

IN PLANNING PANELS VICTORIA

GREATER GEELONG PLANNING SCHEME

AMENDMENT C433ggee

PAKINGTON STREET URBAN DESIGN FRAMEWORKS

PART A SUBMISSION

ON BEHALF OF GREATER GEELONG CITY COUNCIL

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INTRODUCTION

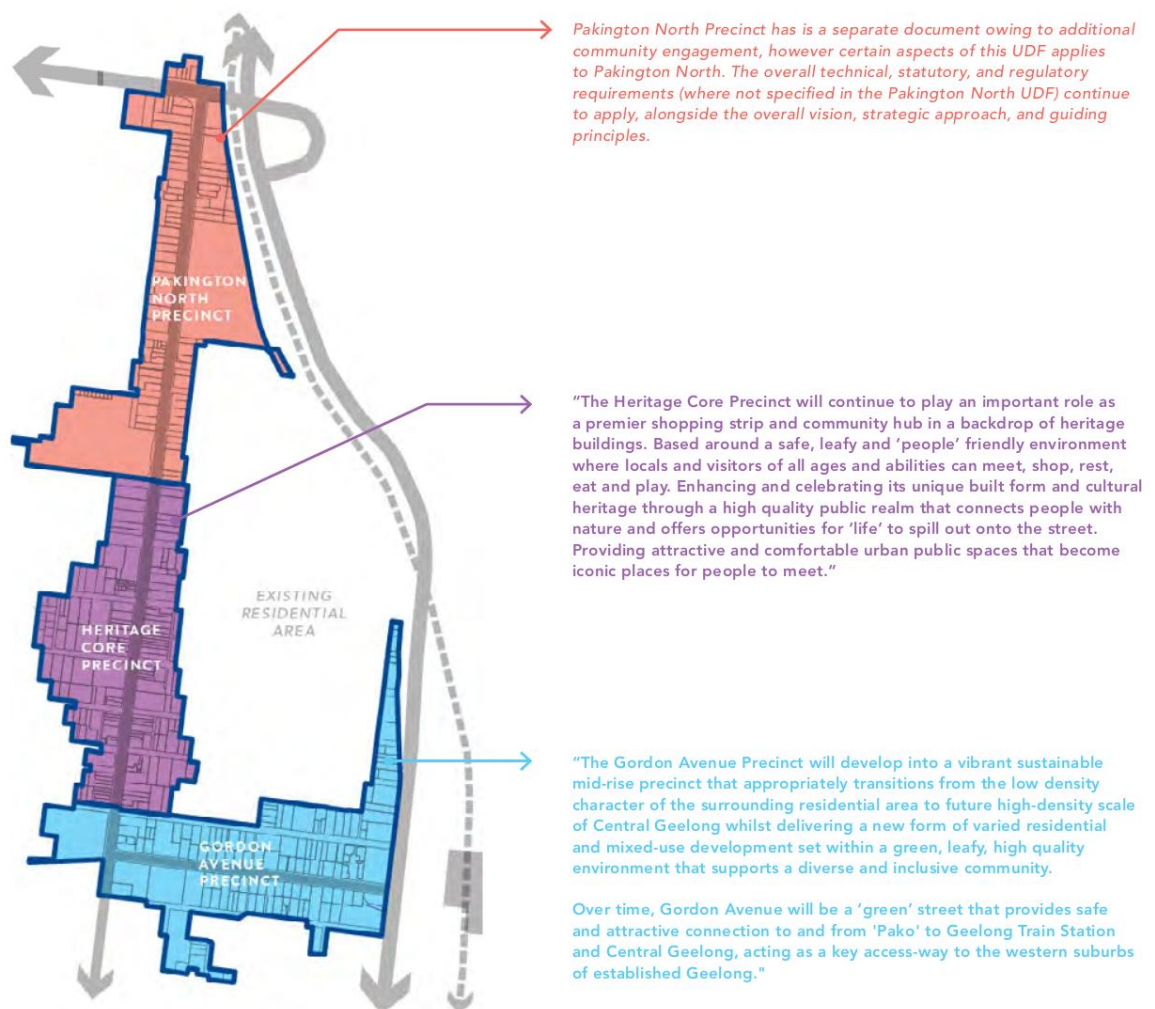
1. These submissions are made on behalf of Greater Geelong City Council (**Council**), the planning authority for Amendment C433ggee (**Amendment**) to the Greater Geelong Planning Scheme (**Planning Scheme**).
2. The Amendment implements the *Pakington Street and Gordon Avenue Urban Design Framework* (Greater Geelong City Council, 2024) and the *Pakington North Urban Design Framework* (Greater Geelong City Council, 2024) (**Urban Design Frameworks** or **UDFs**) by making changes to local planning policy, rezoning land for commercial and residential purposes and applying the Design and Development Overlay (**DDO**) and Environmental Audit Overlay (**EAO**) to specific properties.
3. The Urban Design Frameworks outline an overarching vision and guiding principles for the growth and development of land along and adjacent to Pakington Street and Gordon Avenue, Geelong West, comprised of the Gordon Avenue, Heritage Core and Pakington North Precincts (the **Precincts**). The Urban Design Frameworks also specify built form objectives, guidelines and actions for each of the three precincts.
4. At a high level, the Urban Design Frameworks seek to facilitate increased residential densities and commercial opportunities in the Gordon Avenue and Pakington North Precincts while ensuring appropriate transitions to the Heritage Core Precinct and adjoining residential areas.
5. In summary, the Amendment will achieve these objectives by:
 - 5.1. applying the Commercial 1 Zone (**C1Z**) to allow for co-location of residential and commercial development and to permit a wide range of commercial uses;
 - 5.2. applying the Mixed Use Zone (**MUZ**) and Residential Growth Zone – Schedule 1 (**RGZ1**) to provide for more substantial change and facilitate the supply of housing at increased densities alongside commercial and other uses;
 - 5.3. applying the Design and Development Overlay – Schedules 56 and 57 (**DDO56** and **DDO57**) to introduce design objectives, mandatory and discretionary built form requirements and decision guidelines in respect of future development in the Gordon Avenue and Pakington North Precincts; and

- 5.4. introducing and amending local policy in the Planning Scheme to guide the future use and development of land within the Precincts in a manner which achieves a vibrant, compact and thriving urban village with greater housing density and housing diversity, whilst respecting the amenity and heritage values of surrounding residential areas (among other objectives).
6. The Panel's directions dated 19 January 2026 require this submission to address the following:
 - 6.1. a summary of the physical context of the subject land and surrounds
 - 6.2. a map showing the activity centre boundary, existing Heritage Overlay and proposed Design and Development Overlay schedules
 - 6.3. background to the Amendment including chronology of events
 - 6.4. a summary of the conditions of authorisation and how they have been met
 - 6.5. a summary of the strategic context, including:
 - 6.5.1. relevant planning policies and provisions
 - 6.5.2. any other recently approved or upcoming amendments that might impact on the Amendment
 - 6.6. a summary of any permit applications or recently granted permits that might impact on the Amendment
 - 6.7. a summary of the issues raised in submissions, including an explanation of which (if any) of those issues have been resolved and how
 - 6.8. its interpretation of Council's resolution made at its 25 November 2025 meeting, specifically whether Council has endorsed the officer response to issues attached to the minutes.
7. These matters are addressed below.
8. In addition to this Part A submission, Council will rely upon the expert evidence of John Glossop in relation to town planning matters and Amanda Roberts in relation to urban design, and its Part B Submission to be filed on 16 February 2026.

BACKGROUND

Land affected by the Amendment

9. The Amendment applies to all land within the Gordon Avenue, Heritage Core and Pakington North Precincts, which are detailed in the Urban Design Frameworks.
10. The land affected by the Amendment is shown on the following extract from the Pakington Street and Gordon Avenue UDF:



11. The Pakington Street and Gordon Avenue UDF describes the overall study area (i.e. the Gordon Avenue, Heritage Core and Pakington North Precincts) as follows:

"The study area is located in the established inner suburb of Geelong West and includes two key streets; Pakington Street and Gordon Avenue. Pakington Street is a key north south connection bound by Church Street to the north and

Barwon River to the south. Gordon Avenue is a key east-west connection between Pakington Street and Latrobe Terrace. They both play important roles in providing connections for the West to key destinations including; Geelong train station, Central Geelong, the waterfront, and the many shops and businesses in 'Pako' itself.

The area surrounding these two key streets have many established dwellings of heritage significance. The areas along Pakington Street and Gordon Avenue are established commercial areas; the central part of Pakington Street is a recognised specialised retail centre, while Gordon Avenue and the northern section of Pakington Street mainly include secondary services and bulky goods.

The location and access to existing services, public and active transport infrastructure, and established community are some of the factors that highlight its infill development potential, contributing to Geelong's sustainable growth.”¹

12. More specifically, the Gordon Avenue Precinct is described as:

“The Gordon Avenue Precinct stretches along Gordon Avenue from Pakington Street to Latrobe Terrace; large format retail is predominant in the area with some office and educational uses. The precinct developed over time as a peripheral area to the Heritage Core Precinct and Central Geelong.

The streetscape reflects its more car-oriented uses, characterised by large warehouse built form, front setbacks accommodating private car parking, frequent cross overs and a lack of street trees and street furniture. Activity in the precinct is limited and centred primarily on visitation.

Existing large property sizes and its proximity to 'Pako', Central Geelong and the Geelong Train Station means the precinct has potential to support a wider mix of uses including residential. Gordon Avenue is a key link between Geelong West and Central Geelong.

The City recognises the need to advocate for sustainable growth by encouraging development in areas that are within walking distance to existing

¹ Pakington Street and Gordon Avenue UDF, page 20.

services and public transport and can support a range of building types catering for a diverse community by providing greater housing diversity and choice.²

13. The Heritage Core Precinct is described as:

“The activity core of Pakington Street (Geelong West), stretching from Wellington / Waratah Street to Autumn Street is the area that comes to mind when you hear “Pako”. It’s home to one of Geelong’s biggest celebrations of cultural diversity and offers some of the best shopping and dining experiences in a backdrop of heritage buildings and community spirit.

Pakington Street itself is the glue that brings everything together, the space between the buildings that belongs to everyone and from where shops and services are accessed and where interactions and activity take place.

The retail and community hub function of this section of Pakington Street requires it to be a safe, inclusive and attractive part of the public realm. Embracing its role and catering for the different ways people move, with nodes offering seating, shelter and interest.

Recognising that this is a successful and well-known part of Geelong with a distinct character and strong community, design interventions should focus on improving, rather than changing the area in order to ensure the precinct continues to thrive.”³

14. The Pakington North UDF describes the Pakington North Precinct as follows:

“Having evolved as a peripheral commercial area adjacent to the established Pakington Street Commercial Heritage Area (Heritage Core Precinct), this part of Pakington Street predominantly comprises of restricted retail and office uses with some hospitality businesses. Activities in this area are generally around ‘purpose’ oriented visits with limited opportunities to linger.

North Geelong Station lies approximately 1.9km to the north, while Geelong Station is situated approximately 1.3km southeast of the precinct. Additionally, bus route 22 traverses the precinct. There exists good access to other parts of West Geelong however, ease in movement to destinations to the east such as

² Pakington Street and Gordon Avenue UDF, page 68

³ Pakington Street and Gordon Avenue UDF, page 48.

the waterfront, central Geelong and Railway Station is constraint due to the presence of rail line and Latrobe Terrace, a key arterial road. A number of urban renewal and growth areas have been established proximate to this precinct...⁴

15. In terms of the physical context of the subject land and its surrounds:

15.1. Geelong West is an established inner suburb with good access to Central Geelong and the waterfront, including via pedestrian, bicycle and public transport (bus) routes. For example:

15.1.1. The southern end of the Heritage Core Precinct is located approximately 600 metres from Geelong Railway Station and 1.2 kilometres from Cunningham Pier and the Deakin University waterfront campus.⁵

15.1.2. The eastern end of the Gordon Avenue Precinct is located directly opposite the Geelong Railway Station and approximately 750 metres from Central Geelong.⁶

15.1.3. The Pakington North Precinct also has good access to the waterfront via Church Street and Glenleith Avenue (distance of approximately 500 metres) or via the pedestrian link from the corner of Wellington Street and Madden Avenue across the railway line (distance of approximately 650 metres⁷).

15.1.4. North Geelong Railway Station is located approximately 1 kilometre to the north of the Pakington North Precinct.⁸

15.1.5. Pakington Street, Geelong West forms part of the principal bicycle network, and Pakington Street and Gordon Avenue are serviced by regular bus services.

15.2. Pakington Street is a specialised, high street retail centre which includes various retail, commercial and community uses. It is surrounded by residential development, generally in the form of 1-2 storey detached or semi-detached

⁴ Pakington North UDF, page 28.

⁵ Measured from the corner of Pakington Street and Autumn Street

⁶ Measured from the corner of Gordon Avenue and Latrobe Street to the corner of Malop Street and Moorabool Street.

⁷ Measured from the corner of Wellington Street and Pakington Street

⁸ Measured from the corner of Pakington Street and Church Street

dwellings, 1-3 storey townhouses and single storey units. As shown on the at Appendix A, many buildings in and around the Pakington Street activity centre are affected by the Heritage Overlay.

- 15.3. Gordon Avenue and the northern section of the Pakington Street activity centre include more professional service and office-type uses, large format retail and some hospitality and educational uses.
- 15.4. Pakington Strand, at the southern end of the Pakington North Precinct, includes the only large supermarket in the study area (Woolworths) and also retains remnants of the historical Kinnears Ropeworks (State-heritage listed).
16. A map showing the Pakington Street activity centre boundary, the existing Heritage Overlay and the proposed Schedules to the Design and Development Overlay is included at **Appendix A**.

Outline of the UDFs

17. The Urban Design Frameworks are strategic planning documents that have been developed by Council in accordance with Planning Practice Note 17: Urban Design Frameworks (PPN17) to guide future development in the Gordon Avenue, Heritage Core and Pakington North Precincts.
18. The Urban Design Frameworks articulate a long-term vision for each of the three precincts and set out objectives, principles, controls, guidelines, high-level concepts and ideas to guide future land use and development.
19. More specifically:
 - 19.1. the Pakington Street and Gordon Avenue UDF is comprised of:
 - 19.1.1. **background information** in relation to the study area including drivers for change and the strategic and planning policy context;
 - 19.1.2. a summary of **community and stakeholder engagement**;
 - 19.1.3. an overarching **vision** for the study area and specific **visions** for each of the Gordon Avenue and Heritage Core Precincts;
 - 19.1.4. **guiding principles** for the study area;

- 19.1.5. **key moves** for each of the Gordon Avenue and Heritage Core Precincts;
- 19.1.6. **built form objectives** for the study area;
- 19.1.7. key **opportunities** for the Gordon Avenue and Heritage Core Precincts;
- 19.1.8. recommended **land use changes** (including application of zone and overlay provisions) for the Gordon Avenue Precinct;
- 19.1.9. proposed **built form controls** and **guidelines** in relation to building heights, site coverage, solar access, interfaces and density;
- 19.1.10. recommended **public realm upgrades** for the Gordon Avenue and Heritage Core Precincts; and
- 19.1.11. an **implementation strategy** and discussion of further work for the Gordon Avenue and Heritage Core Precincts;
- 19.2. the Pakington North UDF is comprised of:
 - 19.2.1. a summary of **community engagement** including the deliberative engagement process;
 - 19.2.2. **background information** in relation to the Pakington North Precinct including the strategic and planning policy context, drivers for change and key influences;
 - 19.2.3. a specific **vision** for the Pakington North Precinct
 - 19.2.4. an **urban design framework plan** for the Pakington North Precinct;
 - 19.2.5. **objectives** and **guidelines** in relation to land use and activity, development and interface management, access and movement, public realm and open space;
 - 19.2.6. **aspirations** for specific **strategic sites**, namely the rail sidings yard and Pakington Strand; and
 - 19.2.7. an **implementation plan** in respect of outcomes identified in the Pakington North UDF.

Pakington Street and Gordon Avenue UDF

20. The Pakington Street and Gordon Avenue UDF articulates the following **vision** for the overall study area:

“Over the next 25+ years, the Pakington Street (Geelong West) and Gordon Avenue area will be a vibrant, compact and thriving urban village that is:

A place of Inclusion

A village that showcases universal design to ensure everyone can access the varied local attractions, services and businesses offering plenty of opportunities for all to participate and contribute to the vibrant street and community life.

A place of Opportunities

A village that provides a variety of spaces and places to rest, reflect and socialise that are comfortable, attractive and relaxing. There's always something happening with plenty of community events showcasing local design, culture and business.

A place for People

A village that puts people first and respects the human scale at the street level. Designing streetscapes that allow for the integration of varied transport modes while providing enough room for activities. The green leafy trees provide shade and comfort helping to create a healthy, safe and attractive urban village.”⁹

21. The **guiding principles** for the study area are:

- 21.1. shared vision;
- 21.2. thriving business and activity;
- 21.3. places for people;
- 21.4. urban greening and sustainable development;

⁹ Pakington Street and Gordon Avenue UDF, pages 7 and 34.

- 21.5. a great place for everyone;
 - 21.6. design excellence; and
 - 21.7. identity and place.
22. The Pakington Street and Gordon Avenue UDF also articulates the following more specific **vision** for the Gordon Avenue Precinct:

“The Gordon Avenue Precinct will develop into a vibrant sustainable mid-rise precinct that provides an appropriate transition from the low density character of the surrounding residential area to the future high-density scale of Central Geelong. Delivering a new form of varied residential and mixed-use development set within a green, leafy, high quality environment that supports a diverse and inclusive community.

Over time, Gordon Avenue will be transformed into a green street that provides a safe and attractive connection to and from the Geelong Train Station and Central Geelong, acting as a key access-way to the western suburbs of established Geelong.”¹⁰

23. And for the Heritage Precinct:

“The Heritage Core Precinct will continue to play an important role as a premier shopping strip and community hub in a backdrop of heritage buildings. Based around a safe, leafy and people friendly environment where locals and visitors of all ages and abilities can meet, shop, rest, eat and play. Enhancing and celebrating its unique built form and cultural heritage through a high quality public realm that connects people with nature and offers opportunities for life to spill out onto the street. Providing attractive and comfortable urban public spaces that become iconic places for people to meet.”¹¹

24. The built form objectives, recommended land use changes, proposed built form controls and guidelines and recommended public realm upgrades will be discussed as part of Council’s response to issues raised in submissions.

¹⁰ Pakington Street and Gordon Avenue UDF, page 70.

¹¹ Pakington Street and Gordon Avenue UDF, page 50

Pakington North UDF

25. The Pakington North UDF identifies a number of key influences on the Pakington North Precinct, including:
 - 25.1. its diverse range of land uses, including restaurants, cafes, warehouse retailers, small scale retailers, and various personal and business services, as well as larger retail establishments such as the Woolworths supermarket to the south;
 - 25.2. its current transition from a peripheral area including manufacturing and bulky goods retail to a wider array of uses;
 - 25.3. two large landholdings, each in single ownership (Pakington Strand and the Rail Sidings Yard);
 - 25.4. a lack of public open spaces;
 - 25.5. a lack of fine-grain lot frontages;
 - 25.6. predominantly one and two storey buildings, often featuring expansive commercial street frontages;
 - 25.7. a lack of active street frontages;
 - 25.8. several buildings of historical and heritage significance, including the Ropeworks within Pakington Strand;
 - 25.9. low public transport patronage, with residents driving to and through the precinct, creating high levels of congestion;
 - 25.10. bi-directional vehicular lanes, on-street parking spaces and narrow bicycle lanes;
 - 25.11. a lack of pedestrian crossing points and constrained footpath width;
 - 25.12. the fact that Pakington Street forms part of the Principal Bike Network; and

- 25.13. surrounding land use, noting that rail tracks are located along the majority of the western boundary of the precinct, the precinct otherwise adjoins established residential areas, zoned NRZ1 and GRZ1.¹²
26. The Pakington North UDF articulates the following vision for the Pakington North Precinct:
- “Pakington North Precinct will be a vibrant destination with local shops, offices and communal spaces at lower levels fronting Pakington Street and residential living above. By becoming a people friendly and inclusive precinct, businesses will thrive, residents will benefit from a range of housing choices close to amenities and visitors will be inspired by the quality of the public realm and architecture.*
- Pakington Street will be enhanced as a green street that improves the urban environment and contributes to the canopy cover targets for Geelong.”¹³*
27. The **objectives** and **guidelines** in relation to land use and activity, development and interface management, access and movement, public realm and open space will be discussed as part of Council’s response to issues raised in submissions.

Description of the Amendment

28. The Amendment implements the UDFs through zoning and overlay changes and the introduction of local policy, as detailed in the Explanatory Report, a copy of which is attached at **Appendix B**.
29. In summary, the Amendment rezones land in the Pakington North and Gordon Avenue Precincts as follows:
- 29.1. Pakington North Precinct:
- 29.1.1. rezones various parcels of land from the General Residential Zone – Schedule 1 (**GRZ1**) and the Commercial 2 Zone (**C2Z**) to the C1Z; and
- 29.1.2. rezones land at 1/2 Waratah Street from MUZ to the Neighbourhood Residential Zone – Schedule 3 (**NRZ3**) (correction of a zoning anomaly);

¹² Pakington North UDF, pages 30-35.

¹³ Pakington North UDF, page 38.

- 29.2. Gordon Avenue Precinct:
- 29.2.1. rezones various parcels of land at the western end of Gordon Avenue, Autumn Street and Spring Street from C2Z to C1Z;
 - 29.2.2. rezones various parcels of land at the eastern end of Gordon Avenue, Autumn Street and Spring Street, and along Latrobe Terrace, from C2Z to MUZ;
 - 29.2.3. rezones other parcels of land along Gordon Avenue, Autumn Street and Spring Street from C2Z and GRZ4 to RGZ1;
 - 29.2.4. rezones Council-owned land at 21-33 Autumn Street from C2Z to Public Parks and Recreation Zone (**PPRZ**); and
 - 29.2.5. rezones land at part 46 - 50 Villamanta Street from C2Z to GRZ4 (correction of a zoning anomaly).
30. In terms of overlays, the Amendment:
- 30.1. Inserts and applies the DDO56 to land in the Gordon Avenue Precinct;
 - 30.2. Inserts and applies the DDO57 to land in Pakington North Precinct ;
 - 30.3. Applies the Environmental Audit Overlay (**EAO**) to select properties in the Pakington North and Gordon Avenue Precincts; and
 - 30.4. Removes the DDO17 from the west side of Latrobe Terrace (with associated amendments to Schedule 17).¹⁴
31. There are no proposed changes to zones or overlays in the Heritage Core Precinct, noting that further work is required to review the existing application of the Heritage Overlay and built form controls within the Heritage Core Precinct.
32. In terms of policy and other ordinance changes, the Amendment:
- 32.1. Inserts **Clause 11.03-6L-06 Pakington Street Geelong West** to implement objectives and strategies for Pakington Street, Geelong West as identified in the UDFs;

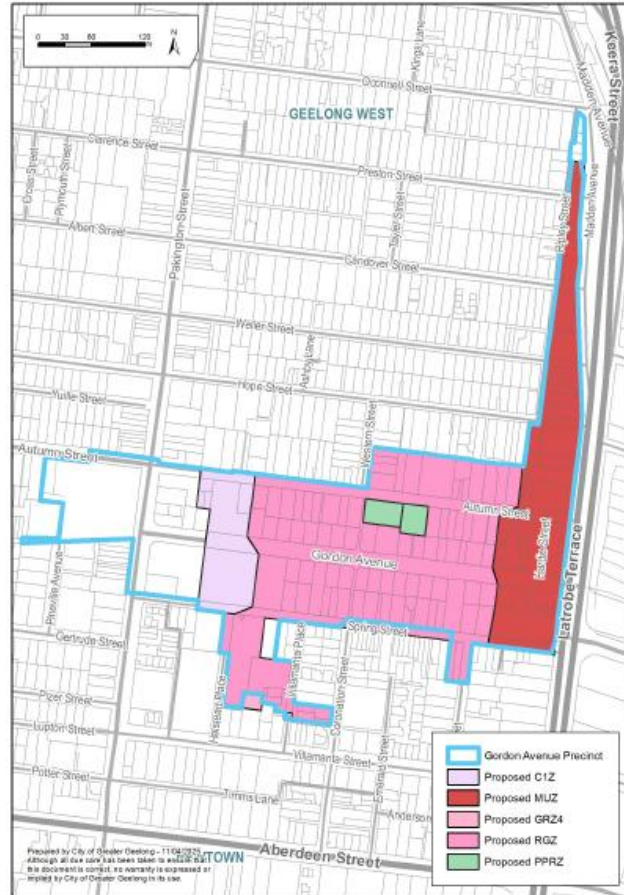
¹⁴ The DDO17 will continue to apply to an area known as Western Beach.

- 32.2. Deletes **Clause 15.01-1L-02 Pakington Street North urban design**;
 - 32.3. Amends **Clause 16.01-1L-01 Integrated housing and housing diversity** to identify the Pakington North and Gordon Avenue Precincts as Key Development Areas;
 - 32.4. Amends **Clause 16.01-1L-02** to remove the Pakington North Key Development Area and Gordon Avenue Key Development Area from the Geelong West, Manifold Heights & Newtown IHDA Map;
 - 32.5. Inserts **Clause 16.01-2L Social and affordable housing** applicable to land in the Pakington North and Gordon Avenue Precincts;
 - 32.6. Amends the **Schedule to Clause 72.08 Background Documents** to insert the UDFs as background documents; and
 - 32.7. Amends the **Schedule to Clause 74.02 Further Strategic Work** to identify necessary future work, including for the Rail Sidings Yard Key Strategic Site.
33. The proposed changes to zoning and overlays within the Gordon Avenue and Pakington North Precincts are depicted on the following plans:¹⁵

¹⁵ Extracted from the Gordon Avenue and Pakington North Information Sheets prepared by Council for the purpose of community consultation and available on Council's website here: <https://www.geelongaustralia.com.au/amendments/item/8d90e220d33bb2d.aspx>

GORDON AVENUE PRECINCT

PROPOSED CHANGES TO ZONES



Amendment C433ggee proposes to rezone land along Latrobe Terrace from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ), Gordon Avenue, Autumn Street and Spring Street from Commercial 2 Zone (C2Z) and General Residential Zone (GRZ) to Residential Growth Zone (RGZ) and Commercial 1 Zone (C1Z) and council owned land at 21-33 Autumn Street to Public Parks and Recreation Zone (PPRZ) to facilitate a future park.

PROPOSED CHANGES TO OVERLAYS



Amendment C433ggee proposes to apply a new Design and Development Overlay (DDO56) to implement the design principles, objectives and guidelines identified in the UDF's. DDO56 will replace Design and Development Overlay (DDO17) along Latrobe Terrace. The Environmental Audit Overlay (EAO) is applied to several properties within the precinct to ensure the land is suitable for sensitive uses.

PAKINGTON NORTH PRECINCT

PROPOSED CHANGES TO ZONES



Amendment C433ggee proposes to rezone land in the Pakington North Precinct as shown in the map above from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z). It also corrects the zone at 1/2 Waratah Street from Mixed Use Zone (MUZ) to Neighbourhood Residential Zone (NRZ).

PROPOSED CHANGES TO OVERLAYS



Amendment C433ggee proposes to apply a new Design and Development Overlay (DDO57) to implement the design principles, objectives and guidelines identified in the UDF's and the Environmental Audit Overlay (EAO) to several properties within the precinct to ensure the land is suitable for sensitive uses.

Strategic work underpinning the Amendment

34. The UDFs and the Amendment are founded on, and informed by, various pieces of strategic work, including:
- 34.1. *Pakington Street and Gordon Avenue Built Form Framework* (Hodyl & Co, August 2021) (**Hodyl & Co Report**);
 - 34.2. *Pakington Street & Gordon Avenue Urban Design Framework Traffic Network Impact Assessment* (One Mile Grid, 23 September 2021) (**One Mile Grid Report**);
 - 34.3. *Population Projects – Gordon Avenue* (Hill PDA Consulting, June 2023) (**Hill PDA Report**);
 - 34.4. *History Review of PSA Areas and Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong Victoria* (Landserv Environment, 30 June 2023) (**Landserv Report**);
 - 34.5. *Gordon Avenue Infrastructure Servicing Assessment* (Stantec, 31 August 2023) (**Stantec Report**);
 - 34.6. *Pakington North UDF – Community Panel Engagement Summary Report* (Capire Consulting, May 2024) (**Capire Report**);
 - 34.7. *C433ggee – Pakington St & Gordon Avenue, Geelong West Acoustic Report* (Renzo Tonin & Associates, 7 February 2025) (**Renzo Tonin Acoustic Report**); and
 - 34.8. *Built Form Testing Pakington North Precinct* (City of Greater Geelong, July 2025) (**Pakington North Built Form Testing Report**).
35. To further assist the Panel and parties to understand the extent of built form testing undertaken in relation to Pakington North, Council officers have also prepared a document *Comprehensive Built Form Testing Pakington North* (City of Greater Geelong, February 2026). This document does not introduce new built form testing but documents previous work undertaken by the Council, including the built form testing undertaken as part of the deliberative engagement process for the Pakington North Precinct.

36. The findings and recommendations of these reports will be discussed as part of Council's response to issues raised in submissions.

Chronology of events

37. The key events in relation to the Amendment are identified in the following table and discussed in the subsequent sections of this submission.

Date	Event
2018	Council commences work in relation to the Pakington Street and Gordon Avenue UDF, which identifies three precincts – Gordon Avenue, Heritage Core and Pakington Street North
2018-2024	Council undertakes consultation in relation to the UDFs, consisting of four phases of community engagement and a deliberative panel process
14 December 2021	Council resolves to adopt the Pakington Street and Gordon Avenue UDF, and to continue community consultation in relation to the Pakington North Precinct
2022	Council undertakes community consultation in relation to Pakington North UDF, however the additional round of community engagement does not receive sufficient support and Council decides to undertake a deliberative community engagement process
February 2023	Council commissions Capire Consulting to design and deliver a deliberative community engagement process, involving a community panel.
23 October 2023	Council adopts Capire Consulting's proposed engagement strategy

Date	Event
February – April 2024	Capire Consulting leads the deliberative community engagement process. This involves establishing and managing a representative community panel, and ensuring that the 66 community members invited to participate on the panel are a representative sample of the broader community.
2 May 2024	Capire Consulting issues its report entitled <i>Pakington North Urban Design Framework – Community Panel Engagement Summary Report</i> which identifies that 79% of panellists felt the Pakington North UDF reflected the work of the panel, 61% supported its role in guiding development, and 60% were comfortable with it going to Council for adoption.
28 May 2024	Council resolves to adopt the Pakington North UDF and request that the Minister authorise the preparation and exhibition of the Amendment to implement the UDFs.
20 June 2025	The Minister authorises the preparation and exhibition of the Amendment subject to conditions.
31 July 2025 – 1 September 2025	The Amendment is exhibited and 51 submissions are received in response to exhibition.
25 November 2025	Council resolves to request that the Minister for Planning appoint a planning panel, refer all submissions to the panel and submit Council's response to submissions generally as outlined in the officer report.

Preparation of and adoption of the UDFs

38. As set out above, Council first commenced the preparation of an urban design framework for Pakington Street, Geelong West and Gordon Avenue in 2018.
39. In March and April 2018, Council conducted a community engagement process to inform the development of a vision for the future of the study area and to identify key focus areas, issues, opportunities and desired outcomes from a wide range of community members and key stakeholders. The community engagement process involved a wide range of activities including workshops, an online survey, a trader workshop, and 'Place Assessment and Care Factor' surveys.¹⁶
40. Council then proceeded to prepare a draft urban design framework and sought further community feedback between March and August 2020. While this phase of consultation was impacted by the COVID-19 Pandemic, 51 individuals participated in the consultation process and Council received 77 submissions in relation to the draft urban design framework. Council also received 379 online survey responses. The majority of issues raised by participants related to building and development matters (including building heights, environmental and social impacts, the village character of the area and impacts on heritage values) and movement and access matters (including traffic congestion and parking).¹⁷
41. The community feedback obtained by Council throughout 2020 informed the preparation and finalisation of the Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, December 2021) (**Original UDF**), which encompassed all three precincts.
42. The Original UDF, including the proposed development controls such as preferred building height, site coverage, solar access, interface and density requirements, was also informed by the built form testing and analysis documented in Pakington Street and Gordon Avenue Built Form Framework (Hodyl & Co, August 2021) (**Hodyl & Co Report**). The Hodyl & Co Report provides a built form vision for the Pakington North and Gordon Avenue Precincts and sets out design objectives and recommended built form controls, such as building separation requirements, ground floor and upper level setback requirements, street wall height requirements and overall building height and site coverage requirements.

¹⁶ Pakington Street and Gordon Avenue UDF, page 22.

¹⁷ Pakington Street and Gordon Avenue UDF, page 25.

43. At its meeting on 14 December 2021, Council considered the Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, December 2021) and resolved to:
- 43.1. adopt the Urban Design Framework in respect of two of the three precincts — the Gordon Avenue and Heritage Core Precincts – to enable the commencement of a planning scheme amendment and delivery of key infrastructure upgrades; and
 - 43.2. undertake further community consultation in relation to the Pakington North Precinct.
44. The further community consultation undertaken by Council in relation to the Pakington North Precinct did not receive sufficient support, prompting Council to commission external consultants (Capire) to design and deliver a deliberative community engagement process.
45. Deliberative engagement is a method of community engagement that aims to provide the community with sufficient time and information to enable the community to work together to develop recommendations as part of a decision-making process.¹⁸ In this instance, the process involved the appointment of a community panel, comprised of members that were reflective of the wider study area. The panel members met to learn about, and discuss, key elements of the Pakington Street North UDF, develop recommendations and identify preferred solutions to inform the UDF.¹⁹
46. Of particular note, as part of the deliberative engagement process, the community panel voted on their preferred maximum heights across the 12 blocks in the Pakington Street North Precinct, with an option to choose between:
- 46.1. conventional residential scale, 2 storeys (9 metres);
 - 46.2. low scale, 3-4 storeys (11-15 metres);
 - 46.3. medium scale, 5-7 storeys (18-25 metres); and
 - 46.4. higher scale, +8 storeys (+29 metres).

¹⁸ *Pakington Street North Community Panel Summary Report* (Capire, 2024).

¹⁹ *Pakington Street North Community Panel Summary Report* (Capire, 2024).

47. The voting results per block are set out in the Capire Report (refer to pages 17 to 23). The voting results and comments from the community panel regarding preferred maximum building heights were considered by Council officers and are reflected in the Pakington North UDF.
48. Following the deliberative community engagement process, Council prepared the Pakington North UDF and amended the Pakington Street and Gordon Avenue UDF to remove content in relation to the Pakington North Precinct.
49. At its meeting on 28 May 2024, Council resolved to:
 - 49.1. thank the community panel for its work and feedback on the Pakington North UDF;
 - 49.2. adopt the amended UDFs; and
 - 49.3. request that the Minister authorise the preparation and exhibition of the Amendment.
50. The Urban Design Frameworks are thus informed by considerable community consultation and engagement, in addition to research and analysis, consistent with Planning Practice Note 17: Urban Design Frameworks (**PPN17**).²⁰

Authorisation to prepare the Amendment

51. On 20 June 2025 a delegate of the Minister authorised the preparation and exhibition of the Amendment subject to the following conditions:
 - 51.1. include the rear of 66 Pakington Street in the C1Z and DDO57 (this property is included within the boundary of the Pakington North UDF);
 - 51.2. replace the proposed RGZ5 with the RGZ1;
 - 51.3. amend Clause 11.03-6L-06 in accordance with the DTP edited version;
 - 51.4. update the Geelong West, Manifold Heights & Newtown IHDA Map in Clause 16.01-1L-02 to remove the Pakington North Key Development Area;
 - 51.5. amend Clause 16.01-2L to include reference to the map in Clause 11.03-6L-06;

²⁰ [PPN17: Urban design frameworks](#)

- 51.6. amend Schedules 56 and 57 to the Design and Development Overlay in accordance with the DTP edited versions;
 - 51.7. amend the Schedule to Clause 72.08 to correct the references to the DDO to 43.02; and
 - 51.8. amend the Instruction Sheet and Explanatory Report in accordance with the DTP edited versions.
52. Council satisfied the conditions of authorisation by amending the Amendment documents in the manner requested by the Department, before proceeding to give notice of the Amendment in the manner described below.

Exhibition of the Amendment

53. The Amendment was publicly exhibited between 31 July 2025 and 1 September 2025.
54. Council gave notice of its preparation of the Amendment in accordance with section 19 of the Act as follows:
- 54.1. Notices were sent to all owners and occupiers of land affected by the Amendment, as well as 766 nearby residents and business owners;
 - 54.2. Notices were sent to prescribed Ministers and public authorities;
 - 54.3. A notice was published in the Geelong Times and the Victorian Government Gazette; and
 - 54.4. The Amendment and supporting documents were published on Council's website²¹ and a physical copy was made available at the Geelong West Library.
55. In addition, Council gave non-statutory notice of its preparation of the Amendment as follows:
- 55.1. Notices were published in the Geelong Advertiser on 21 August 2025 and the Geelong Independent on 28 August 2025; and
 - 55.2. A Facebook advert notifying users of the Amendment was active from 20 August 2025 to 1 September 2025; and

²¹ See <https://www.geelongaustralia.com.au/amendments/item/8d90e220d33bb2d.aspx>

- 55.3. Council notified 62 submitters from the Pakington North UDF community panel consultation process via email.
56. Council received a total of 51 submissions in response to exhibition of the Amendment. 13 submissions supported the Amendment, 34 submissions opposed the Amendment and four submissions provided comments but did not express support or opposition to the Amendment.

Response from public authorities

57. Council received submissions from the following public authorities in response to notice of the Amendment:
- 57.1. the Country Fire Authority (**CFA**);
- 57.2. the Environment Protection Authority (**EPA**);
- 57.3. Homes Victoria; and
- 57.4. the Head, Transport for Victoria (**Head, TfV**).
58. The issues raised in the submissions, and Council's response, are summarised below.

CFA

59. The CFA (Submission No. 9) noted that the subject land is not in a bushfire prone area and the Amendment does not alter bushfire risk.

EPA

60. The EPA (Submission No. 13) noted that it had already provided a response in accordance with Ministerial Direction 19 (**MD19**) and confirmed that it did not intend to make any further submission. In its prior response,²² the EPA raised various matters in relation to potentially contaminated land and noise.
61. In regards to potentially contaminated land, the EPA advised that:
- To meet the requirements of Ministerial Direction 1 (**MD1**), the planning authority will need to satisfy itself that the land is either potentially contaminated or not. If the land is potentially contaminated, PPN30 recommends the level of

²² Refer to the letter dated 9 October 2024, attached to the EPA's submission.

assessment for land which has been determined to have a 'medium' or 'high' potential for contamination.

