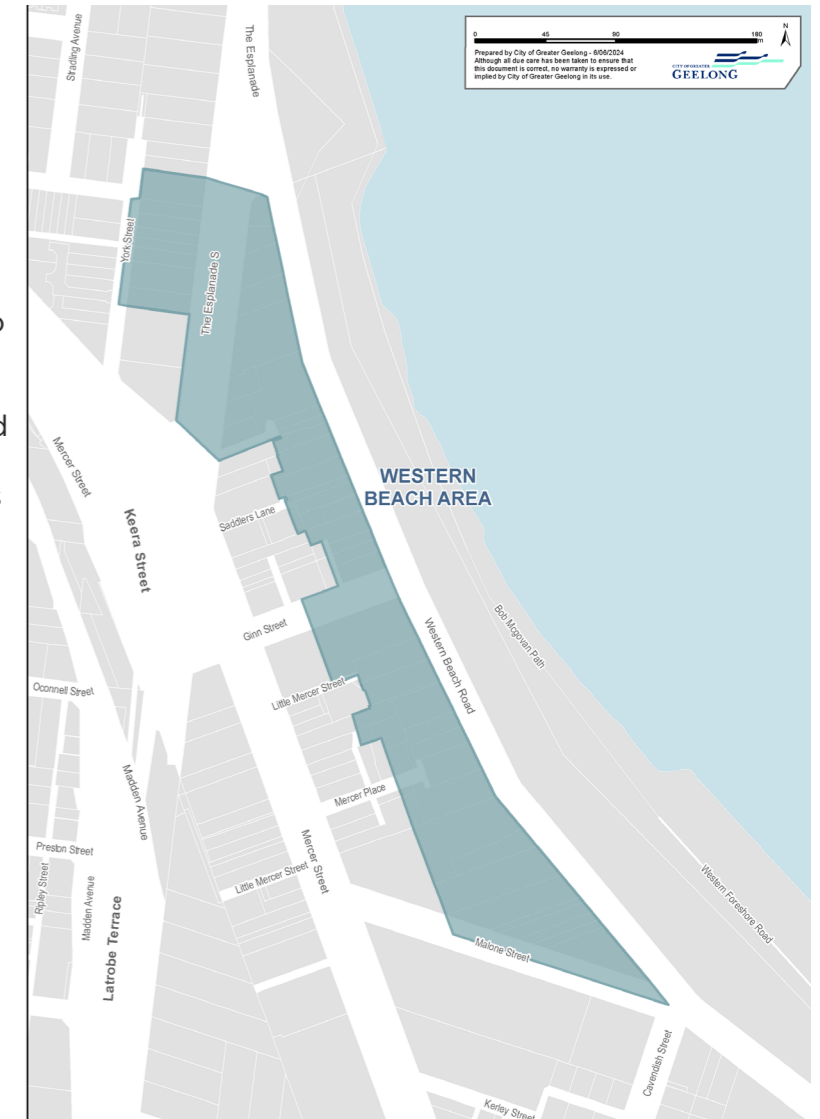


Figure 12: Map 1 to Schedule 17 to Clause 43.02 Western Beach Area, p. 6

Area	Design objectives	Preferred building height requirement (above natural ground level)	Preferred setback requirement (from property boundary)
Western Beach Area	Protect the established character of the area. Ensure new buildings and landscaping respect the established neighbourhood character.	9 metres. Where new buildings differ in height from adjoining buildings by more than one storey, step the new building down to the height of the adjoining building to create a transition in height.	Front and side setbacks consistent with adjoining buildings and the overall streetscape, except where the heritage significance of an adjoining building in a Heritage Overlay necessitates a variation.

Figure 13: Table 1: Western Beach Area (Schedule 17 to Clause 43.02 Western Beach Area, p. 2)

4.6 Design and Development Overlay - Schedule 56 (DDO56 Gordon Avenue Precinct)

77. 1.0 Design Objectives

- To implement the Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024).
- To create a vibrant and sustainable mid-rise precinct with a variety of building typologies which supports a diverse and inclusive community.
- To ensure high quality architectural design that integrates landscaping, maintains solar access and ensures comfortable wind conditions within the public realm.
- To provide a mix of small and medium scale tenancies with activated street frontage to Gordon Avenue, and generous landscaping at residential interfaces to contribute to urban cooling and greening, biodiversity and create a visual buffer.
- To ensure development appropriately transitions to sensitive interfaces such as heritage and established low scale residential sites and open spaces.

Discussion

78. The Design Objectives successfully summarise the 'Vision', 'Guiding Principles' and 'Key Moves' of the UDF.

2.0 Building and Works

79. The following buildings and works requirements apply to an application to construct a building or construct or carry out works.

80. Building and floor heights

- Development should not exceed the preferred maximum building heights specified in Map 1 to this schedule.

- Provided that the below criteria are met, the preferred maximum building height does not include architectural features, masts and building services. Roof top mechanical equipment such as plant rooms, lift overruns, solar collectors and other such equipment should be sited so achieve all of the following:
 - Not more than 50% of the roof area is occupied by equipment (other than solar panel or greening);
 - The equipment is set back on all sides, no less than 3 metres from the edge of the building, or otherwise located to minimise additional overshadowing and reduce visual impact;
 - The equipment does not exceed the height limit by more than 3.6 metres; and
 - The equipment and screening is integrated into the design of the building;
- to the satisfaction of the Responsible Authority.
- Buildings should provide the floor-to-floor heights set out in Table 1.

Discussion

81. The DDO reflects the UDF's recommendations for adaptable floor-to-floor heights and aligns with urban design best practice by supporting good internal amenity and flexibility for future uses. The preferred building heights shown in Map 1 are generally supported. Their discretionary application is also supported, noting that the FAR controls that regulate height are likewise discretionary, which may create challenges in consistently achieving the intended building heights.

Table 1: Floor-to-floor heights

Floor	Use	Minimum floor-to-floor dimension
Ground	All	4.0 metres
Level 1 and above	Residential	3.2 metres
	Non-residential (including car parking)	3.5 metres

Figure 14: Table 1: Floor-to-floor heights (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 1)



Figure 15: Map 1 to Schedule 56 to Clause 43.02 (building heights, p. 11)

82. A minor discrepancy is noted between Map 1 of the DDO (p. 11) and Figure 20 of the UDF (p. 76), where no height is identified for the property at the corner of McNicol Street and Spring Street. Additionally, a preferred height of 10 storeys is proposed along Latrobe Terrace. It is unclear whether a 10-storey outcome can be achieved in this location while also ensuring that the southern footpaths of Autumn Street and Gordon Avenue are not subject to unreasonable overshadowing.

83. I recommend the following:

- Undertake modelling of the preferred 10-storey maximum height along Latrobe Terrace to test whether acceptable overshadowing outcomes can be achieved, particularly in relation to the southern footpaths of Autumn Street and Gordon Avenue.
- Resolve inconsistencies between Map 1 of the DDO and Figure 20 of the UDF regarding the preferred height at the corner of McNicol Street and Spring Street.

84. Floor area ratios (FARs)

- *Development should not exceed the floor area ratios specified in Table 2.*
- *Where the site includes contiguous titles in the same ownership, a section 173 agreement must be entered into and registered on each title which records the amount of Floor Area Ratio developed across the entire site, and the amount (if any) of remaining Floor Area Ratio able to be developed on each title should it be individually redeveloped in future.*

Discussion

85. The use of floor area ratios (FARs) may be an appropriate mechanism to manage built form outcomes within the DDO and generally aligns with the UDF's objectives by balancing site-specific responses, development yield, and typological diversity. The three key areas where FARs are proposed to apply are, in part, driven by larger lot sizes and the capacity of these sites to accommodate a range of built form outcomes. However, there is no built form testing to demonstrate how the FARs would operate in practice (noting the difficulty of capturing the full range of potential outcomes through modelling), nor is there clear justification for the specific FARs adopted.

86. Further, the way FARs are expressed in the DDO (not shown explicitly as ratios) lacks clarity, and the location and configuration of any residual or communal open space is not clearly articulated. Testing is required to understand the relationship between building height, site coverage, and FAR to ensure that the controls result in feasible development outcomes and acceptable open space provision.

87. It is also unclear whether the proposed laneways identified in the UDF (p. 82) could be delivered as part of achieving the FARs, and whether such laneways would be counted by an applicant as part of site coverage.

88. I recommend the following:

- The removal of FAR's as a tool noting that the preferred heights and preferred site coverage serve the same purpose. This is my preferred action

OR

- Undertake targeted built form modelling to test whether sites can achieve reasonable development outcomes. This modelling should assess the combined impact of preferred front, side and rear setbacks on site coverage and development yield. At least two representative lots within each site coverage area (preferably adjacent) should be tested.
- Present FARs consistently and clearly as ratios (e.g. 2.4:1 rather than 2.4).
- Expand the supporting UDF to provide clearer guidance on the preferred location and function of landscape areas, particularly where significant residual open space remains after setbacks are applied.
- Undertake built form testing to demonstrate how the nominated FARs translate into building height, site coverage, and open space outcomes.
- Clearly justify the selection of specific FARs

- Clarify whether proposed laneways contribute to site coverage calculations.
- Provide guidance on the preferred location and role of residual open space.

89. Interface requirements

- Development should not exceed the preferred maximum street wall heights specified in Table 3 to this schedule.
- Development must meet the ground level setbacks and should be generally in accordance with the other street interface requirements specified in Table 3 and Figures 1-5 to this schedule.

Discussion

90. The interface requirements are inconsistent and overly complex. In several instances, the diagrams in the UDF do not align with the accompanying text and tables, and these inconsistencies have been carried through into the DDO, as outlined below. Discrepancies are evident across multiple interfaces, including G1 (Latrobe Terrace), G2 (Madden Avenue), and G6 (Ripley Street).

Table 2: Floor area ratios

Preferred maximum building height (refer to Map 1)	Preferred maximum site coverage (refer to Map 2)		
	60%	70%	80%
15 metres (4 storeys)	2.4	2.8	3.2
22 metres (6 storeys)	3.6	4.2	4.8
29 metres (8 storeys)	4.8	5.6	6.4
36 metres (10 storeys)	6	7	8

Figure 16: Table 2: Floor area ratios (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 2)

91. For example, on page 80 of the UDF, the text underneath the diagram for Ripley Street specifies a 5 m landscape setback, while the corresponding diagrams indicate a 2 m setback.
92. Proposed laneways (G9-G11) are not consistently identified or described across the UDF and DDO, creating ambiguity as to whether they are existing or proposed elements.
93. The Future Park Interface also raises concern. It describes a zero-metre setback along three sides, with the western interface (as shown in the UDF) fronting a laneway. It is unclear what agreements or assumptions underpin this outcome; however, a zero-metre setback is not considered a preferred urban design response. A setback from the future property boundary would allow for a landscape transition between the park interface and building entrances if developed for residential use (as implied by the balconies shown and the proposed zoning). Alternatively, if a commercial or retail use is envisaged, a setback would enable on-park activation and trading.
94. Further, the G5, G6 and G7 diagrams on p. 80 of the UDF depict setbacks measured to the balcony edge rather than the building edge. As a general principle, setbacks are measured to the building edge, not balconies. If setbacks to balcony edges are intended as an explicit outcome, this should be clearly stated in both the UDF and the DDO. This comment applies to all interface diagrams across both documents.
95. By comparison, the Hodyl & Co Pakington Street and Gordon Avenue Built Form Framework (2021) recommends:

- a 2-storey street wall at Madden Avenue (G2);
 - a 6-storey street wall with a 0 m upper-level setback at Gordon Avenue (G3);
 - a 3 m ground-floor setback, 6-storey street wall and 0 m upper-level setback at the Future Park Interface (G5); and
 - a 5 m ground-floor setback at Ripley Street (G6).
96. The UDF departs from these earlier recommendations, but no built form testing is provided to support the amended interface outcomes. The basis for these changes is therefore unclear.
97. Unclear or inconsistent interface controls reduce certainty for applicants and decision-makers and weaken the strategic basis of the amendment.
98. I recommend the following:
- Review the UDF and DDO to ensure alignment across labelling, metrics and diagrams.
 - Correct and clarify UDF diagrams so that setbacks are consistently measured to building edges rather than balconies.
 - Reconsider the Future Park Interface to allow for a landscape transition zone between public parkland and private development, noting that a setback of approximately 2 metres would be appropriate.
 - Undertake further built form testing to justify a 5-metre ground-level setback with an additional 5-metre upper-level setback above two storeys, noting that this significantly exceeds typical ResCode requirements.