- Consistent with PPN30, meeting an audit system requirement prior to amendment is preferred. However, MD1 supports the deferral of meeting audit requirements where it is considered 'difficult' or 'inappropriate' to meet those requirements prior to amendment, with the recommended planning tool being the application of the Environmental Audit Overlay (**EAO**).
- EPA notes that a statement has been included in the Explanatory Report detailing why it is 'difficult' or inappropriate' to meet audit system requirements as part of the Amendment (in accordance with MD1), and hence the proposed application of the EAO.
- Whilst it is not for EPA to support deferral of audit system requirements, the application of the EAO is consistent with policy and guidance.

62. The EPA recommended that the application requirement in the DDO57 in relation to environmental audit statements be removed and replaced with a planning permit condition requirement in the DDO56 and DDO57 to compel compliance with applicable environmental audit recommendations.

63. In regards to noise, the EPA provided the following advice:

63.1. Within the Pakington North Precinct, development of land close to the rail sidings yard could expose future sensitive land uses to a significant risk of harm to human health and the environment from noise and the proposed rezoning from C2Z to C1Z could result in the rail sidings yard becoming non-compliant with current regulations and the Noise Protocol.²³

63.2. Within the Gordon Avenue Precinct, the development of land close to rail and road corridors could expose future sensitive land uses to a significant risk of harm to human health and the environment from noise.

63.3. It is not appropriate to defer the assessment of noise impacts and it is recommended that an acoustic assessment be undertaken as part of the preparation of the Amendment, which should consider:

²³ Noise Limit and Assessment Protocol for the Control of Noise from Commercial, Industrial, and Trade Premises and Entertainment Venues (EPA Publication 1826.4)

63.3.1. in the Pakington North Precinct, noise mitigation measures such as suitable setback distances, use of sound barriers, and orientation and positioning of bedroom and living areas away from the rail siding yard (which should be implemented before considering façade treatments, to address both internal and external noise levels for sensitive land uses); and

63.3.2. in the Gordon Avenue Precinct, traffic noise from the Princes Highway having regard to outdoor amenity for apartments and other sensitive land uses not assessed under Clauses 57 and 58, as well as the PRINP with respect to rail noise.²⁴

64. The EPA noted that a further acoustic assessment may be required at the time of a planning permit application to assess the cumulative impact of noise from road, rail and future commercial uses.

65. Council's responded to the EPA's advice as follows:

65.1. in relation to potentially contaminated land:

...the City had prepared the Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria (Landserv, June 2023) which assessed the risk of land contamination in the Pakington North and Gordon Avenue precincts. The City's primary focus in dealing with potentially contaminated land is on sites that are being rezoned from a zone that doesn't allow (or allows a limited range of) sensitive uses to a zone that allows more or all sensitive uses. As such the main focus is:

- *Land along Latrobe Terrace that is being rezoned from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ).*
- *Land along Pakington Street, Church Street, and Gordon Avenue that is being rezoned from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z).*
- *Land along Gordon Avenue that is being rezoned from Commercial 2 Zone (C2Z) to Residential Growth Zone (RGZ1).*

²⁴ Victorian Passenger Rail Infrastructure Noise Policy (PRINP, Victoria April 2013)

- *Land on Autumn Street that is being rezoned from Commercial 2 Zone (C2Z) to Public Park and Recreation Zone (PPRZ).*

A number of properties were assessed as having high or medium potential for land contamination by Landserv and these are proposed to have the EAO applied. The EPA noted a lack of sufficient information in the Landserv report to definitively determine if all land proposed for rezoning is potentially contaminated, however the amendment implements the PSUDF which is a long-term plan for the area. Therefore, it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage. Applying the EAO allows the properties to continue to be used in their current capacity and is consistent with PPN30 in deferring the requirements to undertake site-specific environmental assessments to future developers as part of their development applications. This is consistent with the approach taken with the South Geelong Urban Design Framework (Amendment C432ggee).²⁵

- 65.2. And in relation to noise, Council commissioned the Renzo Tonin Acoustic Report which concludes that, having regard to the proposed zoning changes and applicable noise limits, sensitive land uses can be supported in the Gordon Avenue and Pakington North Precincts and a hierarchy of noise mitigation strategies can be implemented to either eliminate or mitigate noise emissions to acceptable levels. The Renzo Tonin Acoustic Report also recommends changes to the application requirements in the DDO56 and DDO57. These changes have been accepted by Council and are reflected in the exhibited version of the Amendment ordinance.

Homes Victoria

66. Homes Victoria (Submission No. 18) submits that the EAO should not be applied to the land at 1/29 Church Street because the Landserv Report did not specifically recommend the application of the EAO to that site.
67. Homes Victoria also requested that properties owned by Homes Victoria adjoining the Gordon Avenue Precinct should be rezoned to C1Z to provide greater development opportunities, including:
- 67.1. 1A Villamanta Place, Geelong West

²⁵ Explanatory Report, pages 13-14.

- 67.2. Multiple units at 15 Halstead Place and 56 Villamanta Street, Geelong West
- 67.3. Units 1–6 at 46–50 Villamanta Place, Geelong West
- 67.4. Multiple units at 9 McNicol Street, Geelong West
68. In relation to the application of the EAO, Council notes that the land at 1/29 Church Street is proposed to be rezoned to C1Z which allows sensitive land uses (e.g. residential uses) and the Landserv Report identifies that the site has a medium potential for contamination. On that basis, the land falls within the definition of 'potentially contaminated land'²⁶ and it is appropriate to apply the EAO in circumstances where neither a preliminary risk screen assessment nor an environmental audit statement has been prepared to confirm that the land is suitable for sensitive land uses. The application of the EAO to the site defers the requirement to undertake a preliminary risk screen assessment and/or obtain an environmental audit statement and is consistent with the guidance in Planning Practice Note 30: Potentially Contaminated Land (**PPN30**).
69. In relation to the rezoning of properties adjoining the Gordon Avenue Precinct, Council notes that the properties are located outside the study area and therefore lack the strategic justification for a rezoning at this stage. 46-50 Villamanta Street is currently in two different zones and the Amendment proposes to correct this anomaly by rezoning the entire site to the GRZ (consistent with the current land use).

Head, TfV

70. DTP under delegation from the Head, TfV raised the following issues in its submission (**Submission No. 51**):
- 70.1. DTP observed that DDO56 and DDO57 apply new controls for access, parking and infrastructure services and an additional, specific control requirement/objective to address the development interface with Latrobe Terrace and Church Street;
- 70.2. in relation to the rail sidings yard, DTP stated that:

²⁶ Refer to Clause 73.01 of the Planning Scheme and PPN30.

The rail sidings yard in the Pakington North Precinct continues to be an essential site for the operation of rail services in Geelong. The site contains the only train turntable on the Geelong line.

The Head, TfV and VicTrack advised Council in February 2024 during the preparation of the Urban Design Frameworks that it is unrealistic to identify the rail sidings yard for urban renewal at this time. The rail sidings are essential infrastructure with increasing rail services demands in Geelong.

Whilst it is acknowledged that connectivity across the rail line and Latrobe Terrace is important, the Head, TfV does not support the proposed new shared overpass over the Geelong-Melbourne rail line due to its proposed connection through the rail sidings yard, which will not be available for urban renewal for the foreseeable future. A more feasible connectivity option needs to be developed in consultation with the Head, TfV.

The Head, TfV requires changes to the adopted PSUDFs to reflect the retention of this strategic rail infrastructure. Furthermore, planning scheme clauses must be amended to emphasise that the site is necessary to rail operations...

70.3. DTP noted that it is unable to support the “opportunity for a new connection over the top of Latrobe Terrace” in the Pakington Street and Gordon Avenue UDF due to the lack of detail provided in the Amendment.

71. In response, Council proposes to include the following local policy objective at Clause 11.03-6L-06 –

To protect the rail sidings yard at 28–64 Pakington Street as an essential site for the operation of rail services in Geelong.

72. Council also proposes to include the following requirement in the DDO56 under Access, parking and services:

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.

Consideration of submissions and resolution to refer all submissions to a Panel

73. Council officers considered and responded to all submissions as set out at pages 510 to 548 of the Council Meeting Agenda dated 25 November 2025. A copy of that response is included at **Appendix C**.

74. At its meeting on 25 November 2025, Council made the following resolution:

That Council, having considered all submissions to Amendment C433ggee to the Greater Geelong Planning Scheme resolves to:

- 1. Request the Minister for Planning appoint an independent Planning Panel under Part 8 of the Planning and Environment Act 1987;*
- 2. Refer all submissions to the Panel; and*
- 3. Submit to the panel its response to the submissions generally as outlined in this report.*

75. This resolution is consistent with Council's obligations and powers under the P&E Act, namely:

75.1. under section 22(1), the obligation to consider all submissions made on or before the date set out in the notice;

75.2. under section 23(1), the obligation to do one of three things after considering a submission which requests a change to the Amendment –

75.2.1. change the Amendment in the manner requested; or

75.2.2. refer the submission to a panel appointed under Part 8; or

75.2.3. abandon the Amendment or part of the Amendment; and

75.3. under section 23(2), the power to refer to a panel a submission which does not request a change to the Amendment.

76. In this case, the Council has considered all submissions in accordance with section 22(1) and referred all submissions to a panel in accordance with sections 23(1) and 23(2) of the P&E Act.

77. In addition, Council has resolved to provide "its response" to the submissions "generally" as outlined in the report to Council. In other words, Council endorsed the officer response to submissions but provided a degree of flexibility to Council officers

in making submissions to the Panel “generally as outlined in this report”. This flexibility enables Council officers to propose post-exhibition changes to the Amendment in response to issues raised in submissions and expert evidence during the course of the Panel hearing process.

78. To the extent that there is any doubt regarding the Council’s response to issues raised in submissions, Council’s instrument of delegation delegates the power to consider all submissions under section 22(1), the power to refer submissions to a panel under sections 23(1)(b) and 23(2) and the power to represent Council and present a submission at the panel hearing under section 24 to, relevantly, the Coordinator Strategic Implementation.

STRATEGIC CONTEXT AND ASSESSMENT

Minister’s Direction No. 11 Strategic Assessment of Amendments and PPN46 Strategic Assessment Guidelines

Why is the Amendment required?

79. The Amendment is required in order to implement the Urban Design Frameworks and in particular, the overarching vision and guiding principles for Pakington Street (Geelong West) and Gordon Avenue and the built form objectives, guidelines and actions for each of the three Precincts.

Rezoning

80. The proposed zoning changes are a key component of the Amendment which will drive change across the Pakington North and Gordon Avenue Precincts. In particular:
- 80.1. by rezoning land to C1Z, the Amendment facilitates the co-location of commercial and residential uses and permits a wide range of commercial uses thereby creating a vibrant, mixed-use commercial centre for retail, office, business, entertainment and community uses;²⁷
- 80.2. by rezoning land to MUZ, the Amendment provides for a range of residential, commercial, industrial and other uses which complement the mixed-use function of the locality, in addition to encouraging higher density housing;²⁸

²⁷ Refer to the purpose of the C1Z.

²⁸ Refer to the purpose of the MUZ.

- 80.3. by rezoning land to RGZ1, the Amendment facilitates higher density housing (maximum height of four storeys), encourages a diversity of housing types in locations with good access to services and seeks to achieve a scale of development that transitions between areas of more intensive use and development and other residential areas;²⁹ and
- 80.4. by rezoning Council-owned land at 21-33 Autumn Street from C2Z to PPRZ, the Amendment reserves land for public recreation and open space.
81. To the extent that the above zoning changes facilitate increased housing in a well-serviced, established urban area, the Amendment aligns with the recently updated Planning Practice Note 90: Planning for Housing (January 2026) (**PPN90**) including the following guidance regarding infill housing:
- Serviced urban land within settlement boundaries, such as the Urban Growth Boundary, is limited. To avoid further urban sprawl, planning authorities need to plan for increased housing in established areas. This includes more housing across all locations within settlement boundaries, with priority given to well serviced areas like activity centres, regional cities and centres with access to public transport, jobs, community facilities and other services. These areas also have potential to support additional low to mid-rise apartments and townhouses alongside existing houses in walkable catchments around these well serviced areas.*
82. Council does not yet have access to the Department of Transport and Planning's Housing Capacity Assessment Platform (HCAP) referred to in PPN90. Once the HCAP tool is available, Council will be assessing the capacity of its Planning Scheme (including having regard to this Amendment) using the HCAP tool and considering this as part of its current planning scheme review which is due to be reported to the Minister for Planning in October 2026.³⁰
83. Furthermore, the application of the MUZ and the RGZ1 is consistent with the guidance in the recently updated Planning Practice Note 91: Using the Residential Zones (January 2026) (**PPN91**), which explains that:

²⁹ Refer to the purpose of the RGZ.

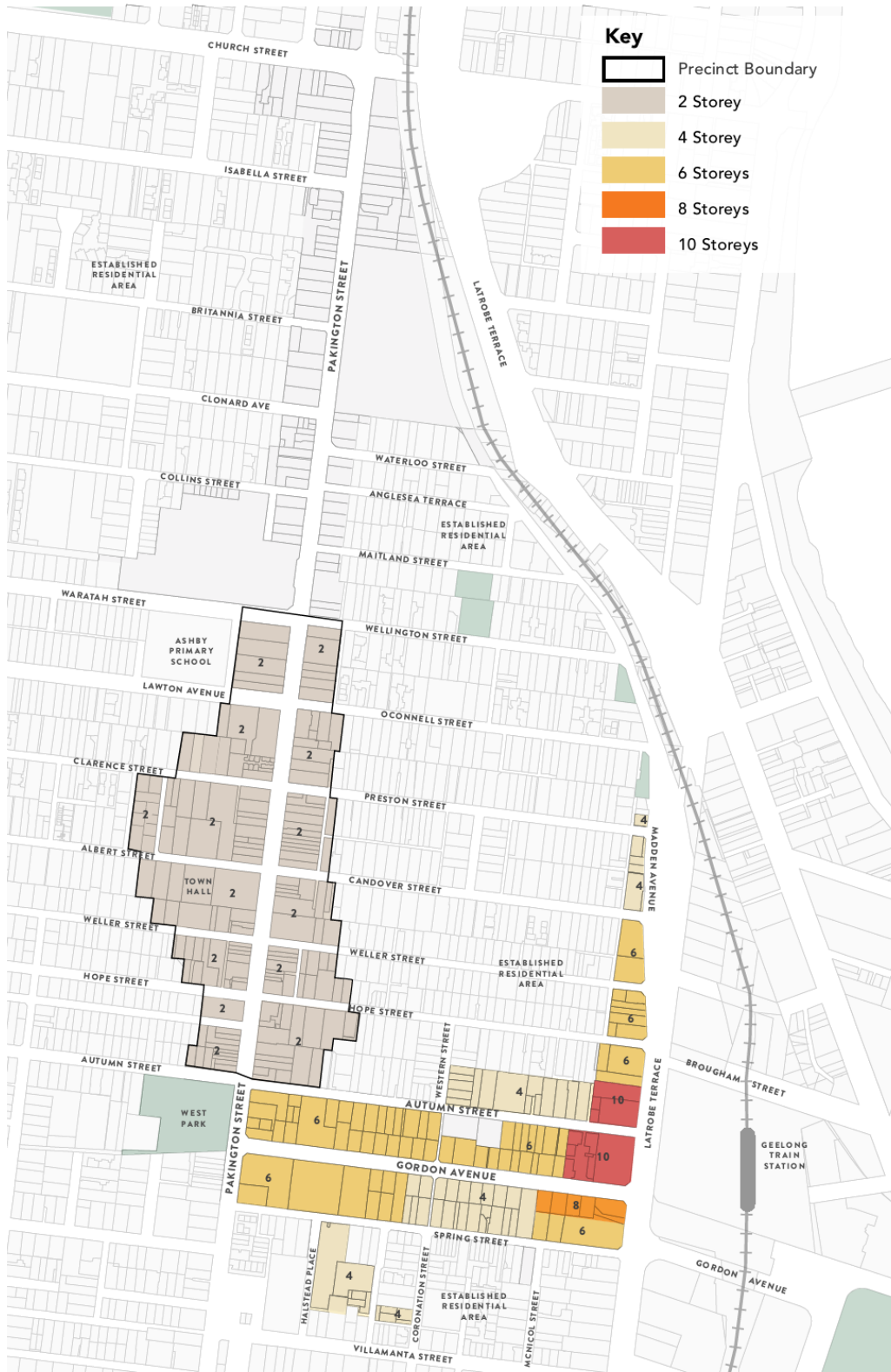
³⁰ Refer to letter from the Minister for Planning to City of Greater Geelong dated 27 January 2026 at **Appendix H**.

- 83.1. the MUZ is to be “applied to areas suitable for a mixed-use function, including a range of residential, commercial, industrial and other uses” and that it is “suitable for areas identified for residential development at higher densities including urban renewal and strategic redevelopment sites”; and
- 83.2. the RGZ is to be “applied to areas suitable for housing diversity and housing at increased densities in locations offering good access to services, jobs and public transport, and to provide a transition between areas of more intensive use and development such as activity centres and other residential areas.”

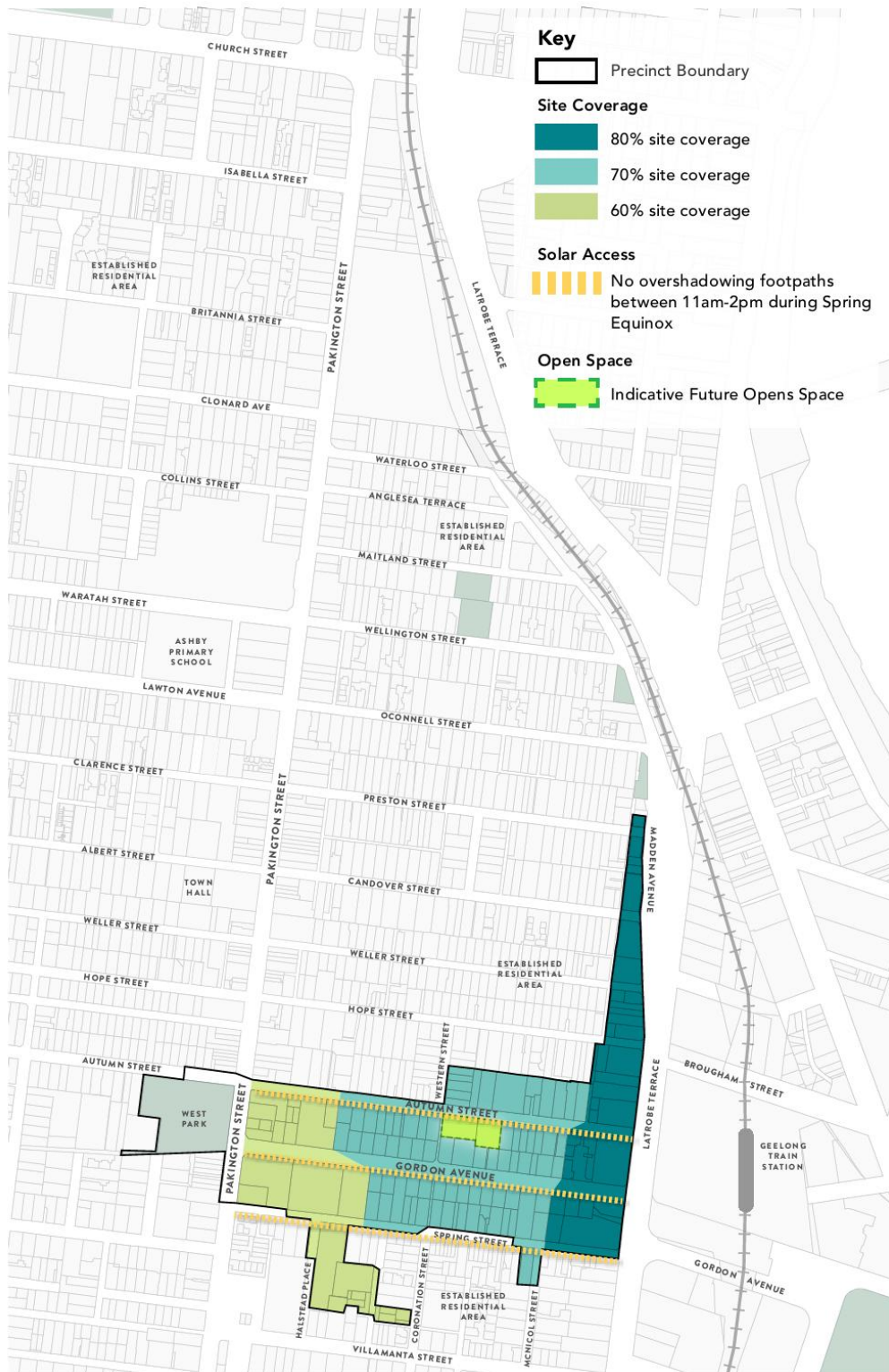
Built form controls

84. The introduction of the DDO56 and DDO57 will provide the necessary built form controls to guide future development in the Gordon Avenue and Pakington North Precincts in line with the aspirations of the UDFs.
85. In the Gordon Avenue Precinct, the DDO56 imposes preferred maximum building heights ranging from 15 metres (4 storeys) and 22 metres (6 storeys) adjacent to established residential areas, to 29 metres (8 storeys) and 36 metres (10 storeys) at the eastern end of Gordon Avenue and adjacent to Latrobe Terrace.
86. The DDO56 also imposes preferred maximum site coverage requirements, preferred floor area ratios (**FARs**), interface requirements (both preferred and mandatory), building separation requirements (both preferred and mandatory), building design requirements, active frontage requirements, solar access, wind and weather requirements, access, parking and services requirements and site coverage requirements.
87. The preferred maximum building heights and interface responses and maximum site coverage requirements are derived from the Pakington Street and Gordon Avenue UDF, including the following maps:³¹

³¹ The maps are both in the Pakington Street and Gordon Avenue UDF at page 10.

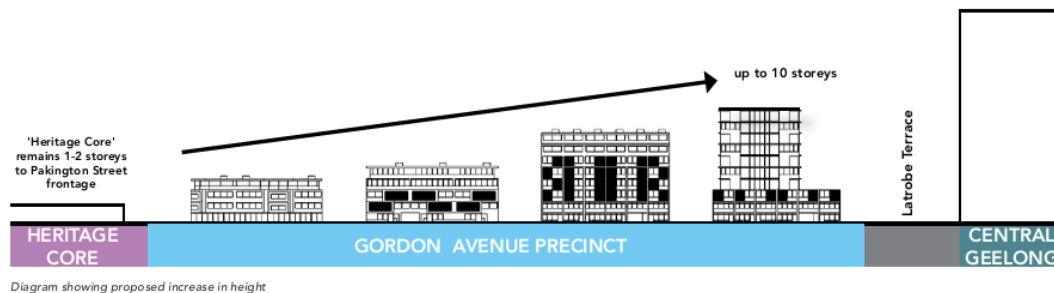


Proposed Preferred Building Heights



Proposed Site Coverage and Solar Access Requirements

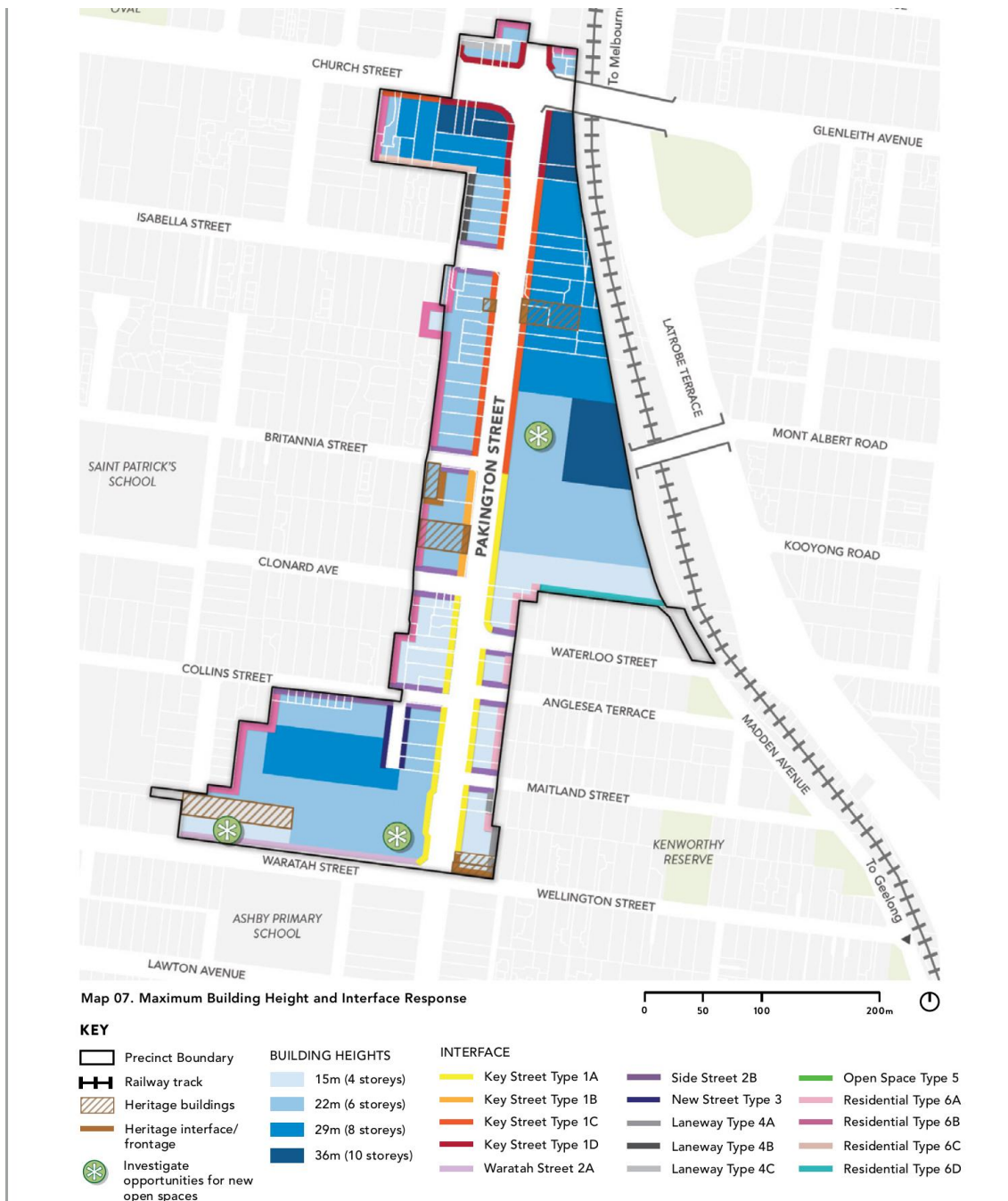
88. These built form controls are designed to achieve an increase in scale and density from the Heritage Core towards Central Geelong, whilst simultaneously responding sensitively to adjoining, low-scale residential areas, as shown on the following diagram in the Pakington Street and Gordon Avenue UDF:³²



89. In the Pakington North Precinct, the DDO57 imposes preferred maximum building heights ranging from 15 metres to 36 metres and street interface requirements (both preferred and mandatory) as shown on Map 1 to Schedule 57.
90. The DDO57 also imposes preferred maximum floor-to-floor heights, other preferred interface requirements, building separation requirements (both preferred and mandatory), building design requirements, active frontage requirements, solar access, wind and weather requirements, access, parking and services requirements and site coverage requirements.
91. The preferred maximum building heights and interface responses are derived from the Pakington North UDF, including the following map:³³

³² Pakington Street and Gordon Avenue UDF, page 73.

³³ Pakington North UDF, page 43.



92. These built form controls in the Pakington North Precinct are aimed at providing opportunities for urban renewal, commercial development and increased housing density, thus creating a vibrant mixed-use precinct with retail, offices and community spaces at lower levels and residential uses above. The preferred maximum building heights and interface requirements are intended to facilitate high-quality medium and high density built form which transitions down to sensitive interfaces including properties within the Heritage Overlay and established low-scale residential areas surrounding the precinct.

Planning policy

93. The Amendment proposes to introduce and amend local policy in the Planning Scheme to guide the future use and development of land within the Precincts in a manner which achieves a vibrant, compact and thriving urban village with greater housing density and diversity, whilst respecting the amenity and heritage values of surrounding residential areas.
94. New local policy at Clause 11.03-6L-06 will guide future land use and development within the Gordon Avenue, Heritage Core and Pakington North Precincts. The policy provisions emphasise matters such as:
- 94.1. the development of a vibrant, compact and thriving urban village;
 - 94.2. the provision of greater housing diversity while respecting the amenity and heritage values of surrounding residential areas;
 - 94.3. the facilitation of sustainable development outcomes;
 - 94.4. the facilitation of safe and accessible environments for pedestrians and cyclists;
and
 - 94.5. the enhancement of a sense of identity and place throughout the three Precincts and the improvement of connections to other key areas such as Central Geelong,
- among other matters.
95. The Pakington North and Gordon Avenue Precincts will be identified as Key Development Areas at Clause 16.01-1L-01 which means that the following policy strategies apply:
- 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.*

Increase housing diversity in growth areas through the delivery of a broad range of lot sizes, capable of accommodating a variety of different housing types, including mixed use and high and medium density housing in strategically identified locations.

96. Moreover, new local policy at Clause 16.01-2L will encourage social and affordable housing contributions as part of the development of land in the Pakington North and Gordon Avenue Precincts.

Application of EAO

97. The EAO is proposed to be applied to all properties identified in the Landserv Report as 'potentially contaminated land' within the meaning of the Planning Scheme, where there is an absence of a preliminary risk screen assessment or environmental audit statement confirming that the land is suitable for sensitive uses.³⁴ This accords with Ministerial Direction 1 (**MD1**) and the guidance contained in [PPN30](#).

98. PPN30 explains that:

Where land has been determined to be potentially contaminated, but it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage, the application of the Environmental Audit Overlay (EAO) to the land allows deferment of these requirements. The EAO is a mechanism provided in the VPP and planning schemes to ensure that requirements under Ministerial Direction No. 1 are met before the commencement of a sensitive use (or children's playground or secondary school), or the construction or carrying out of any buildings and works associated with those uses. Applying the overlay ensures the requirements will be met in the future but does not prevent the assessment and approval of a planning scheme amendment.³⁵

99. The application of the EAO will ensure that, prior to the commencement of a sensitive use or the commencement of development associated with a sensitive use, either a preliminary risk screen assessment or an environmental audit statement is issued confirming that the land is suitable for the proposed use.

³⁴ Clause 73.01

³⁵ PPN30, page 2.

Does the amendment implement the objectives of planning and address any environmental, social and economic effects?

100. The Explanatory Report explains how the Amendment implements the objectives of planning in Victoria:

The amendment implements the below objectives of planning in Victoria outlined in section 4(1) of the Act.

(a) to provide for the fair, orderly, economic and sustainable use, and development of land

The rezoning to C1Z, MUZ and RGZ allows for highest and best use outcomes and provides opportunities for the development of residential and commercial prospects across the subject area.

(c) to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria;

The expansion of the Commercial 1 Zone in the subject area will allow for more employment and residential opportunities with good amenity and connectivity to help secure a pleasant, efficient and safe environment. The provision of new residential zoning in the area will support housing objectives.

(d) to conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value;

The amendment encourages the protection of existing heritage places and provides guidance for development to ensure a sympathetic design response in new developments contributes to the continuation of the character of Pakington Street. Existing Heritage Design Guidelines incorporated in the Greater Geelong Planning Scheme provide built form guidance regarding character and height for sites within the Heritage Overlay. Further work to review the Heritage Overlays in the precinct, instigated by this amendment, will review provisions and protections to ensure they are appropriate.

(e) to protect public utilities and other assets and enable the orderly provision and co ordination of public utilities and other facilities for the benefit of the community;

The amendment ensures appropriate transitions to adjoining transport assets to enable the continued orderly provision of those services.

(f) to facilitate development in accordance with the objectives set out in paragraphs (a), (b), (c), (d) and (e);

The amendment complies with the relevant components of this objective, as outlined above.

(fa) to facilitate the provision of affordable housing in Victoria;

The amendment introduces the subject area into Clause 16.01-2L to encourage the provision of affordable housing. Where relevant, the City would also seek to enter into S173 agreements for the provision of social and or affordable housing during the planning permit process for developments made possible through the changes implemented in this amendment.

(g) to balance the present and future interests of all Victorians.

The amendment was developed through a deliberative engagement process to ensure there is balance between the current interests of affected parties and the future interests of those who will live, work, and shop in and around the affected area.

101. To supplement the above explanation, Council also provides a brief economic impact assessment of the proposed zoning changes by economic geographer, Tim Nott at **Appendix F**.
102. The Explanatory Report also explains how the Amendment addresses any environmental, social and economic effects:

Environmental

Environmental Quality

It is likely the amendment will have a net positive effect on air, land and water quality in the area. The PSUDF facilitates an increase in open space and greening which may have a positive impact on air quality in the immediate vicinity. Appropriate on-site management of stormwater in accordance with the DDO will benefit water quality. Environmental audits required on relevant lots will ensure the remediation and improvement of land quality.

Buffers

The uses and developments made possible via the changes facilitated through this amendment are not predicted to require the introduction of buffers for threshold issues. Possible impacts to community amenity such as overshadowing, increased wind impacts, noise etc are mitigated through the design guidelines in the DDO. However, potential buffers around the VicTrack site in the eastern section of the precinct will need to be managed through design and interface treatments to minimise the possibility of negative impacts on adjacent amenity.

Stormwater

The Special Building Overlay currently applies to properties along Gordon Avenue, Geelong West. Elements of the UDF, including requirements in the proposed Schedule 56 to the Design and Development Overlay, further seek to ensure appropriate development response to the conditions of the affected sites.

Other Environmental Factors

There are no predicted negative impacts on ecological systems or natural resources due to the infill nature of the affected area. The amendment will result in an increase of green space and canopy cover in the area which may support extant ecological systems.

Social

Opportunities

The amendment facilitates increased employment opportunities in Geelong West. The increase in residential and worker populations will increase diversity of participants in economic and social life in the area, enriching the strong community bonds of the existing community. It is likely that there will be increased demand on community and public infrastructure as the area develops in accordance with the PSUDF.

Transport

The implementation of the PSUDF will necessitate increase to public transport services, including the frequency of the current bus Routes 1 (North Shore Station - Deakin University) and 22 (Geelong Station - North Shore Station).

While there is an increase in population density, a proportional increase in vehicle traffic is not anticipated due to the proximity of the area to Central Geelong, public transport routes, and the augmentation of active transport options through the implementation of the PSUDF. It is possible that there will be some increase in people commuting to the area for employment purposes. An increase in waste service vehicles, and associated vehicle movements, can be expected in areas which are developed for multi-story commercial and residential uses.

Changes to the Public Realm and Perception of Place

Pakington Street, in particular the Heritage Core, has a distinct local character. It is this character and sense of place which makes it such a popular destination among locals and visitors alike. Changes to the public realm and perception of place are a given. While the Heritage Core will retain its current scale, in the in the Gordon Avenue and Pakington North precincts the amendment will create the conditions to develop a multi-story commercial/residential urban form which is distinctly different from the current low-density, single story commercial character of the area. However, the built form controls in the PSUDF, which will be enacted via the Design and Development Overlays, seek to mitigate negative impacts. The controls seek to enhance the existing character and functionality of the area by ensuring high-quality urban design outcomes which respect the heritage elements of the subject area and the abutting established residential areas.

The amendment will allow for improved interfaces and the physical condition of the immediate area by addressing the current lack of activation, shading and greenery along sections of Pakington Street and improving the interface with transitional areas such as the rail siding yard.

Economic

Economic Well-being

The amendment will have a net positive impact on the economic well-being of the community. Under proposed zone provisions, existing businesses may be impacted by now-prohibited uses although existing use rights may apply. Conflicts of land use or amenity may impact the operation of existing businesses. However, the changes to commercial zoning will result in a reduction of new applications for uses associated with manufacturing and industries, bulky goods retailing, and associated business and commercial services permitted in the Commercial 2 Zone. There are a number of Commercial 2 Zone areas with similar lot sizes in neighbouring suburbs such as Norlane, Newtown, and South Geelong, and slightly further afield in the Armstrong Creek Urban Growth Area. The City is working on a number of policies and strategies to unlock additional Commercial 2 Zone land in Greater Geelong. Amendment C468ggee is likely to facilitate the delivery of C2Z land in south-west Geelong in the coming years.

The expansion of the Commercial 1 Zone over part of Gordon Avenue and throughout the Pakington North precinct will enable a vibrant mix of retail, office, business, entertainment and community uses. The Commercial 1 Zone also allows residential uses, which facilitates the population density objectives of the PSUDF and ensures that established and new businesses have access to a large customer base and employment force in close proximity. The increase in commercial activity facilitated through the amendment will likely result in more people coming to the area to work and shop.

The colocation of commercial, employment and residential uses ensures the feasibility of commercial ventures and improves the wellbeing and connection to place of those who live in or visit the area. The rezoning to Mixed Use Zone along Latrobe Terrace also facilitates the above outcomes. As Pakington Street continues to grow as the commercial focus of Geelong West, it is foreseen that the increase in population in the subject area will support the commercial growth and that there will not be a net negative impact on retail activity in surrounding areas.

Investment and Growth

The implementation of the PSUDF through the amendment will have a net positive effect on the capacity for growth of the immediate area, including encouraging significant private sector investment. There are also opportunities

for public sector investment such as grants etc to assist with bringing the vision of the PSUDF to fruition. It is likely the amendment will support the capacity for growth in the surrounding areas as well, assisting the City to reach density targets, including IHDA targets.

There will be increased opportunities for active and public transport, art installations, and community infrastructure. The identified key strategic sites offer opportunity for significant investment and growth in the subject area. In the short term, the amendment supports the redevelopment and intensification of development on the Pakington Strand site. The Rail Sidings Yard offers long term opportunities, subject to the needs of VicTrack for the site.

Does the amendment address climate change?

103. The Amendment addresses climate change by requiring increased landscaping and specific interface responses to contribute to urban cooling, urban greening and biodiversity and encouraging Environmentally Sustainable Design (**ESD**).

Does the amendment address relevant bushfire risk?

104. This consideration is not applicable to the Amendment (noting that the land affected by the Amendment is not located in a Bushfire Prone Area and having regard to the response from the CFA detailed above).

Does the amendment comply with the relevant Minister's Directions?

105. The Explanatory Report explains how the Amendment complies with relevant Ministerial Directions:

Ministerial Direction – The Form and Content of Planning Schemes

All schedules and consequential changes to local planning provisions in the amendment have been prepared in accordance with applicable style guides, formatting and layout as specified in the Ministerial Direction - The Form and Content of Planning Schemes.

Ministerial Direction No. 1 – Potentially Contaminated Land

The amendment complies with Ministerial Direction No. 1 (Potentially Contaminated Land) under section 12 of the Planning and Environment Act 1987.

Council engaged Landserv, suitably qualified consultants, to undertake a site history review as set out in Appendix 2 of Planning Practice Note 30 – Potentially contaminated land (PPN30). Landserv provided a report Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria (Landserv, June 2023).

Where this report identified potential of land contamination on sites that will be rezoned to allow a sensitive use via this amendment, an Environmental Audit Overlay is proposed.