Table 3: Street interface

Street interface	Mandatory ground level setback	Preferred maximum street wall or podium height	Preferred setback above street wall/podium
Latrobe Terrace	6 metres	None specified	3 metres
Madden Avenue	0 metres	None specified	None specified
Gordon Avenue	3 metres	15 metres	3 metres
Pakington Street	None specified	8 metres	5 metres
Ripley Street	2 metres	8 metres	5 metres
Residential Streets (Autumn Street, Spring Street, Western Street, Halstead Place, Coronation Street, Villamanta Place)	3 metres	8 metres	3 metres

Figure 17: Table 3: Street interface (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 2)

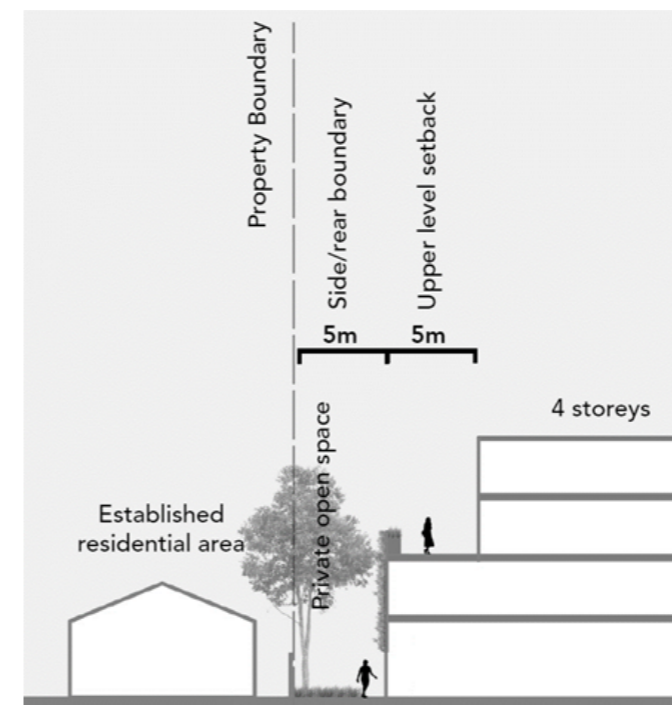


Figure 18: Figure 1: Direct residential (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 3)

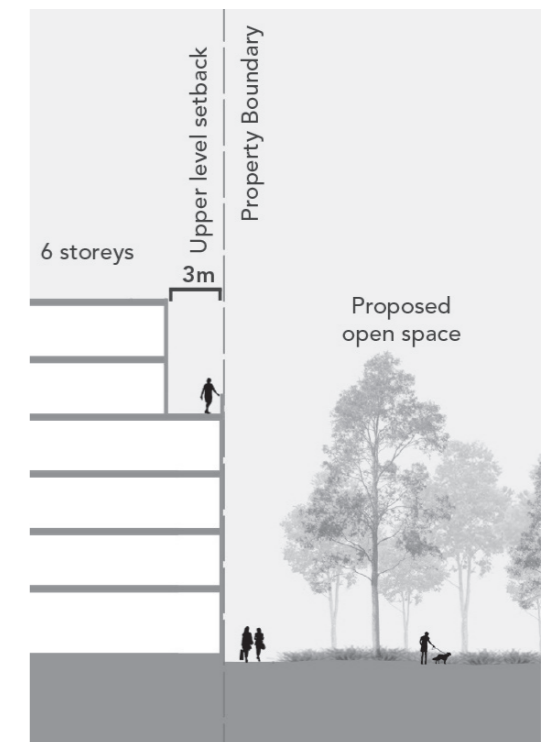


Figure 19: Figure 2: Future park interface (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 3)

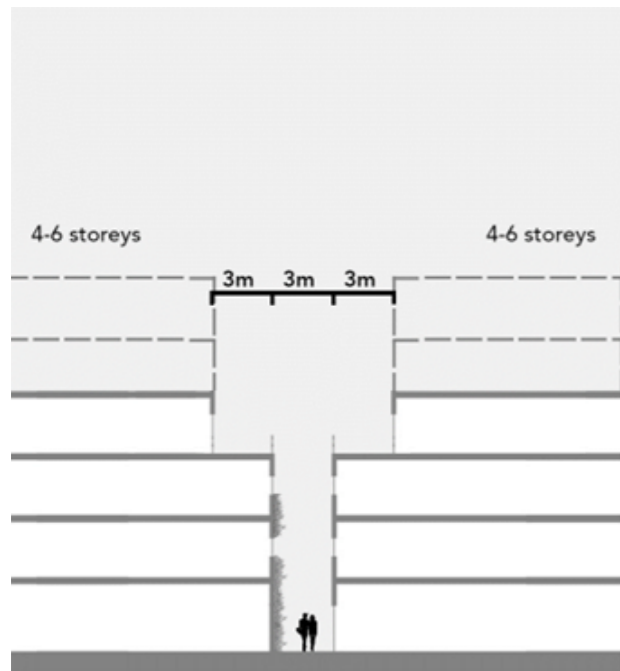


Figure 20: Figure 3: Laneway interface (pedestrian) (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 3)

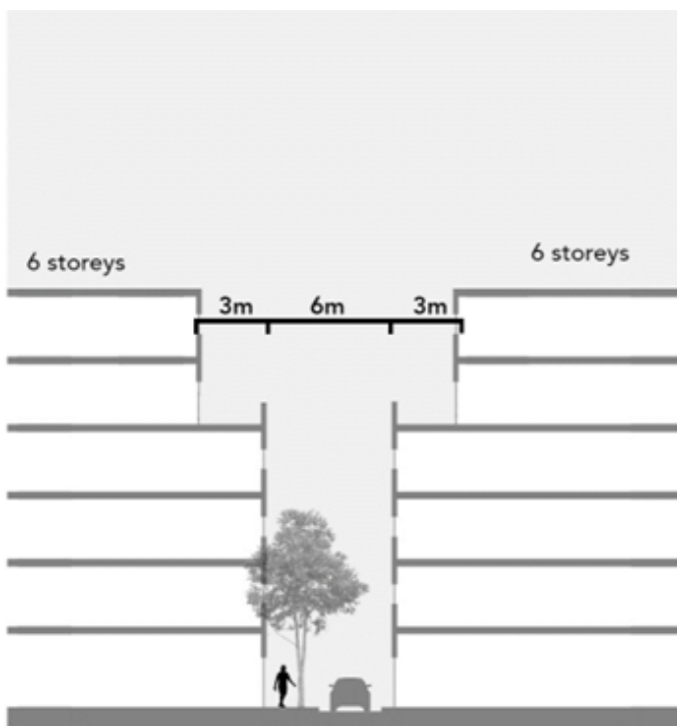


Figure 21: Figure 4: Laneway interface (service) (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 4)

- Clarify whether setbacks in both the UDF and DDO are intended to be measured from the building edge or the balcony edge and apply this consistently across all interface diagrams and controls.
 - Resolve inconsistencies between UDF text, diagrams and DDO provisions.
99. Building separation
- *Balconies must not encroach into side setbacks.*
 - *Where a building is to be built to a common boundary, the minimum side setback at Figures 6-7 applies.*

Discussion

100. Building separation controls play an important role in delivering good

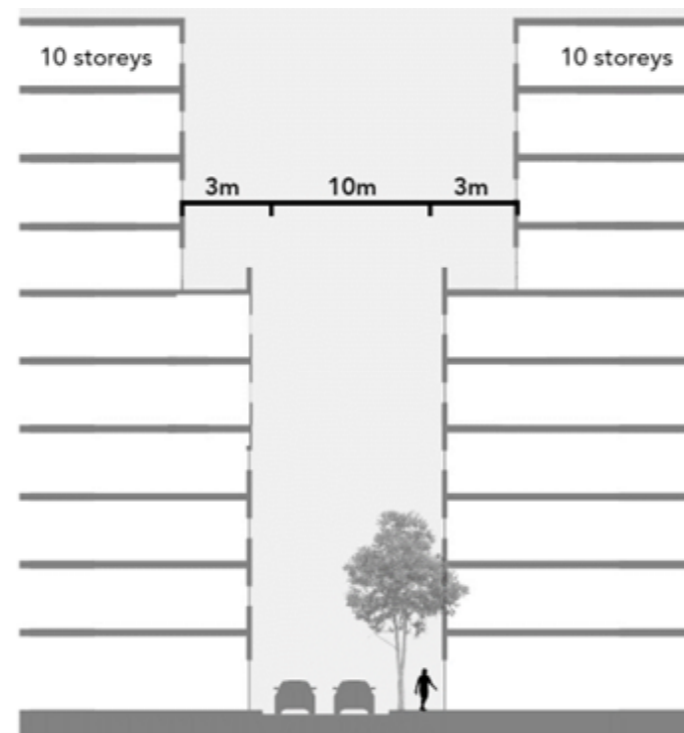


Figure 22: Figure 5: Laneway interface (new street) (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 4)

- internal amenity and ensuring equitable development outcomes between adjoining sites. They also support adequate access to sunlight, light and ventilation for buildings and associated private and communal open spaces. A commonly adopted and well-understood rule is that habitable room windows should be separated by a minimum of 9 metres to manage overlooking and avoid the need for obscure glazing or other screening treatments that may reduce internal amenity. As acknowledged in the supporting documents, separation distances typically increase as building height increases to maintain adequate light and air.
101. It is also important that the application of these metrics is clearly illustrated, typically through diagrams. Based on the example provided in the DDO, the controls appear to operate as follows:
- Up to four storeys, buildings may be built to the side boundary
 - For buildings above a four-storey podium, levels are required to be set back 6 metres
 - For buildings not built to the boundary:
 - Levels up to a four-storey podium are to be set back 4.5 metres
 - Levels above a four-storey podium are to be set back 6 metres
 - Levels above eight storeys are to be set back 9 metres
102. It is unclear how this approach would apply in circumstances where the podium or street wall height exceeds four storeys, such as along Latrobe Terrace.
103. The option for a zero-metre side setback for buildings of four storeys or less is supported and may, although unlikely given site coverage and FAR requirements, result in a contiguous street edge that could be appropriate in certain locations. However, a 6-metre side setback above four storeys results in an overall building separation of 12 metres between adjoining developments. This is a very generous separation distance.
104. Given the magnitude of these separation distances, further built form testing is required to understand whether a developable parcel would remain on sites to which these controls apply.
105. I recommend the following:
- Undertake built form modelling to test the preferred side setbacks and confirm that developable building envelopes remain.
 - Clarify how building separation and side setback requirements apply where podium or street wall heights exceed four storeys.
 - Reconsider and/or clearly justify upper-level side setback and separation distances, particularly where they exceed comparable controls in other planning schemes.
 - Excessive or untested separation distances may unnecessarily constrain development potential and undermine the intent of the controls.
106. Building design
- *Encourage developments at corner sites to address both street interfaces with equal design quality.*