The urban design frameworks implemented via the amendment are long-term plans for the area. Therefore, it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage. Applying the Environment Audit Overlay allows the properties to continue to be used in their current capacity and is consistent with PPN30 in deferring the requirements to undertake site-specific environmental assessments to future developers as part of their development applications.

Ministerial Direction No. 11 – Strategic Assessment of Amendments

The amendment complies with Ministerial Direction No. 11 (Strategic Assessment of Amendments) under section 12 of the Planning and Environment Act 1987. The explanatory report has been prepared in accordance with the strategic assessment requirements and outlines the strategic justification for the amendment.

Ministerial Direction No. 15 – Planning Scheme Amendment Process

The amendment complies with Ministerial Direction No. 15 (Planning Scheme Amendment Process) under section 12 of the Planning and Environment Act 1987. This planning scheme amendment has been prepared in accordance with this direction.

Ministerial Direction No. 19 – Amendments that may result in impacts on the environment, amenity and human health

The amendment complies with Ministerial Direction No. 19 and has sought the Environment Protection Authority's (EPA) views. EPA provided written comment in a letter dated 9 October 2024.

Acoustic Assessment

In response to the EPA's letter, the City engaged a qualified acoustic engineer to conduct an acoustic assessment of the Pakington North and Gordon Avenue precincts. The C433ggee - Pakington St & Gordon Ave, Geelong West Acoustic Report (Renzo Tonin & Associates, February 2025) determined that the implementation of noise mitigation measures such as building siting and design can ensure the subject area is suitable for sensitive uses. It recommended further detail in the relevant application requirements in Schedules 56 and 57 to the Design and Development Overlay. This recommendation is reflected in the current drafting.

Potentially Contaminated Land

The letter also addressed the amendment's response to potentially contaminated land. As outlined above, the City had prepared the Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria (Landserv, June 2023) which assessed the risk of land contamination in the Pakington North and Gordon Avenue precincts. The City's primary focus in dealing with potentially contaminated land is on sites that are being rezoned from a zone that doesn't allow (or allows a limited range of) sensitive uses to a zone that allows more or all sensitive uses. As such the main focus is:

- *Land along Latrobe Terrace that is being rezoned from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ).*
- *Land along Pakington Street, Church Street, and Gordon Avenue that is being rezoned from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z).*
- *Land along Gordon Avenue that is being rezoned from Commercial 2 Zone (C2Z) to Residential Growth Zone (RGZ1).*
- *Land on Autumn Street that is being rezoned from Commercial 2 Zone (C2Z) to Public Park and Recreation Zone (PPRZ).*

A number of properties were assessed as having high or medium potential for land contamination by Landserv and these are proposed to have the EAO

applied. The EPA noted a lack of sufficient information in the Landserv report to definitively determine if all land proposed for rezoning is potentially contaminated, however the amendment implements the PSUDF which is a long-term plan for the area. Therefore, it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage. Applying the EAO allows the properties to continue to be used in their current capacity and is consistent with PPN30 in deferring the requirements to undertake site-specific environmental assessments to future developers as part of their development applications. This is consistent with the approach taken with the South Geelong Urban Design Framework (Amendment C432ggee).

How does the amendment support or implement the Planning Policy Framework (PPF)?

106. As set out in the Explanatory Report, the Amendment supports or implements the following clauses in the Planning Policy Framework:

Clause 11.01-1S Settlement

The amendment facilitates the sustainable growth and development of the area and the delivery of housing choice and commercial opportunity. The amendment encourages infill urban development, thereby directing growth into established urban areas and capitalising opportunities for urban renewal. The amendment facilitates this compact growth around the existing activity area of Pakington Street and Gordon Avenue to maximise accessibility to facilities and services. The amendment encourages a prosperous and sustainable urban density that supports healthy, active and sustainable transport.

Clause 11.01-1R Settlement – Geelong G21

The amendment supports the strategies of this clause by providing growth options that build on existing infrastructure, supporting infill growth, and encouraging urban outcomes that will support Geelong’s role as Victoria’s second city.

Clause 11.01-1L-01 Settlement – Greater Geelong

The amendment supports the strategies of this clause as it ensures urban development occurs within designated settlement boundaries and directs housing growth to urban areas by facilitating infill development.

Clause 11.03-6S Regional and local places

The amendment supports the objectives and strategies of this clause by introducing a new sub-clause to the scheme. Clause 11.03-6L-06 Pakington Street Geelong West provides specific direction for the planning of the land nominated in the subject area.

Clause 15.01-1S Urban design

The amendment supports the objective and strategies of this clause, which underpin the principles of the PSUDF. The PSUDF was designed to ensure that the subject area is a safe, healthy, functional and enjoyable activity centre that enhances the existing sense of place and cultural identity.

Clause 15.01-1L-02 Pakington Street North urban design

The amendment removes this policy from the Greater Geelong Planning Scheme. The development of the Pakington North Urban Design Framework (City of Greater Geelong, May 2024) provides updated considerations for design and form of development which are implanted via a Design and Development Overlay, which is the more appropriate mechanism. This amendment adds relevant local policy provisions to Clause 11.03 Planning for places.

Clause 15.01-2S Building design

The amendment supports the objective and relevant strategies of this clause. Principles of the PSUDF, implemented through the Design and Development Overlay, contribute to the implementation of the strategies in this clause.

Clause 15.01-5L Neighbourhood character

The amendment supports the objectives of this clause by introducing built form controls that ensure a responsive transition between Commercial 1 Zone and Residential Growth Zone and adjoining residential zones.

Clauses 15.03-1S and 15.03-1L Heritage conservation

The amendment ensures development of and near places of heritage significance within the subject area is appropriate and respects the identified heritage value. The delineation of the Heritage Core from the other precincts

promotes the retention of heritage fabric and character, ensuring that the appropriate setting and context for the heritage places is maintained or enhanced. The Design and Development Overlays introduced in this amendment ensure an appropriate transition from the higher development areas to the Heritage Core.

The Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024) encourages development that respects heritage character in the subject area by encouraging the retention or re-installment of relevant street works.

Clause 16.01-1S Housing supply

The amendment supports the objectives and strategies of this clause by increasing the proportion of housing in designated areas, encouraging higher density on appropriate sites, consolidating residential densities in urban areas and facilitating a diversity of housing types to ensure a mix of people can benefit from the housing options in the area.

Clause 16.01-1R Infill housing - Geelong G21

The amendment supports the strategies of this clause by facilitating infill development within and near to the activity areas along Pakington Street and Gordon Avenue, Geelong West.

Clause 16.01-1L-02 Increased housing diversity areas

The study area is partially within the Geelong West, Manifold Heights & Newtown Increased Housing Diversity Area (Figure 2). The amendment supports the strategies of this clause and facilitates a level of development suitable for an identified area of increased housing diversity.

The amendment updates this map to exclude the Gordon Avenue and Pakington North Key Development Areas being introduced to Clause 16.01-1L-01 Integrated housing and housing diversity.

Clause 16.01-2S Housing affordability

The amendment supports the strategies of this clause by opening up land supply for residential use, diversifying housing types in the area, and promoting

good urban design which minimises negative environmental impacts and keeps costs down for residents and the wider community. It also introduces land in the Mixed Use Zone within the subject area to Clause 16.01-2L.

Clause 17.01-1S Diversified Economy

The amendment supports this clause. Rezoning land to C1Z, RGZ1 and MUZ allows for the colocation of employment and residential uses, thereby improving access to jobs closer to where people live. The Retail Strategy 2020-36 (City of Greater Geelong, August 2020) directs the preparation of the UDF for Pakington Street, Geelong West which “should consider rezoning opportunities within the northern end of Pakington Street and review the role of the Gordon Avenue restricted retail precinct.” (p.48) It also directs the preparation of a UDF for Gordon Avenue which “should focus on transitioning this area into a mixed-use precinct, which would incorporate residential, office, retail and light industrial uses.” (p.192)

Clause 19.02-6L Open space

The amendment supports the strategies of this clause and includes measures in the planning scheme ordinance to ensure new public open space is usable for its intended purpose and well-connected to the development around it through the provision of paths and other linkages. The amendment also ensures that solar access to open spaces is not compromised by adjoining development, that adjoining development transitions sympathetically, and the buildings are designed to provide passive surveillance to the open space to improve safety and sense of place.

Competing Objectives

The need to accommodate growing populations in inner urban areas (Clauses 11.01, 16.01-1S, 16.01-1R) competes with the need to respect the identified heritage values of the Geelong West area. The amendment balances these competing demands by introducing a framework which recognises the different nature and needs of the Heritage Core precinct, and by implementing design and development overlays to ensure respectful transitions to adjacent residential areas with recognised heritage value and to the Heritage Core.

The need to accommodate growing populations in inner urban areas (Clauses 11.01, 16.01-1S, 16.01-1R), which informed the decision to rezone the central portion of the Gordon Avenue Precinct from Commercial 2 Zone to Residential Growth Zone, may have some impact on existing businesses however this is mitigated by existing use rights. The priority is to transition this area for housing and applying the RGZ is consistent with PPN91 and supported by the Retail Strategy 2020-36 (City of Greater Geelong, August 2020).

The need for increased urban density in areas with good transport links (Clauses 11.01, 18.01-1S, 18.02-3S) competes with VicTrack's need to continue to use the Railway Siding Yard for transport purposes. While the Pakington North Urban Design Framework (City of Greater Geelong, May 2024) identifies the Railway Sidings Yard as a Key Strategic Site, it is not proposed to rezone that site as part of this amendment. Instead, the amendment identifies the importance of the site to the PSUDF via Clause 74.02 Future strategic work to direct future advocacy work in conjunction with the Department of Transport and Planning so that should that site no longer be needed for transport purposes, it can be developed in accordance with the vision of the PSUDF (subject to a future rezoning).

Is the amendment consistent with the delivery of the relevant housing target set out in the Planning Policy Framework?

107. The housing target for Greater Geelong as set out in Table 2 in Clause 16.01-1S of the Planning Scheme is 128,600 new dwellings by 2051, with 77,500 of these to be provided within established areas. Current strategy for infill housing as set out at Clause 16.01-1R is to facilitate infill development in Central Geelong and West Fyans and around activity centres within urban Geelong and district towns.
108. At a more granular level, it is current strategy to accommodate medium and high density housing in Key development Areas as identified in mapping at Clause 16.01-1L-01. The Key Development Areas are Central Geelong, part of Wauran Ponds, West Fyans, South Geelong and the Geelong Saleyards\.
109. The Amendment facilitates the delivery of higher density, infill housing within two established areas in Geelong by:

- 109.1. rezoning land in the Pakington North Precinct from the GRZ1 and C2Z to the C1Z, whereby the use of land for accommodation is permitted (and in some cases, as-of-right) and not subject to the height controls imposed by the GRZ1.;
- 109.2. rezoning land in the Gordon Avenue Precinct from the C2Z to the C1Z, MUZ and RGZ1, all of which are zones which support higher density housing (in particular, refer to the purposes of the MUZ and RGZ);
- 109.3. identifying the Pakington North and Gordon Avenue Precincts as Key Development Areas in Clause 16.01-1S.
110. More specifically, the Amendment is expected to facilitate the delivery of up to approximately:
- 110.1. 2,262 new dwellings (apartments) in the Gordon Avenue Precinct comprising:
- 865 in the Latrobe Terrace area³⁶;
 - 1,081 in the Gordon central area³⁷;
 - 316 apartments in the Gordon West area³⁸.
- 110.2. 1,565 new dwellings (apartments) in the Pakington North Precinct.³⁹
111. In doing so, the Amendment will provide an opportunity for the delivery of approximately 3,827 new dwellings and thus make a significant contribution towards meeting the housing target set for Greater Geelong.

How does the amendment support or implement the Municipal Planning Strategy (MPS)?

112. The Explanatory Report explains how the Amendment supports or implements the following provisions of the MPS:

Clause 02.03-1 Settlement

³⁶ Hill PDA Report, Table 6, page 16.

³⁷ Ibid, Table 7, page 17.

³⁸ Ibid, Table 7, page 19.

³⁹ Capacity Assessment - Pakington North Precinct (City of Greater Geelong, 3 February 2026), Section 5.4, page 10. This document is provided as **Appendix G** to this Part A Submission.

“Direct and contain growth within identified locations across the municipality.”

The precinct to which the amendment applies is identified in the City of Greater Geelong Settlement Strategy (City of Greater Geelong, 2020) for increased infill development and it is mostly within the Geelong West, Manifold Heights & Newtown Increased Housing Diversity Areas.

Clause 02.03-2 Environmental and landscape values

“Reduce the amount of runoff from urban development and improve the quality of stormwater runoff entering waterways, estuarine and marine waters.”

The use of site area coverage maximums, in conjunction with other elements of the planning scheme, enable a greater extent of permeable areas on each lot, thereby reducing runoff impacts.

Clause 02.03-3 Environmental risk and amenity

“Encourage a balance between the need for goods and services that serve local residents and workers and the potential for negative impacts on residential amenity.”

The built form directions, outlined in the Design and Development Overlays, manage the desire for usable commercial and residential developments within the study area with the desire to mitigate negative impacts on adjoining residential properties.

Clause 02.03-5 Built environment and sustainability

“Ensure that development enhances Geelong’s sense of place and identity. Encourage all development to provide high quality urban design and landscaping.”

The PSUDF has been designed with sense of local place in mind and encourages high quality urban design to ensure developments respect the existing character of the street.

Clause 02.03-6 Housing

“Facilitate infill development to increase its housing supply contribution.

“Support residential development where the density, mass and scale is complementary to the location, role and character of the specific IHDA.”

“Ensure housing diversity is achieved in established and growth area communities.”

The amendment implements the above strategic directions through the PSUDF and associated changes to the planning scheme. It also seeks to increase the level of affordable and social housing in Greater Geelong.

Clause 02.03-8 Transport

“Prioritise active and public transport modes over private vehicle use.”

The PSUDF facilitates development close to Central Geelong, encouraging active transport, and is well serviced by bus and train networks.

Clause 02.03-9 Infrastructure

“Encourage safe and equal access to community and development infrastructure for all members of the community.”

“Develop a comprehensive, safe and accessible open space network.”

“Ensure that development and community infrastructure is provided or upgraded in a sustainable and timely manner in all areas, with particular regard to the servicing of new communities in urban growth areas and large urban infill areas.”

The amendment introduces design guidelines which integrate with and make best use of existing infrastructure.

The amendment also implements the strategic framework of the Housing and Settlement Framework Plan at Clause 02.04-3 of the Greater Geelong Planning Scheme.

Does the amendment make proper use of the Victoria Planning Provisions?

113. The Amendment makes proper use of the Victoria Planning Provisions by amending local policy provisions, rezoning land and introducing and applying appropriate

overlays (including new schedules to the DDO). The provisions have been drafted in a manner which is consistent with the *Ministerial Direction on the Form and Content of Planning Schemes* and reviewed by DTP prior to authorisation.

114. More specifically, as set out in the Explanatory Report:

Rezoning Land

Residential Zones

The PSUDF identifies three sub-precincts within the Gordon Avenue Precinct, two of which have potential for substantial increase in population density in a location close to Central Geelong and the Geelong Railway Station. The central sub-precinct, Gordon Central, is envisioned as a vibrant, green and predominantly residential precinct with 4-6 storey buildings that are well spaced and set within a thriving landscape. The eastern-most sub-precinct along Latrobe Terrace is envisioned as a predominantly commercial precinct that benefits from its close proximity to key sites. The determination of residential zone changes in the Gordon Avenue Precinct was informed by Planning Practice Note 91: Using the residential zones. Given the density objectives outlined in the PSUDF and planning policy, these areas are appropriate for substantial change. The Residential Growth Zone and Mixed Use Zone respectively are appropriate zones to facilitate these outcomes.

Commercial Zones

Rezoning of Commercial 2 Zone land to Commercial 1 Zone allows for colocation of residential and commercial development. The City's Retail Strategy 2020-36 predicated an increase in demand in the Pakington Street specialised retail centre would outstrip supply and suggested rezoning the C2Z land (in the Pakington North Precinct and some properties in the west of the Gordon Avenue Precinct) to C1Z to support new economic development. Additionally, the C1Z supports the IHDA objectives of the area targets and increases opportunity for a wider range of allowable commercial uses. C1Z is therefore a more appropriate zone for the identified land.

Public Land Zones

The Council-owned site at 21-33 Autumn Street, Geelong West, which is within the Gordon Avenue Precinct, is identified in the Pakington Street and Gordon

Avenue Urban Design Framework (City of Greater Geelong, May 2024) as a future park. Applying the Public Park and Recreation Zone (PPRZ) to this parcel of land as part of the amendment facilitates that use. The UDF and relevant schedule to the DDO include built form directions for appropriate design considerations and treatments to open spaces, which differ from interfaces requirements to residential zones. Applying the PPRZ as part of this amendment ensures that development on adjoining lots can appropriately respond to the relevant provisions, clarifies these outcomes for applicants and statutory planning officers processing applications, and signals to the community this is the long-term intention of the site.

Applying the Design and Development Overlay

The purpose of the DDO is to implement strategic directions and apply area-specific design guidance and is therefore an appropriate mechanism to enact the built form and design guidelines summarised within the PSUDF. The amendment applies Schedules 56 and 57 to the Design and Development Overlay (DDO56, DDO57). The DDOs implement the design principles, objectives and guidelines identified in the two urban design frameworks.

A mandatory ground level setback is included in the new provisions which is applied in accordance with Planning Practice Note 59: The role of mandatory provisions in planning schemes. This provision is strategically supported as it implements the objectives and strategies of the new policy proposed at Clause 11.03-6L-06 (Pakington Street Geelong West). The ground level setbacks from the street facilitate wider footpaths, enable active uses, allow for deep soil canopy plantings, provide a buffer to high traffic roads, and on side streets enable transition between commercial activity and residential streets. The setbacks for each location have been considered in light of the surrounding context and objectives of the relevant sub-precinct. For example, the 6-metre setback along LaTrobe Terrace echoes the 6-metre setback on the opposite (east) side of LaTrobe Terrace within the Activity Centre 1 Zone and further down within the South Geelong UDF area.

The mandatory nature of this provision facilitates the required outcome and ensures that the other objectives of the PSUDFs, such as those relating to landscaping, transition, and streetscape, are not compromised by future development. This approach avoids the risk of adverse outcomes variations to

the setback may create such as an incoherent, visually cluttered streetscape, compromise delivery of dedicated landscape areas, offer poor amenity for ground level apartments. Therefore, it is appropriate to depart from the performance-based approach in this aspect. The remaining provisions are performance-based as it was determined variation should not result in outcomes inherently misaligned with the objectives of the PSUDF. The mandatory ground level setback is clearly stated in the DDOs and will ensure consistent and predictable development outcomes that implement the objectives of the PSUDF.

Applying the Environmental Audit Overlay

The amendment applies the EAO to a number of properties within the precincts on the basis of data provided in the Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria (Landserv, June 2023). This report identified properties with potential medium or high levels of contamination in accordance with PPN30.

The application of the EAO, which defers the requirement for an environmental audit until the time of development, is considered appropriate due to the fragmented ownership and existing site coverages and uses of the precinct.

Background Documents

It is appropriate to include the Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024) and the Pakington North Urban Design Framework (City of Greater Geelong, May 2024), as background documents in the Greater Geelong Planning Scheme. These UDFs inform the preparation of the amendment, provide information to explain the context of proposed provisions, and inform the understanding of the desired outcomes for the subject area.

How does the amendment address the views of relevant agencies?

115. Council consulted with the following agencies as part of the preparation of the Amendment:

115.1. the Department of Transport and Planning;

115.2. VicTrack;

115.3. Regional Rail Victoria; and

115.4. the EPA.

116. Council has endeavoured to respond to any issues raised by relevant agencies, including by undertaking further strategic work and changing the Amendment where necessary and appropriate.

117. As set out in the Explanatory Report, prior to exhibition of the Amendment:

...VicTrack advised that the Rail Sidings Yard site is still required for transport uses and that the turntable on the site is a critical piece of infrastructure in the region. As a result, the site, though identified within the study area as a key strategic site, is not proposed to be rezoned and the proposed Schedule 57 to the Design and Development Overlay contains provisions to ensure appropriate management of interfaces to the site.

The requirement for an acoustic assessment included in both Schedule 56 and 57 to the Design and Development Overlay was refined based on the further work conducted at the behest of the EPA.

118. Where public authorities made a submission in response to exhibition of the Amendment, those submissions and Council's response are summarised above.

Does the amendment address the requirements of the Transport Integration Act 2010?

119. The Explanatory Report explains how the Amendment addresses the requirements of the Transport Integration Act 2010 (**TI Act**):

Section 25 of the Transport Integration Act 2010 requires a planning authority to have regard to specified transport system objectives and decision-making principles where a planning scheme amendment is likely to have a significant impact on the transport system, as defined in the Transport Integration Act 2010.

The subject area directly abuts a transport zone in two places. The eastern portion of the Gordon Avenue Precinct, along Latrobe Terrace, fronts onto a Transport Zone 2 (TRZ2). The eastern portion of the Pakington North Precinct backs onto the Melbourne-Waurn Ponds Railway Line, which is in the Transport Zone 1 (TRZ1). The site within this zone at 28-64 Pakington Street, Geelong

West, is currently used as a railway siding yard, has been identified as a further investigation area for a strategic development site. Discussions with VicTrack representatives indicated this land is still needed for transport purposes at present. Therefore, design decisions in the PSUDF have taken into account the need for appropriate interface treatments to this site.

Impact on Road System

The amendment will allow for intensive commercial and residential development along Latrobe Terrace, which is within a Transport Zone 2. It is proposed to mitigate the impact to this major road through design guidelines which ensure that property access is not permitted from the major road. The surrounding road network is considered capable of accommodating all proposed uses and development resulting from this amendment. The amendment is not expected to have a direct significant impact on other major roads and the surrounding road network is considered capable of accommodating any increases to traffic. Applicants will be required to prepare a Transport Impact Assessment as relevant.

Impact on Public Transport System

An increase in residents and others in the area will likely increase demand for public transport services including V/Line train services and bus journeys. The additional services facilitated by the duplication of the Geelong-Waurn Ponds railway line are considered adequate to meet this demand. There is adequate provision of bus stops in the study area, however more frequent bus services and some upgrades to weather shelters at stops may be required to meet demand.

Impact on Railway Infrastructure

The development of the Rail Sidings Yard site at 28-64 Pakington Street, Geelong West identified in the Pakington North Urban Design Framework (City of Greater Geelong, May 2024) for further investigation would only become feasible if an appropriate alternate site for a turntable could be found, other train stabling options become available, and with the support of the Department of Transport and Planning/VicTrack. Despite its identification as a potential strategic development site, due to the constraints, it is not proposed to rezone this site as part of this amendment.

Consideration of Transport Integration Act 2010

The amendment generally supports the transport system objectives, as set out in Division 2 of Part 2 of the Transport Integration Act 2010 and implements land use objectives at Section 11(2) and Section 11(3). The amendment does not undermine the principles decision-making principles as set out in Division 3 of Part 2.

The amendment provides for the effective integration of transport and land use by reducing the need for private motor vehicle transport, facilitating better access to, and greater mobility within, local communities.

The amendment minimises harm to the local environment through a reduction in transport related emissions and pollutants and promotes forms of transport which have the least impact on the natural environment.

How does the amendment have regard to the principles set out in the Yarra River Protection (Wilip-gin Birrarung murrn) Act 2017 in relation to Yarra River land and other land, the use of development of which may affect Yarra River land?

120. This consideration is not applicable, noting that the Amendment does not affect land within or near the Yarra River or land likely to impact the Yarra River.

What impact will the new planning provisions have on the administrative costs of the responsible authority?

121. The Amendment is likely to increase the number of planning permit applications lodged with Council because the rezoning will facilitate new commercial, residential and mixed-use development and the DDO56 and DDO57 contain planning permit triggers. However, the increase in permit applications will be accompanied by an increase in permit application fees and therefore resources, which will enable Council to accommodate the increase in volume and process permit applications within the prescribed time.

Relevant strategic documents

Settlement Strategy

122. The Urban Design Frameworks are both driven and supported by the *City of Greater Geelong Settlement Strategy* (City of Greater Geelong, August 2020).

123. The Settlement Strategy provides an analysis of population and housing trends and recommendations aimed at providing housing for a growing population while protecting Geelong’s unique lifestyle and environmental values, among other matters.⁴⁰
124. Relevantly, the Settlement Strategy:
- 124.1. encourages urban consolidation and the management of future growth to deliver more sustainable, well-serviced communities;⁴¹
 - 124.2. seeks to direct the majority of future housing to urban Geelong, including urban infill;⁴²
 - 124.3. seeks to increase housing diversity in existing communities and increase the level of social and affordable housing;⁴³
 - 124.4. aims to facilitate infill development to increase its housing supply contribution to 50% by 2047;⁴⁴ and
 - 124.5. supports continued investment in ‘place making’ activities – that is amenity and local facility improvements – in urban renewal areas, key development and increased housing diversity areas and activity centres.⁴⁵
125. In particular, the Settlement Strategy identifies Gordon Avenue as an “urban renewal precinct” within walking distance of Central Geelong station which, as at the date of the Settlement Strategy, was being investigated as part of the preparation of the Original UDF. The Settlement Strategy recommends that Council continue with the preparation of the Pakington Street Urban Design Framework.⁴⁶

Retail Strategy

126. The Urban Design Frameworks also find strategic support in the City of Greater Geelong Retail Strategy 2020-2036 (City of Greater Geelong and SGS Economics and Planning, August 2020) (**Retail Strategy**).

⁴⁰ Settlement Strategy, page 5.

⁴¹ Settlement Strategy, page 5.

⁴² Settlement Strategy, page 6.

⁴³ Settlement Strategy, page 7.

⁴⁴ Settlement Strategy, page 10.

⁴⁵ Settlement Strategy, page 10.

⁴⁶ Settlement Strategy, page 85.

127. The Retail Strategy classifies the Pakington Street, Geelong West retail spine as a 'specialised retail centre' (the only specialised retail centre in the municipality) and Gordon Avenue, Geelong West as a 'dispersed restricted retail centre'.
128. Information from the Retail Strategy regarding the role and status of the Pakington Street and Gordon Avenue retail centres – including their key characteristics, current roles, size (floorspace), future roles and opportunities, and growth opportunities – is extracted at **Appendix D** below.
129. Notably, the Retail Strategy specifically recommends the preparation of an urban design framework or structure plan for both the Pakington Street, Geelong West and Gordon Avenue retail centres, "...which should consider development re-zoning opportunities in Pakington Street, north of Waratah and Wellington Streets and within the dispersed restricted retail area along Gordon Avenue."⁴⁷

Plan for Victoria

130. *Plan for Victoria* (Department of Transport and Planning, 2025) (**Plan for Victoria**) sets the State-wide vision for how Victoria will grow over time. It is comprised of five "pillars for action":
 - 130.1. Pillar 1: Housing for all Victorians
 - 130.2. Pillar 2: Accessible jobs and services
 - 130.3. Pillar 3: Great places, suburbs and towns
 - 130.4. Pillar 4: Sustainable environments
 - 130.5. Pillar 5: Self-determination and caring for Country
131. The vision for Victoria is:

By 2050, Victoria will be a vibrant, accessible and connected community, valued for its diverse cultures, sustainable environmental practices and respect for the First Peoples of Victoria.

Building a state that provides choices and opportunities for current and future generations of Victorians in quality housing, transport, employment,

⁴⁷ Retail Strategy, page 100.

environment and connectivity will require input from the community, government, local businesses and industry alike.

We will create a society that caters to the unique needs of all Victorians, nurturing individual health through physical and cultural recreation.⁴⁸

132. In relation to housing, Plan for Victoria emphasises the need to provide all Victorians with a choice of a well-designed home at an affordable price and close to daily needs, and to ensure that housing is affordable, diverse and accessible.⁴⁹

133. The vision for housing is as follows:

Our housing will be consistently functional, inclusive, accessible, fair and sustainable. Victorians will live in diverse forms of housing that meet the needs of the public and contribute to our multi-faceted and vibrant community, providing accessible services, lively centres and open space.

We will increase medium-density housing and limit urban sprawl to preserve our natural landscapes and biodiversity.

The Victorian government will proactively align their policies with other levels of government to facilitate ample and affordable private and social housing.⁵⁰

134. Plan for Victoria articulates the aim of building 2.24 million homes across Melbourne and Victoria's regional cities and towns over the next 30 years, with local government housing targets identifying where these new homes will go.⁵¹

135. The City of Greater Geelong is expected to provide a significant proportion of the State's housing growth, with Plan for Victoria stating:

More homes will be built in regional Victoria in well-connected, well-serviced locations. The three major regional cities of Ballarat, Bendigo and Geelong will accommodate the most homes. Victoria's regional cities and centres, including those near Melbourne, will also accommodate more homes.⁵²

⁴⁸ Plan for Victoria, page 19

⁴⁹ Plan for Victoria, page 21

⁵⁰ Plan for Victoria, page 21

⁵¹ Plan for Victoria, page 21

⁵² Refer to Map 2, page 22.

136. More specifically, Plan for Victoria sets a housing target of 128,600 new homes by 2051 in the City of Greater Geelong, with a non-greenfield target of 77,500 and a greenfield target of 51,100.⁵³ While this split between non-greenfield and greenfield (60% non-greenfield and 40% greenfield) is less than the split for other local government areas (70% non-greenfield and 30% greenfield), the aim is to move closer to building 70% of new homes in existing urban areas.⁵⁴
137. Plan for Victoria (including the local government area housing targets) was recently implemented in the Planning Scheme via Amendment VC283.
138. As set out above, the Amendment will facilitate the delivery of considerable infill housing and therefore contribute towards achieving the housing target for the City of Greater Geelong.

Relevant planning scheme amendments

139. As at the date of these submissions, there are no planning scheme amendments which directly impact the Amendment. However, the following planning scheme amendments are of indirect relevance and may be of interest to the Panel:

139.1. Planning Scheme Amendment C432 was approved and gazetted on 13 November 2025. The amendment:

Implements the South Geelong Urban Design Framework (April 2025) by introducing new planning policy for South Geelong at Clauses 11.03 and 16.01, rezoning land to Residential Growth Zone (RGZ), General Residential Zone (GRZ) and Mixed Use Zone (MUZ), applying Design and Development Overlays (DDO50 and DDO54) to Key Development Areas, applying the Heritage Overlay (HO) and Environmental Audit Overlay (EAO) to nominated properties, incorporating revised Heritage Design Guidelines and Statement of Significance for HO1641 City South Heritage Area and new Statements of Significance for three individual heritage places, and making other associated changes to the Greater Geelong Planning Scheme.⁵⁵

139.2. Planning Scheme Amendment C457ggee was approved (with changes) and gazetted on 8 January 2026. The amendment:

⁵³ Plan for Victoria, page 31.

⁵⁴ Plan for Victoria, page 29.

⁵⁵ <<https://planning-schemes.app.planning.vic.gov.au/All%20schemes/amendments/C432ggee?schemeCode=ggee>>

*Implements the Highton Village Urban Design Framework (UDF) in the Greater Geelong Planning Scheme by rezoning two (2) Council car parks, the road reserves of Belle Vue Avenue, part of Taylor Court and the laneway east of Belle Vue Avenue, from General Residential Zone 4 to Commercial 1 Zone, inserting Clause 16.01-2L (Social and affordable housing), and applying a new Schedule 52 to Clause 43.02 Design and Development Overlay.*⁵⁶

139.3. Planning Scheme Amendment C469ggee proposes to implement the recommendations of Council's Local Policy Review 2023 and Housing Framework Review 2024 by introducing new and revised local content in the Municipal Planning Strategy and Planning Policy Framework and by amending some schedules to zones and overlays and operational provisions. The amendment was submitted for authorisation on 26 May 2025 and re-submitted following modification on 3 September 2025. It is currently on hold pending the approval and gazettal of Planning Scheme Amendment VC245 (which proposes to implement the Surf Coast and Bellarine Peninsula Statements of Planning Policy). The amendment is not expected to specifically impact the Geelong West area, although local planning policy is proposed to be updated to reference current Council strategies and place a greater emphasis on infill housing.

140. In addition, the *Greater Geelong Heritage Design Guidelines* (2025) were adopted by Council in November 2025 and work is underway to seek authorisation for to prepare a planning scheme amendment to incorporate the design guidelines into the Planning Scheme.⁵⁷

Relevant permit applications

141. A table summarising relevant planning permits and planning permit applications within the study area is included at **Appendix E**.

ISSUES RAISED IN SUBMISSIONS

Summary of issues raised in submissions and Council response

142. The key issues raised in submissions can be summarised as follows:

⁵⁶ <<https://planning-schemes.app.planning.vic.gov.au/All%20schemes/amendments/C457ggee?schemeCode=ggee>>

⁵⁷ <<https://www.geelongaustralia.com.au/news/item/8de2dd3720a9e4f.aspx>>

Theme 1: Lack of strategic justification and concerns regarding the public engagement process

- submissions contending that the amendment is not strategically justified and not appropriate for this locality
- submissions raising concerns regarding the nature and extent of community consultation (including the deliberative community consultation process that informed the Pakington North UDF), and the extent of public notification

Theme 2: Traffic congestion, car parking and public transport

- submissions contending that existing traffic congestion and insufficient car parking will be exacerbated by the Amendment due to an increase in population density and visitor numbers and limited public transport services
- submissions raising concerns in relation to traffic management and traffic spill-over into residential streets surrounding the activity centres
- submissions objecting to the loss of car parking on Autumn Street (noting the proposal to rezone Council-owned land at 21-33 Autumn Street from C2Z to PPRZ)

Theme 3: Building heights

- submissions objecting to the proposed scale of development and maximum building heights (particularly in the Pakington North Precinct), including submissions contending that the proposed building heights will have negative impacts on neighbourhood character, amenity and heritage values
- submissions requesting increased maximum building heights (particularly in the Gordon Avenue Precinct)

Theme 4: Drainage

- submissions raising concerns in relation to stormwater management, drainage and the capacity of the sewer network, particularly in areas affected by overland stormwater flow / flooding

Theme 5: Open space

- submissions raising concerns in relation to a lack of public open space / green space

Theme 6: Application of the EAO

- submissions contending that the EAO should not be applied to specific properties
- submissions questioning the identification of potentially contaminated land (i.e. the scientific basis for the identification)
- submissions raising concerns in relation to the implications of the application of the EAO (e.g. additional environmental audit requirements)

Theme 7: Application of zones

- submissions objecting to the application of the RGZ and C1Z including requests to rezone specific properties to alternative zones or leave specific properties in their current zone

Theme 8: Drafting of the DDO56 and DD57

- submissions objecting to, or requesting changes to, various provisions in the DDO56 and DDO57 including requests for greater flexibility in the controls

Theme 9: Drafting of local policy

- submissions requesting changes to local policy, including in relation to the rail sidings yard in the Pakington North Precinct

Theme 10: Changes to the UDFs

- submissions requesting changes to the UDFs including in relation to wayfinding, parking integration and connectivity to Central Geelong and the waterfront

143. Council's response to these issues is set out in the officer report, a copy of which is enclosed at Appendix C.

144. While Council proposes some post-exhibition changes in response to issues raised in submissions (as set out below), the issues raised in submissions have not been resolved per-se but rather remain before the Panel for its deliberation.

POST-EXHIBITION CHANGES

145. In response to submissions, Council proposes the following changes to the Amendment ordinance:

145.1. DDO56:

145.1.1. amend the building separation requirements for clarity;

145.1.2. amend the wind requirements including to cross-reference Table 4;

145.1.3. add a new access, parking and services requirement in relation to development abutting Latrobe Terrace;

145.1.4. add a new decision guideline in relation to comfortable wind conditions;

145.2. DDO57:

145.2.1. amend Figure 8 (Open Space Interface) to include a label for the spring equinox and state "50% overshadowing between 10am and 2pm"

145.2.2. amend Table 3 (Solar Access) to require a minimum 50% solar access in public open space between 10am and 2pm on 22 September;

145.2.3. amend the wind requirements including to cross-reference Table 4;

145.2.4. add new access, parking and services requirements;

145.2.5. amend the decision guidelines in relation to solar access to cross-reference Table 3;

145.2.6. add a new decision guideline in relation to comfortable wind conditions;

145.3. Local policy at Clause 11.03-6L-06:

145.3.1. add a new objective in relation to the Pakington North Precinct as follows:

To protect the rail sidings yard at 28–64 Pakington Street as an essential site for the operation of rail services in Geelong.

146. These proposed post-exhibition changes will be shown in the 'Version 1' Amendment documentation required to be submitted by 16 February 2026.
147. Council reserves the right to propose further post-exhibition changes in response to issues raised in submissions and expert evidence.

CONCLUSION

148. This concludes Council's Part A submission.
149. Council's Part B submission to be filed on 16 February 2026 will detail Council's response to issues raised in submissions and matters raised in expert evidence, an explanation of how the proposed mandatory provisions meet the criteria set out in PPN59 and Council's final position on the Amendment.

10 February 2026

Kate Morris

HARWOOD ANDREWS

on behalf of

GREATER GEELONG CITY COUNCIL

Appendix A

Map showing the Pakington Street activity centre boundary, the existing Heritage Overlay and the proposed Schedules to the Design and Development Overlay

Appendix B
Explanatory Report

Greater Geelong Planning Scheme

Amendment C433ggee

Explanatory Report

Overview

The amendment implements two urban design frameworks (UDFs) which outline the vision for the growth and development of land along and adjacent to Pakington Street, Geelong West into the Greater Geelong Planning Scheme. These are:

- the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)*, which outlines the overall vision, identifies the three precincts within the study area, and details the built form objectives for two of those precincts (the Gordon Avenue Precinct and the Heritage Core), and;
- the *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)*, which details the built form objectives for the Pakington North Precinct.

To accommodate growing populations, it is important to strengthen the role of existing inner urban areas. The UDFs facilitate increased residential densities and commercial opportunity in the Gordon Avenue and Pakington North precincts while ensuring appropriate transitions to the central Heritage Core and adjoining residential areas. The amendment will create more compact, liveable neighbourhoods that are well connected to Central Geelong, and which provide new housing, lifestyle and business opportunities.

The amendment does this by making changes to local planning policy, rezoning land for commercial and residential uses, applying two Design and Development Overlays and an Environmental Audit Overlay to nominated properties.

Note: Pakington Street Urban Design Frameworks/PSUDF is used in the body of this report to collectively refer to the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* and the *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)*.

Where you may inspect this amendment

The amendment can be inspected free of charge at:

- City of Greater Geelong website at www.geelongaustralia.com.au/amendments/
- Geelong West Library, 153A Pakington Street, Geelong West - Monday to Friday

9am to 5:30pm and Saturday 9am to 1pm (document folder available for inspection)

- By appointment only during office hours at Wurriki Nyal, Wadawurrung Country, 137-149 Mercer Street, Geelong - Monday to Friday 8am to 5pm

The amendment can also be inspected free of charge at the Department of Transport and Planning website at <http://www.planning.vic.gov.au/public-inspection> or by contacting the office on 1800 789 386 to arrange a time to view the amendment documentation.

Submissions

Any person may make a submission to the planning authority about the amendment. Submissions about the amendment must be received by **Monday 1 September 2025**.

A submission must be sent to:

The Coordinator
Strategic Implementation
City of Greater Geelong

- either by mail to: PO Box 104, GEELONG VIC 3220
- or by email to: amendments@geelongcity.vic.gov.au
- or lodged online at: www.geelongaustralia.com.au/amendments

Panel hearing dates

In accordance with clause 4(2) of Ministerial Direction No.15 the following panel hearing dates have been set for this amendment:

- directions hearing: 12 January 2026
- panel hearing: 16 February 2026

Details of the amendment

Who is the planning authority?

This amendment has been prepared by the City of Greater Geelong, which is the planning authority for this amendment.

Land affected by the amendment

The amendment applies to all land within the Pakington Street and Gordon Avenue Urban Design Framework study area in Geelong West, as shown in Figure 1. This area consists of three precincts: the Gordon Avenue and Heritage Core Precincts, which are detailed in the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* and the Pakington North Precinct which is detailed in *Pakington North Urban Design Framework (City of Greater*

Geelong, May 2024).

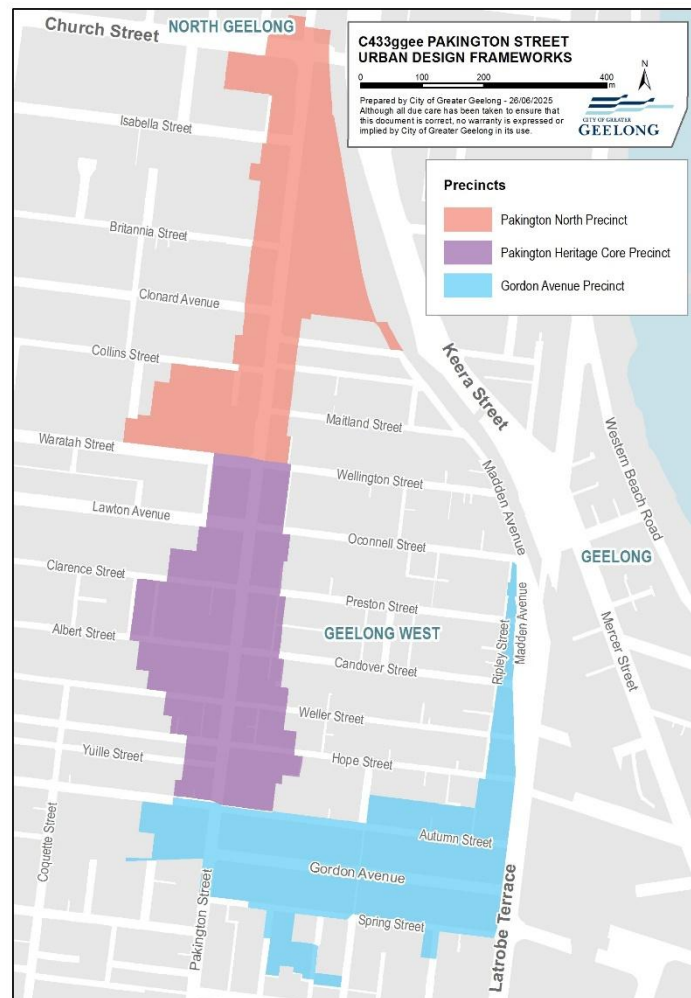


Figure 1. Precincts of the Pakington Street Urban Design Frameworks

A mapping reference table is attached at Attachment 1 to this Explanatory Report.

What the amendment does

The amendment implements the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* and *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)* through the application of local policy, zones and overlays.

Specifically, the amendment:

Zoning maps

- Amends Planning Scheme Map No. 49 to rezone land as detailed below:
 - 22 - 42 Spring Street, Geelong West, from General Residential Zone (GRZ4) to Residential Growth Zone (RGZ1).
 - 4 - 40 and 9 - 37 Gordon Avenue, Geelong West, including laneways; 15, 44 - 60, and 59 - 63 Spring Street, Geelong West; 6 - 46, 9 - 19 and

- 35 - 55 Autumn Street, Geelong West; 2 - 8 Western Street, Geelong West; 1 - 5 and 2 - 4 Villamanta Place, Geelong West; and 13 Coronation Street, Geelong West, from Commercial 2 Zone (C2Z) to Residential Growth Zone (RGZ1).
- 158 - 224 Latrobe Terrace, Geelong West; 2A Gordon Avenue, Geelong West; 2 Autumn Street, Geelong West; 1 and 2 Hope Street, Geelong West; 1A Weller Street, Geelong West, from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ).
- 57 - 59 and 69 Autumn Street, Geelong West, including 1/69 and 2/69 Autumn Street; 39 - 45 and 42 - 46 Gordon Avenue, Geelong West, from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z).
- 21 - 33 Autumn Street, Geelong West, from Commercial 2 Zone (C2Z) to Public Park and Recreation Zone (PPRZ).
- Part 46 - 50 Villamanta Street, Geelong West, from Commercial 2 Zone (C2Z) to General Residential Zone (GRZ4).
- Amends Planning Scheme Map No. 37 to rezone land as detailed below:
 - 2 - 8 Church Street, North Geelong and part of 23 Pakington Street, Geelong West, from General Residential Zone (GRZ1) to Commercial 1 Zone (C1Z).
 - 134 - 156 Latrobe Terrace, Geelong West; 4 and 5 - 7 Preston Street, Geelong West, from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ).
 - 1 - 79, 2 - 26 and 66 - 100A Pakington Street, Geelong West; 17 - 29 Church Street, Geelong West; 1 Britannia Street, Geelong West; 2 - 4 Collins Street, Geelong West; and 1 Isabella Street, Geelong West, from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z).
 - Part 1/2 Waratah Street, Geelong West, from Mixed Use Zone (MUZ) to Neighbourhood Residential Zone (NRZ3).

Overlay maps

- Amends Planning Scheme Map Nos. 37DDO, 38DDO, 49DDO and 50DDO to:
 - Remove Schedule 17 to the Design and Development Overlay (DDO17) from the west side of Latrobe Terrace.
 - Apply Schedule 56 to the Design and Development Overlay (DDO56) to the Gordon Avenue Precinct.
 - Apply Schedule 57 to the Design and Development Overlay (DDO57) to the Pakington North Precinct.
- Amends Planning Scheme Map Nos. 37EAO and 49EAO to apply the

Environmental Audit Overlay (EAO) to potentially contaminated land.

Planning scheme ordinance

- Inserts Clause 11.03-6L-06 Pakington Street Geelong West to implement objectives and strategies for Pakington Street Geelong West identified in the PSUDF.
- Deletes Clause 15.01-1L-02 Pakington Street North urban design.
- Amends Clause 16.01-1L-01 Integrated housing and housing diversity to identify the Pakington North and Gordon Avenue Precincts as Key Development Areas.
- Amends Clause 16.01-1L-02 to remove the Pakington North Key Development Area and Gordon Avenue Key Development Area from the Geelong West, Manifold Heights & Newtown IHDA map.
- Inserts Clause 16.01-2L Social and affordable housing.
- Amends Schedule 17 to Clause 43.02 Design and Development Overlay to remove the Latrobe Terrace area.
- Inserts new Schedule 56 to Clause 43.02 Design and Development Overlay (DDO56) applying to the Gordon Avenue Precinct identified in Figure 1.
- Inserts new Schedule 57 to Clause 43.02 Design and Development Overlay (DDO57) applying to the Pakington North Precinct identified in Figure 1.
- Amends the Schedule to Clause 72.08 Background Documents to insert the following as a Background Document:
 - *Pakington Street and Gordon Avenue Urban Design Framework* (City of Greater Geelong, May 2024)
 - *Pakington North Urban Design Framework* (City of Greater Geelong, May 2024)
- Amends the Schedule to Clause 74.02 Further Strategic Work to identify necessary future work, including for the Rail Sidings Yard Key Strategic Site.

Strategic assessment of the amendment

Why is the amendment required?

Geelong West is an established area of Geelong, located adjacent to Central Geelong with good road and rail transport links. The Pakington Street commercial area runs like a spine through the suburb from Gordon Avenue to Church Street. The commercial vitality of the area, proximity to Central Geelong and access to movement networks make it a viable location for infill development opportunities.

The *G21 Regional Growth Plan (G21 Geelong Region Alliance, April 2013)* identified

the need for infill development in Geelong to meet population targets and maintain the rural character of the surrounding area. The City's *Retail Strategy 2020-2036* identified Pakington Street, Geelong West, as a specialised retail centre within the City's retail hierarchy. The *Settlement Strategy (City of Greater Geelong, August 2020)* recommended the preparation of the Pakington Street Urban Design Framework, and the inclusion of the Gordon Avenue precinct within that plan.

A section of the study area is identified as an Increased Housing Diversity Area (IHDA) in the *Housing Diversity Strategy (City of Greater Geelong, 2007)*. This classification encourages a mix of high, medium, and conventional density housing. The UDFs also support the objectives and strategies identified in various council policy documents and strategies, including the *Clever and Creative Future (City of Greater Geelong, 2017)*, the Council Plan 2018-2022, the *City of Greater Geelong Retail Strategy 2020-36 (City of Greater Geelong and SGS Economics and Planning, August 2020)*, and the *Settlement Strategy (City of Greater Geelong, August 2020)*.

In response to these strategic policies, the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, December 2021)* was prepared to help shape the continued development and renewal of Pakington Street and Gordon Avenue, Geelong West. The PSUDF has undergone extensive community consultation in anticipation of the amendment. Recommendations from the most recent consultation, a deliberative engagement process in February-April 2024, have directly informed the *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)* implemented via this amendment.

The process to adopt the PSUDF occurred in two parts. Firstly, Council considered the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, December 2021)* which guided the design and development outcomes for all three precincts. At the Council meeting on 14 December 2021, Council adopted two of the three precincts — the Gordon Avenue and Heritage Core Precincts — and resolved to undertake further community consultation regarding the Pakington North Precinct. In early 2024, a community panel was guided via a collaborative process to co-create the *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)* which was adopted by Council in May 2024. An updated version of the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)*, amended in accordance with the extent first adopted at the 14 December 2021 meeting, was also adopted.

This amendment is required to implement the land use and development controls identified in the two urban design frameworks via the planning mechanisms discussed further in this report. The amendment is strategically sound and does not repeat provisions already in the scheme or those dealt with through other regulations.

Policy Changes

The planning scheme is the most appropriate means of achieving the desired

outcome as it provides statutory support for desired urban outcomes. The local policy, including the PSUDF, responds to a demonstrated need and is necessary to guide the infill development of Pakington Street North. The local policy enacts a number of strategic directions in the Municipal Planning Strategy, which are further outlined in the relevant sections of this report and will assist the Responsible Authority to make informed decisions about development proposals. The objectives and guidelines of the PSUDF, in combination with the Design and Development Overlays, will assist developers, landowners and other relevant parties to better understand the opportunities and limitations.

Zoning Changes

Rezoning of Commercial 2 Zone to Commercial 1 Zone allows for colocation of residential and commercial development, supporting the IHDA objectives of the area and increasing opportunity for a wider range of allowable commercial uses. The PSUDF identifies the Gordon Avenue Precinct as an area with significant potential to accommodate a wider mix of uses with a particular focus on residential uses that increase the local resident population, taking advantage of its proximity to the Geelong Train Station, Central Geelong and Pakington Street itself. The application of residential zones (MUZ and RGZ1) reflects the capacity of this area to support more substantial change and facilitates the delivery of density. The Residential Growth Zone promotes housing intensification in locations close to jobs, services and facilities serviced by public transport including activity centres. The Mixed Use Zone facilitates higher densities of residential development in areas identified for residential development at higher densities, including urban renewal and strategic redevelopment sites.

Applying the Design and Development Overlay

The amendment applies Schedules 56 and 57 to the Design and Development Overlay (DDO56, DDO57). The DDOs implement the design principles, objectives and guidelines identified in the urban design frameworks relevant to the Gordon Avenue and Pakington North precincts.

The *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* suggests the preparation of a DDO for the Heritage Core, however much of the direction in the UDF relates to work that either forms part of the streetscape improvement works or will be included in a review of the Heritage Overlays, implemented in this amendment via Clause 74.02 Further Strategic Work. Heritage Design Guidelines currently incorporated in the Greater Geelong Planning Scheme provide built form guidance regarding character and height for sites within the Heritage Overlay. Therefore, it was considered that the application of a DDO to the Heritage Core is not appropriate at this stage.

Applying the Environmental Audit Overlay

The amendment applies the Environmental Audit Overlay (EAO) to a number of properties within the precinct based on data provided in the *Environmental Audit*

Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria (Landserv, June 2023). This ensures that where land has been rezoned to allow sensitive uses, the appropriate assessment and reparation work is completed prior to use and development.

Further Strategic Work

The Rail Sidings Yard, although identified in the PSUDF as a Key Strategic Site, is still in use by VicTrack for transport purposes. Heritage design guidelines in the PSUDF also require additional work prior to implementation in the planning scheme. The further strategic work clause allows for the further steps needed to implement these items is included in the planning scheme, thereby providing the strategic underpinning for those projects in the future.

How does the amendment implement the objectives of planning in Victoria?

The amendment implements the below objectives of planning in Victoria outlined in section 4(1) of the Act.

(a) to provide for the fair, orderly, economic and sustainable use, and development of land

The rezoning to C1Z, MUZ and RGZ allows for highest and best use outcomes and provides opportunities for the development of residential and commercial prospects across the subject area.

(c) to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria;

The expansion of the Commercial 1 Zone in the subject area will allow for more employment and residential opportunities with good amenity and connectivity to help secure a pleasant, efficient and safe environment. The provision of new residential zoning in the area will support housing objectives.

(d) to conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value;

The amendment encourages the protection of existing heritage places and provides guidance for development to ensure a sympathetic design response in new developments contributes to the continuation of the character of Pakington Street. Existing Heritage Design Guidelines incorporated in the Greater Geelong Planning Scheme provide built form guidance regarding character and height for sites within the Heritage Overlay. Further work to review the Heritage Overlays in the precinct, instigated by this amendment, will review provisions and protections to ensure they are appropriate.

(e) to protect public utilities and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community;

The amendment ensures appropriate transitions to adjoining transport assets to enable the continued orderly provision of those services.

(f) to facilitate development in accordance with the objectives set out in paragraphs (a), (b), (c), (d) and (e);

The amendment complies with the relevant components of this objective, as outlined above.

(fa) to facilitate the provision of affordable housing in Victoria;

The amendment introduces the subject area into Clause 16.01-2L to encourage the provision of affordable housing. Where relevant, the City would also seek to enter into S173 agreements for the provision of social and or affordable housing during the planning permit process for developments made possible through the changes implemented in this amendment.

(g) to balance the present and future interests of all Victorians.

The amendment was developed through a deliberative engagement process to ensure there is balance between the current interests of affected parties and the future interests of those who will live, work, and shop in and around the affected area.

The amendment, which implements the objectives of planning in Victoria as outlined above, is therefore compliant with Section 12(1)(a) of the Act.

How does the amendment address any environmental, social and economic effects?

Environmental

Environmental Quality

It is likely the amendment will have a net positive effect on air, land and water quality in the area. The PSUDF facilitates an increase in open space and greening which may have a positive impact on air quality in the immediate vicinity. Appropriate on-site management of stormwater in accordance with the DDO will benefit water quality. Environmental audits required on relevant lots will ensure the remediation and improvement of land quality.

Buffers

The uses and developments made possible via the changes facilitated through this amendment are not predicted to require the introduction of buffers for threshold issues. Possible impacts to community amenity such as overshadowing, increased wind impacts, noise etc are mitigated through the design guidelines in the DDO. However, potential buffers around the VicTrack site in the eastern section of the precinct will need to be managed through design and interface treatments to minimise the possibility of negative impacts on adjacent amenity.

Stormwater

The Special Building Overlay currently applies to properties along Gordon Avenue, Geelong West. Elements of the UDF, including requirements in the proposed Schedule 56 to the Design and Development Overlay, further seek to ensure appropriate development response to the conditions of the affected sites.

Other Environmental Factors

There are no predicted negative impacts on ecological systems or natural resources due to the infill nature of the affected area. The amendment will result in an increase of green space and canopy cover in the area which may support extant ecological systems.

Social

Opportunities

The amendment facilitates increased employment opportunities in Geelong West. The increase in residential and worker populations will increase diversity of participants in economic and social life in the area, enriching the strong community bonds of the existing community. It is likely that there will be increased demand on community and public infrastructure as the area develops in accordance with the PSUDF.

Transport

The implementation of the PSUDF will necessitate increase to public transport services, including the frequency of the current bus Routes 1 (North Shore Station - Deakin University) and 22 (Geelong Station - North Shore Station).

While there is an increase in population density, a proportional increase in vehicle traffic is not anticipated due to the proximity of the area to Central Geelong, public transport routes, and the augmentation of active transport options through the implementation of the PSUDF. It is possible that there will be some increase in people commuting to the area for employment purposes. An increase in waste service vehicles, and associated vehicle movements, can be expected in areas which are developed for multi-story commercial and residential uses.

Changes to the Public Realm and Perception of Place

Pakington Street, in particular the Heritage Core, has a distinct local character. It is this character and sense of place which makes it such a popular destination among locals and visitors alike. Changes to the public realm and perception of place are a given. While the Heritage Core will retain its current scale, in the in the Gordon Avenue and Pakington North precincts the amendment will create the conditions to develop a multi-story commercial/residential urban form which is distinctly different from the current low-density, single story commercial character of the area.

However, the built form controls in the PSUDF, which will be enacted via the Design and Development Overlays, seek to mitigate negative impacts. The controls seek to enhance the existing character and functionality of the area by ensuring high-quality urban design outcomes which respect the heritage elements of the subject area and the abutting established residential areas.

The amendment will allow for improved interfaces and the physical condition of the immediate area by addressing the current lack of activation, shading and greenery along sections of Pakington Street and improving the interface with transitional areas such as the rail siding yard.

Economic

Economic Well-being

The amendment will have a net positive impact on the economic well-being of the community. Under proposed zone provisions, existing businesses may be impacted by now-prohibited uses although existing use rights may apply. Conflicts of land use or amenity may impact the operation of existing businesses. However, the changes to commercial zoning will result in a reduction of new applications for uses associated with manufacturing and industries, bulky goods retailing, and associated business and commercial services permitted in the Commercial 2 Zone. There are a number of Commercial 2 Zone areas with similar lot sizes in neighbouring suburbs such as Norlane, Newtown, and South Geelong, and slightly further afield in the Armstrong Creek Urban Growth Area. The City is working on a number of policies and strategies to unlock additional Commercial 2 Zone land in Greater Geelong. Amendment C468ggee is likely to facilitate the delivery of C2Z land in south-west Geelong in the coming years.

The expansion of the Commercial 1 Zone over part of Gordon Avenue and throughout the Pakington North precinct will enable a vibrant mix of retail, office, business, entertainment and community uses. The Commercial 1 Zone also allows residential uses, which facilitates the population density objectives of the PSUDF and ensures that established and new businesses have access to a large customer base and employment force in close proximity. The increase in commercial activity facilitated through the amendment will likely result in more people coming to the area to work and shop.

The colocation of commercial, employment and residential uses ensures the feasibility of commercial ventures and improves the wellbeing and connection to place of those who live in or visit the area. The rezoning to Mixed Use Zone along Latrobe Terrace also facilitates the above outcomes. As Pakington Street continues to grow as the commercial focus of Geelong West, it is foreseen that the increase in population in the subject area will support the commercial growth and that there will not be a net negative impact on retail activity in surrounding areas.

Investment and Growth

The implementation of the PSUDF through the amendment will have a net positive effect on the capacity for growth of the immediate area, including encouraging significant private sector investment. There are also opportunities for public sector investment such as grants etc to assist with bringing the vision of the PSUDF to fruition. It is likely the amendment will support the capacity for growth in the surrounding areas as well, assisting the City to reach density targets, including IHDA targets.

There will be increased opportunities for active and public transport, art installations, and community infrastructure. The identified key strategic sites offer opportunity for significant investment and growth in the subject area. In the short term, the amendment supports the redevelopment and intensification of development on the Pakington Strand site. The Rail Sidings Yard offers long term opportunities, subject to the needs of VicTrack for the site.

Does the amendment address relevant bushfire risk?

The subject site is not within a designated Bushfire Prone Area or a Bushfire Management Overlay. It is considered that the amendment will not increase bushfire risk.

Does the amendment comply with the requirements of any other Minister's Direction applicable to the amendment?

Ministerial Direction – The Form and Content of Planning Schemes

All schedules and consequential changes to local planning provisions in the amendment have been prepared in accordance with applicable style guides, formatting and layout as specified in the Ministerial Direction - The Form and Content of Planning Schemes.

Ministerial Direction No. 1 – Potentially Contaminated Land

The amendment complies with Ministerial Direction No. 1 (Potentially Contaminated Land) under section 12 of the *Planning and Environment Act 1987*.

Council engaged Landserv, suitably qualified consultants, to undertake a site history review as set out in Appendix 2 of Planning Practice Note 30 – Potentially contaminated land (PPN30). Landserv provided a report *Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria* (Landserv, June 2023).

Where this report identified potential of land contamination on sites that will be rezoned to allow a sensitive use via this amendment, an Environmental Audit Overlay is proposed.

The urban design frameworks implemented via the amendment are long-term plans

for the area. Therefore, it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage. Applying the Environment Audit Overlay allows the properties to continue to be used in their current capacity and is consistent with PPN30 in deferring the requirements to undertake site-specific environmental assessments to future developers as part of their development applications.

Ministerial Direction No. 11 – Strategic Assessment of Amendments

The amendment complies with Ministerial Direction No. 11 (Strategic Assessment of Amendments) under section 12 of the *Planning and Environment Act 1987*. The explanatory report has been prepared in accordance with the strategic assessment requirements and outlines the strategic justification for the amendment.

Ministerial Direction No. 15 – Planning Scheme Amendment Process

The amendment complies with Ministerial Direction No. 15 (Planning Scheme Amendment Process) under section 12 of the *Planning and Environment Act 1987*. This planning scheme amendment has been prepared in accordance with this direction.

Ministerial Direction No. 19 – Amendments that may result in impacts on the environment, amenity and human health

The amendment complies with Ministerial Direction No. 19 and has sought the Environment Protection Authority's (EPA) views. EPA provided written comment in a letter dated 9 October 2024.

Acoustic Assessment

In response to the EPA's letter, the City engaged a qualified acoustic engineer to conduct an acoustic assessment of the Pakington North and Gordon Avenue precincts. The *C433ggee - Pakington St & Gordon Ave, Geelong West Acoustic Report* (Renzo Tonin & Associates, February 2025) determined that the implementation of noise mitigation measures such as building siting and design can ensure the subject area is suitable for sensitive uses. It recommended further detail in the relevant application requirements in Schedules 56 and 57 to the Design and Development Overlay. This recommendation is reflected in the current drafting.

Potentially Contaminated Land

The letter also addressed the amendment's response to potentially contaminated land. As outlined above, the City had prepared the *Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria* (Landserv, June 2023) which assessed the risk of land contamination in the Pakington North and Gordon Avenue precincts. The City's primary focus in dealing with potentially contaminated land is on sites that are being rezoned from a zone that doesn't allow (or allows a limited range of) sensitive uses

to a zone that allows more or all sensitive uses. As such the main focus is:

- Land along Latrobe Terrace that is being rezoned from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ).
- Land along Pakington Street, Church Street, and Gordon Avenue that is being rezoned from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z).
- Land along Gordon Avenue that is being rezoned from Commercial 2 Zone (C2Z) to Residential Growth Zone (RGZ1).
- Land on Autumn Street that is being rezoned from Commercial 2 Zone (C2Z) to Public Park and Recreation Zone (PPRZ).

A number of properties were assessed as having high or medium potential for land contamination by Landserv and these are proposed to have the EAO applied. The EPA noted a lack of sufficient information in the Landserv report to definitively determine if all land proposed for rezoning is potentially contaminated, however the amendment implements the PSUDF which is a long-term plan for the area. Therefore, it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage. Applying the EAO allows the properties to continue to be used in their current capacity and is consistent with PPN30 in deferring the requirements to undertake site-specific environmental assessments to future developers as part of their development applications. This is consistent with the approach taken with the South Geelong Urban Design Framework (Amendment C432ggee).

How does the amendment support or implement the Planning Policy Framework and any adopted State policy?

The amendment supports or implements a number of clauses within the planning policy framework.

Clause 11.01-1S Settlement

The amendment facilitates the sustainable growth and development of the area and the delivery of housing choice and commercial opportunity. The amendment encourages infill urban development, thereby directing growth into established urban areas and capitalising opportunities for urban renewal. The amendment facilitates this compact growth around the existing activity area of Pakington Street and Gordon Avenue to maximise accessibility to facilities and services. The amendment encourages a prosperous and sustainable urban density that supports healthy, active and sustainable transport.

Clause 11.01-1R Settlement – Geelong G21

The amendment supports the strategies of this clause by providing growth options that build on existing infrastructure, supporting infill growth, and encouraging urban outcomes that will support Geelong's role as Victoria's second city.

Clause 11.01-1L-01 Settlement – Greater Geelong

The amendment supports the strategies of this clause as it ensures urban development occurs within designated settlement boundaries and directs housing growth to urban areas by facilitating infill development.

Clause 11.03-6S Regional and local places

The amendment supports the objectives and strategies of this clause by introducing a new sub-clause to the scheme. Clause 11.03-6L-06 Pakington Street Geelong West provides specific direction for the planning of the land nominated in the subject area.

Clause 15.01-1S Urban design

The amendment supports the objective and strategies of this clause, which underpin the principles of the PSUDF. The PSUDF was designed to ensure that the subject area is a safe, healthy, functional and enjoyable activity centre that enhances the existing sense of place and cultural identity.

Clause 15.01-1L-02 Pakington Street North urban design

The amendment removes this policy from the Greater Geelong Planning Scheme. The development of the *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)* provides updated considerations for design and form of development which are implanted via a Design and Development Overlay, which is the more appropriate mechanism. This amendment adds relevant local policy provisions to Clause 11.03 Planning for places.

Clause 15.01-2S Building design

The amendment supports the objective and relevant strategies of this clause. Principles of the PSUDF, implemented through the Design and Development Overlay, contribute to the implementation of the strategies in this clause.

Clause 15.01-5L Neighbourhood character

The amendment supports the objectives of this clause by introducing built form controls that ensure a responsive transition between Commercial 1 Zone and Residential Growth Zone and adjoining residential zones.

Clauses 15.03-1S and 15.03-1L Heritage conservation

The amendment ensures development of and near places of heritage significance within the subject area is appropriate and respects the identified heritage value. The delineation of the Heritage Core from the other precincts promotes the retention of heritage fabric and character, ensuring that the appropriate setting and context for the heritage places is maintained or enhanced. The Design and Development Overlays introduced in this amendment ensure an appropriate transition from the

higher development areas to the Heritage Core.

The *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* encourages development that respects heritage character in the subject area by encouraging the retention or re-installment of relevant street works.

Clause 16.01-1S Housing supply

The amendment supports the objectives and strategies of this clause by increasing the proportion of housing in designated areas, encouraging higher density on appropriate sites, consolidating residential densities in urban areas and facilitating a diversity of housing types to ensure a mix of people can benefit from the housing options in the area.

Clause 16.01-1R Infill housing - Geelong G21

The amendment supports the strategies of this clause by facilitating infill development within and near to the activity areas along Pakington Street and Gordon Avenue, Geelong West.

Clause 16.01-1L-02 Increased housing diversity areas

The study area is partially within the Geelong West, Manifold Heights & Newtown Increased Housing Diversity Area (Figure 2). The amendment supports the strategies of this clause and facilitates a level of development suitable for an identified area of increased housing diversity.

The amendment updates this map to exclude the Gordon Avenue and Pakington North Key Development Areas being introduced to Clause 16.01-1L-01 Integrated housing and housing diversity.

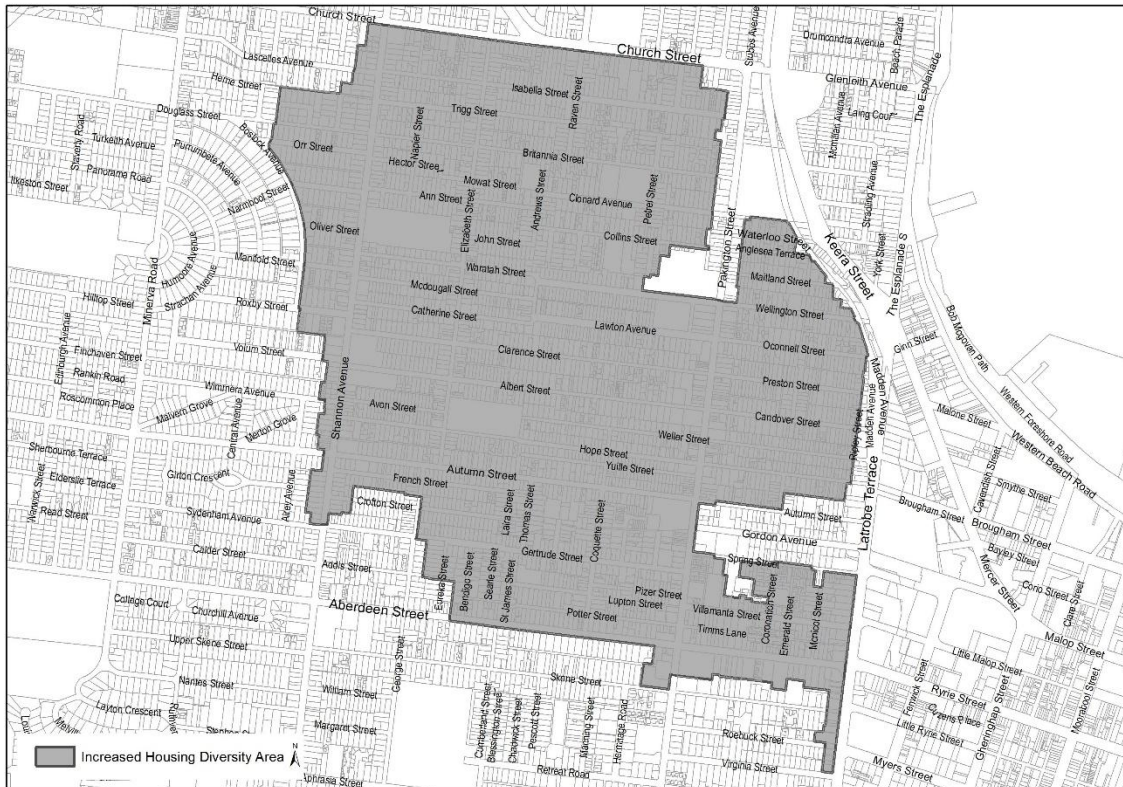


Figure 2. Geelong West, Manifold Heights & Newtown Increased Housing Diversity Areas Map (Clause 16.01-1L-02 of the Greater Geelong Planning Scheme)

Clause 16.01-2S Housing affordability

The amendment supports the strategies of this clause by opening up land supply for residential use, diversifying housing types in the area, and promoting good urban design which minimises negative environmental impacts and keeps costs down for residents and the wider community. It also introduces land in the Mixed Use Zone within the subject area to Clause 16.01-2L.

Clause 17.01-1S Diversified Economy

The amendment supports this clause. Rezoning land to C1Z, RGZ1 and MUZ allows for the collocation of employment and residential uses, thereby improving access to jobs closer to where people live. *The Retail Strategy 2020-36* (City of Greater Geelong, August 2020) directs the preparation of the UDF for Pakington Street, Geelong West which “should consider rezoning opportunities within the northern end of Pakington Street and review the role of the Gordon Avenue restricted retail precinct.” (p.48) It also directs the preparation of a UDF for Gordon Avenue which “should focus on transitioning this area into a mixed-use precinct, which would incorporate residential, office, retail and light industrial uses.” (p.192)

Clause 19.02-6L Open space

The amendment supports the strategies of this clause and includes measures in the planning scheme ordinance to ensure new public open space is usable for its

intended purpose and well-connected to the development around it through the provision of paths and other linkages. The amendment also ensures that solar access to open spaces is not compromised by adjoining development, that adjoining development transitions sympathetically, and the buildings are designed to provide passive surveillance to the open space to improve safety and sense of place.

Competing Objectives

The need to accommodate growing populations in inner urban areas (Clauses 11.01, 16.01-1S, 16.01-1R) competes with the need to respect the identified heritage values of the Geelong West area. The amendment balances these competing demands by introducing a framework which recognises the different nature and needs of the Heritage Core precinct, and by implementing design and development overlays to ensure respectful transitions to adjacent residential areas with recognised heritage value and to the Heritage Core.

The need to accommodate growing populations in inner urban areas (Clauses 11.01, 16.01-1S, 16.01-1R), which informed the decision to rezone the central portion of the Gordon Avenue Precinct from Commercial 2 Zone to Residential Growth Zone, may have some impact on existing businesses however this is mitigated by existing use rights. The priority is to transition this area for housing and applying the RGZ is consistent with PPN91 and supported by the *Retail Strategy 2020-36* (City of Greater Geelong, August 2020).

The need for increased urban density in areas with good transport links (Clauses 11.01, 18.01-1S, 18.02-3S) competes with VicTrack's need to continue to use the Railway Siding Yard for transport purposes. While the *Pakington North Urban Design Framework* (City of Greater Geelong, May 2024) identifies the Railway Sidings Yard as a Key Strategic Site, it is not proposed to rezone that site as part of this amendment. Instead, the amendment identifies the importance of the site to the PSUDF via Clause 74.02 Future strategic work to direct future advocacy work in conjunction with the Department of Transport and Planning so that should that site no longer be needed for transport purposes, it can be developed in accordance with the vision of the PSUDF (subject to a future rezoning).

Key Changes to Local Planning Policy

This amendment proposes three key changes to local policy:

- 1) The addition of a new sub-clause at 11.03-6L to identify directions specific to the subject area;
- 2) The removal of Clause 15.01-1L-02 Pakington Street North urban design as discussed above, and;
- 3) The addition of Clause 16.01-2L to encourage the provision of social and affordable housing in the subject area.

These local policy changes implement various strategic directions in the MPS, as

discussed further below. These changes will assist the responsible authority in its decision making and help support applicants to understand what is feasible on their site. The elements added in the local policy provide a level of detail specific to the area and context, which is not adequately covered elsewhere. It does not duplicate the overlays introduced via this amendment or other decision guidelines.

How does the amendment support or implement the Municipal Planning Strategy?

Through rezoning, the application of Design and Developments Overlays and the introduction of the Urban Design Frameworks into the planning scheme, the amendment supports or implements the below strategic directions of Greater Geelong's Municipal Planning Strategy. The amendment does not seek to change the strategic directions of the MPS and is consistent with strategic directions within the MPS.

Clause 02.03-1 Settlement

Direct and contain growth within identified locations across the municipality.

The precinct to which the amendment applies is identified in the *City of Greater Geelong Settlement Strategy* (City of Greater Geelong, 2020) for increased infill development and it is mostly within the Geelong West, Manifold Heights & Newtown Increased Housing Diversity Areas.

Clause 02.03-2 Environmental and landscape values

Reduce the amount of runoff from urban development and improve the quality of stormwater runoff entering waterways, estuarine and marine waters.

The use of site area coverage maximums, in conjunction with other elements of the planning scheme, enable a greater extent of permeable areas on each lot, thereby reducing runoff impacts.

Clause 02.03-3 Environmental risk and amenity

Encourage a balance between the need for goods and services that serve local residents and workers and the potential for negative impacts on residential amenity.

The built form directions, outlined in the Design and Development Overlays, manage the desire for usable commercial and residential developments within the study area with the desire to mitigate negative impacts on adjoining residential properties.

Clause 02.03-5 Built environment and sustainability

*Ensure that development enhances Geelong's sense of place and identity.
Encourage all development to provide high quality urban design and landscaping.*

The PSUDF has been designed with sense of local place in mind and encourages high quality urban design to ensure developments respect the existing character of the street.

Clause 02.03-6 Housing

Facilitate infill development to increase its housing supply contribution.

Support residential development where the density, mass and scale is complementary to the location, role and character of the specific IHDA.

Ensure housing diversity is achieved in established and growth area communities.

The amendment implements the above strategic directions through the PSUDF and associated changes to the planning scheme. It also seeks to increase the level of affordable and social housing in Greater Geelong.

Clause 02.03-8 Transport

Prioritise active and public transport modes over private vehicle use.

The PSUDF facilitates development close to Central Geelong, encouraging active transport, and is well serviced by bus and train networks.

Clause 02.03-9 Infrastructure

Encourage safe and equal access to community and development infrastructure for all members of the community.

Develop a comprehensive, safe and accessible open space network.

Ensure that development and community infrastructure is provided or upgraded in a sustainable and timely manner in all areas, with particular regard to the servicing of new communities in urban growth areas and large urban infill areas.

The amendment introduces design guidelines which integrate with and make best use of existing infrastructure.

The amendment also implements the strategic framework of the Housing and Settlement Framework Plan at Clause 02.04-3 of the Greater Geelong Planning Scheme.

Does the amendment make proper use of the Victoria Planning Provisions?

The amendment makes proper use of the Victoria Planning Provisions (VPP) by updating local policy, rezoning land and introducing appropriate overlays. Drafting of these provisions is consistent with the *Ministerial Direction – The Form and Content of Planning Schemes*.

Rezoning Land

Residential Zones

The PSUDF identifies three sub-precincts within the Gordon Avenue Precinct, two of which have potential for substantial increase in population density in a location close to Central Geelong and the Geelong Railway Station. The central sub-precinct, Gordon Central, is envisioned as a vibrant, green and predominantly residential precinct with 4-6 storey buildings that are well spaced and set within a thriving landscape. The eastern-most sub-precinct along Latrobe Terrace is envisioned as a predominantly commercial precinct that benefits from its close proximity to key sites. The determination of residential zone changes in the Gordon Avenue Precinct was informed by Planning Practice Note 91: Using the residential zones. Given the density objectives outlined in the PSUDF and planning policy, these areas are appropriate for substantial change. The Residential Growth Zone and Mixed Use Zone respectively are appropriate zones to facilitate these outcomes.

Commercial Zones

Rezoning of Commercial 2 Zone land to Commercial 1 Zone allows for colocation of residential and commercial development. The City's *Retail Strategy 2020-36* predicated an increase in demand in the Pakington Street specialised retail centre would outstrip supply and suggested rezoning the C2Z land (in the Pakington North Precinct and some properties in the west of the Gordon Avenue Precinct) to C1Z to support new economic development. Additionally, the C1Z supports the IHDA objectives of the area targets and increases opportunity for a wider range of allowable commercial uses. C1Z is therefore a more appropriate zone for the identified land.