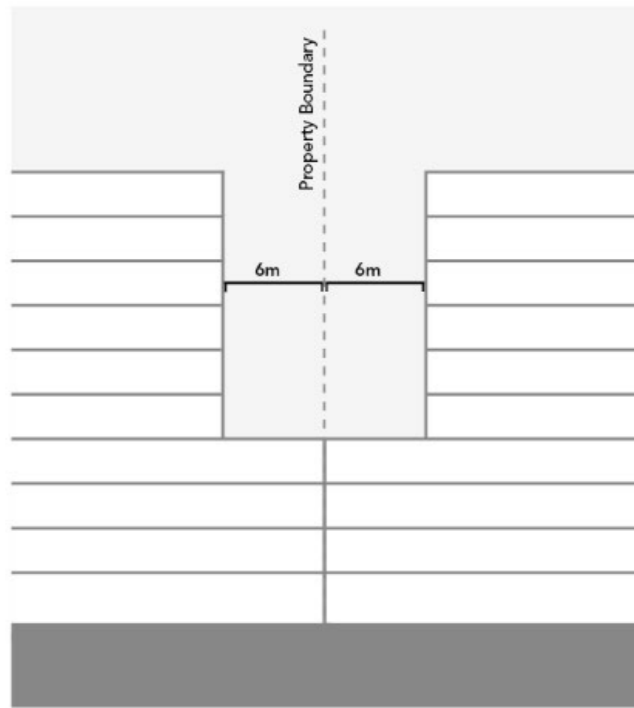


Figure 23: Figure 6: Preferred side separation for buildings built to boundary (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 4)

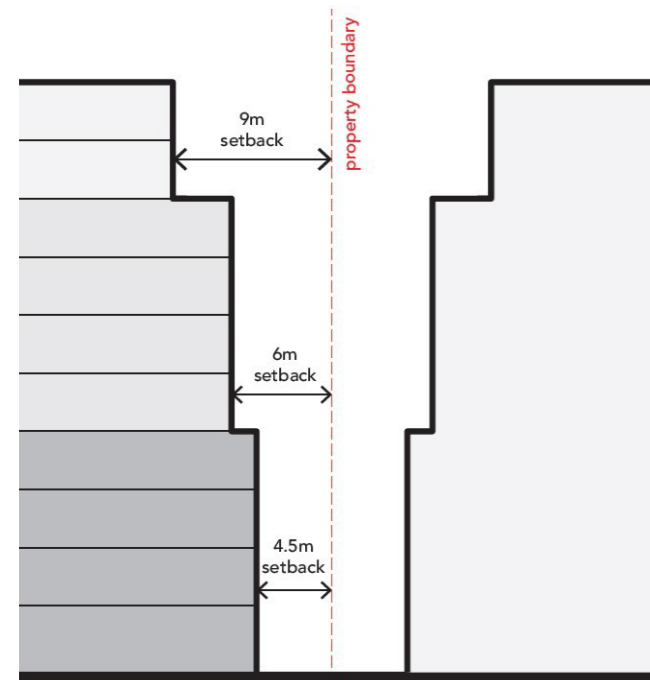


Figure 24: Figure 7: Preferred side separation for buildings not built to boundary (Schedule 56 to Clause 43.02 Gordon Avenue Precinct, p. 5)

- Encourage the use of natural, tactile, and visually interesting materials and façade articulation that clearly distinguishes the podium from the upper levels.
- Create visual interest in upper levels through the provision of balconies, eaves, terraces, and verandas to ensure passive surveillance of the public realm.
- Ensure passive surveillance for developments that directly abut or are adjacent to public open spaces with the provision of clear sight lines, views and activation to these spaces.
- Incorporate an interim façade strategy when blank walls are visually prominent while adjoining properties are being realised.
- Encourage design solutions that ensure screening is integrated with the facade of the building and do not substantially reduce the potential for daylight or outlook for residents.
- Incorporate façade design and lighting that enhances safety and security after hours including along main streets, side streets and laneways.
- Minimise the potential for off-site impacts, including from noise, fumes, odour or vibrations, through the use of setbacks, acoustic barriers, high performance glazing, consideration of internal layout, or other relevant measures.
- Integrate landscape planting with building design and encourage the planting of canopy trees within setbacks to sensitively transition to lower-scale residential areas.

- Encourage the provision of functional open spaces (e.g. central courtyards) and landscaped areas to the front and rear of buildings.

Discussion

107. The building design requirements are generally supported as they provide clear guidance to achieve high-quality outcomes that respond to the precinct context. Encouraging corner frontages ensures consistent visual interest and activation of the public realm. The emphasis on natural, tactile, and visually engaging materials, combined with façade articulation that distinguishes podiums from upper levels, supports a legible hierarchy of built form and contributes positively to the streetscape.
108. Balconies, terraces, verandas, and eaves provide opportunities for passive surveillance and engagement with the public realm, enhancing safety and social activation. Similarly, design requirements that address the interface with public open spaces ensure that these areas are overlooked, active, and safe, reinforcing their usability and amenity. Interim façade strategies are a pragmatic response to staged development, preventing visually dominant blank walls while surrounding properties are yet to be realised.
109. The guidance on integrated screening, façade lighting, and consideration of off-site impacts demonstrates a balanced approach that protects residential amenity while enabling high-quality urban intensification. Integration of landscape planting, including canopy trees and functional open spaces, is particularly important in creating softer transitions

to lower-scale residential areas and enhancing the overall environmental and visual quality of the precinct. Collectively, these requirements support sustainable, adaptable, and context-sensitive built form outcomes, and provide developers with a framework to deliver safe, attractive, and activated streets and public spaces.

110. Active frontages

- Encourage frontages which employ depth and tactility with high quality materials and operable windows.
- Encourage visual and physical permeability between the building and the street by incorporating measures such as doors facing the street, operable windows and direct residential access for ground level residences
- Ensure ground floor activity, façade and internal layout is designed to facilitate visual and physical access between the building and adjoining public realm, enhancing the pedestrian environment.
- Avoid concealed alcoves, recessed nooks and hidden entrances that affect safety.
- Design buildings to address the street, with legible and direct entries to support street activation whilst clearly distinguishing residential and commercial entrances.
- Ensure laneways and pedestrian links are publicly accessible, safe (comply with Crime Prevention Through Environmental Design guidelines), receive adequate access to sunlight and are open to the sky.

- Provide gates and other structures associated with security, vehicle access or servicing points that are integrated into the building design and provide visual permeability.
- Encourage landscaping planting in front setbacks to improve ground-floor amenity and facilitate the transition between the public and private realms.
- Allow a maximum 75% glazing on any façade and provide 50% visually permeable balcony balustrades.

Discussion

111. The active frontage objectives are generally supported. However, clarification is required in relation to UDF p. 44 (Designed for People), point 6, which states that “developments should provide opportunities for the ground floor to spread out onto and interact with the street.” It is unclear whether this is intended to apply only to active ground-floor uses (such as cafés or retail) or to all development types.
112. In addition, DDO point 8 encourages landscaping within front setbacks to improve ground-floor amenity and facilitate a transition between the public and private realms. There is an opportunity to strengthen and better integrate this landscape guidance with the active frontage objectives.
113. I recommend the following:
- Include a new dedicated section, or more clearly integrated guidance, within the UDF and DDO that sets out expectations for landscape and open space outcomes in support of active frontages. This guidance should reflect

community engagement findings and align with Council’s climate resilience and environmental strategies.

- Suggested guidance may include:
 - Provide integrated, well-designed soft landscaping within sites to mitigate urban heat island effects, enhance biodiversity and habitat, and contribute to a strong and visually engaging streetscape, particularly within ground-level setbacks.
 - Planted landscaping to comprise a minimum of 60 per cent of the total front setback area.
 - Maximise deep soil planting areas within front and rear setbacks to support the establishment of canopy trees.
 - Encourage the use of green roofs, green walls and landscaped balconies to further reduce urban heat impacts, improve biodiversity outcomes and enhance visual amenity, particularly on sites with limited or no ground-level setbacks.
 - Encourage planting palettes that include a minimum proportion of indigenous and native species (e.g. 40 per cent indigenous and 40 per cent native) to reinforce local character and ecological values.
 - Encourage the provision of communal garden spaces at podium and rooftop levels to improve amenity for residents, workers and visitors.

114. Solar access, wind and weather

- Incorporate continuous weather protection such as awnings, openings and architectural detail that are well detailed and attractive when viewed from the street.
- Ensure weather protection measures do not impinge existing or future street trees.
- Limit overshadowing impacts on the existing private open space of adjacent residential properties.
- Avoid overshadowing of the southern footpath on Autumn Street, Gordon Avenue and Spring Street between 11am and 2pm on 22 September.
- Avoid overshadowing of more than 50% of public open space between 11am and 2pm on 22 September.
- Address wind gust management in building design, without the need for additional protective screens, incidental add-ons and landscaping in public spaces.
- Buildings and works with an overall height equal to, or greater than 16 metres:
 - *Must not cause unsafe wind conditions as specified in Table 4 on public land, publicly accessible areas on private land, private open space and communal open space; and*
 - *Should achieve comfortable wind conditions as specified in Table 4 on public land, publicly accessible areas on private land, private open space and communal open space.*

Discussion

115. The UDF (p. 10) states: “Solar access controls seek to maintain solar access to the streets in order to support the role of footpaths as a key public space. No overshadowing should occur between 11am and 2pm at Spring Equinox. This will ensure that important public and semi-public spaces remain high amenity in the long term. Solar access controls are also proposed for potential future open spaces, with no overshadowing above 50% of the site between 11am and 2pm at Spring Equinox.” Solar access controls are generally supported, as they maintain sunlight on the southern footpaths of Autumn Street, Gordon Avenue, and Spring Street, and limit overshadowing to no more than 50% of potential future open space. However, the wording differs between the UDF and DDO - for example, “no overshadowing” in the UDF versus “limit” or “avoid” in the DDO. This implies that these controls are intended to be discretionary.
116. Point 1 of the DDO states: “Incorporate continuous weather protection such as awnings, openings and architectural detail that are well detailed and attractive when viewed from the street.” It is unclear where this requirement applies. It should be limited to streets with a zero-metre lot setback and should exclude laneways, effectively applying only to Pakington Street and Madden Avenue.
117. Ambiguity in design guidance limits the effectiveness of the controls and reduces confidence that desired public realm outcomes will be achieved.
118. I recommend the following:
- I consider that access to sunlight

within urban public spaces is crucial to the success of those spaces and the amenity of the public realm, particularly in winter. I consider the application of mandatory solar controls an appropriate planning tool to help manage height, and importantly deliver good public outcomes. Therefore I recommend replacing discretionary language with mandatory language. For example, replace “avoid overshadowing to footpath on the opposite side of the street between 11am and 2pm 22 September” with: “Development must not overshadow the footpath on the opposite side of the street between 11am and 2pm on 22 September.” This should only be done on the proviso that the built form testing shows that the preferred heights can achieve the mandatory outcome in the majority of cases.

- Consider offsetting overshadowing controls from the property boundary to allow for potential future improvements to the public realm, such as wider footpaths, tree planting, or on-street activity. For example: “Development must not overshadow the public realm for a distance of [X] metres from the property boundary.”
- Clarify where canopies and weather protection are required or desired.
- Clarify the intent and applicability of active frontage and weather protection requirements.
- Strengthen solar access controls by consistently using enforceable language throughout the DDO.
- Amend the wording in Application requirements in the DDO to reflect the overshadowing requirements in the

body of the clause under Building and Works: (application requirements ask for overshadowing diagrams between 10am and 3pm, Building and works between 11am 2pm)

119. Access, parking and services

- Consolidate vehicular access points for parking and loading to minimise the number of crossovers.
- New development that abuts Latrobe Terrace to avoid direct access to Latrobe Terrace (where possible) and make use of the local road network for access.
- Encourage car parking within basements where possible and the provision of shared car parking facilities. Where car parking is provided above ground, ensure it is sleeved with active uses along street frontages and located to minimise impacts on footpaths from vehicle entries and ramp access.
- Design off-street car parking facilities to have flexible electric vehicle charging spaces. Electric charging stations should be equipped with at least 50kw charging facilities.
- Services, loading and waste areas should be accessed away from main streets and public spaces and located within basements or upper levels. Access doors to any waste, parking or loading area should be designed as an integrated element of the building.
- Integrate plant equipment and services into the built form design. Avoid locating services on Gordon Avenue and Latrobe Terrace and grouping them together to create long inactive edges. Service cabinets should not visually

dominate street frontages and should use high quality materials.