Public Land Zones

The Council-owned site at 21-33 Autumn Street, Geelong West, which is within the Gordon Avenue Precinct, is identified in the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* as a future park. Applying the Public Park and Recreation Zone (PPRZ) to this parcel of land as part of the amendment facilitates that use. The UDF and relevant schedule to the DDO include built form directions for appropriate design considerations and treatments to open spaces, which differ from interfaces requirements to residential zones. Applying the PPRZ as part of this amendment ensures that development on adjoining lots can appropriately respond to the relevant provisions, clarifies these outcomes for applicants and statutory planning officers processing applications, and signals to the community this is the long-term intention of the site.

Applying the Design and Development Overlay

The purpose of the DDO is to implement strategic directions and apply area-specific design guidance and is therefore an appropriate mechanism to enact the built form

and design guidelines summarised within the PSUDF. The amendment applies Schedules 56 and 57 to the Design and Development Overlay (DDO56, DDO57). The DDOs implement the design principles, objectives and guidelines identified in the two urban design frameworks.

A mandatory ground level setback is included in the new provisions which is applied in accordance with Planning Practice Note 59: The role of mandatory provisions in planning schemes. This provision is strategically supported as it implements the objectives and strategies of the new policy proposed at Clause 11.03-6L-06 (Pakington Street Geelong West). The ground level setbacks from the street facilitate wider footpaths, enable active uses, allow for deep soil canopy plantings, provide a buffer to high traffic roads, and on side streets enable transition between commercial activity and residential streets. The setbacks for each location have been considered in light of the surrounding context and objectives of the relevant sub-precinct. For example, the 6-metre setback along LaTrobe Terrace echoes the 6-metre setback on the opposite (east) side of LaTrobe Terrace within the Activity Centre 1 Zone and further down within the South Geelong UDF area.

The mandatory nature of this provision facilitates the required outcome and ensures that the other objectives of the PSUDFs, such as those relating to landscaping, transition, and streetscape, are not compromised by future development. This approach avoids the risk of adverse outcomes variations to the setback may create such as an incoherent, visually cluttered streetscape, compromise delivery of dedicated landscape areas, offer poor amenity for ground level apartments. Therefore, it is appropriate to depart from the performance-based approach in this aspect. The remaining provisions are performance-based as it was determined variation should not result in outcomes inherently misaligned with the objectives of the PSUDF. The mandatory ground level setback is clearly stated in the DDOs and will ensure consistent and predictable development outcomes that implement the objectives of the PSUDF.

Applying the Environmental Audit Overlay

The amendment applies the EAO to a number of properties within the precincts on the basis of data provided in the *Environmental Audit Overlay Recommendations, South Geelong and Pakington St / Gordon Avenue UDFs, Geelong, Victoria* (Landserv, June 2023). This report identified properties with potential medium or high levels of contamination in accordance with PPN30.

The application of the EAO, which defers the requirement for an environmental audit until the time of development, is considered appropriate due to the fragmented ownership and existing site coverages and uses of the precinct.

Background Documents

It is appropriate to include the *Pakington Street and Gordon Avenue Urban Design Framework (City of Greater Geelong, May 2024)* and the *Pakington North Urban*

Design Framework (City of Greater Geelong, May 2024), as background documents in the Greater Geelong Planning Scheme. These UDFs inform the preparation of the amendment, provide information to explain the context of proposed provisions, and inform the understanding of the desired outcomes for the subject area.

How does the amendment address the views of any relevant agency?

Several relevant agencies were engaged during the creation of the PSUDF including:

- Regional Rail Victoria
- Environment Protection Authority
- Department of Transport and Planning
- VicTrack

Where possible, stakeholder comments have been addressed through further collaboration and discussion.

Crucially, VicTrack advised that the Rail Sidings Yard site is still required for transport uses and that the turntable on the site is a critical piece of infrastructure in the region. As a result, the site, though identified within the study area as a key strategic site, is not proposed to be rezoned and the proposed Schedule 57 to the Design and Development Overlay contains provisions to ensure appropriate management of interfaces to the site.

The requirement for an acoustic assessment included in both Schedule 56 and 57 to the Design and Development Overlay was refined based on the further work conducted at the behest of the EPA.

Further views of relevant agencies will be considered during exhibition stage of this amendment.

Does the amendment address relevant requirements of the Transport Integration Act 2010?

Section 25 of the *Transport Integration Act 2010* requires a planning authority to have regard to specified transport system objectives and decision-making principles where a planning scheme amendment is likely to have a significant impact on the transport system, as defined in the *Transport Integration Act 2010*.

The subject area directly abuts a transport zone in two places. The eastern portion of the Gordon Avenue Precinct, along Latrobe Terrace, fronts onto a Transport Zone 2 (TRZ2). The eastern portion of the Pakington North Precinct backs onto the Melbourne-Waurn Ponds Railway Line, which is in the Transport Zone 1 (TRZ1). The site within this zone at 28-64 Pakington Street, Geelong West, is currently used as a railway siding yard, has been identified as a further investigation area for a strategic development site. Discussions with VicTrack representatives indicated this land is

still needed for transport purposes at present. Therefore, design decisions in the PSUDF have taken into account the need for appropriate interface treatments to this site.

Impact on Road System

The amendment will allow for intensive commercial and residential development along Latrobe Terrace, which is within a Transport Zone 2. It is proposed to mitigate the impact to this major road through design guidelines which ensure that property access is not permitted from the major road. The surrounding road network is considered capable of accommodating all proposed uses and development resulting from this amendment. The amendment is not expected to have a direct significant impact on other major roads and the surrounding road network is considered capable of accommodating any increases to traffic. Applicants will be required to prepare a Transport Impact Assessment as relevant.

Impact on Public Transport System

An increase in residents and others in the area will likely increase demand for public transport services including V/Line train services and bus journeys. The additional services facilitated by the duplication of the Geelong-Waurn Ponds railway line are considered adequate to meet this demand. There is adequate provision of bus stops in the study area, however more frequent bus services and some upgrades to weather shelters at stops may be required to meet demand.

Impact on Railway Infrastructure

The development of the Rail Sidings Yard site at 28-64 Pakington Street, Geelong West identified in the *Pakington North Urban Design Framework (City of Greater Geelong, May 2024)* for further investigation would only become feasible if an appropriate alternate site for a turntable could be found, other train stabling options become available, and with the support of the Department of Transport and Planning/VicTrack. Despite its identification as a potential strategic development site, due to the constraints, it is not proposed to rezone this site as part of this amendment.

Consideration of Transport Integration Act 2010

The amendment generally supports the transport system objectives, as set out in Division 2 of Part 2 of the *Transport Integration Act 2010* and implements land use objectives at Section 11(2) and Section 11(3). The amendment does not undermine the principles decision-making principles as set out in Division 3 of Part 2.

The amendment provides for the effective integration of transport and land use by reducing the need for private motor vehicle transport, facilitating better access to, and greater mobility within, local communities.

The amendment minimises harm to the local environment through a reduction in

transport related emissions and pollutants and promotes forms of transport which have the least impact on the natural environment.

How does the amendment have regard to the principles set out in the *Yarra River Protection (Wilip-gin Birrarung murron) Act 2017* in relation to Yarra River land and other land, the use or development of which may affect Yarra River land?

The amendment does not affect land within or near the Yarra River or land likely to impact the Yarra River.

Resource and administrative costs

What impact will the new planning provisions have on the resource and administrative costs of the responsible authority?

The amendment is likely to increase the number of planning permit applications lodged however, resourcing challenges can be met to ensure applications are considered within the prescribed time.

Attachment 1 – Mapping reference table

Location	Land /Area Affected	Mapping Reference	Address	Proposed Zone changes	Proposed Overlay changes	Proposed deletion changes
Geelong West	Land within the Gordon Avenue Precinct	001znMaps37_49	22-42 Spring Street, Geelong West; 4-40 and 9-37 Gordon Avenue, Geelong West, including laneways; 15, 44-60, and 59-63 Spring Street, Geelong West; 6-46, 9-19 and 35-55 Autumn Street, Geelong West; 2-8 Western Street, Geelong West; 1-5 Villamanta Place, Geelong West; and 13 Coronation Street, Geelong West	Apply RGZ1		
Geelong West	Land within the Gordon Avenue Precinct	001znMaps37_49	158-224 Latrobe Terrace, Geelong West; 2A Gordon Avenue, Geelong West; 2 Autumn Street, Geelong West; 1-2	Apply MUZ		

Location	Land /Area Affected	Mapping Reference	Address	Proposed Zone changes	Proposed Overlay changes	Proposed deletion changes
			Hope Street, Geelong West; 1A Weller Street, Geelong West			
Geelong West & Geelong North	Land within the Pakington North and Gordon Avenue Precincts	001znMaps37_49 002znMap37	1-79, 2-26 and 66-100A Pakington Street, Geelong West; 17-29 Church Street, Geelong West; 1 Britannia Street, Geelong West; 2-4 Collins Street, Geelong West; and 1 Isabella Street, Geelong West 1-4/2-8 Church Street, Geelong North 57-69 Autumn Street, Geelong West, including 1/69 and 2/69 Autumn Street; 39-45 and 42-46 Gordon Avenue, Geelong West	Apply C1Z		

Location	Land /Area Affected	Mapping Reference	Address	Proposed Zone changes	Proposed Overlay changes	Proposed deletion changes
Geelong West	Land within the Gordon Avenue Precinct	001znMaps37_49	21-33 Autumn Street, Geelong West	Apply PPRZ		
Geelong West	Gordon Avenue Precinct	005d-ddoMaps37_38_49_50	Various along Latrobe Terrace, Geelong West			D-DDO17
Geelong West	All land in Gordon Avenue Precinct	006ddoMaps37_49	Various		Apply DDO56	
Geelong West	All land in Pakington North Precinct	007ddoMap37	Various		Apply DDO57	
Geelong West	Selected properties within the Pakington North and Gordon Avenue Precincts	003eaoMap37 004eaoMap49			Apply EAO	
Geelong West	Property adjacent to the Gordon Avenue Precinct zoned C2Z and GRZ4	001znMaps37_49	Part 46-50 Villamanta Street, Geelong West	Apply GRZ4		
Geelong West	Property adjacent to the Pakington North Precinct zoned MUZ and NRZ3	002znMap37	Part 1/2 Waratah Street, Geelong West	Apply NRZ3		

Appendix C

Council response to submissions (extract from Council Meeting Agenda dated 25 November 2025)

COMMON THEMES AND RESPONSES

1. Strategic Merit and Process

28. 6 of the 51 submitters raised concerns with the strategic merit of the amendment and describe the amendment as unfairly targeting Geelong West for high-rise development and as council applying a “Melbourne” scale to a regional setting.
29. 2 of the 51 submitters expressed either the amendment notification as being insufficient or raised concerns with the deliberative community panel engagement process in developing the Pakington North UDF.

Council officer response

Strategic Merit

30. Amendment C433 implements the Council adopted UDFs to guide growth and change in the Pakington Street and Gordon Avenue precincts. The Retail Strategy 2020–36 identifies Pakington Street as a specialised centre, and both the Plan for Victoria and Geelong Settlement Strategy (2020) highlight the need to accommodate significant housing growth in established, well-served locations.
31. Pakington North and Gordon Avenue have been identified as Key Development Areas due to their proximity to Central Geelong Train Station, employment, services and shops. The amendment is strategically justified and necessary to achieve coordinated housing, retail and urban design outcomes.
32. Refer to section ‘Policy Context’ in this report.

Notification and Engagement Process

33. Exhibition and notice of Amendment C433 were conducted in accordance with the requirements of the *Planning and Environment Act 1987*.
34. Refer to section ‘Authorisation and Public Exhibition’ of this report.
35. The adopted Pakington North UDF was informed by a deliberative community panel process designed to reflect a cross-section of the community. Council notes the concerns raised but considers the process consistent with endorsed engagement strategies and appropriate for informing the Pakington North UDF and subsequent planning controls.

2. Traffic, Car Parking and lack of Public Transport

36. Car parking and traffic were among the most consistently raised concerns in submissions.
37. 15 of the 51 submitters raise concerns regarding the transition of the Autumn Street car park to open space within Gordon Avenue precinct and rezoning of 21-33 Autumn Street from General Residential Zone (GRZ) to Public Parks and Recreation Zone (PPRZ) particularly in relation to the impact on students at Oxygen College and surrounding businesses.
38. 13 of the 51 submitters emphasised that Pakington Street and adjoining residential streets already experience high levels of congestion and parking pressure, particularly around peak times and near schools. There is strong concern that the additional heights and densities enabled by the amendment will exacerbate these existing problems.

39. 4 of the 51 submitters raised concerns with the lack of public transport.
40. Key themes include:
 - 40.1. Congestion: Intersections such as Pakington Street - Church Street and Gordon Avenue - Latrobe Terrace are already seen as bottlenecks. Increased development is feared to worsen traffic volumes and reduce safety for pedestrians and cyclists.
 - 40.2. Poor traffic management: At the Telegraph Bridge and unsafe turning movements into Stubbs Avenue from Guthrie Avenue.
 - 40.3. Parking availability: Residents, traders and visitors report difficulty finding spaces, with overflow into side streets. Submitters strongly object to any reduction or waiving of parking requirements for new developments.
 - 40.4. Amenity and safety: Traffic spill-over into narrow residential streets is viewed as a direct threat to neighbourhood amenity and pedestrian safety.
 - 40.5. Public transport limitations: Multiple submissions noted that bus services are infrequent or unreliable, meaning residents will continue to rely on cars unless significant improvements are made.
 - 40.6. Request for an updated traffic study and parking management plan.

Council officer response

Traffic

41. The request for council to undertake an additional traffic study is not supported.
42. The Traffic Network Impact Assessment (One Mile Grid, 2021) indicates that redevelopment is expected to generate a modest and manageable increase in traffic averaging 0.7% per year over a 20 year period. The most notable impacts are forecast at the Pakington Street - Gordon Avenue intersection, with traffic volumes increasing by about 13% in the morning peak and 10% in the afternoon peak.
43. Traffic growth is expected to be gradual and manageable through a mix of infrastructure upgrades, behaviour change, and site specific measures required through the DDOs at the planning permit stage.
44. Council acknowledges that due to travel and trade restrictions associated with the COVID-19 pandemic, up to date traffic counts could not be undertaken as they would not provide typical results. As such, the existing conditions analysis in the Traffic Network Impact Assessment utilises historical turning movements counts and weeklong tube count data provided by Council as well as intersection volumes sourced from Department of Transport (previously VicRoads), to approximate the existing traffic conditions as best as possible with the data available. In the absence of more up to date traffic data, this methodology is considered acceptable and is outlined in more detail in the Traffic Network Impact Assessment.
45. Traffic impacts will continue to be assessed and managed at the planning permit stage (including the requirement for site specific Traffic Impact Assessments, access design and parking provision).

Car parking

46. The request to remove the proposed future open space from council owned land at 21-33 Autumn Street is not supported.

47. The transition of 21–33 Autumn Street from a car park to open space will occur incrementally and will align with redevelopment and increased demand for open space. Rezoning the land to PPRZ will ensure surrounding development provides appropriate interfaces to the future open space.
48. Car parking requirements for development will continue to be assessed under Clause 52.06 of the Victoria Planning Provisions. Reductions from the standard parking provision would require a planning permit, with applications assessed against demand, accessibility, and local policy to ensure equitable outcomes.
49. The Pakington Street Public Parking Plan was developed by the City and completed in February 2024, with the aim to improve the management of existing car parking spaces along Pakington Street. The Plan has developed a proposed parking option for each parking area along Pakington Street, with appropriate amendments from existing conditions. Further funding is required for the implementation of the plan and will be considered as part of council's future resource planning and annual budget planning process.
50. The City will work with Pakington Street traders to ensure parking controls are up to date and relevant with future conditions and publicise key changes.

Public Transport

51. The UDFs include actions to improve bus infrastructure, advocate for increased service frequency, and strengthen sustainable transport connections. Responsibility for bus routes and service delivery lies with the Head of Transport for Victoria (Head TfV).
52. The Head (TfV) has provided the following information in a submission to the exhibited Amendment:
 - 52.1. The 2025/26 State Budget allocated funding for localised development work across regional Victoria that will deliver bus network plans for high-priority regional areas, including Geelong. The Geelong Bus Network Review will identify gaps and opportunities across the network, enabling proactive responses to emerging priorities.
 - 52.2. Pakington Street and Gordon Avenue are important streets for bus movements for both current and future bus services. Depending on the outcome of the Geelong Bus Network Review, improvements to both corridors may be required to provide for a reliable and efficient bus network for commuters.

3. Building Heights

53. 5 of the 51 submitters object to the proposed building heights, specifically in Pakington North, arguing they are excessive, out of character with the existing two-storey and low-rise residential and heritage context. Heights of 6–10 storeys are described as inappropriate for narrow streets and sensitive heritage interfaces, with several submitters requesting a reduction in building heights.
54. 1 submitter requested an increase in building heights in Gordon Avenue precinct from 6 storeys to 12+ storeys noting limited impacts to overshadowing.
55. Submitter 15 highlights broader amenity impacts, including noise, overlooking, overshadowing, loss of privacy, overcrowding, and erosion of neighbourhood character and requests to limit building heights in Pakington North to 4 storeys.

56. Submitter 16 emphasises the importance of protecting the historic identity and heritage of Pakington Street and argue that the scale of development proposed is inappropriate for the area, particularly given the presence of schools and narrow residential streets.
57. Submitters 27, 30 and 42 emphasise that such scale is inconsistent with surrounding heritage or would undermine the village character of Pakington Street. Submitter 27 and 30 requests to reduce building heights by 2 storeys across Pakington North (Wellington/Waratah Street to Clonard Street) to ensure better transition to the heritage core and surrounding residential areas. Submitter 42 requests to limit building heights to no more than 15m (4–5 storeys).

Council officer response

58. The request to reduce or increase building heights in Pakington North precinct is not supported.
59. The exhibited building height controls are discretionary and deliberately establish a flexible mid-rise built form to balance redevelopment opportunities with protection of amenity, solar access, and character.
60. The adopted building heights of Pakington North precinct were determined through a deliberative community panel process and extensive built form testing, which considered overshadowing, overlooking, solar access, heritage character and amenity impacts.
61. The DDOs create a graduated built form transition, ensuring mid-rise development respects surrounding character, amenity and heritage.

Amenity Impacts, Neighbourhood Character and Heritage

62. DDO56 and DDO57 include requirements to minimise impacts to amenity and consider surrounding neighbourhood character and heritage.
63. Privacy and overlooking: Building separation standards and setback requirements ensure new development respects the privacy of adjoining dwellings.
64. Overshadowing and solar access: Built form testing indicated overshadowing could be kept to a minimum and does not compromise public amenity.
65. Noise and wind impacts: Requirements for acoustic and wind protection measures, supported by landscaping to soften building edges and improve the pedestrian environment.
66. Character and heritage: Sensitive transitions, landscaped buffers to heritage sites, retention of heritage frontages and setbacks ensure that new development respects the established identity and fine-grain heritage of Pakington Street.
67. Collectively, these controls are designed to protect existing amenity while enabling appropriate redevelopment in line with the area's strategic role.

4. Drainage

68. 3 of the 51 (22, 27 and 30) submitters raised concerns with infrastructure capacity, specifically, stormwater management and drainage.

Council officer response

69. The UDFs recognise that parts of the Gordon Avenue precinct are affected by flooding and overland flow, as reflected by the Special Building Overlay. The Gordon Avenue Infrastructure Capacity Assessment (Stantec 2023) identifies the presence of

significant underground drainage infrastructure and highlights the need for augmentation and possible relocation of drains as redevelopment occurs.

70. While the UDFs do not provide detailed drainage design, they ensure these constraints are acknowledged, and any future development will be required to demonstrate appropriate stormwater management through the planning permit process and in consultation with the relevant authorities.
71. Council is also undertaking a Catchment Management Strategy for Central Geelong with the aim to understand and manage flood risk, stormwater quality, and water supply in the Central Geelong area. The strategy includes detailed flood modelling for the Central Geelong, Newtown, Geelong West, Manifold Heights, and East Geelong.
72. The project is in its final stages, with community feedback on flood mapping and mitigation options gathered in 2023/2024 and 2025. The goal is to inform better planning decisions, improve flood management, and enhance stormwater quality and reuse for a more resilient and liveable Geelong.

5. Open Space

73. 2 of 51 submissions raised concerns with open space, specifically a lack of open / green space.

Council officer response

74. The UDFs for Pakington Street and Gordon Avenue embed objectives to improve the public realm, create landscaped streetscapes, and support greening and pedestrian amenity alongside higher-density development. These objectives are carried into the statutory provisions of DDO56 (Gordon Avenue) and DDO57 (Pakington North), which:
 - 74.1. Require landscaped setbacks at residential interfaces.
 - 74.2. Provide for widened footpaths and planting zones through street wall and setback treatments.
 - 74.3. Protect key public spaces and footpaths from overshadowing.
75. Together, these provisions ensure redevelopment delivers greener, more pedestrian-friendly environments and improved public realm outcomes.
76. In addition, Council is preparing a new Open Space Strategy, informed by data and community input, to guide the future provision and enhancement of parks, gardens, and reserves across the municipality, including identification of gaps and priority areas for investment.

6. Environmental Audit Overlay (EAO)

77. 3 of 51 submitters questioned the application of the Environmental Audit Overlay either directly on their property or just in general.
78. Submitter 18, Homes Victoria, requested land at 1/29 Church Street, Geelong be removed from the proposed EAO, as the Landserv report (June 2023) does not specifically recommend its application to this site.
79. Submitter 20 questions the need for an EAO over 39–45 Gordon Avenue, noting further evidence will be provided by the submitter indicating the land is not contaminated.

80. Submitter 43 raised concerns about underground contamination along both sides of Gordon Avenue. The submitter argues this will constrain residential development and notes this needs to be addressed.

Council officer response

81. Submitter 20 was contacted to request 'further information' in support of their submission. The submitter confirmed the testing conducted related to the ground water, not soil. On this basis the submitter withdrew their submission regarding the application of the EAO.
82. The Landserv report (June 2023) identifies land as high, medium or low potential for contamination and "low" is considered to not meet the definition of potentially contaminated land.
83. The City's primary focus in dealing with potentially contaminated land is on sites that are being rezoned from a zone that does not allow (or allows a limited range of) sensitive uses to a zone that allows more or all sensitive uses.
84. 1/29 Church Street and 39-45 Gordon Avenue are proposed to be rezoned from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z) which allows sensitive land use. Both sites were identified as either high or medium potential for contamination. Land along Gordon Avenue and Spring Street is proposed to be rezoned from C2Z to either C1Z, RGZ or MUZ (all allow sensitive land uses).
85. Ministerial Direction No. 1 requires a planning authority to satisfy itself that potentially contaminated land is suitable for the use by either a Preliminary Risk Screen Assessment (PRSA) statement stating that no audit is required, or an environmental audit statement stating that the land is suitable for the proposed use.
86. Where complying with either of those assessments is difficult, deferring these requirements through application of an EAO is appropriate.
87. The UDFs implemented via the amendment are long-term plans for the area. Therefore, it is difficult or inappropriate to meet environmental audit system requirements at the amendment stage. Applying the EAO allows land to continue in its current use and is consistent with Planning Practice Note 30 (PPN30) in deferring the requirements of a Preliminary Risk Screen Assessment or environmental audit at the planning permit stage to ensure land is suitable for residential or sensitive uses.

7. Proposed zones

Rezone land to Residential Growth Zone (RGZ)

88. 2 of the 51 submitters objects to their land being rezoned to Residential Growth Zone (RGZ).
89. Submitter 40 requests that 22-42 Spring Street retain its current zone General Residential Zone (GRZ) for the following reasons:
- 89.1. RGZ would allow 4-5 storey development and is considered excessive for narrow streets.
- 89.2. The established open garden outlook and sense of spaciousness valued by residents would be undermined with risks of overshadowing, loss of natural light, and diminished outlooks.
- 89.3. Increased density would add to existing congestion and parking pressures on Spring Street.

90. Submitter 43 objects to the RGZ along Gordon Avenue and Spring Street. Many sites contain relatively new developments unlikely to be demolished or redeveloped in the near future. The submitter suggests the Mixed Use Zone (MUZ) would be more appropriate.

Council officer response

91. The request to retain 22-42 Spring Street in its current zone (GRZ) or the request to rezone land proposed to be zoned to RGZ to MUZ is not supported.

Rationale for Applying Residential Growth Zone (RGZ)

92. The proposed application of the RGZ in the Gordon Avenue precinct is supported by Plan for Victoria and the guidance in Planning Practice Note 91: *Using the Residential Zones* (PPN91), which directs higher density housing to well-serviced locations close to activity centres, jobs and transport that can accommodate substantial housing growth.
93. The rezoning is supported by the adopted Pakington Street and Gordon Avenue UDF, which identify Gordon Avenue precinct as a strategic renewal area capable of delivering mid-rise residential outcomes providing a transition from the high density scale of Central Geelong to more low density sensitive residential areas. The precinct is within walking distance of Central Geelong, Geelong Station and established retail centres, making them appropriate locations for higher density housing.
94. Supporting technical reports including population projections, traffic, infrastructure, and acoustic assessments confirm the precinct can absorb additional growth while maintaining amenity and access to services. The RGZ will contribute to meeting Geelong's share of the State housing target identified in the *Plan for Victoria* (128,600 new homes by 2051, including 77,500 in established areas).
95. Accordingly, the proposed RGZ is strategically justified and consistent with PPN91's purpose of directing housing growth to locations with strong strategic support, infrastructure capacity and access to services.

Rezone land to Commercial 1 Zone (C1Z)

96. 2 of the 51 submitters raised concerns or requests in relation to the proposed rezoning of land to Commercial 1 Zone (C1Z).
97. Submitter 18, Homes Victoria requested to rezone Homes Victoria owned properties adjoining the Gordon Avenue precinct to C1Z to provide greater development opportunities. The properties include:
- 97.1. 1A Villamanta Place, Geelong West
 - 97.2. Multiple units at 15 Halstead Place and 56 Villamanta Street, Geelong West
 - 97.3. Units 1–6 at 46–50 Villamanta Place, Geelong West
 - 97.4. Multiple units at 9 McNicol Street, Geelong West
98. Submitter 42 objects to the land proposed to be rezoned to C1Z in the Pakington North precinct noting C1Z prioritises generic apartment development at the expense of existing diverse businesses, services, and creative industries. They request Commercial 3 Zone (C3Z) instead of C1Z due to its ability to sustain small scale manufacturers, start-ups, and creative industries while balancing moderate population growth. Submitter notes that alternative zoning options were not canvassed in consultation processes.

Council officer response

- 99. The request to rezone Homes Victoria properties listed in the submission to C1Z is not supported. All properties are outside the study area and do not have strategic justification to consider a rezone at this stage. 46-50 Villamanta Street is currently in two different zones and Amendment C433 seeks to correct this anomaly and rezone to the appropriate zone that fits the current land use being the GRZ.
- 100. The request to rezone land to C3Z instead of C1Z is not supported.

Rationale for Applying Commercial 1 Zone (C1Z)

- 101. C1Z is designed to create vibrant, mixed use commercial centres with an emphasis on retail, office, entertainment, community uses and residential at complementary densities. C3Z, by contrast, is a mixed-use employment zone, prioritising industrial, office, creative industries and small-scale employment uses with only limited retail and residential allowances.
- 102. The Pakington North UDF identifies Pakington North as a renewal precinct intended to evolve into a vibrant mixed use activity centre with retail and hospitality at ground floor and housing above. This aligns directly with the purpose of the C1Z, which supports retail led activation and residential development as part of activity centre growth. Applying C3Z would conflict with this intent because it is employment focused and limits retail and residential uses, which could undermine the delivery of the UDFs.
- 103. The *Greater Geelong Retail Strategy (2020–2036)* identifies Pakington Street (Geelong West) as a Specialised Activity Centre. These centres are expected to deliver retail, hospitality, community services and higher density housing. The C1Z is the standard zone for activity centres, whereas the C3Z is more appropriate for transitional employment precincts (such as older industrial areas identified for creative industries).

8. Design and Development Overlays (DDOs)

- 104. 6 of the 51 submitters requested changes to either Schedule 56 to the Design and Development Overlay (DDO56) or Schedule 57 to the Design and Development Overlay (DDO57) or both.

Table 1; Requested changes to Schedule 56 to the Design and Development Overlay (DDO56)

Schedule 56 to the Design and Development Overlay (DDO56)	
Submitter 17	Council officer response
A minimum 5 metre setback from the north edge of the northern footpath on Spring Street.	Do not agree to a 5 metre setback to Spring Street. The proposed 3 metre setback provides for street landscaping, widening of footpaths and addresses the sensitive residential area to the south while providing for good development opportunities.
Extend the restriction on locating services (currently applied to Gordon Street and La Trobe Terrace) to also apply to Spring Street, to protect residential amenity.	Not supported. The provision to “ <i>Avoid locating services on Gordon Avenue and La Trobe Terrace....</i> ” is due to their role as primary pedestrian and activation frontages.

	<p>While DDO56 does not specifically restrict services on Spring Street, the following provision applies to the submitters request:</p> <p>“Services, loading and waste areas should be accessed away from main streets and public spaces and located within basements or upper levels.”</p>
Submitter 20	Council officer response
<p>Building heights:</p> <p>Requests 12+ storeys on larger sites along Gordon Avenue, supported by shadow studies and prior planning approvals.</p>	<p>The request to increase heights to 12+ storeys is not supported. The exhibited controls are discretionary and deliberately establish a mid rise built form along Gordon Avenue to balance redevelopment opportunities with protection of amenity, solar access, and character.</p>
<p>Site Coverage:</p> <p>Opposes the 60% site coverage cap on C1Z land, noting it is more restrictive than the adjacent GRZ (70%). Seeks higher site coverage to support active ground floors, efficient podium layouts, and stronger public realm outcomes.</p>	<p>Not supported. The 60% site coverage is proposed to apply to Gordon West in the Gordon Avenue precinct owing to large allotment sizes and potential to deliver significant open space and public realm. The preferred site coverage is discretionary and was informed by the UDF’s built form testing and engagement feedback.</p>
<p>Interface treatments:</p> <p>a) Remove the mandatory 3 metre front setback on Gordon Avenue and Spring Street, arguing it is unnecessary and limits development outcomes.</p> <p>b) Reconsider street wall height controls on the south side of Gordon Avenue, suggesting human-scale design can be achieved without strict height limits.</p> <p>c) Reduce tower separation requirements (currently 20 metre for buildings over 8 storeys), which are considered excessive and above normal planning practice.</p>	<p>Council officers have considered interface treatments and offer the following response:</p> <p>a) Do not support the request to remove the mandatory 3 metre front setback. The 3 metre ground level setback is based on a site analysis and is intended to:</p> <ul style="list-style-type: none"> • Avoid a cluttered and inconsistent streetscape. • Reduce safety risks from concealed spaces. • Protect landscaped areas that support the UDF vision. • Improve amenity for ground floor dwellings. <p>Removing this control risks undermining the corridor’s identity. Upper-level setbacks and street wall/podium heights remain discretionary to allow design flexibility.</p> <p>b) Street Wall Height – The preferred maximum street wall or podium height for Gordon Avenue is 15 metres and responds to existing scale and massing of built form. This is a discretionary provision and provides flexibility where applications can show it meets design objectives.</p> <p>c) Tower separation – Agreed. Recommend amending Figure 6 and Figure 7 of DDO56 to require a preferred 6 metres side separation for all buildings built to boundary</p>

	above 4 storeys, to manage building massing and amenity while providing flexibility for alternative design solutions.
<p>Floor Area Ratios (FAR):</p> <p>Opposes cumulative restrictions of FAR combined with height, setback, and coverage controls. Recommends a more flexible, performance based approach</p>	<p>FARs are discretionary and aligned with preferred heights and site coverage to set clear development expectations. They are designed to provide flexibility, encourage varied building typologies, and deliver site specific outcomes while ensuring consistency with the UDF vision. Performance based flexibility exists where exceptional design quality and public benefit can be demonstrated.</p>
Submitter 28	Council officer response
<p>Make wind and solar controls mandatory in DDO56 (consistent with PPN59 and other DDOs in Geelong and Melbourne). Ensure the phrase “a permit cannot be granted...” is applied for shadow and wind requirements.</p> <p>Alternatively, a decision guideline should be provided within both schedules relating to solar and wind protection of the public realm.</p>	<p>The amendment seeks to balance development potential with amenity. The adopted approach reflects the community feedback for clear controls while ensuring sufficient flexibility for site responsive design and innovative outcomes.</p> <p>Agree to update Decision Guidelines in DDO56 to include:</p> <p>“Whether the development achieves comfortable wind conditions”.</p>
<p>Wind impacts:</p> <p>a) Replace the word “safe” with “comfortable” to align with PPN93 and other DDOs.</p> <p>b) Apply consistent trigger points for wind assessments (set at 5 storeys, not 16m).</p>	<p>a) Agree to change “safe” with “comfortable” in DDO56. The change aligns with Clause 58.04-4 which specifies “comfortable” wind conditions for public land and publicly accessible areas on private land and other DDOs in the Geelong planning scheme.</p> <p>b) Not supported. 16 metres is consistent with the ACZ – Central Geelong and ensure wind assessments are consistent across land uses.</p>
<p>Solar access:</p> <p>a) Amend the Design Objective in DDO56 to duplicate what’s in DDO57 by including the following objective:</p> <p><i>“To protect the amenity of key public spaces including footpaths, future plazas and new public open spaces from overshadowing impacts.”</i></p> <p>b) Adopt winter solstice (not spring equinox) as the test date for overshadowing of public open spaces in DDO56.</p>	<p>a) Not supported. The following proposed objective to be more appropriate as it balances landscaping, solar access and wind:</p> <p><i>“To ensure high quality architectural design that integrates landscaping, maintains solar access and ensures comfortable wind conditions within the public realm.”</i></p> <p>b) Not supported. The testing of solar access to public open spaces at spring equinox reflects existing controls in Geelong’s planning scheme. Solar access controls measured at winter solstice would overly constrain development potential and was not supported through UDF testing.</p>
Submitter 51	Council officer response

<p>Requests additional control/objective to address the development interface with Latrobe Terrace and Church Street.</p>	<p>Agree to include the following change to DDO56:</p> <p>Access, parking and services</p> <p><i>“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”.</i></p>
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Table 2; Requested changes to Schedule 57 to the Design and Development Overlay (DDO57)

<p>Schedule 57 to the Design and Development Overlay (DDO57)</p>	
<p>Submitter 28</p>	<p>Council officer response</p>
<p>Make wind and solar controls mandatory in DDO57 (consistent with PPN59 and other DDOs in Geelong and Melbourne). Ensure the phrase “a permit cannot be granted...” is applied for shadow and wind requirements.</p> <p>Alternatively, a decision guideline should be provided within both schedules relating to solar and wind protection of the public realm.</p>	<p>Mandatory wind and solar controls are not supported. The amendment seeks to balance development potential with amenity. The adopted approach reflects the community feedback for clear controls while ensuring sufficient flexibility for site-responsive design and innovative outcomes.</p> <p>Council officer supports strengthening Decision Guidelines in DDO57 to include:</p> <p>“Whether the development achieves comfortable wind conditions”.</p> <p>And to amend the following Decision Guideline in DDO57:</p> <p>“Whether the development retains solar access to the locations specified in table 3 to this schedule”.</p>
<p>Wind impacts:</p> <p>a) Replace the word “safe” with “comfortable” to align with PPN93 and other DDOs.</p> <p>b) Apply consistent trigger points for wind assessments (set at 5 storeys, not 16m).</p> <p>c) Remove wording in DDO57 that limits wind reporting to commercial buildings; apply requirements consistently across both schedules.</p>	<p>a) Agree to change “safe” with “comfortable” in DDO57. The change aligns with Clause 58.04-4 which specifies “comfortable” wind conditions for public land and publicly accessible areas on private land and other DDOs in the planning scheme.</p> <p>b) Not supported. 16 metres is consistent the ACZ – Central Geelong and ensures wind assessments are consistent across land uses.</p> <p>c) Agree to remove the word “commercial” in the wind report requirements in DDO57 as they are not limited to commercial buildings.</p>
<p>Solar access:</p> <p>a) Clarify vague terms such as “all other streets” in DDO57 and provide specific time periods for solar access.</p> <p>b) Extend solar access controls to 3pm (instead of 2pm) for better protection of eastern Pakington Street footpaths.</p>	<p>a) Not supported. The reference to “All other streets” in Table 3 is considered clear as it follows the specific solar access requirements for Pakington and Waratah Streets and therefore applies to all remaining streets within the precinct. Introducing additional time-based requirements for the side streets would significantly constrain the development potential of the corner sites, particularly on narrower lots. Overshadowing impacts on</p>

<p>c) Update decision guidelines in DDO57 to reference both “all other streets” and public open space.</p>	<p>the southern footpaths can be appropriately assessed and managed through the planning permit process to ensure unreasonable outcomes are avoided.</p> <p>b) Not supported. Extending solar access controls to 3pm and testing at winter solstice (rather than equinox) were considered but not adopted as this would substantially constrain development potential and was not supported through UDF testing. The equinox standard reflects established practice in Geelong DDOs.</p> <p>c) Do not support updating the decision guidelines for solar access in DDO57 for the same reason stated in point a) above.</p>
<p>Open Space: Specify approximate sizes for proposed new open spaces in DDO57, rather than leaving it to permit stage.</p>	<p>Not supported. The Pakington North UDF identifies a lack of open space within the precinct and provides the objective to “establish new open space within strategic sites of Pakington Strand and Railing Sidings Yard. However, the UDF did not specify the exact requirements for any future open space. Council is in the process of developing an Open Space Strategy which may look to provide greater detail regarding size, category of park and associated uses which would inform an application at the planning permit stage.</p>
<p>Submitter 35</p>	<p>Council officer response</p>
<p>Remove mandatory street wall/interface controls and any other mandatory requirements.</p>	<p>The request to remove mandatory controls is not supported.</p> <p>Ground level setbacks are the only mandatory control in DDO57.</p> <p>These setbacks ensure a soft transition between larger scale mixed-use buildings and adjoining fine-grain residential or heritage streetscapes.</p> <p>They allow for landscaping and urban greening, consistent with objectives to deliver urban cooling, biodiversity benefits, and improved amenity.</p> <p>They also help manage pedestrian amenity, safety, and sightlines at narrow residential streets, which was a core concern raised during engagement.</p> <p>All other controls are discretionary.</p>
<p>Delete the two indicative open space/plaza locations shown on Map 1 of DDO57, as they pre-empt site specific design, compromise redevelopment potential, and were applied only due to the large site size. Suggest Council</p>	<p>Do not agree to remove the two open space/plaza locations shown on Map 1 of DDO57.</p> <p>The property in question is located on the corner of Waratah Street and Pakington Street</p>

<p>instead explore land acquisition for open space elsewhere.</p>	<p>in the Pakington North precinct. The site was established as a key strategic site:</p> <ul style="list-style-type: none"> • as it acts as a gateway and anchor within the precinct. • to reinforcing pedestrian movement along key east–west connections. • to create opportunities for landmark buildings. <p>Strategic sites are expected to contribute public plazas, open space, or streetscape improvements as part of redevelopment. Their selection was informed by the need to balance housing growth with community infrastructure and amenity outcomes. The plaza/open space locations are indicative and intended to be delivered generally in accordance with Map 1, allowing some design flexibility at the permit stage.</p>
<p>Remove winter solstice overshadowing requirements linked to the proposed open space locations and delete the reference to the north side of Waratah Street footpath in the solar access diagrams (Appendix 6.4). These requirements are seen as unfeasible and not supported.</p>	<p>Not supported. The overshadowing requirements for open space in DDO57 ensures new development protects solar access to key public spaces, consistent with the Pakington North UDF objectives and the overshadowing/solar access studies undertaken for the precinct.</p> <p>Council officer notes the built form testing and overshadowing requirements performed for Pakington North precinct and DDO57 was measured at spring equinox. The UDF specifies both winter solstice and spring equinox at different points in the document and DDO57 referenced winter solstice incorrectly.</p> <p>Recommend amending DDO57 to be consistent with built form testing and change the overshadowing requirements to open space from winter solstice to spring equinox (10am-2pm) in line with the Pakington North Community Panel Summary Report p.48 (May 2024).</p>
<p>Remove the 60% site coverage control, as it is inappropriate for a key urban renewal site in an activity centre and more akin to suburban residential standards.</p>	<p>The request to remove the 60% site coverage requirement is not supported. The control ensures sufficient space for landscaping, open space, and amenity outcomes within large strategic sites. The preferred site coverage balances redevelopment opportunities with broader public realm benefits expected in a specialised activity centre. The control is discretionary and provides flexibility where design objectives can be met.</p>

Update references in DDO57 regarding pedestrian permeability objectives to align with the correct planning scheme clause.	DDO57 is referring to the correct clause of the planning scheme, 11.03-6L-06, which is part of the same amendment.
Submitter 39	Council officer response
Remove mandatory ground level setbacks in the Type 2B interface (Waterloo Street frontage). Instead, apply discretionary controls to allow site specific design responses and avoid poor design outcomes caused by rigid requirements.	See response to submitter 35 in DDO57.
Reconsider rear setback controls where C1Z land abuts residential zones (NRZ/GRZ). Allow greater wall heights at rear interfaces to achieve more practical floorplates and appropriate transitions, consistent with Pakington Street's linear subdivision pattern.	The exhibited controls provide for rear setbacks and height transitions to manage amenity impacts such as overshadowing, privacy, and noise at sensitive residential interfaces. These standards were informed by built form testing and community panel feedback and are necessary to ensure compatible transitions to lower-scale neighbourhoods. These controls are discretionary and provide for design flexibility.
Convert mandatory design requirements in DDO57 to preferred requirements, enabling more flexibility and better design outcomes in future redevelopment.	The request to remove mandatory controls is not supported. Mandatory provisions are limited to ground level setbacks, as these are fundamental to achieving the design vision and public realm outcomes for Pakington North. Retaining them as mandatory ensures certainty in delivering safe, landscaped, and high-amenity interfaces. Converting them to preferred provisions would undermine these objectives. See response to submitter 35 in DDO57.
Submitter 51	Council officer response
Include an additional, control requirement/objective to address the development interface with Latrobe Terrace and Church Street as per the attachment to this submission.	Agree to include the following changes to DDO57: Access, parking and services <i>"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".</i> Amend the following strategy to include (Where possible, provide access via local streets): <i>"Minimise or consolidate vehicular access points and carefully design ramps into basements to support increased amenity and safety for pedestrians and bicycles."</i>

9. Local Policy

105. 2 of the 51 submitters requested changes to proposed local policy.
106. Submitter 28 requests public realm objectives proposed to be deleted from Clause 15.01-1L-02 be reinstated into Clause 11.03-6L-06, including specific objectives/strategies relating to solar access and wind protection and high-quality built form outcomes. The following objectives and strategies were requested to be included in Clause 11.03-6L-06:
- 106.1. Objective – To ensure the continued preservation of public realm amenity.
- Strategy – To ensure appropriate solar access is maintained to the public realm and wind impacts from new developments are addressed on-site to maintain comfortable wind conditions within the public realm.
- 106.2. Objective – To ensure new development provides for a high quality presentation to the public realm.
- Strategy – Require new development to achieve high quality architectural outcomes.
107. Submitter 51, Head of Transport for Victoria (TfV), raises concerns regarding the intention of the rail sidings yard and request local policy relevant to the Pakington North precinct to acknowledge that the rail sidings yard is an essential site for provision of rail services.

Council officer response

108. Council officer does not support the request to include the objective and strategy at point 107.1 and consider them to be duplicating state policy under Clause 15.01-1S (Urban Design):
- “Ensure development supports public realm amenity and safe access to walking and cycling environments and public transport.”*
109. The proposed strategy is delivered in the two exhibited DDOs as a design objective and supported by “Solar access, wind and weather” controls:
- 109.1. DDO56
- Design Objectives - To ensure high quality architectural design that integrates landscaping, maintains solar access and ensures comfortable wind conditions within the public realm.
- 109.2. DDO57
- Design Objectives - To protect the amenity of key public spaces including footpaths, future plazas and new public open spaces from overshadowing impacts.
110. Council officer does not support the request to include the objective and strategy at point 107.2 and consider this objective to be duplicating state policy under Clause 15.01-2S (Building design):
- “To achieve building design and siting outcomes that contribute positively to the local context, enhance the public realm and support environmentally sustainable development.”*
111. While DDO57 does not specifically require high quality architectural design, it sets out architectural outcomes around scale, proportion, setbacks, activation, and contextual design, all aimed at ensuring high quality built form. Where a zone, overlay, particular provision or general provision provides all the direction required to make a planning decision, a local policy is not needed.

112. Council officer accepts Submitter 51 (Head TfV) request to include local policy for the Pakington North precinct to acknowledge that the rail sidings yard is an essential site for provision of rail services.
113. The Pakington North UDF recognises the rail sidings yard at 28–64 Pakington Street as a strategic site within the study area. However, it is not proposed for rezoning or immediate urban renewal.
114. Schedule 57 to the Design and Development Overlay (DDO57) includes provisions and decision guidelines to manage sensitive interfaces with the rail sidings yard.
115. Given this context, it would be appropriate for Clause 11.03-6L-06 (Pakington North precinct local policy) to explicitly acknowledge the ongoing rail function of the site to support decision making.
116. Council considers the following local policy to be included in Clause 11.03-6L-06 as appropriate:

“The rail sidings yard at 28–64 Pakington Street is an essential site for the operation of rail services in Geelong and must be protected for ongoing transport use.”

10. Urban Design Frameworks

117. 4 of the 51 submitters referenced strategies or processes relevant to the UDFs.
118. Submitter 20 requests to reinstate 39-45 Gordon Avenue as a key strategic site.
119. Submitter 36 supports the vision but recommends UDF refinements for wayfinding, station parking integration, and connectivity to waterfront.
120. Submitter 51 requests the adopted UDFs be amended to reflect the retention of the strategic rail infrastructure.

Council officer response

121. In response to submitter 20, Gordon Avenue precinct is identified as a Key Development Area and the amendment proposes to update Clause 16.01-1L-01 accordingly. The Pakington Street and Gordon Avenue UDF does not separately identify any key sites for development.
122. The UDFs were adopted by Council following a comprehensive process, including technical studies, built form testing, and a deliberative community panel. Amendment C433ggee gives statutory effect to the UDFs through rezonings and the introduction of new Schedules to the Design and Development Overlays (DDO56 and DDO57).
123. In response to submitter 36:
 - 123.1. Wayfinding: The recommendation is supported in principle. Wayfinding improvements at Gordon Avenue and Latrobe Terrace require coordination with the State Government. Council will advocate for this outcome as part of ongoing transport and movement planning.
 - 123.2. Parking integration: Supported in principle. The Pakington Street Public Parking Plan (2024) and UDFs identify the need to optimise existing supply and manage demand. Integration of Geelong Station parking is a matter for State Government but will continue to be raised through Council advocacy.
 - 123.3. Connectivity: The UDF objectives and DDO provisions prioritise safe and legible pedestrian and cycling links. Improving connections to Central Geelong and the

waterfront is a short-term priority and will be advanced through infrastructure planning and advocacy with State agencies.

124. Reopening or redrafting the UDFs as part of this amendment process is not supported. The UDFs are Council adopted and provide an appropriate balance between facilitating growth, supporting business and community activity, and protecting sensitive residential and heritage interfaces.

Attachment 2 – Summary of Submissions and Council Response

Submissions have been summarised into their key themes. This includes any specific requests for changes to Amendment C433ggee, such as changes to the two schedules to the Design and Development Overlay. The following key themes have been identified from the issues raised in submissions.

- 1. Strategic Merit and Engagement Process**
Issues regarding whether the amendment is strategically justified for this location and the adequacy and representativeness of notification and the deliberative panel process.
- 2. Traffic, Car Parking and Public Transport**
Issues about existing traffic congestion and parking shortfalls being exacerbated by higher densities and limited public transport.
- 3. Building Heights**
Issues raised regarding the proposed building heights negatively impacting surrounding neighbourhood character, amenity and heritage with some submitters requesting a reduction in building heights.
- 4. Drainage**
Issues concerning stormwater and sewer network's ability to accommodate additional development, especially in areas affected by overland flow/flooding.
- 5. Open Space**
Issues concerning lack of open space.
- 6. Environmental Audit Overlay (EAO)**
Issues relate to whether specific properties warrant an EAO, the evidence base for contamination potential, and the development implications of audit requirements.
- 7. Proposed Zones**
Issues regarding the proposed Residential Growth Zone (RGZ) and Commercial 1 Zone (C1Z) including requests to rezone land to alternative zones or leave land in its current zone.
- 8. DDO controls**
Issues regarding mandatory provisions, site coverage, setbacks, wind and solar requirements and proposed open space.
- 9. Local policy**
Includes request to amend proposed local policy.
- 10. Urban Design Frameworks (UDF's)**
Concerns regarding wayfinding, station parking integration and connectivity.

No.	Submission Type	Summary of Submission	Themes	Council officer response	Recommendation
01.	Objection	Concerns regarding current car parking issues and the removal of the car park from 21-33 Autumn Street to facilitate future open space.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel
02.	Objection	The submitter expresses general support for amendment and acknowledge some shopkeepers may oppose the changes due to possible business impacts. Overall, the changes are viewed positively as a significant improvement for both Pakington Street and Gordon Avenue.	N/A	Noted.	Refer submission to independent Planning Panel.
03.	Acceptance	The submitter prefers 'high density housing options that maximise vertical space close to public transport as opposed to developing more land by spreading out.'	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
04.	Objection	The submitter works on Gordon Avenue and objects to the removal of the car park.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
05.	Acceptance	The submitter is "happy with amendments made".	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
06.	Objection	Raises issues with the current car parking conditions and objects to the removal of the car park from 21-33 Autumn Street to facilitate future open space.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
07.	Acceptance	The amendment is not only logical, but critical to ensuring the area continues to flourish. Submitter supports the amendment.	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
08.	Acceptance	Supports the work of the UDF and the subsequent amendment.	N/A	Noted.	Submission supportive. Refer

					submission to independent Planning Panel.
09.	Comment	The CFA reviewed the amendment and noted that the affected land is not within a bushfire prone area. The proposed rezoning and Design and Development Overlay (DDO) changes are focused on guiding future built form and do not alter bushfire risk. Accordingly, CFA offers no further comment on the amendment. The CFA also highlighted that part of the land sits within a Fire Rescue Victoria (FRV) area, not CFA's operational area.	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
10.	Objection	Objects to the proposed changes for Pakington Street, stressing that the precinct's existing role as a popular shopping and dining destination would be undermined by new apartment development, which they see as visually unattractive and unsuitable in an already busy area. They also raise concern about past planning decisions that harmed the Geelong CBD.	Strategic Merit and Engagement Process	See response to theme 1.	Refer submission to independent Planning Panel.
11.	Objection	Concerns regarding the removal of all day car parking and lack of public transport. Requests all day car parking to be increased.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
12.	Objection	The submitter works on Gordon Avenue and objects to the removal of the car park.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
13.	Comment	EPA has already provided its views on Amendment C433 under Ministerial Direction 19 (MD19). EPA have not reviewed the exhibited documents and will not make a submission.	N/A	Noted.	No submission made. Do not refer to an independent Planning Panel.
14.	Objection	Objects to the removal of the Council-owned car park at 21-33 Autumn Street, Geelong West. Suggests considering underutilised land or shared-use arrangements for green space instead of removing essential parking.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.

15.	Objection	<p>1. Building heights & increased density</p> <ul style="list-style-type: none"> • Strong objection to proposed 8–10 storeys as excessive, out of character with the prevailing two-storey scale and adjoining low-rise residential areas. • Requests building heights to be capped at 4 storeys to protect neighbourhood character, privacy, and amenity. • Concerns about noise, overshadowing, overlooking, overcrowding, and loss of privacy. <p>2. Traffic, car parking & public transport</p> <ul style="list-style-type: none"> • Objection to any waiver of car parking in an area already under pressure, with fears of worsening congestion. • Notes adjoining streets are narrow, unsafe, and unsuitable for more vehicles, particularly given proximity to two primary schools and vulnerable users. <p>3. Strategic merit & process</p> <ul style="list-style-type: none"> • Perceives the proposal as unfairly targeting Geelong West for high-rise development compared with other centres (North Geelong, Newtown, Barwon Heads). • Suggests Council is motivated by rates revenue and not applying growth equitably across the municipality. • Requests housing growth be redirected to areas with modern infrastructure better able to accommodate intensity. 	Building Heights, Traffic, Car Parking and Public Transport, Strategic Merit and Engagement Process	<p>1. See response to theme 3.</p> <p>2. See response to theme 2.</p> <p>3. See response to theme 1 and policy context.</p>	Refer submission to independent Planning Panel.
16.	Objection	<p>1. Building heights & increased density</p> <ul style="list-style-type: none"> • Opposes proposed heights, requesting nothing over 5 storeys near Church Street tapering down to 2–3 storeys towards Britannia Street to protect the area’s heritage, history, and identity. • Seeks a reduction of at least half the exhibited heights to safeguard residential amenity and neighbourhood character. <p>2. Traffic, car parking & public transport</p>	Building Heights, Traffic, Car Parking and Public Transport, Strategic Merit and Engagement Process	<p>1. See response to theme 3.</p> <p>2. See response to theme 2.</p> <p>3. See response to theme 1 and policy context.</p>	Refer submission to independent Planning Panel.

		<ul style="list-style-type: none"> Argues increased height/density will worsen traffic and parking pressures in already narrow streets, creating safety risks for children and school communities. Notes existing waiver of parking for businesses has already negatively impacted residents' ability to park. <p>3. Strategic merit & process</p> <ul style="list-style-type: none"> Suggests larger-scale development should be directed to better-suited areas such as Central Geelong, South Geelong, or East Geelong, rather than the historic Pakington Street precinct. 			
17.	Objection	<p>1. DDO controls (DDO56 & DDO57)</p> <ul style="list-style-type: none"> Requests clarification of setback measurements in Figure 1 and seeks a mandatory 5m setback from the north edge of the Spring Street footpath to protect adjoining residential amenity. Suggests extending restrictions on locating services (currently applying to Gordon Avenue and Latrobe Terrace) to also cover Spring Street. <p>2. Traffic, car parking & public transport</p> <ul style="list-style-type: none"> Notes a lack of clear guidance on car parking provision in DDO56 and requests realistic parking requirements be applied to future developments, despite proximity to Geelong Station. 	Traffic, Car Parking and Public Transport, DDO controls	<p>1. See response to theme 8.</p> <p>Setbacks (DDO56 Figure 1 & Table 3) – Figure 1 illustrates side and rear setbacks to adjoining General Residential or Neighbourhood Residential zoned land, with a 5-metre requirement from property boundaries. For street setbacks, including Spring Street, DDO56 specifies a mandatory 3-metre ground-level setback measured from the property boundary (Table 3).</p> <p>2. See response to theme 2.</p>	Refer submission to independent Planning Panel.

18.	Objection	<p>1. Environmental Audit Overlay (EAO) Exclude Homes Victoria land at 1/29 Church Street, Geelong from the proposed EAO (map reference 003eaoMap37), as the Landserv report (June 2023) does not specifically recommend its application to this site.</p> <p>2. Proposed Zones Rezone Homes Victoria-owned properties adjoining the Gordon Avenue Precinct to Commercial 1 Zone to provide greater development opportunities. The properties include:</p> <ul style="list-style-type: none"> • 1A Villamanta Place, Geelong West • Multiple units at 15 Halstead Place and 56 Villamanta Street, Geelong West • Units 1–6 at 46–50 Villamanta Place, Geelong West • Multiple units at 9 McNicol Street, Geelong West <p>Homes Victoria requests to be consulted in relation to any further review of the Heritage Core Precinct overlays (HO1634) affecting Homes Victoria land at 1–16 and 1A Lawton Avenue, Geelong West, and 4 Clarence Street, Geelong West.</p>	Environmental Audit Overlay (EAO), Proposed Zones	<p>1. See response to theme 6. 2. See response to theme 7.</p> <p>Heritage Overlay extents: Request to be consulted on any future Heritage Overlay review is supported and noted.</p>	Refer submission to independent Planning Panel.
19.	Objection	Raises issues with the current car parking conditions and objects to the removal of the car park from 21-33 Autumn Street to facilitate future open space.	Traffic, Car Parking and Public Transport	See council to theme 2.	Refer submission to independent Planning Panel.
20.	Objection	<p>The submitter expresses conditional support for Amendment C433ggee. The submitter supports the overall vision of the UDF and rezoning of the site 39–45 Gordon Avenue to Commercial 1 Zone (C1Z) but raises significant concerns that elements of DDO56 are too restrictive and risk constraining development potential on larger strategic sites.</p> <p>1. UDF - Key site status: Reinstate the land at 39–45 Gordon Avenue as a key site, given its scale, location, and capacity to contribute to public realm outcomes.</p> <p>2. Building height - Opposes the 6-storey preferred height along Gordon Avenue; requests allowance for 12+ storeys on</p>	UDFs, Building Heights, DDO Controls, Environmental Audit Overlay (EAO)	<p>1. See response to theme 10 2. See response to theme 3. 3. See response to theme 8. 4. See response to theme 6.</p> <p>Council requested further information from the submitter.</p>	Change recommended. Refer submission to independent Planning Panel.

		<p>larger sites, supported by shadow studies and prior planning approvals.</p> <p>3. DDO controls - Site coverage: Opposes the 60% site coverage cap on C1Z land, noting it is more restrictive than the adjacent GRZ (70%). Seeks higher site coverage to support active ground floors, efficient podium layouts, and stronger public realm outcomes.</p> <p>Interface treatments:</p> <ul style="list-style-type: none"> • Remove the mandatory 3m front setback on Gordon Avenue and Spring Street, arguing it is unnecessary and limits development outcomes. • Reconsider street wall height controls on the south side of Gordon Avenue, suggesting human-scale design can be achieved without strict height limits. • Reduce tower separation requirements (currently 20m for buildings over 8 storeys), which are considered excessive and above normal planning practice. <p>Floor Area Ratio (FAR): Opposes cumulative restrictions of FAR combined with height, setback, and coverage controls. Recommends a more flexible, performance-based approach.</p> <p>4. Environmental Audit Overlay (EAO): Questions the need for an EAO over the site, arguing preliminary information suggests the land is unlikely to be contaminated and further evidence will be provided by the submitter to support the removal of the EAO.</p>		Human Habitats confirmed the testing provided related only to groundwater, not soil. On this basis the submitter withdrew their submission regarding the application of the EAO.	
21.	Acceptance	No comment.	N/A	Noted	Submission supportive. Refer submission to independent Planning Panel.
22.	Objection	The submitter objects to the amendment, arguing that the UDFs have not adequately addressed key infrastructure and amenity issues. Concerns include:	Drainage, Traffic, Car Parking and Public Transport	1. See response to theme 4.	Refer submission to independent Planning Panel.

		<p>1. The capacity of stormwater and sewer systems to support multiple new developments.</p> <p>2. Existing parking pressures on residential streets, with an apparent omission of traffic data.</p> <p>3. A lack of provision for new or enhanced green spaces.</p>		<p>2. See response to theme 2.</p> <p>3. See response to theme 5.</p>	
23.	Acceptance	The submitter expresses support for the amendment, describing it as a positive plan that will create additional business opportunities in the area and provide affordable living options for new residents in a convenient location within Geelong West.	N/A	Noted	Submission supportive. Refer submission to independent Planning Panel.
24.	Objection	Objects to the proposal, expressing frustration with existing traffic and safety issues in the Pakington Street area. Specific concerns include poor traffic management at the Telegraph Bridge, unsafe turning movements into Stubbs Avenue from Guthrie Avenue due to the lack of a turning arrow and red-light running, and confusing line markings and inadequate signal times at the Weddell Road intersection. Believes additional traffic generated by the proposal will exacerbate these existing problems and result in failure of the road network in the area.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
25.	Objection	Objects to the proposed conversion of the car park into green space, citing significant concerns about the loss of essential parking for students, local businesses, and employees. They note that Council's recent shift from all-day to 1–2 hour on-street parking has already increased pressure. Requested Changes: Retain the existing car park rather than converting it to green space. Redirect Council's renewal efforts to the CBD instead of removing commercial parking capacity in Geelong West.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
26.	Objection	Objects to the removal of the car park next to Oxygen Music, stating it is essential for students and workers who need convenient access for schooling and employment. They argue that replacing the car park with green space is unnecessary	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.

		given the proximity of the Botanical Gardens less than 10 minutes away.			
27.	Objection	<p>1. Building heights & increased density</p> <ul style="list-style-type: none"> Strong objection to proposed building heights in Pakington North, requesting a two-storey reduction across the precinct (Wellington/Waratah St to Clonard St/railyards). Concerns that current heights will overshadow, overlook, and overwhelm adjoining heritage overlay residential streets, erode village character, and create heat island/wind tunnel impacts. Notes Pakington Street is already functioning well and should not be redeveloped “like the CBD.” <p>2. Traffic, car parking & public transport</p> <ul style="list-style-type: none"> Deep concerns that increased density will exacerbate existing congestion, parking shortages, and safety issues in narrow side streets, particularly in heritage precincts like Waterloo. Notes inadequate traffic data (based on 2009 studies) and calls for an updated traffic and parking management plan. Highlights safety issues for residents and emergency vehicles, reliance on on-street parking, and rat-running in heritage side streets. Argues Geelong West lacks adequate public transport alternatives, with infrequent buses and no metro system, so residents will remain car dependent. <p>3. Drainage & infrastructure capacity</p> <ul style="list-style-type: none"> Questions how century-old stormwater and sewer systems will cope with additional population and development pressures. <p>4. DDO controls (DDO56 & DDO57)</p>	Building Heights; Traffic, Car Parking and Public Transport; Drainage; DDO Controls; Strategic Merit and Engagement Process;	<p>1. See response to theme 3.</p> <p>2. See response to theme 2.</p> <p>3. See response to theme 4.</p> <p>4. See response to theme 8.</p> <p>The majority of Maitland Street, Waterloo Street and Anglesea Terrace sit outside of the Pakington North Precinct; no zoning changes are proposed to that area through this amendment.</p> <p>5. See response to theme 1.</p>	Refer submission to independent Planning Panel.

		<ul style="list-style-type: none"> • Requests stronger protections for Waterloo heritage streets (Maitland, Anglesea, Waterloo), including ensuring they remain zoned NRZ3, are not used for rear access to Pakington developments, and avoid commercial encroachment. <p>5. Strategic Merit & Engagement process</p> <ul style="list-style-type: none"> • Argues Council is applying a “Melbourne” scale to a regional setting, ignoring Geelong’s different context. • Suggests growth should instead be directed to Central Geelong, South Geelong, East Geelong, and the North Geelong Saleyards redevelopment, which were previously identified for higher-density growth. • Claims exhibition notification was inadequate, with only residents within 4–5 houses of Pako formally notified. • Argues this skews submissions towards business/landowners and breaks earlier undertakings that all Geelong West residents could comment at amendment stage. 			
28.	Objection	<p>1. Local policy (Clause 11.03-6L-06)</p> <ul style="list-style-type: none"> • Supports the amendment but requests that public realm objectives proposed for deletion from Clause 15.01-1L-02 be reinstated in Clause 11.03-6L-06. • Suggested objectives/strategies include: preserving public realm amenity (solar access and wind protection) and requiring new development to achieve high-quality architectural outcomes. <p>2. DDO controls (DDO56 & DDO57)</p> <p>Mandatory Provisions:</p> <ul style="list-style-type: none"> • Recommends adopting the phrase “a permit cannot be granted” for shadow/wind requirements or at minimum including decision guidelines referencing “comfortable” wind conditions (Clause 58.04-4). <p>Wind Impacts:</p>	Local Policy; DDO Controls;	<p>1. See response to theme 9.</p> <p>2. See response to theme 8.</p>	Change recommended. Refer submission to independent Planning Panel.

		<ul style="list-style-type: none"> • Replace “safe” with “comfortable” for wind conditions in both DDOs. • Set wind assessment triggers at 5 storeys (not 16m) in both DDOs. • Remove wording in DDO57 that limits wind reporting to commercial buildings. <p>Solar access:</p> <ul style="list-style-type: none"> • Apply DDO57’s overshadowing objective to DDO56. • Clarify “all other streets” in DDO57 and provide specific time periods for solar access. • Extend eastern Pakington footpath protection to 3pm. • Adopt winter solstice (not spring equinox) as the test date for overshadowing of public open spaces in DDO56. • Requests decision guidelines in DDO57 be updated to reference both “all other streets” and public open space. <p>Open space</p> <ul style="list-style-type: none"> • Requests DDO57 specify approximate sizes for proposed new open spaces rather than leaving this detail to the planning permit stage. 			
29.	Objection	The submitter objects to the proposal, noting they work in the area and rely on the existing car park. They express concern that, if the car park is removed, there will be no suitable alternative parking available for workers.	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
30.	Objection	<p>1. Strategic Merit</p> <ul style="list-style-type: none"> • Submitter argues the amendment applies a “Melbourne-centric” approach unsuited to Geelong’s infrastructure and transport context. • Concern it will erode Pakington North’s village character and liveability. • Recommends reconsidering overall housing density to better reflect Geelong’s unique heritage and local constraints. 	Strategic Merit and Engagement Process; Traffic, Car Parking and Public Transport; Building Heights; Drainage; Open Space	<p>1. See response to theme 1.</p> <p>2. See response to theme 2.</p> <p>3. See response to theme 3.</p> <p>4. See response to theme 4.</p>	Refer submission to independent Planning Panel.

		<p>2. Traffic, Car Parking and Public Transport</p> <ul style="list-style-type: none"> • Existing congestion is already severe. Says amendment relies on flawed/outdated traffic data (2010) and that promised connections like the Madden Avenue extension have not been delivered. Narrow side streets (<7m wide) may become unsafe “rat runs.” • Significant existing parking pressure from businesses and limited off-street residential parking. Concerned new development won’t provide enough on-site spaces, pushing overflow into nearby residential streets. • Geelong’s limited, disconnected bus/train services are not a realistic alternative to cars, contrary to assumptions in the UDF. • Requests Council undertake up-to-date traffic and parking studies and prepare a reliable traffic management plan before development proceeds. <p>3. Building Heights</p> <ul style="list-style-type: none"> • Strong opposition to proposed 4–6 storey heights in Pakington North, arguing they are excessive compared with the two-storey heritage core and adjoining heritage streets (Maitland St, Anglesea Terrace, Waterloo St). • Concerns about overshadowing, amenity loss, and poor transition to residential/heritage areas. • Requested change: Reduce proposed heights by 2 storeys across the precinct (Wellington/Waratah to Clonard Street). <p>4. Drainage</p> <ul style="list-style-type: none"> • Belief that the ageing stormwater and sewer system cannot accommodate additional density, especially in overland flow areas. <p>5. Open Space</p> <ul style="list-style-type: none"> • Concerns about loss of the large railyard siding maintenance site as open space. 		<p>5. See response to theme 5.</p>	
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		<ul style="list-style-type: none"> • Only two small open spaces are proposed, seen as inadequate to meet local needs or address urban heat impacts. • Requested change: Provide additional green space, with commitments to deliver rail site open space followed through. 			
31.	Objection	The submitter objects to the removal of the car park, explaining they rely on it for all-day parking while at work. They note that all-day parking in the area is already limited, and they cannot reasonably move their car during the day, making the existing facility essential.	Traffic, Car Parking and Public Transport	See council officer response to theme 2.	Refer submission to independent Planning Panel.
32.	Acceptance	The submitter expresses support for the amendment, noting it will improve the area and encourage stronger commercial use of the proposed locations.	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
33.	Acceptance	<p>The submitter expresses strong support for Amendment C433ggee, particularly the proposed rezoning of land at Hope Street, Geelong West from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ) with associated overlays.</p> <p>Key Reasons for Support:</p> <p>Rezoning to MUZ supports the fair, orderly, and sustainable use of land under the Planning and Environment Act 1987 and aligns with the Planning Policy Framework and local housing strategies.</p> <p>Current C2Z restrictions discourage residential redevelopment. MUZ will enable sensitive residential and mixed-use projects more suited to community needs.</p> <p>Supports State and Council objectives for increased housing supply and diversity in established areas close to services, jobs, and transport.</p>	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.

		Application of DDO56 will guide high-quality design, protect neighbourhood amenity, and ensure new development integrates with existing character.			
34.	Acceptance	The submitter supports the rezoning of 1 Hope Street, Geelong West from Commercial 2 Zone (C2Z) to Mixed Use Zone (MUZ). The property has functioned as a dwelling for over 100 years, but the previous C2Z prevented replacement with a new dwelling if demolished. Rezoning to MUZ provides a more practical outcome by allowing continued residential use while also enabling future mixed-use opportunities. The approach is seen as fair and sensible, respecting the site's history while providing flexibility for future development.	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
35.	Comment	Supports recognition of 91–93 Pakington Street as a strategic redevelopment opportunity but seeks greater flexibility in controls to enable feasible design outcomes. 1. DDO Controls (DDO57) <ul style="list-style-type: none"> Mandatory provisions in DDO57 reduce flexibility and are not appropriate for a strategic site. Requests to remove all mandatory requirements in DDO57. Winter solstice overshadowing controls linked to proposed plazas are unfeasible. Requests overshadowing requirements linked to plaza/open space locations be removed. Reference to solar access on the north side of Waratah Street footpath is not supported. Requests to remove the Waratah Street solar access reference. 60% site coverage control is considered inappropriate, being more aligned with suburban residential standards. Requests this provision be removed. Objects to the two indicative open space/plaza locations in Map 1 of DDO57, stating they pre-empt site-specific design and compromise redevelopment potential. Requests Council delete the indicative open space/plaza locations at 91–93 Pakington Street and instead explore Council-led acquisition of open space elsewhere. 	DDO Controls; Local Policy	1. See response to theme 8. 2. See response to theme 9.	Change recommended. Refer submission to independent Planning Panel.

		<p>2. Local Policy</p> <ul style="list-style-type: none"> References to pedestrian permeability in DDO57 are inconsistent with the planning scheme. Requests Council update references to align with the correct clause. 			
36.	Acceptance	<p>Expresses support for the principles of Amendment C433ggee and the UDFs.</p> <p>Recommendations:</p> <p>Wayfinding: Implement a coordinated approach with the State Government to improve wayfinding at the Gordon Avenue and Latrobe Terrace intersection.</p> <p>Parking integration: Explore opportunities to better utilise Geelong Station parking as a destination, helping to manage demand and encourage safe movement towards the city.</p> <p>Connectivity: Prioritise safe, legible pedestrian and cycling links between the Pakington Street precinct and the Geelong waterfront in the short term, to ensure both precincts achieve their intended success.</p>	UDFs	See response to theme 10.	Submission supportive. Refer submission to independent Planning Panel.
37.	Acceptance	<p>The submitter expresses support for the amendment, welcoming the proposed changes to Pakington Street as a positive step for future generations. The submission also thanks Council for its work on the project and acknowledges the challenges involved.</p>	N/A	Noted.	Submission supportive. Refer submission to independent Planning Panel.
38.	Objection	<p>The submitter objects to the amendment on the basis of parking loss. They highlight that parking in the area is already very limited, with the only alternatives being behind Oxygen College or at Geelong Station, which is full before 7:30 am. The removal of the existing car park would make it extremely difficult for local workers, including themselves, to access suitable parking.</p>	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
39.	Acceptance	<p>Overall submitter supports Amendment C433ggee, including its objectives, rezoning, and the strategic outcomes it seeks for Pakington Street North. The rezoning of 68 and 70 Pakington Street, Geelong West from Commercial 2 Zone (C2Z) to</p>	DDO Controls	See response to theme 8.	Refer submission to independent Planning Panel.

		<p>Commercial 1 Zone (C1Z) is supported as a logical extension of the retail and heritage core, better aligned to surrounding residential interfaces, and consistent with broader strategic policy for activity centres.</p> <p>Requested Changes:</p> <p>DDO Controls (DDO57)</p> <ul style="list-style-type: none"> • Mandatory ground-level setbacks in the Type 2B (Waterloo Street) interface are too rigid and may lead to poor outcomes. Requests to replace with discretionary controls. • Rear setback controls where C1Z abuts NRZ/GRZ are overly restrictive; higher rear wall heights are needed for functional floorplates and appropriate transitions. Reconsider rear interface controls to allow greater wall heights and practical design responses. • Convert mandatory requirements in DDO57 to preferred requirements to support flexibility and site-responsive design. 			
40.	Objection	<p>The submitter objects to amendment for the following reasons:</p> <ol style="list-style-type: none"> 1. Proposed Zones <ul style="list-style-type: none"> • Objects to rezoning of 22–42 Spring Street from GRZ4 to RGZ1. Requests Council do not rezone and retain current GRZ4 zoning. • Rezoning to RGZ1 would enable 4–5 storey development, seen as excessive for a narrow street. Concerns that recent apartment projects nearby have been of poor design quality and may set an undesirable precedent. • Established open garden outlook and sense of spaciousness would be undermined by increased height and density, with risks of overshadowing, loss of natural light, and reduced outlooks. 2. Traffic, Car Parking and Public Transport 	Traffic, Car Parking and Public Transport; Proposed Zones	1. See response to theme 7. 2. See response to theme 2.	Refer submission to independent Planning Panel.

		<ul style="list-style-type: none"> Increased density would worsen congestion and parking pressures on Spring Street, which is already narrow and affected by existing traffic associated with Rex Gorell. 			
41.	Objection	<p>The submitter objects to the amendment, expressing frustration at existing traffic congestion in the area. They argue that the proposed changes would deliberately worsen already busy conditions on local streets, creating further traffic problems.</p>	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
42.	Objection	<p>Objects to Amendment C433ggee for Pakington North Precinct. Concern that the amendment enables inappropriate high-density apartment development, risking overdevelopment and undermining the precinct’s role as a regional business, retail, and cultural hub.</p> <ol style="list-style-type: none"> Proposed Zones (C2Z → C1Z) <ul style="list-style-type: none"> Opposes rezone from Commercial 2 Zone (C2Z) to Commercial 1 Zone (C1Z), noting it prioritises apartments over existing diverse businesses and creative industries. Requests Council rezone to Commercial 3 Zone (C3Z) as a better fit, supporting small-scale manufacturing, start-ups, and creative industries alongside modest housing growth. Alternative zoning options were not presented during consultation. Building heights <ul style="list-style-type: none"> Considers heights above 15m (approx. 4–5 storeys) unsustainable in this context due to street pattern, scale, and expected impacts on the precinct’s role and character. Requests building heights to be capped at 15m in Pakington North Precinct Traffic Car Parking and Public Transport <ul style="list-style-type: none"> States traffic studies are outdated/insufficient and do not reflect current conditions (school/childcare traffic, narrow streets, emergency access). 	Proposed Zones; Building Heights; Traffic, Car Parking and Public Transport; Strategic Merit and Engagement Process	<ol style="list-style-type: none"> See response to theme 7. See response to theme 3. See response to theme 2. See response to theme 1. 	Refer submission to independent Planning Panel.

		<ul style="list-style-type: none"> Notes limited public transport (distance to station, single bus route, radial network) and high car dependency; indicates higher density would exacerbate congestion/parking. Requests Council obtain updated traffic and parking assessments and a parking management plan before permitting further density. Address public transport gaps prior to intensifying residential development. <p>4. Strategic Merit and Engagement Process</p> <ul style="list-style-type: none"> Questions validity of community panel process due to declining attendance and possible undeclared conflicts of interest. Claims resident voices, particularly the “Help Save Pako Street” group, were underrepresented. <p>Requests Council refer amendment to Planning Panels Victoria for independent review.</p>			
43.	Objection	<p>The submitter raises objections to aspects of Amendment C433gee relating to the Gordon Avenue Precinct.</p> <p>1. Proposed Zones</p> <ul style="list-style-type: none"> Objects to rezoning to RGZ along Gordon Avenue and Spring Street (to Coronation Street), stating many properties contain relatively new housing unlikely to be redeveloped. Requests amendment apply the Mixed Use Zone (MUZ) instead, as a more suitable zoning outcome. <p>2. Environmental Audit Overlay (EAO)</p> <ul style="list-style-type: none"> Concern that underground contamination along both sides of Gordon Avenue will constrain residential development potential. Believes this needs to be properly addressed before applying residential-focused zones. 	Traffic, Car Parking and Public Transport; Proposed Zones; Environmental Audit Overlay (EAO)	<ol style="list-style-type: none"> See response to theme 7. See response to theme 6. See response to theme 2. 	Refer submission to independent Planning Panel.

		<ul style="list-style-type: none"> • Ensure contamination issues are resolved or addressed prior to rezoning for residential growth. <p>3. Car Parking</p> <ul style="list-style-type: none"> • Objects to rezoning 21–33 Autumn Street to public open space (PPRZ), noting it currently provides all-day parking for business employees. Loss of this car park is seen as detrimental to small businesses and would exacerbate parking shortages and reliance on private rentals. • Requests Council retain the site as parking rather than rezoning to open space. 			
44.	Objection	<p>Traffic congestion in Geelong West is described as already severe, particularly at peak times due to the concentration of schools and businesses. Concern that further development will exacerbate congestion or push traffic into back streets, increasing risks for pedestrians and school children.</p> <p>Parking provision is considered inadequate in recent developments, attributed to poor planning standards. Concern that additional businesses and residences will worsen parking pressures.</p> <p>Requests Council address traffic and parking impacts before allowing further development and require new developments to provide sufficient on-site parking to meet demand and avoid spillover into surrounding streets.</p>	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
45.	Objection	<p>The submitter objects to the proposal, stating that parking in the area is already inadequate. They argue that removing the only available all-day parking will worsen the situation and negatively affect local users who rely on it.</p>	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
46.	Acceptance	<p>The submitter strongly supports Amendment C433gee and the proposed UDF for the Pakington Street and Gordon Avenue precincts.</p> <p>Key Reasons for Support:</p>	N/A	Noted	Submission supportive. Refer submission to independent Planning Panel.