- Design the location and functionality of gates which do not obstruct public land in their operation.
- Provide easy access to bicycle parking facilities with end of trip change rooms, showers, and lockers.
- Ensure that the location and design of car parks, loading bays, services areas and associated vehicle access promotes active street frontages, does not dominate public spaces, and supports safe use and access.

Discussion

120. The DDO objectives are generally supported, as they align with the UDF and contemporary best practice principles for integrated access, parking, and services. Consolidating vehicular access points and locating loading, waste, and service areas away from main streets minimises interruptions to active frontages and public realm amenity. Encouraging basement or shared parking, with above-ground car parking sleeved by active uses, supports street activation while mitigating visual and functional impacts on pedestrians.

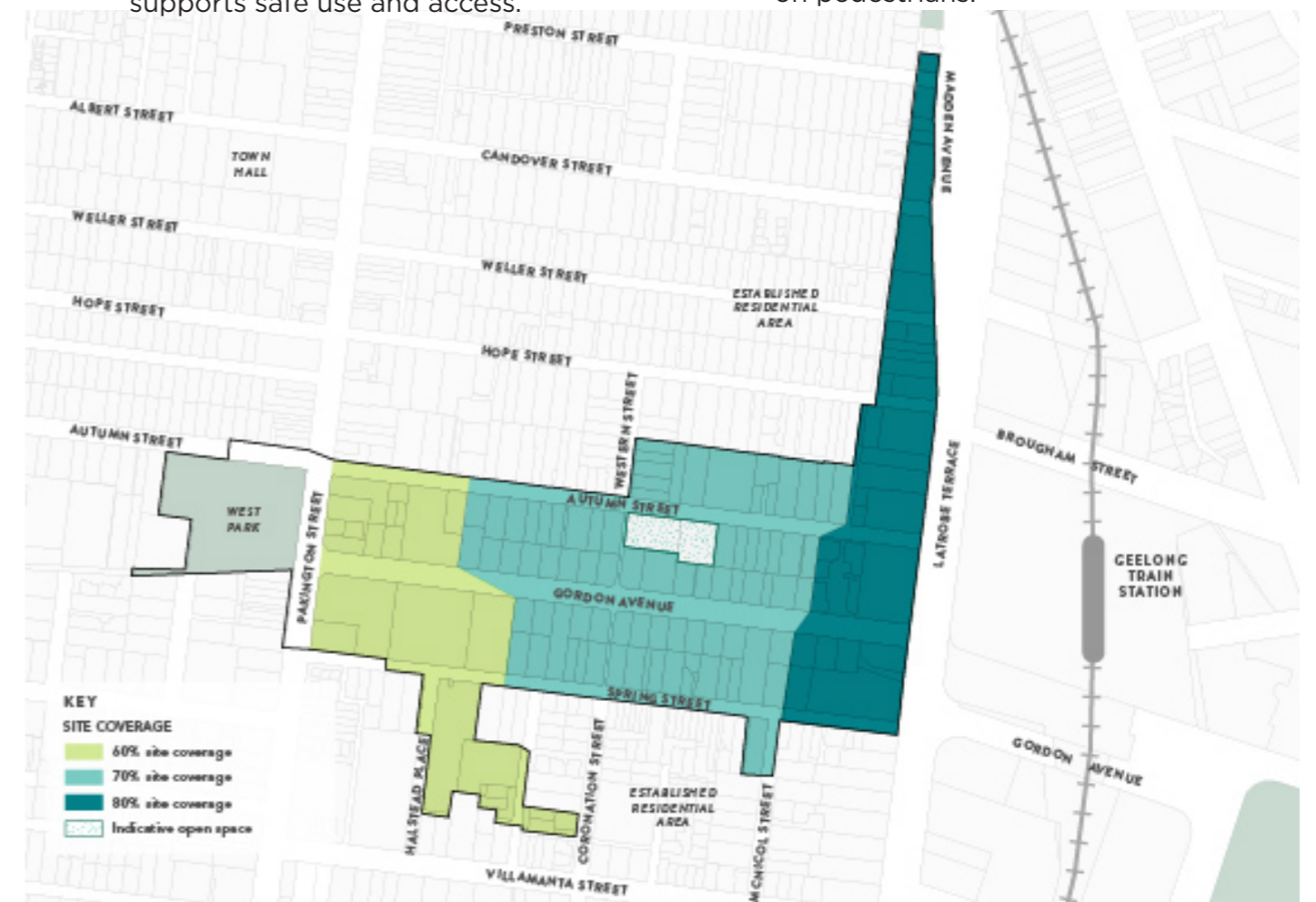


Figure 25: Map 2 to Schedule 56 to Clause 43.02 (site coverage, p. 11)

121. The guidance to provide flexible electric vehicle charging spaces and well-designed bicycle facilities, including end-of-trip amenities, reflects emerging sustainable transport priorities and ensures that developments can respond to changing mobility patterns over time. Designing gates, services, and plant equipment as integrated elements of the building helps avoid the creation of long, inactive edges along Latrobe Terrace and Gordon Avenue, maintaining visual interest and pedestrian safety.

122. These provisions promote a coherent, functional, and safe movement network for vehicles, cyclists, and pedestrians, while supporting the activation and legibility of the streetscape. They also provide clear direction for developers, helping to ensure that access, parking, and service requirements do not compromise public amenity, safety, or the quality of the urban environment.

123. Site Coverage

- *Development should not exceed the preferred maximum site coverage specified in Map 2 to this schedule.*

Discussion

124. The DDO reflects the UDF's differentiated site coverage strategies for the three character areas in the precinct: Latrobe Terrace (80%), Gordon Central (70%), and Gordon West (60%). These percentages align with the area's context and desired outcomes, supporting both landscape amenity and diverse building typologies. For example, 60% site coverage at Gordon West is appropriate due to large lot sizes and the potential to deliver substantial open space, while 80% site coverage at

Latrobe Terrace is suitable given its lower amenity and the absence of sensitive interfaces.

125. While the site coverage controls are generally supported, additional guidance is needed regarding the location and use of undeveloped land. For instance, for the 20% of underdeveloped land within the Latrobe Terrace precinct, is the preferred outcome that this occurs along the street frontage (considering the 6-metre built form setback) with the remainder open to negotiation?

126. I recommend the following:

- Provide further detail on the preferred location and treatment of undeveloped land, particularly along Latrobe Terrace, to clarify intended site coverage outcomes.

3.0 Subdivision

127. N/A

4.0 Signs

128. N/A

5.0 Application Requirements

129. Amend the wording in Application requirements in the DDO to reflect the overshadowing requirements in the body of the clause under Building and Works: (application requirements ask for overshadowing diagrams between 10am and 3pm, Building and works between 11am 2pm)

6.0 Decision Guidelines

130. I am supportive of the decision guidelines.

4.7 Design and Development Overlay - Schedule 57 (DDO57 Pakington North Precinct)

131. 1.0 Design Objectives

- To support opportunities for urban renewal, commercial development, and increased housing density by implementing the Pakington North Urban Design Framework (City of Greater Geelong, May 2024).
- To create a vibrant mixed-use precinct with retail, offices and community spaces at lower levels and residential spaces above.
- To promote high quality medium and higher-density built form which transitions to sensitive interfaces including heritage and adjoining established low scale residential areas to protect the amenity of existing and future residents.
- To establish a vibrant public realm which reinforces the sense of place, supports multi modal movement, and improves local accessibility and amenity.
- To protect the amenity of key public spaces including footpaths, future plazas and new public open spaces from overshadowing impacts.

- Development should not exceed the preferred maximum building heights specified in Map 1 to this schedule.
- Provided that the below criteria are met, the preferred maximum building height does not include architectural features, masts and building services. Roof top mechanical equipment such as plant rooms, lift overruns, solar collectors and other such equipment should be sited so achieve all of the following:
 - Not more than 50% of the roof area is occupied by equipment (other than solar panel or greening);
 - The equipment is set back on all sides, no less than 3 metres from the edge of the building, or otherwise located to minimise additional overshadowing and reduce visual impact;
 - The equipment does not exceed the height limit by more than 3.6 metres; and
 - The equipment and screening is integrated into the design of the building;

- to the satisfaction of the Responsibly Authority.
- Buildings should provide the floor-to-floor heights set out in Table 1.

Discussion

132. The Design Objectives successfully summarise the 'Vision', 'Guiding Principles' and 'Strategic Approach' of the UDF.

2.0 Building and Works

133. The following buildings and works requirements apply to an application to construct a building or construct or carry out works.

134. Building and floor heights

Discussion

135. The DDO reflects the UDF's recommendations for adaptable floor-to-floor heights and aligns with urban design best practice, supporting internal amenity and flexibility for future uses. Building and floor heights are generally supported.

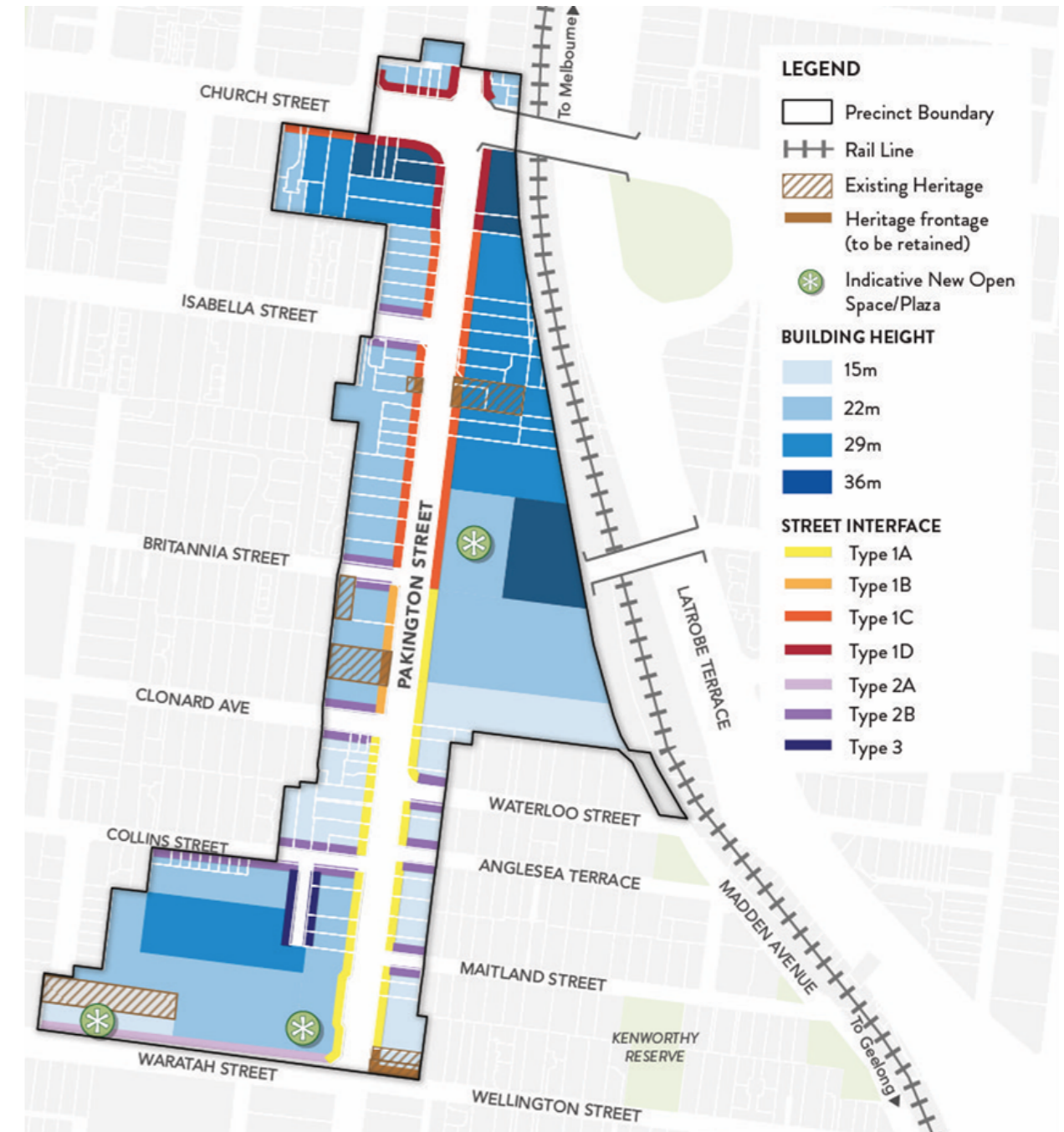


Figure 26: Map 1 to Schedule 57 to clause 43.02 (building height and street interface, p. 12)

Table 1: Floor-to-floor heights

Floor	Use	Minimum floor-to-floor dimension
Ground	All	4.0 metres
Level 1 and above	Residential	3.2 metres
	Non-residential (including car parking)	3.5 metres

Figure 27: Table 1: Floor-to-floor heights (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 1)

136. Street interface
- *Development should not exceed the preferred maximum street wall heights specified in Table 2.*
 - *Development must meet the ground level setbacks and be generally in accordance with the other street interface requirements specified in Table 2 and Map 1 to this schedule.*
 - *Development should retain heritage frontages as indicated in Map 1 to this schedule.*

Discussion

137. The proposed mandatory podium/street wall heights are supported, as they help define the street edge, reinforce human scale, and provide a sense of enclosure.

138. Rear interface

- *Development abutting GRZ and NRZ zoned land should be in accordance with Figures 1-4 and Map 2 to this schedule.*

Discussion

139. The proposed mandatory podium/street wall heights are supported, as they align with maximum heights in abutting NRZ and GRZ zones. Setbacks are generally supported; however, some-such as Type 6D-are excessive and may constrain feasible development.

140. It is unclear whether the 10-metre setback above the 8m high podium, which is also setback from the boundary 5 metres (resulting in 15 m total for the upper levels) has been modelled or justified. These requirements greatly exceed typical ResCode standards. It is also unclear whether the adopted rear interface

setbacks are based solely on community consultation. Excessive or untested setbacks may unnecessarily constrain development potential and could be difficult to defend if challenged.

141. I recommend the following:

- Review excessive rear setbacks (e.g., Type 6D) that exceed typical ResCode standards.

142. Laneway interface

- *Development abutting laneways should be in accordance with Figures 5-7 and Map 2 to this schedule.*

Discussion

143. The proposed mandatory podium and street wall heights are supported, as they align with maximum heights in abutting NRZ and GRZ zones..

144. Open space interface

- *New open spaces and/or plazas should be provided generally in the locations indicated on Map 1 to this schedule. These spaces should be publicly accessible, open to the sky and receive good solar access.*
- *Development abutting new open spaces should be in accordance with Figure 8 and Map 1 to this schedule.*

Discussion

145. The proposed mandatory podium and street wall heights are supported, reflecting the nominated podium heights for the Pakington Street interface. Solar access controls, which inform height and upper-level setbacks of abutting developments, are also supported.

Location (see Map 1 to this schedule)	Mandatory ground level setback	Preferred maximum street wall/podium height	Preferred setback above street wall/podium
Type 1A 28-96 and 67-103 Pakington Street Note: only applies to portion of 28-64 Pakington Street south of alignment with Britannia Street)	0 metres	8 metres	5 metres
Type 1B 53-57 and 63 Pakington Street	0 metres	11 metres	5 metres
Type 1C 21-29 Church Street 9-27, 31-49, 8-20, 24-64 Pakington Street Note: only applies to portion of 28-64 Pakington Street north of alignment with Britannia Street)	0 metres	15 metres	5 metres
Type 1D 2-28 and 17-19 Church Street 2-6 and 1-7 Pakington Street	3 metres	36 metres	0 metres
Type 2A	3 metres	15 metres	5 metres
Type 2B	2 metres	8 metres	2 metres
All properties abutting Collins Street, Maitland Street, Anglesea Terrace, Waterloo Street, Clonard Avenue (south)			
Type 2B All properties abutting Clonard Avenue (north), Britannia Street (south), Isabella Street	2 metres	11 metres	2 metres
Type 2B All properties abutting Britannia Street (north) Isabella Street	2 metres	15 metres	2 metres
Type 3 New streets	0 metres	15 metres	3 metres

Figure 28: Table 2: Street interface (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 2)

146. The open space interface diagram (Figure 8) states: “50% overshadowing between 11am and 2pm.” This wording may be difficult to interpret - for example, it could be read as open space should receive 50% overshadowing during that time.

147. I recommend the following:

- Revise the wording “50% overshadowing between 11am and 2pm” to “maximum 50% of open space to be overshadowed between 11am-2pm at the winter solstice”.

148. Building separation

- *Balconies must not encroach into side setbacks.*
- *Where a building is to be built to a common boundary, the minimum side setbacks at Figures 9 and 10 apply.*

Discussion

149. Building separation controls support internal amenity, development equity between sites, and adequate sunlight to buildings and private or communal open spaces. A commonly adopted “excepted rule” requires habitable room windows to be at least 9-metre apart, which also avoids the need for obscure glazing.

150. Separation distances vary with building height, with taller buildings requiring greater spacing to allow for light and air. For example, the 9-metre upper-level separation above 8 storeys (where the building is not built to the boundary) results in an 18-metre overall building separation. This is considered excessive for a moderate height building and should be tested on applicable sites to ensure that developable parcels remain.

Overly generous separation distances may unnecessarily constrain development potential.

151. I recommend the following:

- *Model preferred side setbacks to ensure developable envelopes remain.*
- *Review the 9-metre upper-level separation above eight storeys, which results in an 18-metre building separation.*
- *Undertake modelling to confirm that separation distances allow for feasible development envelopes.*

152. Building design

- *Encourage developments at corner sites that address both street interfaces with equal design quality.*
- *Encourage the use of natural, tactile, and visually interesting materials and façade articulation that clearly distinguishes the podium from the upper levels.*
- *Create visual interest in upper levels through the provision of balconies, habitable windows, eaves, terraces, and verandas to ensure passive surveillance of the public realm.*
- *Incorporate an interim façade strategy when blank walls are visually prominent while adjoining properties are being realised.*
- *Discourage development that mimics or replicates adjacent heritage styles.*
- *Encourage design solutions that ensure screening is integrated with the facade of the building and does not substantially reduce the potential for daylight or outlook for residents.*

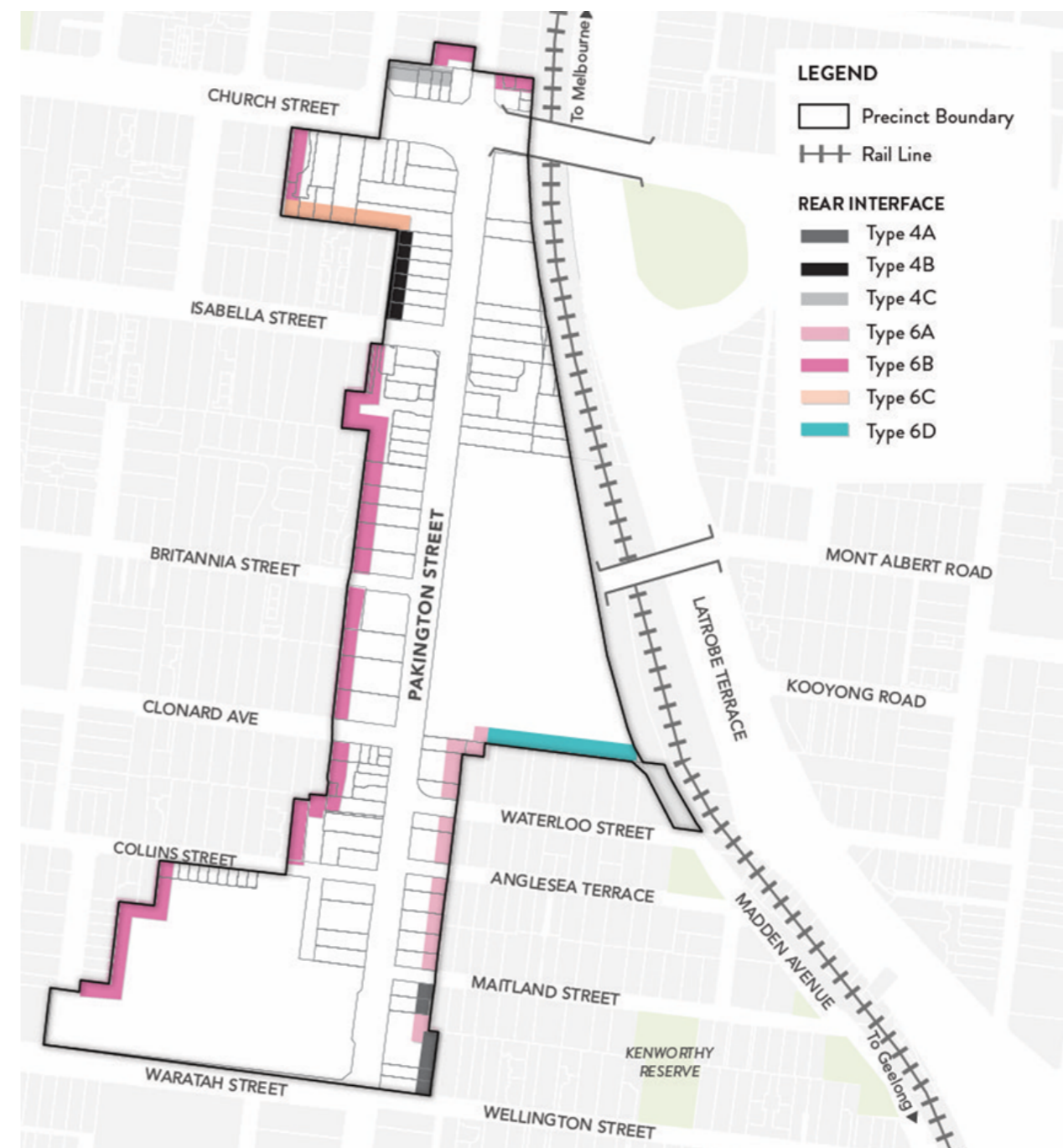


Figure 29: Map 2 to Schedule 57 to clause 43.02 (rear interface, p. 13)

- Incorporate façade design and lighting that enhances safety and security after hours including along main streets, side streets and laneways.
- Ensure improved pedestrian amenity and permeability across the Pakington Strand Strategic Site identified in the Indicative Concept Plan at Clause 11.03-6L-06.
- Minimise the potential for off-site impacts, including from noise, fumes, odour or vibrations through the use of setbacks, acoustic barriers, high performance glazing, consideration of internal layout, or other relevant measures.
- Ensure passive surveillance for developments that directly abut or are adjacent to public open spaces with the provision of clear sight lines, views and activation to these spaces.
- Integrate landscaping with building design by incorporating green walls, roof top gardens and functional courtyards.
- Encourage the provision of functional open spaces (e.g. central courtyards) and landscaped areas to the front and rear of buildings, including the planting of canopy trees to sensitively transition to lower-scale residential areas.