		<p>Renewal and revitalisation: The precinct shows signs of age and underuse; the UDFs present an opportunity to inject life through upgrades to streetscapes, amenities, footpaths, planting, lighting, wayfinding signage, and public art.</p> <p>Economic vitality: The amendment will help sustain existing businesses by attracting residents, visitors, and investment, while strengthening Pakington Street’s identity as a boutique retail and cultural destination.</p> <p>Sustainable growth: New zoning provisions will enable development of businesses, housing, and apartments in a way that aligns with the UDF’s vision while preserving local character.</p> <p>Community benefit: Revitalisation is seen as essential to maintaining liveability, lifestyle, cultural richness, and the long-term viability of the precincts.</p>			
47.	Objection	<p>The submitter objects to the removal of the nearby car park. They explain that it is the only convenient place for the students to park while attending classes at Oxygen College.</p>	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
48.	Objection	No comment	N/A	Noted	Refer submission to independent Planning Panel.
49.	Objection	<p>The submitter objects to the amendment, raising concerns that existing parking and lane space in the area are already insufficient. They argue that additional development would increase traffic congestion and create hazards for larger vehicles, including public transport, which already struggle to move safely and efficiently through the area.</p>	Traffic, Car Parking and Public Transport	See response to theme 2.	Refer submission to independent Planning Panel.
50.	Objection	<p>The submitter does not oppose the development in principle but requests changes to ensure parking adequacy and provision of local services.</p> <p>Requested Changes:</p> <ol style="list-style-type: none"> 1. Car Parking - Make it mandatory that each apartment includes at least one designated car space (basement or 	Traffic, Car Parking and Public Transport; DDO Controls	1. See response to theme 2. DDO57 includes design objectives and built form provisions that encourage active ground floor frontages	Refer submission to independent Planning Panel.

		<p>otherwise), rather than simply encouraging basement parking, to address existing congestion.</p> <p>Require the ground floor of larger developments to include essential services such as a supermarket, restaurants, gyms, or community facilities. If this is not feasible, set aside land specifically for the provision of these amenities, with mechanisms to ensure their delivery.</p>		<p>and commercial uses along Pakington Street and key pedestrian areas. These provisions support retail, and hospitality at ground level. Land use will be guided by the Zone provisions.</p>	
51.	Comment	<p>1. DDO Controls (DDO56)</p> <ul style="list-style-type: none"> • Supports mandatory 6m ground level setback along Latrobe Terrace for safety and amenity. • Amend DDO56 schedule to include specific objectives/controls for Latrobe Terrace and Church Street interfaces. • Amend DDO57 to include a strategy for the Rail Sidings Yard <p>2. UDFs</p> <ul style="list-style-type: none"> • Rail Sidings Yard (Pakington North Precinct) is essential infrastructure. Contains Geelong line's only train turntable. • Not realistic to identify for urban renewal. • Strong objection to the proposed shared overpass through the yard. • Modify UDFs to remove urban renewal assumption for the rail sidings yard and emphasise its strategic operational role. • Exclude or amend reference to a shared overpass through the sidings; develop alternative connectivity options in consultation with TfV. 	DDO Controls; UDF's	<p>1. See response to theme 8.</p> <p>2. See response to theme 10.</p>	<p>Change Recommended.</p> <p>Refer submission to independent Planning Panel.</p>

Appendix D

Extracts from Retail Strategy – Pakington Street, Geelong West and Gordon Avenue, Geelong West

SPECIALISED CENTRE

PAKINGTON STREET, GEELONG WEST

CENTRE NAME: PAKINGTON STREET, GEELONG WEST									
Hierarchy status:	Specialised								
Location:	Geelong West								
Key characteristics:	Major, vibrant retail strip in close proximity to Central Geelong. Contains Pakington Strand (anchored by Woolworths) and a library that is well-served by bus and rail services. The southern end of the precinct has continuous street frontages and a traditional walkable shopping strip role, while the northern end has variable facades and more office and restricted retail use.								
Current role:	Pakington Street (Geelong West) acts as a core retail, commercial and community centre in Greater Geelong, with a number of diverse retail and hospitality offers and community events. It serves both a local and wider regional role.								
Zoning (sqm):	ACZ		C1Z		C2Z		MUZ		Other
	0		115,640		56,280		22,560		0
Retail and commercial floor space* (sqm):	Super market	Depart' Store	Restricted Retail	Specialty Food	Specialty Other	Hospitality	Total Retail	Other Employ'	Vacant
	3,692	0	1,916	4,431	16,099	12,007	38,145	4,530	5,000
Retail anchors:	3,754 sqm Woolworths supermarket								
Transport connections:	Public	Geelong Railway Station (approx. 1 km), bus service (routes 10, 11, 12, 30, 45, 50 and 51)							
	Private	Pakington Street, from Church Street to Gordon Avenue, accessible via Princes Highway and Hamilton Highway							
Future role and opportunities:	<p>Pakington Street (Geelong West) is expected to continue thriving as a retail hub and community centre into the future.</p> <p>Much of Pakington Street is covered by a Heritage Overlay, which plays a significant role in guiding development within the area.</p> <p>Further planning work is needed to better define the role and function of the various sub-precincts within this broader centre, including the Commercial 2 Zone land located to the north. Attention is needed to ensure Pakington Street maintains its specialty retailing function and does not undermine the Geelong CBD.</p> <p>We have commenced work on an Urban Design Framework for the Commercial 1 Zone land in Pakington Street. This project primarily seeks to identify streetscape upgrades. There is scope to broaden this piece of work to investigate re-development and re-zoning opportunities at the northern end of Pakington Street as well as along Gordon Avenue.</p>								
Action required:	Prepare an urban design framework or structure plan for Pakington Street (Geelong West). The plan should consider development and re-zoning opportunities in Pakington Street, north of Waratah and Wellington streets and within the dispersed restricted retail area along Gordon Avenue.								
Growth Opportunities	Forecast supportable floor space 2016–2036 sqm (difference from total floor space)		Potential to grow within current zoned land		Sub-precinct planning required		Potential for rezoning to align with centre boundary		
	18,000		Yes		Yes		Yes		

* Excludes non employment uses such as residential, car parking and sites under construction.

DISPERSED CENTRES

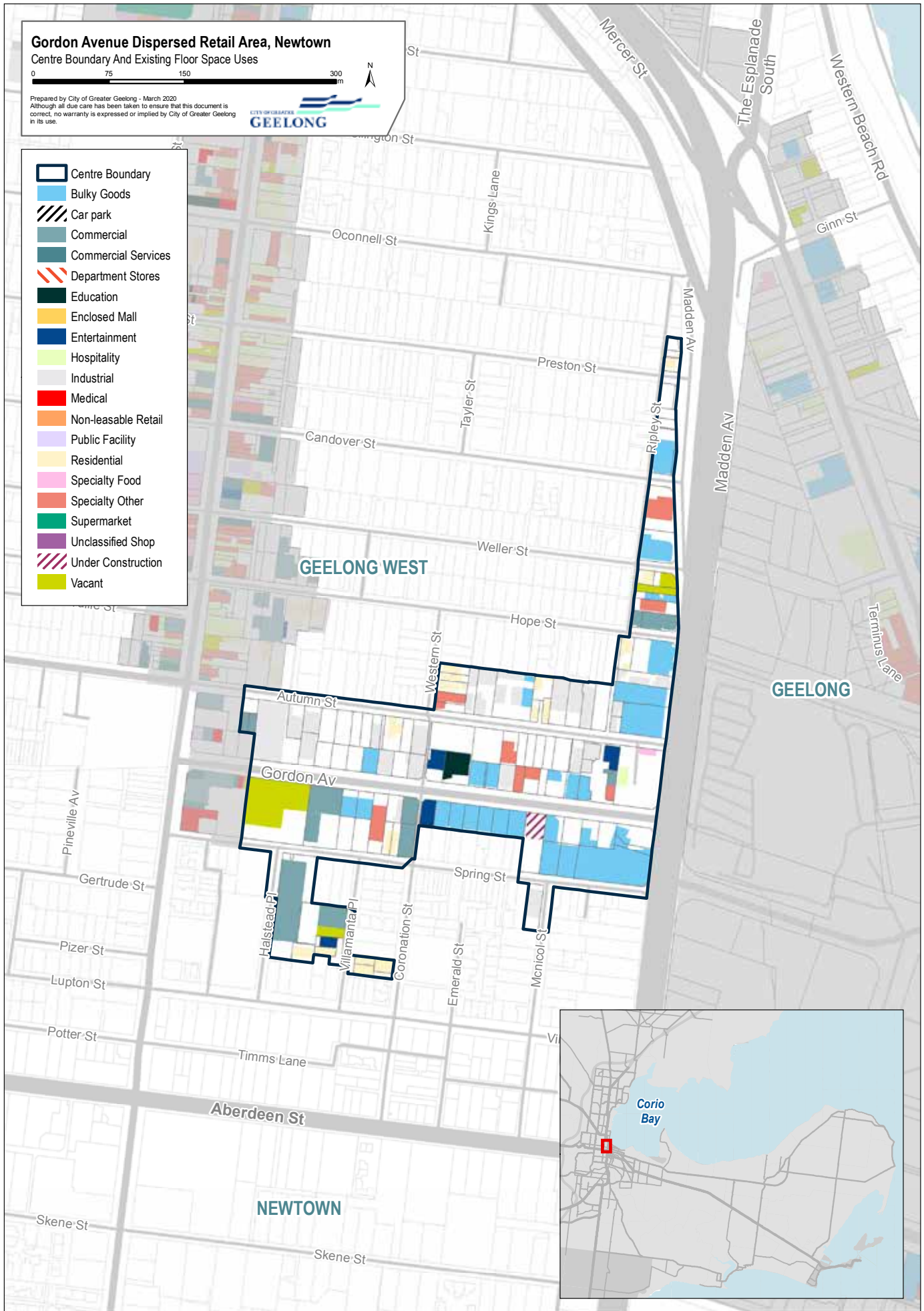
GORDON AVENUE, GEELONG WEST

CENTRE NAME: GORDON AVENUE, GEELONG WEST									
Hierarchy status:	Dispersed restricted retail								
Location:	Geelong West								
Key characteristics:	Mid-sized restricted retail precinct located along the Princes Highway, close to Central Geelong and perpendicular to Pakington Street (Geelong West), but very distinct from it in terms of built form, use and amenity. Stores and services are mostly located along Autumn, Gordon and Spring Streets and have low-density built form.								
Current role:	This centre plays a typical restricted retail precinct role, though it also has a significant proportion of office and industrial floor space.								
Zoning (sqm):	ACZ		C1Z		C2Z		MUZ		Other
	0	0	0	91,200	0	0	0	0	0
Retail and commercial floor space* (sqm):	Super market	Depart' Store	Restricted Retail	Specialty Food	Specialty Other	Hospitality	Total Retail	Other Employ'	Vacant
	0	0	16,650	120	3,390	140	20,300	0	1,800
Retail anchors:	None								
Transport connections:	Public	Geelong Railway Station (approx. 500 m), bus service (12, 30, 45, 50 and 51)							
	Private	Autumn Street, Gordon Avenue and Spring Street, between Pakington Street and Princes Highway							
Future role and opportunities:	<p>This centre is directly opposite the Geelong Train Station and has excellent pedestrian connections into Central Geelong and Pakington Street. There are opportunities to transition this area into a more mixed-use precinct, which could incorporate retail, office and light industrial uses, with residential uses particularly on the first floor.</p> <p>This area should not be identified as a restricted retail precinct in the retail hierarchy to help support the potential transition of the area over time. This area should be identified as a dispersed restricted retail centre.</p>								
Action required:	Prepare an urban design framework or structure plan for this area. The plan should focus on transitioning this area into a mixed-use precinct, which would incorporate residential, office, retail and light industrial uses. The plan should also consider improving connections through to Central Geelong and Pakington Street (Geelong West) centres.								
Growth Opportunities	Forecast supportable floor space 2016–2036 sqm (difference from total floor space)		Potential to grow within current zoned land		Sub-precinct planning required		Potential for rezoning to align with centre boundary		
	-4,200		Yes		Yes		No		

* Excludes non employment uses such as residential, car parking and sites under construction.

GORDON AVENUE, GEELONG WEST

CENTRE BOUNDARY AND EXISTING FLOOR SPACE USES



Appendix E

Table Summarising Relevant Planning Permits and Planning Permit Applications

AMENDMENT C433GGEE – TABLE OF RELATED PLANNING PERMITS & PLANNING PERMIT APPLICATIONS

Address	Permit No. or Permit Application No.	Permission	Overall Building Height	Status
39-45 Gordon Avenue, Geelong West	PP-691-2020	<i>Buildings and works, including demolition, to construct a 8 to 9 level building (plus part enclosed roof top terraces) to be used as a residential hotel together with mixed uses including office, shop, and restricted recreation facility; Use and development for a Residential Hotel, Shop, Restricted Recreation Facility, Car Park; Variation to an easement; reduction of carparking.</i>	10 storeys / 29.8m (excluding roof/plant)	Permit granted on 8 November 2021. Extension of time granted on 23 October 2023 and on 17 October 2025. Development must commence by 8 November 2027 and be completed by 8 November 2030. Use must commence by 8 November 2030. No plans endorsed.
28 Crofton Street, Geelong West	PP-1471-2021	<i>Demolish garage and construct a garage in a heritage overlay generally in accordance with the endorsed plans.</i>	Single storey	Permit granted on 29 December 2021. Condition 1 plans endorsed on 29 December 2021.

AMENDMENT C433GEE – TABLE OF RELATED PLANNING PERMITS & PLANNING PERMIT APPLICATIONS

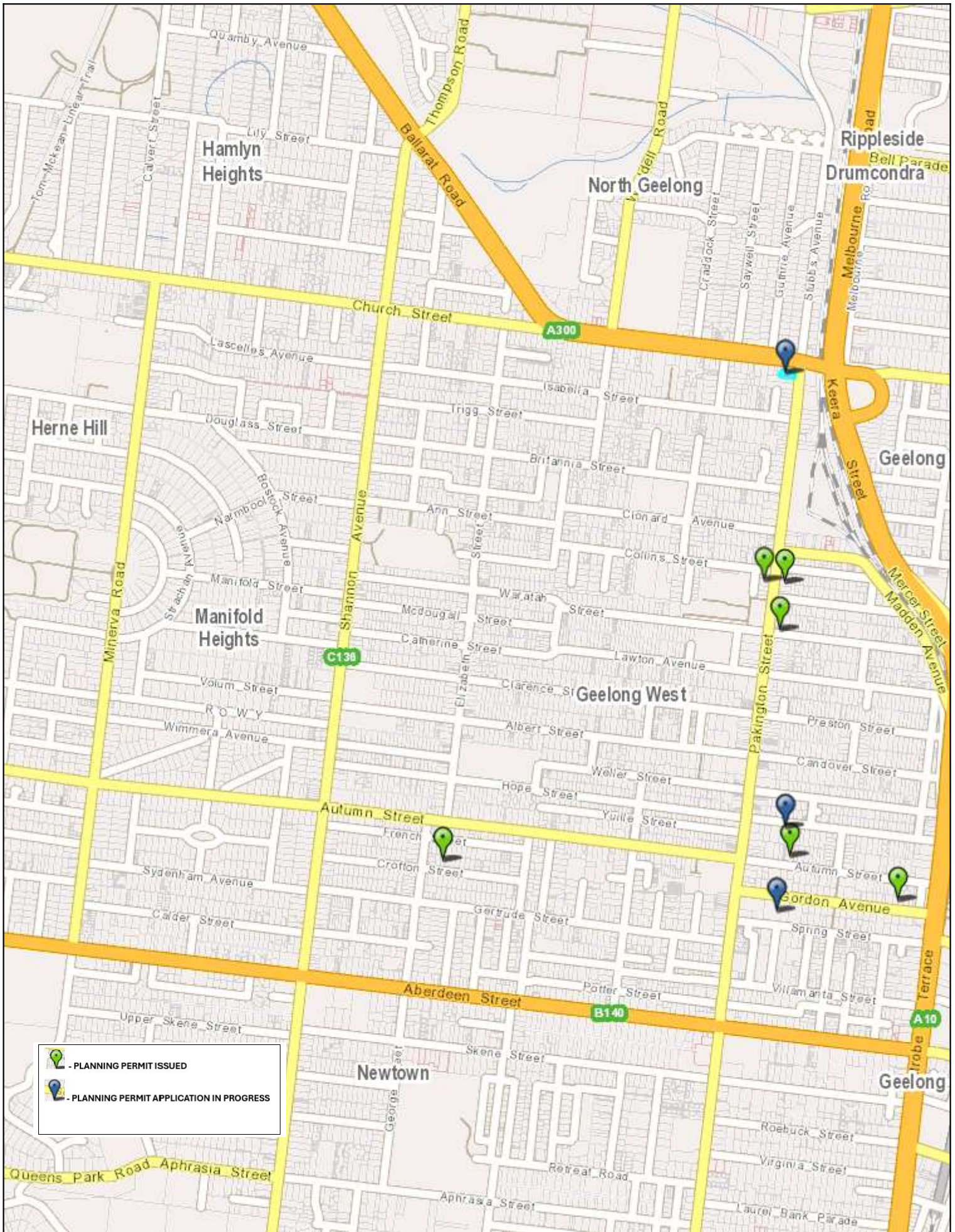
Address	Permit No. or Permit Application No.	Permission	Overall Building Height	Status
85 Pakington Street, Geelong West	PP-592-2021	<i>Use of the land as dwellings, construction of a four storey building containing sixteen dwellings and three shops, Associated subdivision, construct and display business identification signage and a reduction of the visitor and shop parking requirements generally in accordance with the endorsed plans.</i>	4 storeys / 15.38m (excluding plant)	Permit granted on 7 March 2022. No plans endorsed.
84 Pakington Street, Geelong West	PP-731-2022	<i>Use and development of a mixed use multi-storey building, including a food and drink premises, offices and waiver of car parking requirement in accordance with the endorsed plans.</i>	2 storeys plus roof terrace / 11.10m	Permit granted on 14 August 2023. Condition 4 Waste Management Plan was endorsed on 9 November 2023. Condition 6 Sustainable Design Assessment and WSUD Response was endorsed on 9 November 2023. Use/development has not commenced.
1/2A & 4 Gordon Avenue, Geelong West	PP-170-2024	<i>Use and development of the land for a car sales showroom and construct and display business identification sign generally in accordance with the endorsed plans.</i>	Single story	Permit granted on 8 May 2024. Condition 1 plans endorsed on 8 May 2024. Development completed.

AMENDMENT C433GEE – TABLE OF RELATED PLANNING PERMITS & PLANNING PERMIT APPLICATIONS

Address	Permit No. or Permit Application No.	Permission	Overall Building Height	Status
Shop No. 1/100 Pakington Street, Geelong West	PP-1-2025	<i>Partial Demolition, Buildings and Works and Variation to Liquor Licence #32318352 to Increase the Red Line Area.</i>	Single storey	Permit granted on 4 April 2025. Condition 1 plans endorsed on 4 April 2025. Development has not commenced.
51-53 Hope Street and 66-76 Autumn Street, Geelong West (Land on Plan of Consolidation 109425, Lot 1 on Title Plan 908797C, Lots 1, 2A and 2B on Plan of Subdivision 426407T, Lot 1 on Title Plan 16452M, Lot 1 on Title Plan 579687P)	PA2403398	<i>Use of land for dwellings, Construct a building or construct and carry out works (cl. 34.01 and cl. 43.01), Construct two or more dwellings on a lot, Demolish or remove a building, Under section 23 of the Subdivision Act 1988 to remove a restrictive covenant, Reduce the number of car parking.</i>	4 storeys / 17.0m	Permit granted on 29 August 2025. Council is not aware of any plans submitted to/approved by DTP under delegation from Minister. Use/development has not commenced.

AMENDMENT C433GGEE – TABLE OF RELATED PLANNING PERMITS & PLANNING PERMIT APPLICATIONS

Address	Permit No. or Permit Application No.	Permission	Overall Building Height	Status
3 Pakington Street, Geelong West	PP-128-2025	<i>Construction of a Four (4) Storey Building and Reduction of the Car Parking.</i>	4 storeys / 15.5m	Permit application lodged on 4 March 2025. Permit application under consideration.



	- PLANNING PERMIT ISSUED
	- PLANNING PERMIT APPLICATION IN PROGRESS

Pakington Street UDF - C433ggee

Although all due care has been taken to ensure that this document is correct, no warranty is expressed or implied by the City of Greater Geelong, Barwon Water or the State of Victoria in its use.



Legend

Admin1 Property		
Suburb Names	Railway Stations	
Route No	Highway Label	Sub-Arterial_Collector Label
Freeway Label	Arterial Label	Street Names
Major Roads	Railway Line	Topo Sea
Freeway	Railway	Road Alignments
Highway	Disused Railway	Registered
Arterial	Dismantled Railway	Proposed
Sub-Arterial	Rail Bridge	Lot Lines
Collector	Disused Rail Bridge	Registered
Private Road	Dismantled Rail Bridge	Proposed
Private Road	Tramway	
Local Roads	Rail Trail	
Other	Rail Tunnel	
Open (Registered)	Rail Siding	
Proposed	Topo Rivers & Creeks	
Closed	Rivers & Creeks	
Tracks	Topo Hydro Labels	
Topo Waterbody	COGG Region	
Intermittent		
Perennial		

Appendix F

Economic Impact Assessment of Tim Nott dated 3 February 2026

Tim Nott

economic analysis + strategy

20 Scotia Street
Preston, Victoria 3072
Phone: 0401 993 451
www.timnott.com.au

► Amara Coleman

For Greater Geelong City Council
C/o Harwood Andrews
70 Gheringhap Street
Geelong Vic 3220

3 February 2026

Dear Amara

Economic impact assessment of Amendment C433ggee

1. Introduction

The City of Greater Geelong (CoGG) is progressing Planning Scheme Amendment C433ggee to implement the [Pakington North Urban Design Framework](#) (CoGG, 2024) and the [Pakington Street and Gordon Avenue Urban Design Framework](#) (CoGG, 2024). The proposed Amendment requires rezoning land from Commercial 2 to

- Commercial 1, in the Pakington St North precinct, and
- Residential Growth Zone, Commercial 1 Zone and Mixed Use Zone in the Gordon Avenue precinct.

This letter provides a brief economic impact assessment of these proposed changes to land-use zoning. Section 2 looks at the economic role of the activity centres. Section 3 looks at the economic implications of the proposed Amendment. Section 4 reviews submissions; and section 5 provides a conclusion on the balance of costs and benefits.

My credentials to provide this assessment are my experience as an economic geographer over the last 40+ years, which is summarised in an attached CV.

2. Economic role and function of Pakington St Activity/Gordon Ave Centres

The urban design frameworks at the heart of the proposed Amendment identify three principal precincts in the Pakington Street/Gordon Avenue area, with each having a different economic function. These precincts are shown in the following diagram.

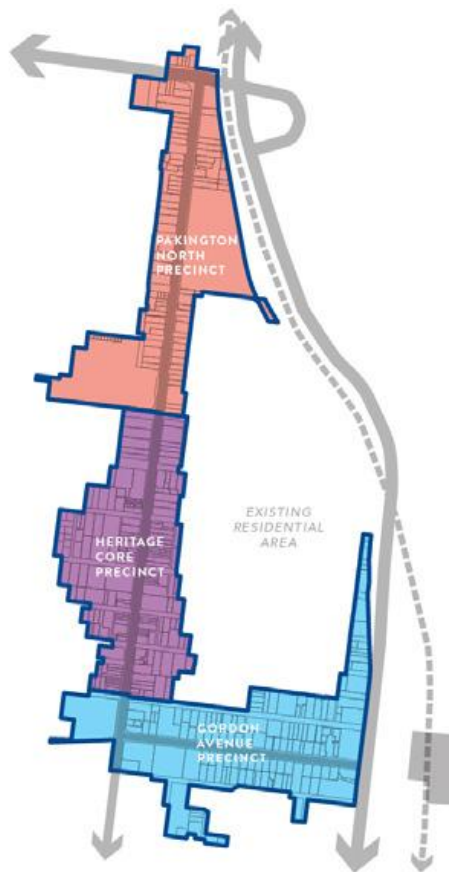


Figure 1: Pakington Street - Gordon Avenue Precincts
 Source: Pakington North Urban Design Framework

The **Heritage Core Precinct** is a vibrant strip shopping centre with a collection of thriving independent and national retailers as well as a substantial hospitality function. The precinct also has a significant civic and community presence, with the Geelong West Town Hall, library, Wathaurong Cooperative, Migrant Resource Centre etc.

In a recent footpath survey (January 2026), I identified five vacant properties in this precinct, which I estimate account for less than 2% of the commercially available floorspace. For most strip shopping centres, a vacancy rate of 5%-8% indicates a broad balance between supply and demand for premises. The low vacancy rate in the Pakington Street core precinct suggests that the strip is sought-after and that demand for premises outstrips the supply.

The **Pakington North Precinct** is an extension of the core retail strip. The area adjacent to the core retail strip accommodates a Woolworths supermarket and a continuation of core retailing. Further north on Pakington Street, is what can be described as a secondary retail strip, with larger format stores, interspersed with offices and hospitality outlets. The precinct culminates with a small service node on Church Street at its northern end.

This precinct also has a very low vacancy rate, estimated by me at less than 2% of the commercial building space, again

indicating a popular area in which demand for premises outstrips supply.

The **Gordon Avenue Precinct** provides an extension to the southern end of the retail core and then a services area characterised mainly by car sales and servicing on Gordon Avenue, Autumn Street and the adjacent parts of Latrobe Terrace, with a variety of large format sales and services activities further along Latrobe Terrace and Madden Avenue. These predominant activities are interspersed with offices and further educational establishments.

This precinct has several vacant land parcels but very few vacant buildings and, as with the other precincts, appears to be well supported, with recent investment in car sales outlets, for example.

The **Greater Geelong Retail Strategy 2020-2036** (adopted by Council in 2020) has identified the Heritage Core Precinct, Pakington North, and the westernmost parts of the Gordon Avenue Precinct as the Pakington Street Activity Centre (see Figure 2). The Retail Strategy categorises Pakington Street as Geelong’s only specialised activity centre, where specialised centres are:

Traditional major centres that have grown from strip shopping centres. They are typically located along main arterial routes and/or public transport nodes. Tend to capture niche trade from wider catchments and play an important community role, as the focus for retail, civic and community uses.
 (Retail Strategy, 2020)

In the hierarchy of centres, specialised centres in this context are larger than a neighbourhood centre – providing a much broader spread of retail, commercial and community services – but having a smaller draw than a sub-regional centre - lacking the characteristic retail forms of a sub-regional centre such as a discount department store.

The Retail Strategy identifies the existing floorspace in the centre (as shown in the adjacent diagram) and provides a forecast for the likely floorspace demand over the period from 2018 to 2036.

- Existing retail floorspace = 43,100 sqm including 5,000 sqm of vacant floorspace
- Additional retail floorspace demand, 2018-2036 = 18,000 sqm

The Strategy describes the future role and opportunities for the centre as follows:

Pakington Street (Geelong West) is expected to continue thriving as a retail hub and community centre into the future.

Much of Pakington Street is covered by a Heritage Overlay, which plays a significant role in guiding development within the area.

Further planning work is needed to better define the role and function of the various sub-precincts within this broader centre, including the Commercial 2 Zone land located to the north. Attention is needed to ensure Pakington Street maintains its specialty retailing function and does not undermine the Geelong CBD.

We have commenced work on an Urban Design Framework for the Commercial 1 Zone land in Pakington Street. This project primarily seeks to identify streetscape upgrades. There is scope to broaden this piece of work to investigate re-development and re-zoning opportunities at the northern end of Pakington Street as well as along Gordon Avenue.

The Strategy recommended that the following action be taken:

Prepare an urban design framework or structure plan for Pakington Street (Geelong West). The plan should consider development and re-zoning opportunities in Pakington Street, north of Waratah and Wellington streets and within the dispersed restricted retail area along Gordon Avenue.

The Retail Strategy describes the Gordon Avenue precinct as a “dispersed retail area”. Its extent and land-uses are shown in Figure 3. This precinct is distinguished from the Pakington Street Centre because of its distinctly different built form and emphasis on restricted retailing and light industry.

The Retail Strategy identifies the existing floorspace in the centre and provides a forecast for additional retail demand over the period from 2018 to 2036:

- Existing retail floorspace = 20,300 sqm (mainly in restricted retailing)
- Forecast **decline** in retail floorspace = 4,200 sqm as a result of mixed use redevelopment – see below

The Strategy identifies the future role and opportunities for Gordon Avenue as follows:

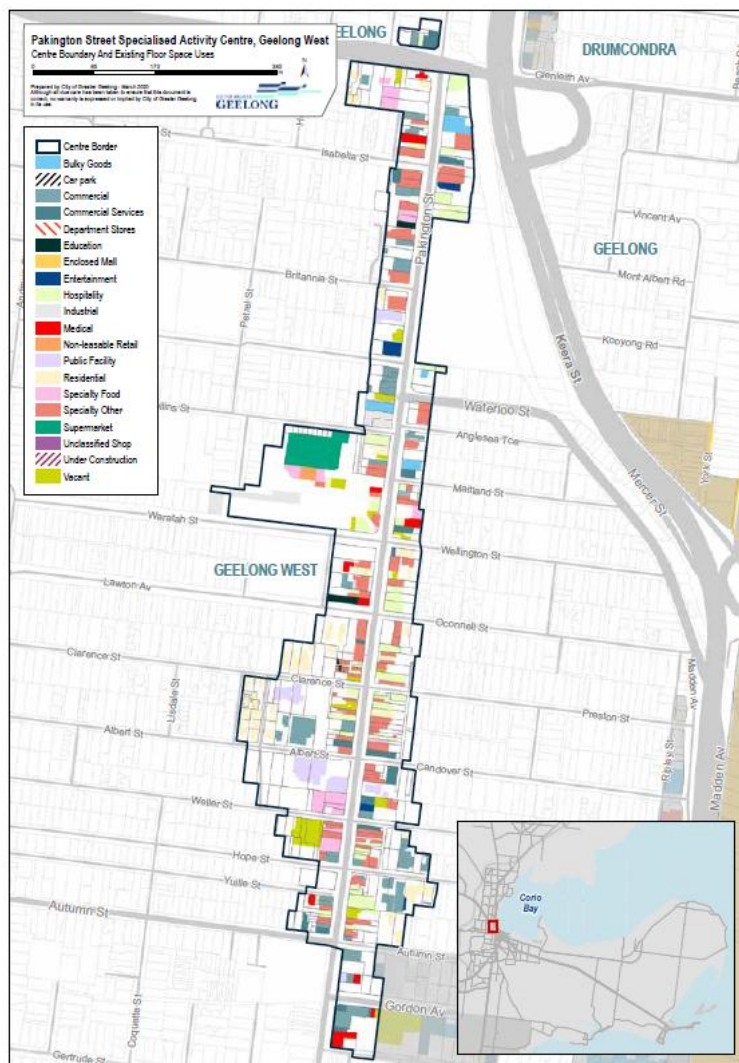


Figure 2: Pakington Street existing uses (2018)

Source: Retail Strategy, 2020

This centre is directly opposite the Geelong Train Station and has excellent pedestrian connections into Central Geelong and Pakington Street. There are opportunities to transition this area into a more mixed-use precinct, which could incorporate retail, office and light industrial uses, with residential uses particularly on the first floor.

The action suggested for this precinct by the Retail Strategy is:

Prepare an urban design framework or structure plan for this area. The plan should focus on transitioning this area into a mixed-use precinct, which would incorporate residential, office, retail and light industrial uses. The plan should also consider improving connections through to Central Geelong and Pakington Street (Geelong West) centres.

The present Urban Design Frameworks are a response to these recommendations from the Retail Strategy.

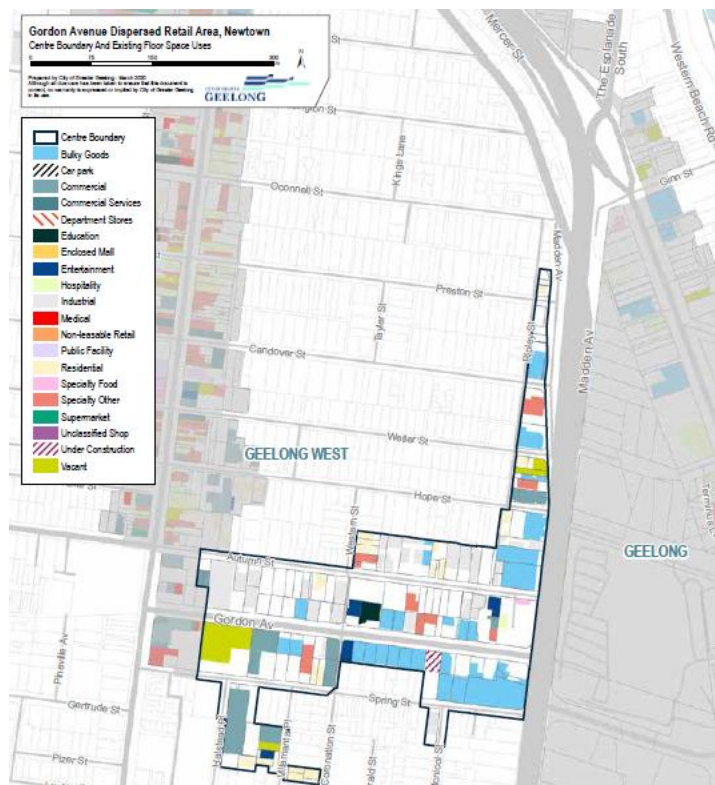


Figure 3: Gordon Avenue Precinct existing uses (2018)
Source: Retail Strategy, 2020

The Retail Strategy focused on the demand and supply of retail floorspace and not on the demand for other types of employment spaces. Nevertheless, the modelling for the Pakington Street/Gordon Avenue study area undertaken by SGS Economics and Planning for the Strategy anticipated a net increase in retail floorspace of 13,800 sqm over the 18-20 years to 2036.

3. Potential economic impacts

The proposed amendments to the Greater Geelong Planning Scheme in C433ggee will have an impact on the local economy in various ways, which are explored below.

3.1. Economic impacts on existing activity centres

In the Pakington North Precinct, according to Council¹ the proposed amendment will change an area of land totalling approximately 40,300 sqm from the Commercial 2 Zone (C2Z) to the Commercial 1 Zone (C1Z). A similar rezoning in Gordon Avenue will create approximately 6,800 sqm of additional C1Z land. These changes will allow the as-of-right use of the land for a variety of activities including shops, offices, cinemas and dwellings which may be restricted or prohibited under the C2 Zone. This would allow the extension of core retailing activities all the way from the Waratah/Wellington Street intersection to Church Street in the north; and a little further west along Gordon Avenue.

There may be a concern that the substantial amount of extra C1Z land would allow Pakington Street Activity Centre to expand its retail role at the expense of surrounding activity centres, including Central Geelong and the neighbourhood centres of West Geelong and Newtown. However, there are several factors which should alleviate that concern.

¹ In a memo titled “Capacity Assessment, Pakington North Precinct”, dated 3 February 2026 (see Table 5.1)

- The Retail Strategy anticipates that a net 13,800 sqm of additional retail space will be required to meet demand in the Pakington Street/Gordon Avenue Activity Centre in the period to 2036 (and this is on top of the take-up of space that was vacant in 2018). This additional space is not expected by the Strategy to alter the role of Pakington Street in the activity centre hierarchy. And this expansion is not expected to come at the expense of other centres since a demand for additional floorspace is also expected in surrounding centres over the period, including Central Geelong (+132,500 sqm), Shannon Avenue, Geelong West (+5,200 sqm), Pakington Street, Newtown (+5,400 sqm) and Shannon Avenue, Newtown (+1,400 sqm).
- Policy makers are particular keen to ensure that Central Geelong is not adversely affected by changes in the rest of the activity centre network. However, it is clear from the Retail Strategy, that in a growing region, activity centres will grow and this includes Central Geelong. Central Geelong is expected to consolidate its role as the preeminent activity centre for the region. The additional floorspace demand expected by the Retail Strategy in Central Geelong would be sufficient to support a major new regional shopping centre. Central Geelong will always compete with other centres in its network for particular functions – for groceries with neighbourhood centres, routine comparison goods with sub-regional centres, hospitality and boutique clothing with specialised and tourist centres etc. However its size, depth and breadth of offering, and its growth to serve the region as a whole means that no other centre in Geelong is positioned to serve its population in the same way.
- The forecast growth in the Pakington Street Activity Centre reflects the expectations for a growing population and increasing income of the residents of the area. My recent site inspection suggests that the space that was vacant in 2018 has now been taken up and that the demand for retailing has begun to displace other uses in the activity centre, including commercial services. The lack of vacant space in the centre is a clear indicator that further supply is warranted.
- Retailing is already the largest activity in the area to be rezoned. In many cases, redevelopment for retailing at ground level would simply be replacing large format shops with smaller ones. In Pakington North, there are few large sites that would create opportunities for significant new retail expansion. The largest sites that could be considered under-utilised for a C1Z - a car yard and an outdoor showroom - are 2,600 sqm and 1,000 sqm, respectively.
- In Gordon Avenue, the sites are 3,000 to 4,000 sqm and currently occupied by vehicle retailing, automotive servicing and large format furniture sales.
- The expansion of the C1Z will enable some further retail development. Nevertheless, even with the large area of additional C1Z, achieving an extra 13,800 sqm of retail space would require careful and extensive redevelopment. In the meantime, much of the land to be rezoned is occupied by productive activities that form a legitimate and useful part of the activity centre – larger format retailing, offices, hospitality and medical facilities, for example (see Figure 2).
- The expansion of C1Z land in the Pakington Street Activity Centre will not encourage investment that would change the role of the centre or seriously threaten the surrounding centres. The size and shape of the allotments in the areas to be rezoned in Pakington North (see Figure 4) would not allow the provision of a further full-line supermarket (requiring at least 3,000 sqm plus car-parking) which would compete strongly with the surrounding network of neighbourhood centres. Neither would it allow for the provision of a discount department store (at least 5,000 sqm plus car-parking) that would elevate the role of Pakington Street to a sub-regional activity centre in the hierarchy, competing with Geelong City Centre, Belmont or Corio. Should there be redevelopment to allow apartment buildings, it is conceivable that there would be new grocery stores or small supermarkets at ground level, as has happened elsewhere. However, these kinds of facilities would be small and focused on meeting the needs of new residents and should not compete with other neighbourhood centres.