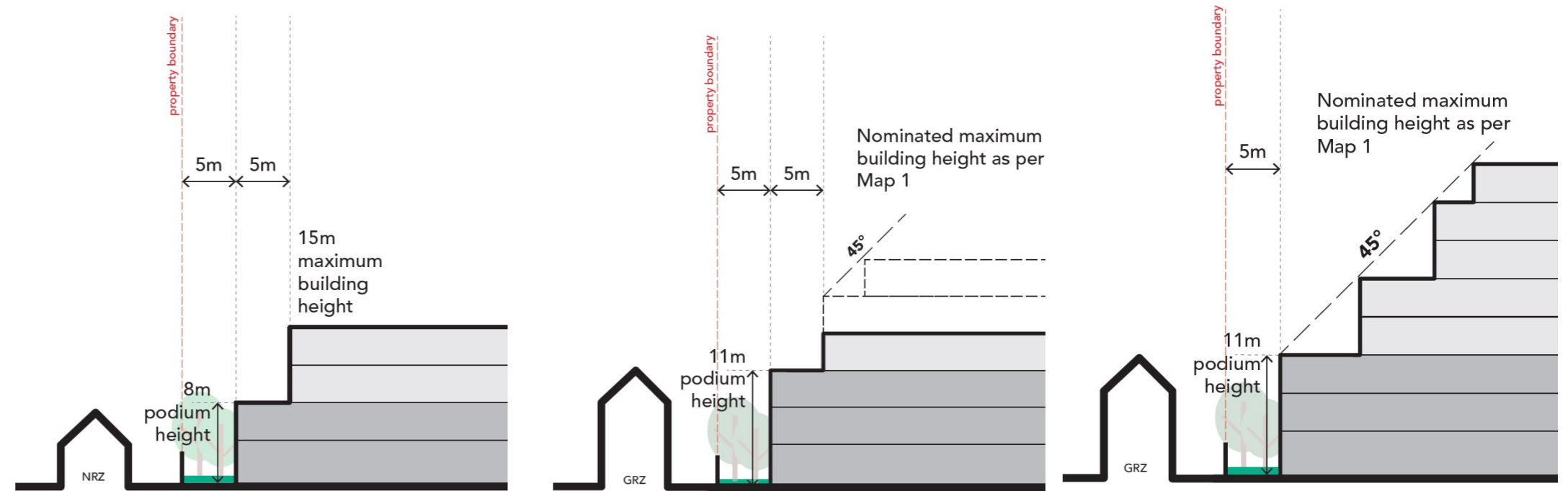


Figure 30: Figure 1: Type 6A residential interface (left) (new street); Figure 2: Type 6B residential interface (middle); Figure 3 Type 6C residential interface (right) (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 3-4)

Discussion

153. The building design objectives in the DDO are generally supported, as they reflect best practice and contribute to high-quality urban design outcomes for the public realm. Encouraging corner developments to address both street interfaces ensures consistent activation,

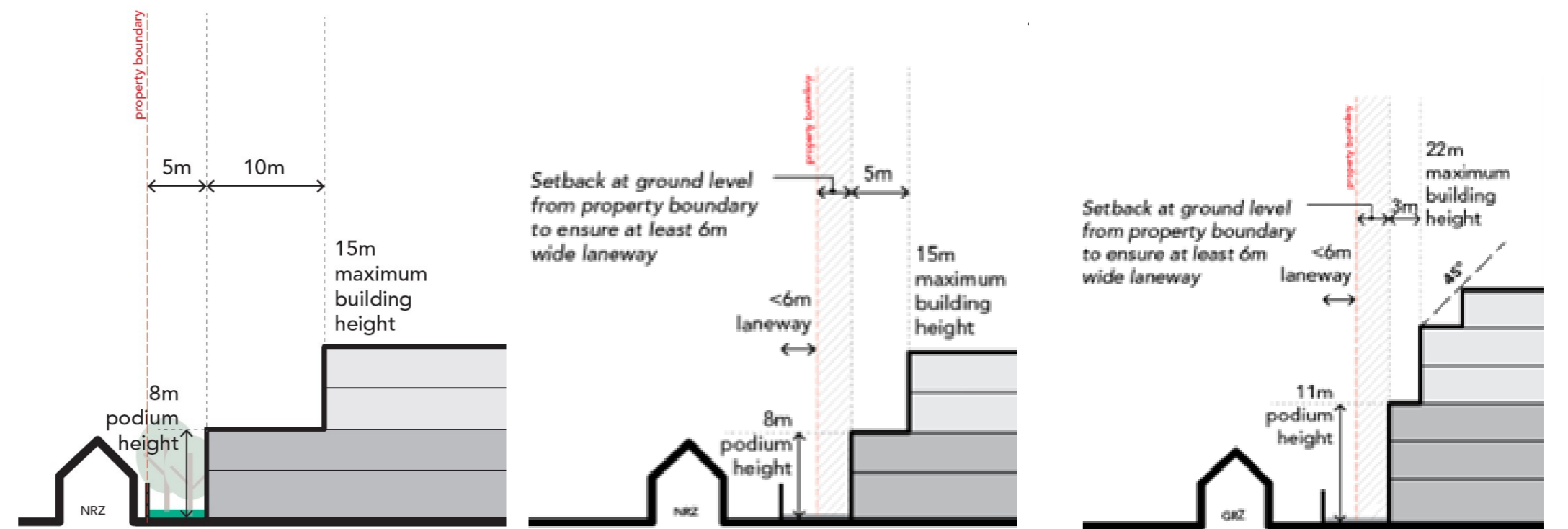


Figure 31: Figure 4: Type 6D residential interface (left); Figure 5: Type 4A Type 4A laneway interface; Figure 6: Type 4B laneway interface (right) (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 4-5)

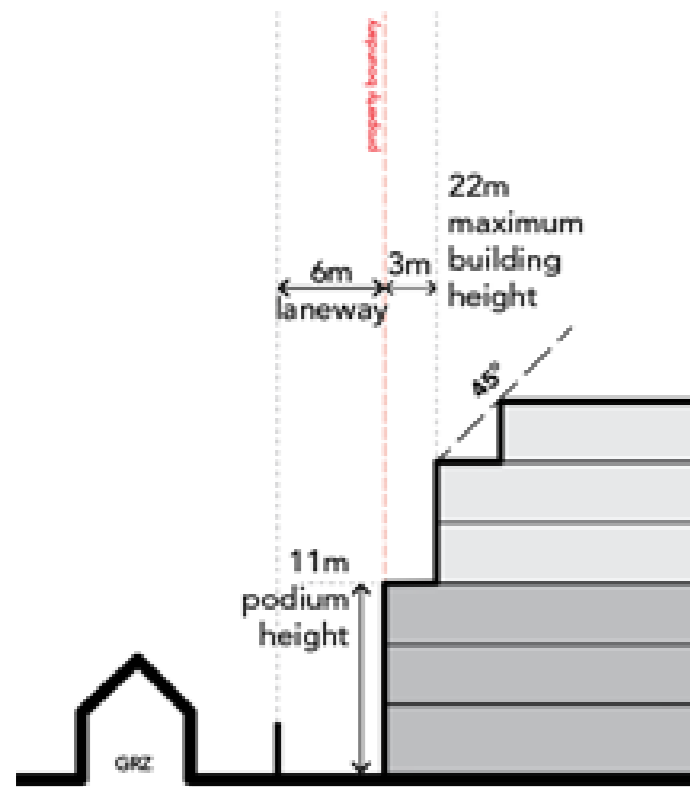


Figure 32: Figure 7: Type 4C rear interface (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 5)

legibility, and visual interest along all frontages. The emphasis on natural, tactile, and visually engaging materials, combined with façade articulation that distinguishes podiums from upper levels, mitigates visual bulk and establishes a clear hierarchy of building form.

154. Upper-level balconies, terraces, verandas, and habitable windows support passive surveillance, enhancing safety and encouraging informal social interaction, while ensuring a visual connection between residents and the public realm. Interim façade strategies provide a pragmatic response to staged development, preventing large blank walls from dominating the streetscape when adjoining properties have not yet been realised.

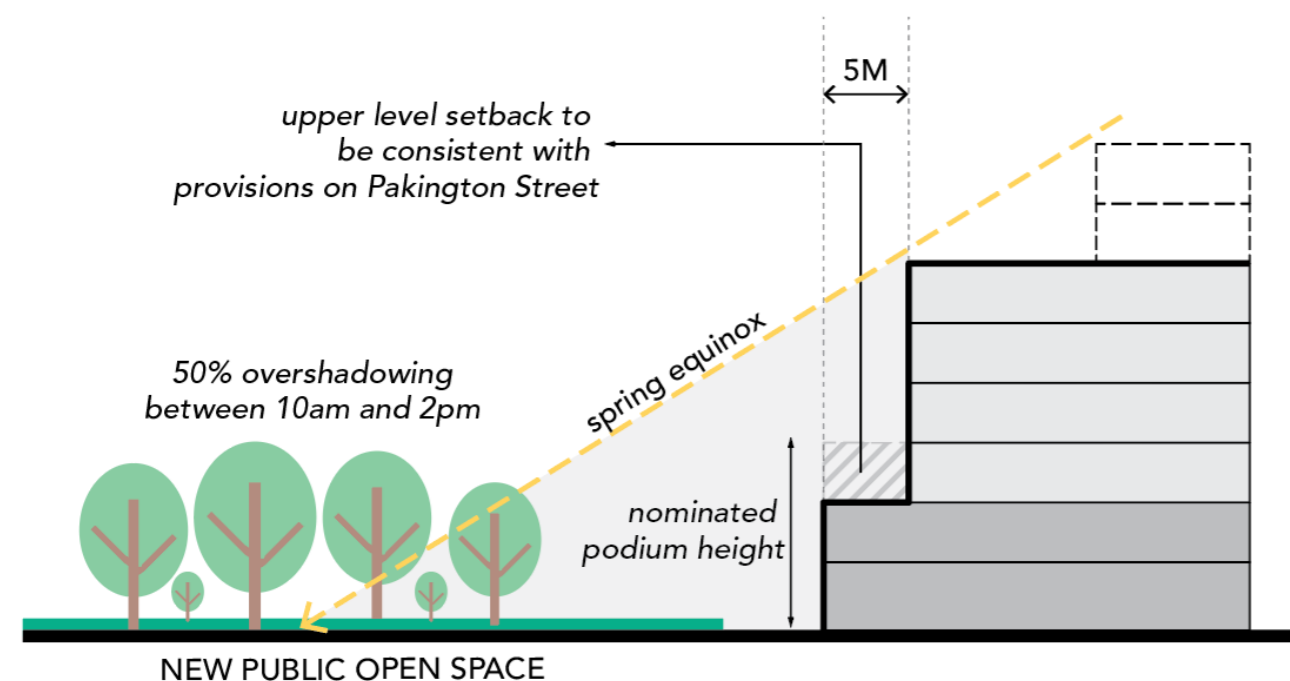


Figure 33: Figure 8: Open space interface (Figure 10 p.42 Pakington North Urban Design UDF 2024)

155. The objectives also balance amenity and functionality: integrated screening maintains resident outlook and daylight access, façade lighting improves safety after hours, and setbacks, acoustic treatments, and high-performance glazing help minimise off-site impacts such as noise, fumes, or vibrations. Integration of landscaping - through green walls, roof gardens, central courtyards, and canopy trees - strengthens the interface with lower-scale residential areas, contributes to microclimate benefits, and enhances environmental and aesthetic quality.

156. Active frontages

- Encourage the use of features which complement the existing character of Pakington Street, including the Heritage Core to the south, such as plinths, depth, and tactile materials.
- Encourage visual and physical permeability between the building and the street by incorporating measures such as doors facing the street, operable windows and direct residential access for ground level residences.
- Design buildings to address the street, with legible and direct entries to support street activation whilst clearly distinguishing residential and commercial entrances.
- Allow a maximum 75% glazing on any façade and provide 50% visually permeable balcony balustrades.

Discussion

157. Active frontage objectives in the DDO are generally supported, as they enhance visual and physical permeability between buildings and the public realm and

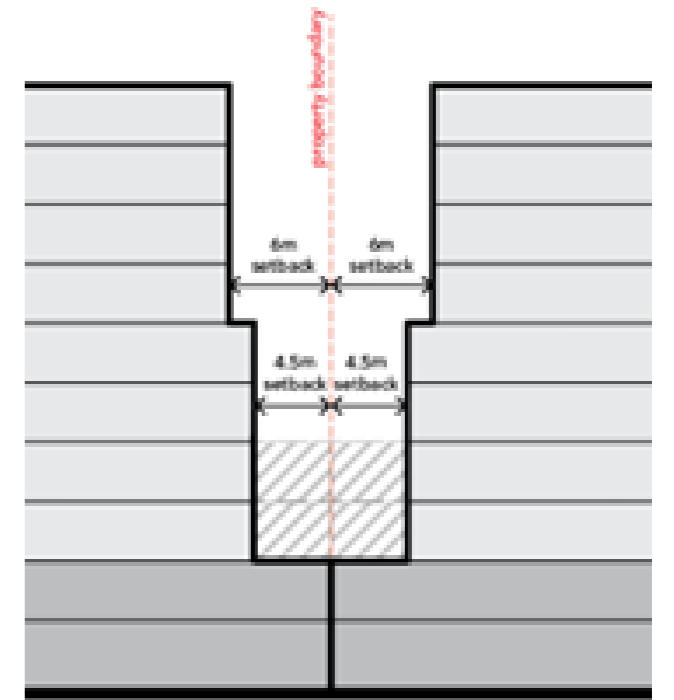


Figure 34: Figure 9: Preferred side separation for buildings built to boundary (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 6)

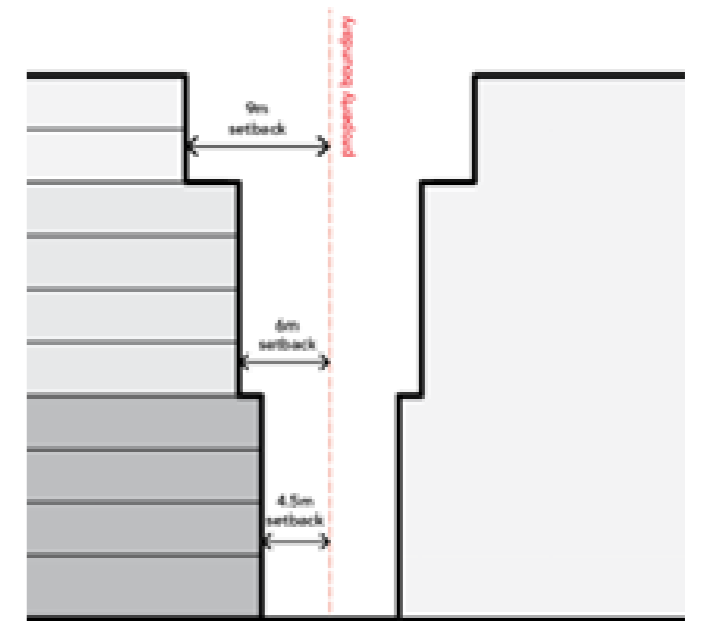


Figure 35: Figure 10: Preferred side separation for buildings not built to boundary (Schedule 57 to Clause 43.02 Pakington North Precinct, p. 6)

- encourage passive surveillance. For example, guidance includes “allow a maximum 75% glazing on any façade and provide 50% visually permeable balcony balustrades” and “...incorporating measures such as doors facing the street, operable windows, and direct residential access for ground-level residences.”
158. However, point two - “encourage the use of features which complement the existing character of Pakington Street, including the Heritage Core to the south, such as plinths, depth, and tactile materials” - requires clarification. It is unclear what is meant by “depth” (e.g., depth of setbacks, façade articulation, or overall built form). Ambiguous terminology reduces the effectiveness of active frontage guidance.
159. I recommend the following:
- Clarify the reference to “depth” in the active frontage guidance (e.g., whether it refers to setbacks, articulation, or built form).
160. Solar access, wind and weather
- *Incorporate continuous weather protection such as awnings, openings and architectural detail that are well detailed and attractive when viewed from the street.*
 - *Ensure weather protection measures do not impinge existing or future street trees.*
 - *Address wind gust management in building design, without the need for additional protective screens, incidental add-ons and landscaping in public spaces.*
 - *Minimise overshadowing impacts on the existing secluded private open space of*
- adjacent residential properties outside the precinct.*
- *Development should ensure solar access as specified in Table 3.*
 - *Buildings and works with an overall height equal to, or greater than 16 metres:*
 - *Must not cause unsafe wind conditions as specified in Table 4 on public land, publicly accessible areas on private land, private open space and communal open space, and*
 - *Should achieve comfortable wind conditions as specified in Table 4 on public land, publicly accessible areas on private land, private open space and communal open space.*
- Discussion
161. Objectives aligned with the Urban Design Guidelines for Victoria are generally supported. However, point one - “Incorporate continuous weather protection such as awnings, openings and architectural detail that are well detailed and attractive when viewed from the street” - requires clarification regarding its application. Weather protection should apply only to streets with a 0-metre lot setback and where pedestrian priority, or high levels of street-level activity are sought. Without this clarification, the objective may result in inconsistent or inappropriate weather protection outcomes.
162. I recommend the following:
- Clarify where weather protection (such as awnings) is required, including whether it applies specifically to pedestrian-priority streets and active frontages.
- Limit the requirement to streets with a 0-metre lot setback and explicitly nominate locations where awnings are expected.
163. Access, parking and services
- *Ensure above ground car parking is sleeved with active uses along street frontages.*
 - *Minimise or consolidate vehicular access points and carefully design ramps into basements to support increased amenity and safety for pedestrians and bicycles. Where possible, provide access via local streets.*
 - *New development that abuts Church Street to avoid direct access to Church Street (where possible) and make use of the local road network for access.*
 - *Ensure car parking frontages to the public realm are visually interesting with interactive materiality and detailing and allow for adequate ventilation. Avoid solid roller shutter doors or security grills.*
 - *Design off-street car parking facilities to have flexible electric vehicle charging spaces. Electric charging stations should be equipped with at least 50kw charging facilities.*
 - *Encourage shared car parking facilities according to peak car parking demand times.*
 - *Services, loading and waste areas should be accessed away from main streets and public spaces and located within basements or upper levels. Access doors to any waste, parking or*
- loading area should be designed as an integrated element of the building.*
- *Integrate plant, equipment and services into the built form design. Where possible, avoid locating services on Pakington Street or grouping them together to create long inactive facades.*
 - *Provide easy access to bicycle parking facilities with end of trip change rooms, showers, and lockers.*
- Discussion
164. The DDO objectives are generally consistent with those set out in the UDF, including “where car parking is provided above ground, ensure it is sleeved with active uses along street frontages” (UDF p. 81; DDO p. 7) and “integrate plant, equipment, and services into the built form design.” These objectives are supported and align with best-practice urban design outcomes. However, point eight - “provide easy access to bicycle facilities with end-of-trip change rooms, showers and lockers” - may be difficult to achieve or inappropriate for certain land uses (e.g. a laundromat). Overly prescriptive requirements may create unnecessary compliance challenges.
165. I recommend the following:
- Revise point eight to read “provide easy access to bicycle facilities with end-of-trip change rooms, showers and lockers, where practical”
166. Site coverage
- *Development should not exceed the preferred maximum site coverage specified in Map 3 to this schedule.*

Discussion

167. The DDO reflects the UDF’s differentiated site coverage approach, which can be summarised as: 60% site coverage for areas adjoining proposed open spaces and public plazas (including the Rail Sidings site and Waratah Street), 70% across much of the Pakington Street Retail Core, and 80% at the Church Street Junction, a less sensitive interface. These controls are supported, as they respond appropriately to context, support landscape amenity, and enable a diversity of built form typologies. However, additional guidance is needed to clarify how the non-built portion of sites is intended to function and be located. For example, within the Woolworths Strategic Site, it is unclear whether the 20% undeveloped area is intended to be consolidated along Waratah Street (noting the 3-metre built form setback) or whether its location is flexible. Without clearer direction, site coverage controls may result in fragmented or unintended open space outcomes.

168. I recommend the following:
- Provide further detail on the site coverage outcomes sought for the Woolworths Strategic Site and the Rail Sidings Strategic Site.
 - Clearly articulate the preferred location and function of non-built areas within these sites.
 - Clarify whether the 20% undeveloped land within the Woolworths Strategic Site is intended to front Waratah Street or be more flexibly located and provide equivalent clarification for the Rail Sidings Strategic Site.

3.0 Subdivision

169. N/A

4.0 Signs

170. N/A

5.0 Application Requirements

171. N/A

6.0 Decision Guidelines

172. I am supportive of the decision guidelines.

173. Comprehensive Built Form Testing Pakington North Precinct February 2026

174. I have reviewed the Comprehensive Built Form Testing (CoGG, February 2026). In summary, the document tests 3 scenarios against 4 criterion, the results of which can be found in the table in Chapter 5. I consider the testing to be reasonable in providing an informative summary of the impact built form can have on the experience of the neighbourhood. It helps provide further information on how the moderate (Scenario C) was adopted and should be read in conjunction with the UDF and Planning Scheme amendment to maximise the understanding, and therefore, likely good-design outcomes.

175. I note that a detailed testing of individual sites, in particular larger sites that may be able to manage off site impacts within their boundaries, was not undertaken. The criterion set out in this document could be applied to a case by case basis if further design guidance is required

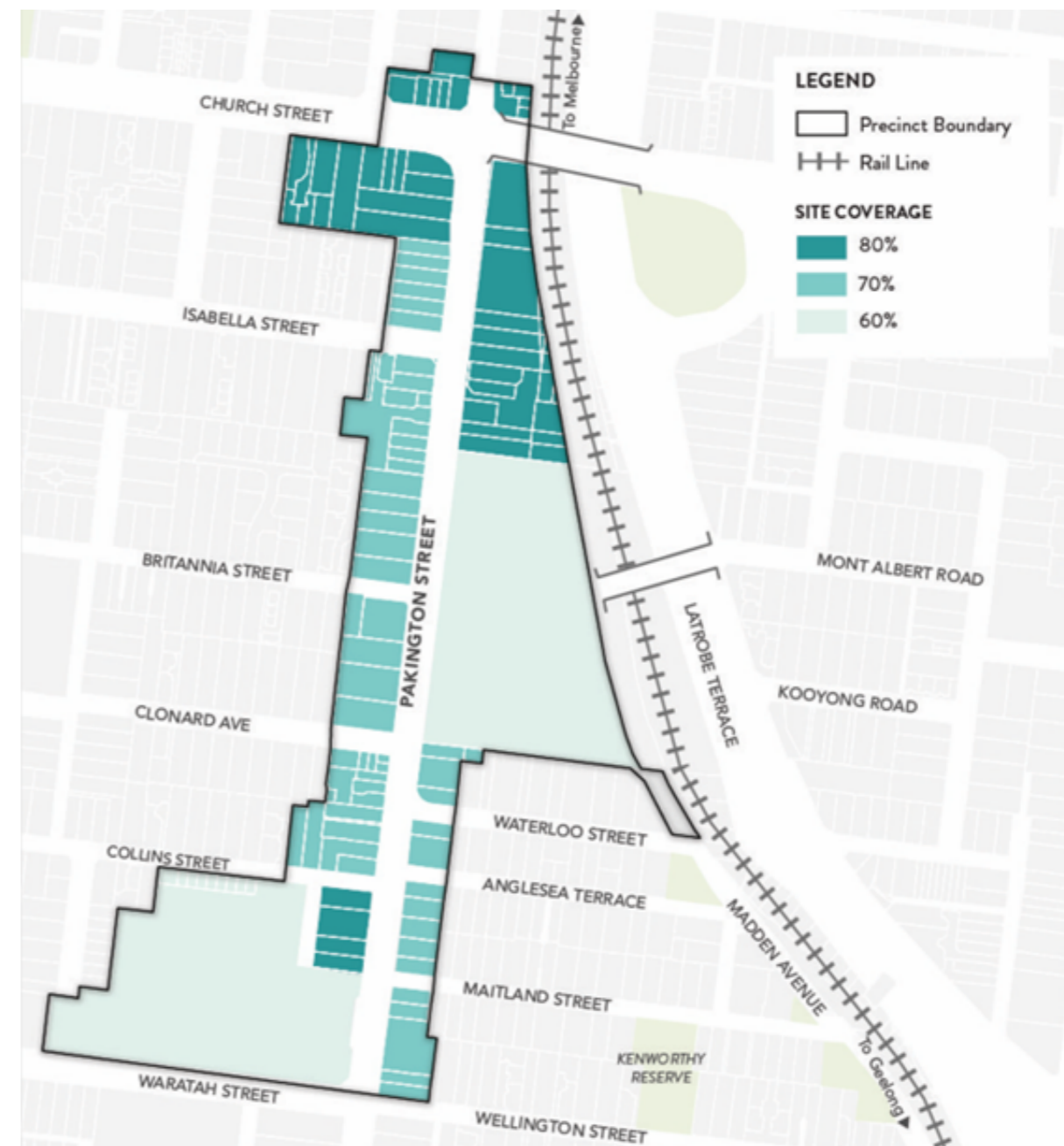


Figure 36: Map 3 to Schedule 57 to clause 43.02 (site coverage, p. 14)

4.8 Conclusion

176. I am generally supportive of the proposed Amendment in its current form. Throughout the urban design review, I have made a number of recommendations, which are listed below. With the addition of these targeted refinements, I believe the adoption of Amendment C433ggee will provide an excellent, achievable, and progressive framework for the future of the Pakington North and Gordon Avenue Precincts.

Design and Development Overlay - Schedule 56 (DDO56 Gordon Avenue Precinct)

177. Building and floor heights

- Model the preferred 10-storey maximum height along Latrobe Terrace to confirm acceptable overshadowing outcomes, particularly for the southern footpaths of Autumn Street and Gordon Avenue.
- Resolve inconsistencies between Map 1 of the DDO and Figure 20 of the UDF regarding the preferred height at the corner of McNicol Street and Spring Street.

178. Floor area ratios (FARs)

- Remove the use of FAR's and rely on the preferred heights and site coverage

OR

- Undertake targeted built form modelling to test whether sites can achieve reasonable development outcomes, considering front, side, and rear setbacks. Test at least two representative lots within each site coverage area.
- Present FARs consistently as ratios (e.g., 2.4:1 rather than 2.4).
- Provide clearer guidance in the UDF on the location and function of landscape areas, particularly where residual open space remains after setbacks.

- Conduct built form testing to show how nominated FARs translate into building height, site coverage, and open space outcomes.
- Justify the selection of specific FARs
- Clarify whether proposed laneways contribute to site coverage calculations.
- Provide guidance on the preferred location and role of residual open space.

179. Interface requirements

- Ensure alignment between UDF and DDO in labelling, metrics, and diagrams.
- Correct UDF diagrams so setbacks are measured consistently to building edges, not balconies.
- Reconsider the Future Park Interface to allow for a landscape transition zone between public parkland and private development (approx. 2 m recommended).
- Undertake built form testing to justify a 5 m ground-level setback plus a 5 m upper-level setback above two storeys.
- Clarify whether setbacks are measured from building edges or balcony edges and ensure consistency across all diagrams and controls.
- Resolve inconsistencies between UDF text, diagrams, and DDO provisions.

180. Building separation

- Model side setbacks to confirm developable building envelopes remain.
- Clarify how separation applies when podium or street wall heights exceed four storeys.
- Review upper-level side setbacks and separation distances, particularly where

they exceed comparable controls in other planning schemes.

- Avoid excessive or untested separation distances that may unnecessarily constrain development.

181. Active frontages

- Include dedicated guidance in the UDF and DDO for landscaping and open space outcomes supporting active frontages. This should reflect community engagement findings and Council climate and environmental strategies.
- Guidance may include:

- Provide integrated soft landscaping within sites to mitigate urban heat island effects, enhance biodiversity, and support engaging streetscapes.
- Require planted/soft landscaping to comprise at least 60% of front setback areas.
- Maximise deep soil planting to support canopy trees.
- Encourage green roofs, walls, and landscaped balconies to enhance biodiversity and visual amenity.
- Use planting palettes with a minimum of 40% indigenous and 40% native species.
- Provide communal garden spaces at podium and rooftop levels.

182. Solar access, wind and weather

- Use mandatory language where solar access controls are enforceable (e.g., "Development must not overshadow the footpath on the opposite side of the street between 11am and 2pm on 22 September").

- Consider offsetting overshadowing controls from property boundaries to allow for potential public realm improvements.

- Clarify where canopies or weather protection are required and the applicability of active frontage requirements.

- Amend the wording in Application requirements in the DDO to reflect the overshadowing requirements in the body of the clause under Building and Works: (application requirements ask for overshadowing diagrams between 10am and 3pm, Building and works between 11am 2pm)

183. Site coverage

- Provide detail on the preferred location and treatment of undeveloped land, particularly along Latrobe Terrace, to clarify intended site coverage outcomes.

Design and Development Overlay - Schedule 57 (DDO57 Pakington North Precinct)

184. Rear interface

- Review excessive rear setbacks (e.g., Type 6D) that exceed typical ResCode standards.

185. Open space interface

- Revise wording (e.g., "50% overshadowing between 11am and 2pm") to clarify intent. i.e. "maximum 50% of open space to be overshadowed between 11am-2pm at the winter solstice"

186. Building separation

- Model side setbacks to ensure feasible development envelopes.

- Review 9 m upper-level separation above 8 storeys, which results in 18 m separation.
- Undertake modelling to confirm separation distances allow practical development outcomes.

187. Active frontages

- Clarify references to “depth” (whether referring to setbacks, articulation, or built form).

188. Solar access, wind and weather

- Clarify where weather protection (awnings) is required, including streets with 0 m lot setbacks.

189. Access, parking and services

- Amend recommendation eight to read: “Provide easy access to bicycle facilities with end-of-trip change rooms, showers and lockers where practical.”

190. Site coverage

- Provide further detail on site coverage outcomes for the Woolworths Strategic Site and Rail Sidings Strategic Site.
- Clearly articulate the preferred location and function of non-built areas.
- Clarify whether the 20% undeveloped land within the Woolworths Strategic Site is intended to front Waratah Street or be flexibly located, and provide equivalent clarification for the Rail Sidings Strategic Site.



Figure 37: Geelong Railway Station carpark (Google maps, 2025)

5.0 Appendix A

Name and Address

Amanda Roberts (MUrban Planning, BLandArch, BArchStud, AILA)

Urban Designer and Landscape Architect

Director, LatStudios

Level 2, 358 Lonsdale Street, Melbourne VIC 3000

Qualifications

- *Master of Urban Planning, University of Melbourne*
- *Bachelor of Landscape Architecture (1st Class Hons), University of Adelaide*
- *Bachelor of Architectural Studies, University of Adelaide*

Experience

2020-present: Director, LatStudios

2022-Present: Co chair of the Urban Design Review Panel, Suburban Rail Loop

2015-present: Member OVGa review panel, NSW review panel, City of Melbourne Design review panel, ODASA review panel

2013-2020: Director (since 2016), SJB Urban

2012-2013: Team Leader Subdivisions & Urban Design, City of Wyndham

2007-2012: Urban Designer, Places Victoria (VicUrban)

2006-2007: Urban Designer, Department of Planning & Community Development

2002-2003: Landscape Architect, Hames Sharley, Perth

2001-2002: Technical Officer, City of Stirling, Perth

1999-2000: Urban Design/Landscape Architect, Heaton Associates, UK

2010-present: Tutor, occasional Lecturer, The University of Melbourne

Area of Expertise

My area of expertise is Urban Design, derived from my professional experience in urban design practice, landscape architecture practice, and state and local government urban design, as well as my tertiary qualifications in Landscape Architecture, Architecture and Urban Planning. Within this field, my specific expertise and experience includes the following:

- *Design Review:*
 - *Office Victorian Government Architect design review panel*
 - *Office Design and Architecture South Australia design review panel*
 - *NSW design review panel*
 - *City of Melbourne Design Review Panel*
 - *Chair of the Urban Design Review Panel for the Suburban Rail Loop Project*
 - *Urban Designer as part of Nation Partners team reviewing Urban Design and Landscape against Urban Design Strategy for North East Link Project*
 - *Expert Urban Design review for Economic Development Victoria on the city shaping Queens Wharf precinct*
 - *Lead Urban Design review member for Places Victoria on Melbourne Docklands and Dandenong*
- *Project manager of the Gehl Places for People study on Melbourne Docklands*
- *Independent Urban Design Reviews for Local Government*
- *Urban Design Advice on a range of development proposals and locations*

- *Urban Design Analysis and Assessment and preparation of Urban Context Reports*
- *Preparation of Development Plans, Master Plans and Urban Design Frameworks for public and private sector clients*
- *Urban development research, investigation, modelling*
- *Landscape Architectural practice - design, documentation, administration on a range of residential, commercial and master planning projects.*

Instructions Which Define the Scope of this Report

I am engaged by City of Greater Geelong. I have received written instructions from Harwood Andrews, including various documents relating to the proposal. I have no private or business relationship with the party for whom the report is prepared.

Facts, Matters and Assumptions Relied Upon

I have relied upon an inspection of the subject site and surrounding area, and a review of planning controls and policies of the existing Greater Geelong Planning Scheme with respect to the subject site and surrounding area.

Documents Taken into Account

- Greater Geelong Planning Scheme Amendment C433ggee (exhibited clauses, schedules and map sheets)
- Pakington North Urban Design Framework (City of Greater Geelong, May 2024)
- Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)

- Greater Geelong Planning Scheme Amendment C433ggee Instruction Sheet
- Greater Geelong Planning Scheme Amendment C433ggee Explanatory Report
- Pakington North UDF - Community Panel Engagement Summary Report (Capire, May, 2024)
- Built Form Testing Pakington North Precinct (City of Greater Geelong, July 2025)
- The Greater Geelong Planning Scheme and relevant supporting documents
- Amendment C433 - Pakington Street Urban Design Frameworks - Community Submissions
- Pakington Street and Gordon Avenue Built Form Framework (Hodyl & Co, August 2021)
- C433 Exhibited DDO56 - Post Exhibition Changes
- C433 Exhibited DDO57 - Post Exhibition Changes
- C433 Exhibited Clause 11.03 Planning for Places - Post Exhibition Changes
- The Letter of Instruction prepared by Harwood Andrews (dated 05/12/2025)
- Various documents and correspondences related to the above

Assistance in Preparation of this Report

I have been assisted in the preparation of this statement by Kate Haughey (Urban Planner).

Summary of Opinions

Refer to the conclusion of this statement.

6.0 Appendix B

Provisional Opinions

There are no provisional opinions in this report.

Questions Outside My Area of Expertise, Incomplete or Inaccurate Aspects of the Report

To the best of my knowledge, this report is complete and accurate. This report does not address questions outside my area of expertise.

Signed Declaration

I have made all the inquiries that I believe are desirable and appropriate and that no matters of significance which I regard as relevant have to my knowledge been withheld from the Tribunal.



Director, LatStudios

Relevant provisions of the Greater Geelong Planning Scheme, Greater Geelong Planning Scheme Amendment C433ggee and other documents to which I have had regard in preparing this statement include:

Planning Policy Framework

- Clause 02.03-1 Settlement
- Clause 02.03-6 Housing
- Clause 02.04-4 Housing and Settlement Framework Plan
- Clause 11.01-1L-01 Settlement - Greater Geelong
- Clause 11.03-6L-06 Pakington Street Geelong West
- Clause 16.01-1L-01 Integrated Housing and Housing Diversity
- Clause 16.01-1L-02 Increased Housing Diversity Areas
- Clause 16.01-2L Social and Affordable Housing

Zones

- Mixed Use Zone (MUZ Greater Geelong Mixed Use Areas)
- Commercial 1 Zone (C1Z)
- Neighbourhood Residential Zone - Schedule 3 (NRZ3 Geelong West)
- General Residential Zone - Schedule 4 (GRZ4 Urban Increased Housing Diversity Areas)
- Public Park and Recreation Zone (PPRZ)
- Residential Growth Zone - Schedule 1 (RGZ1 Residential Growth Areas)

Overlays

- Design and Development Overlay - Schedule 17 (DDO17 Western Beach Areas)
- Design and Development Overlay - Schedule 56 (DDO56 Gordon Avenue Precinct)
- Design and Development Overlay - Schedule 57 (DDO57 Pakington North Precinct)
- Environmental Audit Overlay (EAO)

Other Documents

- Pakington North Urban Design Framework (City of Greater Geelong, May 2024)
- Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)



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