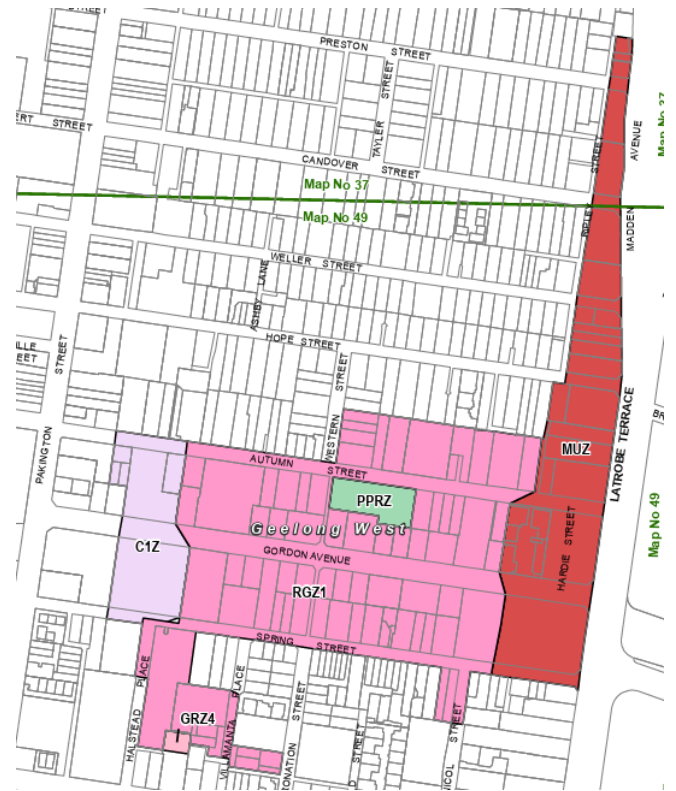
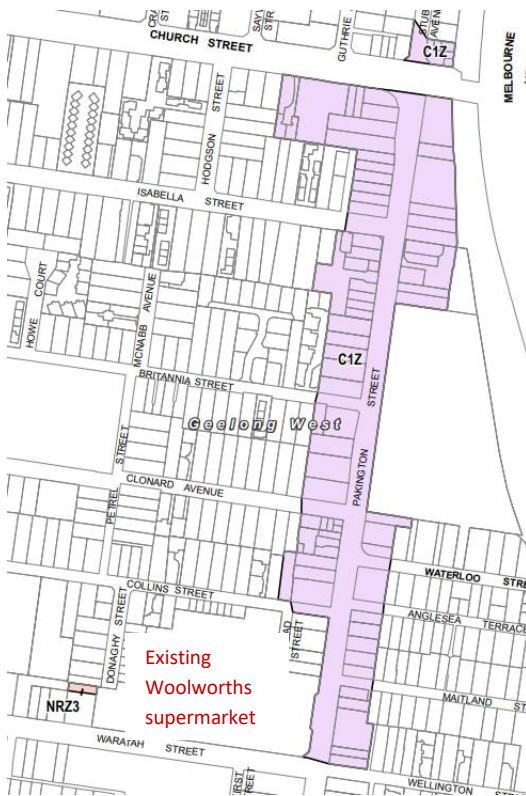


Figure 4: Proposed rezoning from C2Z in Pakington North and the Gordon Avenue Precinct

- The size of the allotments in Gordon Avenue which are to be rezoned from C2Z to C1Z are larger than in Pakington North (see Figure 4 above) but still not sufficiently large to accommodate new full-line supermarkets or discount department stores without substantial site consolidation and/or further rezoning, given the scale of the building and the car-parking required by the Planning Scheme and/or potential operators. The sites on Gordon Avenue may be sufficient to accommodate a smaller specialised supermarket such as an Aldi or large grocery store. However, such a development would be in keeping with the existing role of the centre.

In summary, then, the extension of the C1Z around the Pakington Street Activity Centre will not lead to the over-provision of retailing, beyond the adopted forecast in the Retail Strategy. Indeed, the additional land will be required if the centre is to meet the forecast provision given that much of the land to be rezoned is already occupied by retailing.

3.2. Loss of Commercial 2 land

There may be a concern that the loss of C2Z land in and around the Pakington Street Activity Centre will displace legitimate economic activity and local employment. However, as discussed above, the C2Z in **Pakington North** is already occupied, in large part, by activities that could be found in a C1Z, albeit the existing retailers are in larger format premises than most of those in the core retail precinct. It seems unlikely that there will be *rapid* redevelopment and wholesale displacement of existing uses in Pakington North. Redevelopment is more likely to occur first on the few under-utilised sites as part of a commercial and/or residential intensification. Beyond that, redevelopment will occur in line with market demand for apartment housing, leaving ground floors for new retail and commercial opportunities, as per the vision in the Urban Design Framework for the precinct.

Pakington North Precinct will be a vibrant destination with local shops, offices and communal spaces at lower levels fronting Pakington Street and residential living above. By becoming a people friendly and

inclusive precinct, businesses will thrive, residents will benefit from a range of housing choices close to amenities and visitors will be inspired by the quality of the public realm and architecture.

(Pakington North Urban Design Framework, 2024)

In the **Gordon Avenue Precinct**, the Mixed Use Zone (MUZ) replacing the C2Z along Latrobe Terrace and Madden Avenue will enable existing activity to continue, as well as providing opportunities for more extensive commercial and residential redevelopment. The Urban Design Framework for this part of the precinct envisages that, “...*Latrobe Terrace is a predominantly commercial precinct that benefits from its close proximity to Geelong Railway Station and Central Geelong.*” The Framework envisages building heights of 4-10 storeys in the Mixed Use Zone. This is much higher than the predominantly one and two storey buildings that currently occupy the area. It is unlikely that all the existing activities will be accommodated in any new development. Nevertheless, employment uses will remain, especially at ground level.

The intention of the Amendment in most of Gordon Avenue is to enable the creation of a high density residential corridor between Pakington Street and the Geelong Railway Station and the city centre.

Currently, car sales and associated automotive servicing take up the largest space in this area, along with the sale of pools, gates and outdoor furniture. Many of the car showrooms reflect the demands of the relatively affluent residents of Geelong West and Newtown, with dealers presenting a high proportion of luxury car brands including a recent influx of electric cars. This part of the precinct is also home to the offices of several training and social services organisations.

Looking at historical aerial imagery (via Google Earth), it appears that many of the activities in the proposed RGZ have been there for 15 years or more and owner-operators would have existing use rights. The replacement of these activities with housing may therefore take some time, at least until the commercial viability of high density housing redevelopment becomes compelling².

In this area, the change from C2Z to RGZ will eventually result in the loss of the existing forms of employment, especially sales and servicing jobs. The RGZ will support a modest level of employment through home occupation and the provision of small scale retail and other services which may be permitted in the zone (small retailers, medical services, small offices etc). Nevertheless, I would expect a net loss of employment in the RGZ with the full implementation of the Urban Design Framework.

There is potential for the displaced activity to locate elsewhere in Geelong, including:

- Other C2Z land in the City comprising around 175 hectares³ in stand-alone precincts, as extensions of activity centres or part of industrial precincts
- Other industrial precincts, totalling 2,732 hectares, of which around 292 hectares is vacant according to Charter Keck Cramer.
- Planned employment land in each of the new growth areas in North and West Geelong, both as part of broader industrial precincts and attached to activity centres. New and potential large scale employment precincts include:
 - Greater Avalon Employment Precinct
 - Lara Business Park
 - Armstrong Creek North East Industrial Precinct
 - Northern Geelong Growth Area
 - Western Geelong Growth Area

² By compelling, I mean that the land values are sufficient to allow owners to cover the costs of relocating and rebuilding in an attractive position elsewhere.

³ Extrapolated from Charter Keck Cramer, 2025, [Draft Greater Geelong Industrial Land Review](#) for the City of Greater Geelong

- South West Geelong Investigation Area

None of these areas are as convenient to the residents of West Geelong, Central Geelong and Newtown. However, the car yards and associated services on Gordon Avenue serve a city-wide and regional catchment area and could arguably find a more convenient and accessible position to service this catchment. There would certainly be value in keeping these activities together to provide an automotive node, generating economies of scale and scope.

Charter Keck Cramer (2025) points out that further employment land is required to meet demand over coming years. The redevelopment of inner city employment locations such as Gordon Avenue will add to that demand, bringing forward the need for new employment precincts.

- The educational and social services enterprises in Gordon Avenue could theoretically relocate to commercially zoned land elsewhere, including elsewhere in the Pakington Street Activity Centre or Central Geelong. Equally, these organisations may be keen to stay where they are. If they own the buildings, they may rely on maintaining their existing buildings and existing use rights if they are available. I have no information about the feasibility of moving or the impact on the affected organisations, given the likely costs, assets and customers involved. Further information could be sought from the respective organisations.

In summary, there will be a loss of C2Z land as a result of the proposed Amendment. While there will be an intensification of employment in the areas moving to C1Z, there is likely to be a net loss of employment in the parts of Gordon Avenue moving to RGZ. The successful implementation of the Urban Design Framework and the redevelopment for housing in the new RGZ, will mean that existing activities have moved (or closed). If the respective operators own their buildings, given existing use rights, this is likely to take some time, at least until the financial feasibility of apartment development becomes compelling. There are currently 292 hectares of vacant industrial land in the City, with more employment land planned for Avalon Airport and urban growth areas. Some of this land will be suitable for the large format retailing and light industrial activities which might be displaced from Gordon Avenue. Unless they have existing use rights, the future location of the education and social services activities in Gordon Avenue is less certain.

3.3. Increase in local demand as a result of residential development

Successful implementation of the urban design frameworks for Pakington Street and the Gordon Avenue precinct will generate additional local residents, adding to the demand for new local retailing and other services and improving the viability of existing retail and commercial activities.

Hill PDA⁴ estimates that the Gordon Avenue precinct could accommodate up to 2,278 new dwellings given the preferred building density and height limits in the urban design framework. Using similar calculations to those in the HillPDA report, Council (personal communication) has estimated that the Pakington North precinct could accommodate up to 1,565 new apartments, giving a total of up to 3,843 dwellings in the areas affected by this Amendment. At an average of 1.8 persons per dwelling, Council estimates that the Amendment could generate an additional 6,900 people at full development.

I would expect that, for the foreseeable future, the ultimate population will be somewhat less than the calculated capacity, given existing use rights and the likelihood that some sites will not be developed to the full potential allowed by the planning scheme. However, even redevelopment to accommodate, say, 5,000 additional people would generate a significant fillip to the demand for retailing and other resident services.

According to the Retail Strategy, by 2036, the demand for retail floorspace per Geelong resident will be 4.3 sqm. Given the position of Pakington Street in the hierarchy of retail centres, and my experience of retail network assessment, I would expect that between 40% (1.7 sqm) and 50% (2.1 sqm) of that demand from the

⁴ HillPDA consulting, 2023, [Population Projections – Gordon Avenue](#), for City of Greater Geelong

new local residents would best be satisfied locally, with the remainder satisfied at other centres with different offerings – Geelong City Centre, Belmont, Corio, bulky goods precincts etc. The notional 5,000 new residents would therefore support a further 9,000 to 11,000 sqm of retail floorspace in the Pakington Street Activity Centre.

Part of this increase in demand is already accounted for in the net growth of 13,800 sqm by 2036 anticipated by the Retail Strategy. Part of the increase would be felt in the period beyond 2036 as the precinct is likely to take some years to transition. Nevertheless, the proposed residential redevelopment will clearly create and support local demand for shops as well as other services, keeping the Pakington Street Activity Centre vibrant for the foreseeable future.

3.4. Development of housing to meet economic needs of the city

In launching a report by the Victorian Parliament on the supply of homes in regional Victoria, Committee Chair Julianna Addison said,

“Regional Victoria is growing, vibrant and full of opportunity, and we must ensure that housing supply keeps pace with this momentum. Throughout our inquiry we heard how our regional communities are changing. The number of older Victorians is increasing and there are more single-person and couple households. Greater competition and not enough supply, particularly for smaller homes close to amenities, is driving up rents and property prices in some communities.” [Parliament of Victoria, 2025](#)

The lack of smaller, more affordable dwellings creates economic inefficiencies in a number of ways:

- Workers on low and middle incomes, especially younger workers, find it difficult to move to an area to take up or seek employment. This has an adverse impact on the ability of businesses to source labour and leads to longer commuting times and lost opportunities.
- Smaller households on social housing waiting lists are forced to spend more of their incomes on private sector housing or remain homeless, with a consequent decrease in their life chances.
- Older retired couples and singles are forced to stay in large family houses that they cannot maintain, keeping families that could make good use of those homes out of the area and forcing the development of new family homes on the urban fringe.
- People undergoing family break-ups may have difficulty in finding affordable housing that keeps them close to children and support networks.

In Geelong, the number and proportion of smaller households is growing steadily, as it is in Australia in general. In 2021, according to figures prepared by .id consulting from the ABS Census of population and Housing, the share of lone person and couple households in Greater Geelong was 53.1% of all households (see Figure 5). However, the share of dwellings with 0-2 bedrooms was only 17.8% and the share of medium and high density dwellings was only 13.9%, a share which had actually declined since 2006 (see Figure 6).

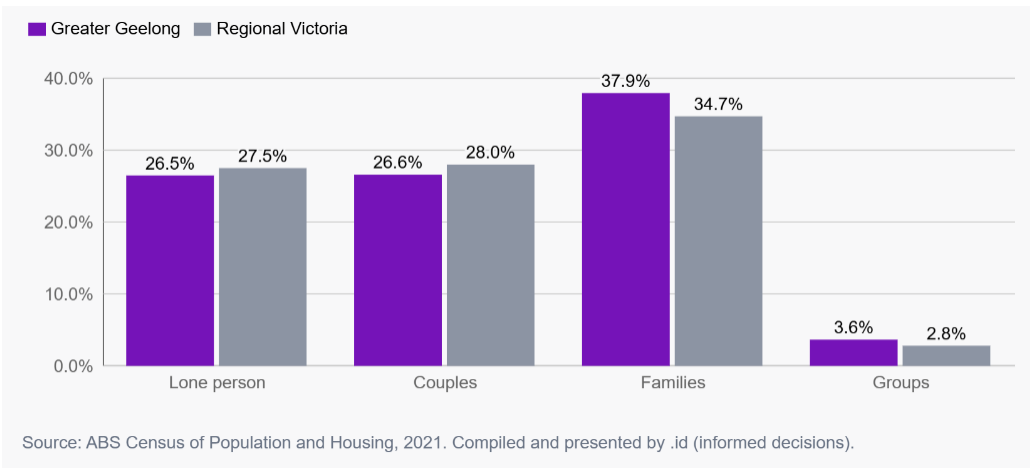


Figure 5: Mix of household types, Greater Geelong, 2021

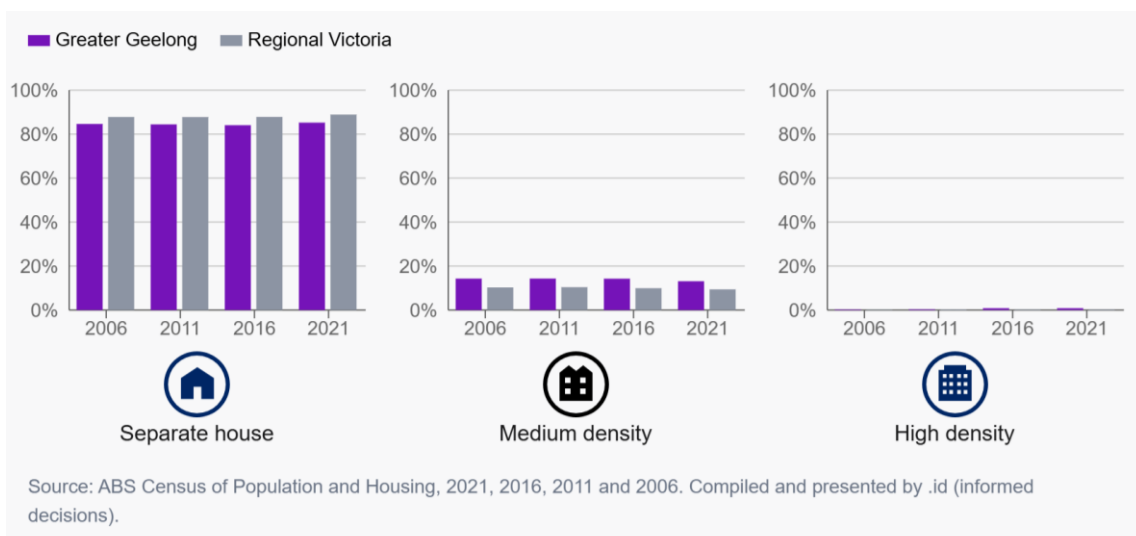


Figure 6: Dominant housing type, Greater Geelong, 2006 to 2021

The Amendment proposes to create affordable housing as part of any housing redevelopment in the precincts. In 2021, 5,487 households in Greater Geelong had an unmet need for affordable housing (Housing Monitor, .id consulting, 2025). The type of households is shown in Figure 7 below.

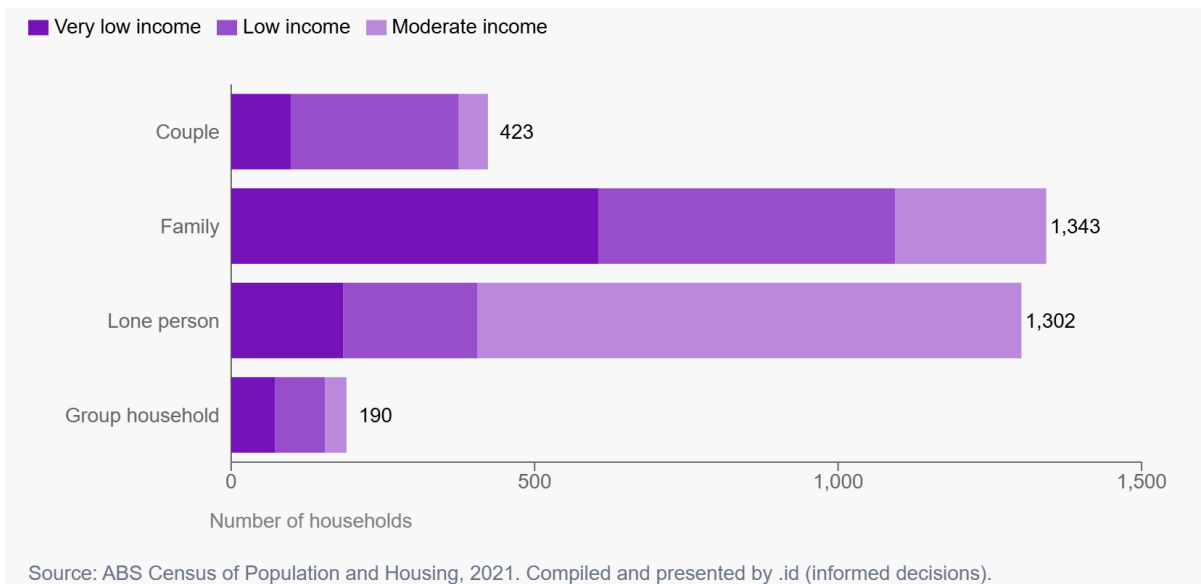


Figure 7: Households unable to access market priced rental housing, 2021

The dwellings enabled by the proposed Amendment will go some way to improving the mix of housing and meeting the need for affordable housing in Geelong, reducing the economic inefficiencies caused by an imbalance of supply and demand.

3.5. Increase in the efficiency of urban development

In 2019, Infrastructure Victoria⁵ found that infrastructure capital costs underpinning housing and urban development were two to four times higher in greenfield areas than in established urban areas. This, and earlier work by SGS Economics and Planning amongst others, as well as the desire to protect valuable agricultural areas on the urban fringe, has driven the government policy to expand the share of infill housing in urban development. On top of these considerations there is strong pressure to improve affordability and to generate a variety of dwelling types to meet the changing needs of the growing population. To assist in meeting these imperatives, the State Government has developed a series of housing targets for each municipality. The targets help municipalities to plan for the housing that will be required as well as assisting the development industry in scoping the task ahead. Currently the target for Greater Geelong is to achieve 128,600 additional dwellings by 2051, 77,500 (60%) of which should be in well-serviced existing urban areas to make the best use of existing infrastructure and to reduce community costs. This target is now enshrined in the Greater Geelong Planning Scheme at [Clause 16.01-1S](#).

The experience of the City of Greater Geelong is that fringe growth areas are expensive for the Council (and therefore the wider community). The [Greater Geelong Settlement Strategy \(2020\)](#) notes that councils in growth areas all have infrastructure funding shortfalls and that, in the case of Greater Geelong, the shortfall in infrastructure funding for the development of the Armstrong Creek Growth Area, for example, was more than \$100 million (in 2020).

Infill development, on the other hand, makes use of existing infrastructure and any required upgrades can be more fully attributed to the developer. New housing developments such as those enabled through this amendment will reduce the need for as much greenfield expansion on the urban fringe and will reduce the overall cost of providing homes for the Geelong Community.

⁵ Infrastructure Victoria, 2019, [Infrastructure provision in different development settings](#), Melbourne

In addition to the reduction in infrastructure costs to the community, the location of the dwellings enabled by this proposed Amendment will reduce costs for the individual occupiers because of their proximity to established work locations in the City Centre, Pakington Street and nearby employment precincts. The Geelong Railway Station is five minutes' walk from Gordon Avenue, providing rail access to employment in the Melbourne CBD and activity centres in Melbourne's western suburbs. Jobs within walking distance reduce the need for expensive car travel as well as providing time savings.

4. Review of relevant submissions

I have briefly reviewed the public submissions on the proposed Amendment. For the most part, economic issues are dealt with only indirectly. However, I note the following:

- a) A number of submissions were supportive of the Amendment, including one which made explicit reference to the zoning provisions providing support for, *"sustainable growth, enabling the new development of businesses, homes and apartments that align with the character and vision of the UDF. This will help keep much needed current businesses viable, by attracting new residents and investment while preserving the unique identity of the area"* (Submission 46)
- b) Traffic and parking issues constituted the largest number of objections to the proposed changes. In particular, there appear to be at least 16 submissions on the loss of parking for students, workers and businesses in the Gordon Avenue precinct. Many of these objections were regarding the loss of the Council-owned car park on Autumn Street, which the UDF envisages will become a public open space. The loss of this parking would disbenefit workers and businesses in the precinct. However, on this issue the Pakington Street and Gordon Avenue UDF states, *"The demand for this site as a public car park serving local businesses in the precinct will be further investigated once the concentration of commercial and retail uses shifts to more residential uses"*. In other words, the loss of the car-park is not intended to happen until redevelopment for housing in the precinct is well underway and the demand from remaining businesses has all but disappeared. Nevertheless, it would be prudent to monitor the use of the car park and to identify potential alternatives for businesses that remain in the precinct for the long term.
- c) Submission 50 identified the need for ground floor services in apartment buildings – *"metro-style supermarket, restaurants, gyms and other community facilities to better support residents"*. This will be encouraged, if not mandatory, in the C1Z and the MUZ; however, in the RGZ of the Gordon Avenue precinct, the provision of services will be less certain. Shops, offices and hospitality activities will be restricted in size and location, and likely to be subject to a permit. Nevertheless, some level of service will be allowed and such facilities are likely to be provided because of their attractiveness to potential residential purchasers and tenants.
- d) A number of submissions suggested that implementation of the UDFs would add substantially to the existing congestion in Pakington Street, Gordon Avenue and surrounding local streets. If the increased congestion deters shoppers, this will have economic impacts on the activity centre, as well as increasing travel costs for those passing through. Congestion does have an impact on the efficiency of the urban system, increasing the costs of accessing services, and is an inevitable consequence of increasing housing density in existing urban areas. However, increasing congestion leads to changes in behaviour: drivers may begin to avoid congested streets; more people may decide to walk or cycle to the shops (and this is encouraged by the landscape improvements in the UDF); more people may decide to leave their car at home and take the bus – and I note Transport for Victoria (submission 51) suggest that the operation of the bus network in the area will need to be monitored and improvements may be required. Rather than see congestion as a reason not to redevelop the area, it should be seen as an issue that needs to be managed in order to gain the benefits of urban densification.

5. Conclusions on the likely balance of benefits

The likely economic costs and benefits of the proposed Amendment are summarised in the table below.

Likely economic benefits	Likely economic costs
Expansion of the C1Z at Pakington Street Activity Centre required to accommodate the forecast growth in retail and commercial services	Uncertainty for existing businesses on Gordon Avenue, with permit applications triggering the need to seek alternative locations for those without existing use rights. However, many businesses do have existing use rights and most could remain in place until the commercial viability of residential redevelopment becomes compelling
Increase in local demand for shops and other services from new residents will support existing businesses and an expanded provision of new businesses, with consequent employment growth	The displacement and relocation of employment activities in Gordon Avenue would generate demand for employment land elsewhere in the City, potentially bringing forward the need for the development of more employment precincts
Development of new apartment buildings encouraged by the Amendment will add to the diversity of housing stock. This will assist low and middle income workers to be housed close to work opportunities and will enable local businesses to expand with confidence in being able to access workers.	Increasing congestion as a result of intensifying residential and commercial development, with the need for monitoring and potential public transport improvements, additional car-parking etc
Provision of new, attractive smaller homes will encourage older couples to move, freeing up family homes for families and improving the efficient use of the housing stock.	
New affordable dwellings will reduce housing stress and improve the life chances of households in need.	
Increasing density in established urban areas will substantially reduce the community costs of infrastructure provision compared with growth at the urban fringe.	

In my view, the balance of economic benefits and costs is clearly in favour of the Amendment. The implementation of the Urban Design Frameworks for the Pakington Street Activity Centre will enable the centre to expand to its potential while improving the equity and efficiency of urban development. The costs can be managed through sensitive implementation of the Amendment and coordination of other City development activities, including public transport improvements and creation of new employment precincts.

*

I trust this assessment is sufficient for present purposes. I would be happy to expand on these issues if required.

Yours sincerely

A handwritten signature in black ink that reads "Tim Nott". The letters are cursive and slightly slanted to the right.

Tim Nott

Tel: 0401 993 451

Attachment: CV for Tim Nott



Employment History

Tim Nott, 2004-present
Sinclair Knight Merz, 2000-2004
Essential Economics, 1997-2000
Henshall Hansen Associates 1991-97
Victorian Ministry for Planning and Environment, 1989-90
London Borough of Southwark, 1986-88
Greater London Council, 1985-86
Norwich Community Workshop, 1984-85

Affiliations

Member Planning Institute of Australia, Registered Planner
Member Economic Development Australia, ACEcD

Qualifications

BA (Hons) Development Studies,
University of East Anglia, 1982

Contact

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TIM NOTT

Economic Geographer

Tim is a highly capable and experienced economic geographer with a broadly based background in urban and regional development, working in this field since 1982. Tim has held senior professional roles in a consulting environment since 1991 and has successfully operated his own practice since 2004. He has prior experience working in local, metropolitan and state government as well as the community sector. Tim has worked extensively on economic planning issues in Australia and elsewhere.

Expertise

Tim undertakes complex projects in local and regional economic analysis, retail and industrial assessment, economic impact analysis, demographic assessment and sustainable development strategy. He is a clear thinker with a collaborative working style.

Experience

Tim has led or provided substantial professional inputs to the following relevant projects:

- Housing, commercial and industrial demand and supply assessments to inform structure plans and urban design frameworks for a wide variety of towns and activity centres. These include Bacchus Marsh, Broadmeadows, Brunswick Camperdown, Doncaster Hill, Dromana, Euroa, Foster, Glenroy, Hamilton, Healesville, Ivanhoe, Kaniva, Karingal Hub Korumburra, Kyneton, Lancefield, Lorne, Macedon, Mirboo North, Moriac, Pakenham East, Romsey, St Leonards, Stawell, Terang, Venus Bay, Winchelsea and Wonthaggi
- Municipal retail and activity centre strategies, for Echuca-Moama, Elcho Road East PSP, Geelong's Northern and Western Growth Areas, Manningham, Melton, Moorabool, Southern Grampians, Torquay-Jan Juc
- Cost benefit analysis for municipal investment projects including several rounds of infrastructure improvements at Dinner Plain, sports facilities in Bairnsdale, Dandenong and Tasmania, and walking/cycling trails in Alpine, East Coast Tasmania, Glenelg and Yarra Ranges
- Economic Development and Tourism Strategies, for towns, municipalities and regions, including for East Gippsland, Greater Geelong, Moorabool, Nillumbik, Queenscliffe, Southern Alpine Resorts, Upper Spencer Gulf and Warrnambool

More information can be found at www.timnott.com.au

Appendix G

Capacity Assessment - Pakington North Precinct (City of Greater Geelong, 3 February 2026)

Capacity Assessment

Pakington North Precinct

3 February 2026



1 Purpose

The purpose of this memo is to better understand the floorspace and population capacity for the Pakington North Precinct (the Precinct) based on the proposed built form controls outlined in the *Pakington North Urban Design Framework (UDF)*. It focuses on the commercial and residential floorspace capacity, expected residential yield and worker and overall population that can be accommodated if the preferred built form outcomes were to be realised. This memo outlines the methodology used to estimate the development capacity based on the preferred built form controls/envelope. It is to be noted that for the purpose of this assessment, it is assumed that the Precinct is/will be fully developed.

Specifically, the memo seeks to:

- Outline the inputs, assumptions, and data sources used to calculate the Gross Floorspace Potential from the proposed built-form envelope.
- Clarify the methodology used to calculate floorspace capacity.
- Provide an indicative estimate of the residential yield and anticipated population that could be accommodated within the Precinct.
- Provide an indicative estimate of the potential worker population that can be accommodated within the Precinct based on the calculated commercial floorspace.
- Compare the capacity of the Pakington North precinct with that of the Gordon Avenue precinct.
- Compare the proposed capacity with the existing floorspace within the precincts.

This memo aims to answer these three key strategic questions:

What is the floorspace capacity, the anticipated residential yield and anticipated residential and worker population for the Pakington North Precinct under the proposed Pakington North UDF?

How does this compare to that of the Gordon Avenue Precinct?

How does proposed floorspace capacity compare to the existing floorspace?

2 Methodology

The floorspace capacity calculation for the Precinct is based on a structured process that uses cadastral data and 3D modelling to generate realistic development capacity estimates. The steps are outlined below.

2.1 Lot Area Identification and Aggregation

Lot areas are measured using the cadastral. Each parcel within the Precinct is assigned to its corresponding existing zone (C1Z, C2Z, MUZ or GRZ) and its proposed site coverage. This ensures that all floorspace estimates that are calculated later in the process can be aggregated by zone and rationalised by proposed site coverage from the outset. All lots that are currently zoned GRZ and C2Z are proposed to be rezoned to C1Z.

2.2 Built Form Envelope Modelling

A 3D built form envelope was developed in SketchUp using the height, setback, and massing controls as defined in the *UDF*. This envelope is a 3D representation of the maximum theoretical built form permissible.

2.3 Extraction of Modelled Building Envelope Floorspace by Level

To convert the 3D envelope into quantifiable floorspace:

- Horizontal sections were taken through the SketchUp model at every storey.
- The resulting floorplate area at each level was measured.
- These areas were classified and summed based on the proposed site coverage for the lot and the current zone.

This produced a raw modelled floorspace estimate reflecting the maximum built form envelope.

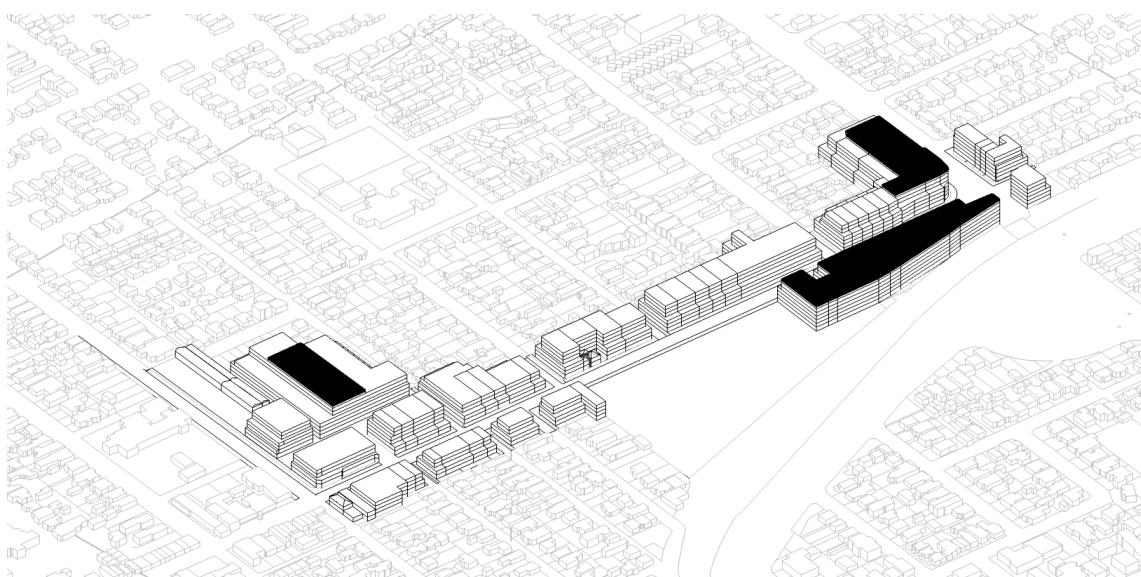


Figure 1 Horizontal section of the 3D model – used to calculate floor-wise area



Figure 2 Horizontal sections of the 3D model at each floor - by current zone and proposed site coverage

2.4 Site Coverage Rationalisation

The modelled envelope does not reflect the proposed site coverage controls in the UDF. Since the modelled footprint reflects the maximum built envelope, it is always higher than the proposed site coverage. To account for this, a rationalisation factor is applied.

The total floorspace is adjusted proportionally using:

$$\text{Rationalisation Factor} = \frac{\text{(Permitted site coverage)}}{\text{(Modelled footprint coverage)}}$$

Example: If the modelled footprint has a site coverage of 90% and the site coverage control allows 80%, the total floorspace is multiplied by **80/90** to calculate the Gross Floorspace Potential. This ensures the floorspace capacity is consistent with UDF site coverage requirements while retaining the vertical distribution of floor area.

2.5 Application of Land-Use Split Assumptions

After the Gross Floorspace Potential is calculated, land-use distribution assumptions are applied. These assumptions allocate the gross floorspace in each zone into residential and commercial floorspace

These assumptions are derived from the Population Projections Report for [Gordon Avenue prepared by Hill PDA in June 2023](#).

2.6 Calculation of Dwelling Yield and Precinct Residential and Worker Population

Residential floorspace is then translated into a dwelling yield and population estimate based on:

- Gross and net dwelling size assumptions (e.g., m² per dwelling)
- Average household size assumptions

Similarly, commercial floorspace is converted into an indicative worker population using employment density assumptions (m² per worker).

These assumptions are derived from the [Population Projections Report for Gordon Avenue prepared by Hill PDA in June 2023](#).

2.7 Total floorspace potential for Gordon Avenue and Pakington North Precincts

Gross Floorspace Potential, Residential yield and Residential and worker population are totalled for Gordon Avenue and Pakington North Precincts.

The values for the Gordon Avenue precinct are taken directly from the [Population Projections Report for Gordon Avenue by Hill PDA in June 2023](#).

2.8 Existing Retail Floorspace

The City of Greater Geelong Retail Strategy 2020 to 2036 (Adopted in August 2020) has undertaken a floorspace audit in March 2018 of the different retail centres in Greater Geelong. Pakington Street (Geelong West) is identified as a Specialised Centre and Gordon Street Avenue Centre (Geelong West) is identified as a Restricted Retail Centre. The floorspace audit is undertaken by land-use and includes residential use within land zoned as C1Z, C2Z or MUZ. The boundaries of the two centres as per the Retail Strategy (see Figure 3) differ from the boundaries of the Gordon Avenue and Pakington North UDFs, as adopted.

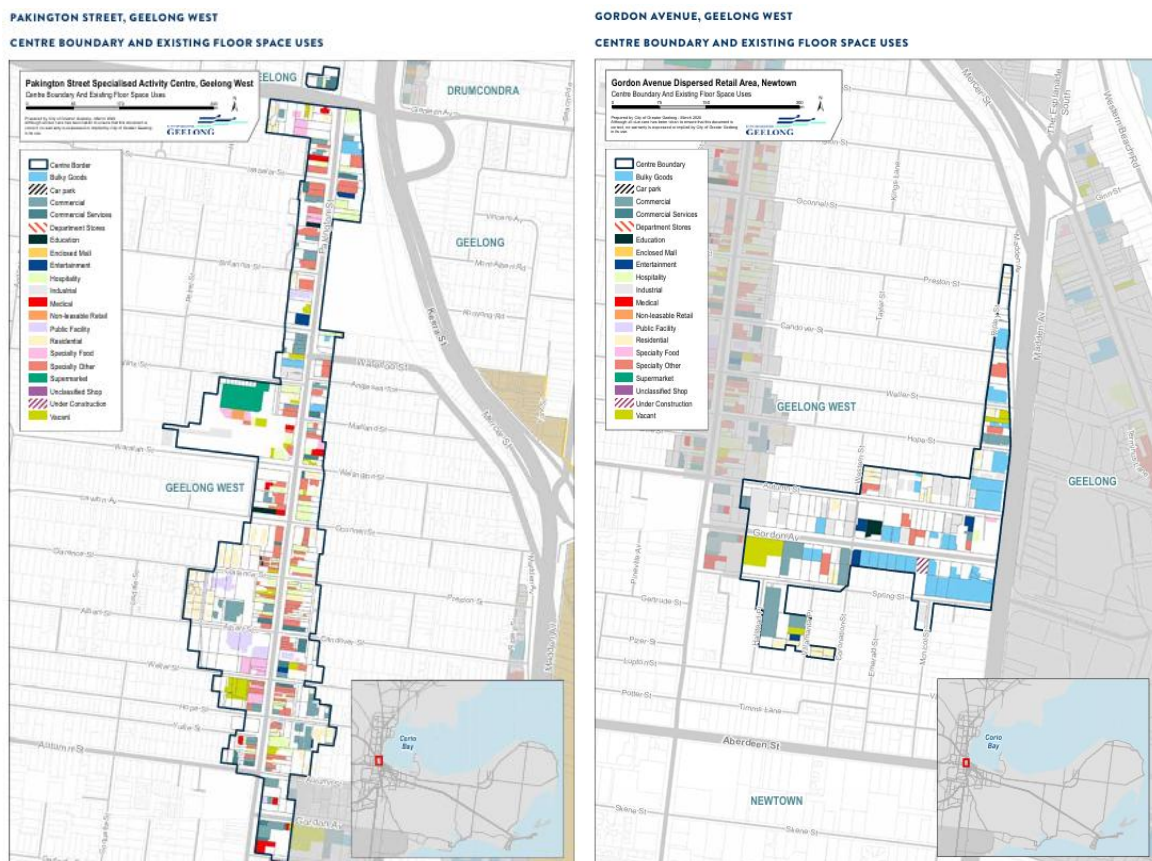


Figure 3 Boundary of Pakington Street Specialised Activity Centre (left) and Gordon Avenue Restricted Retail Centre (right) as per CoGG Retail Strategy

Using the source GIS Shapefile, the floorspace from the audit undertaken for the CoGG Retail Strategy in March 2018 is summed by current zone and land-use within the UDF boundaries as below.

All non-residential land-uses are summed to calculate the existing commercial floorspace and all residential land-uses are summed to calculate the existing residential floorspace.

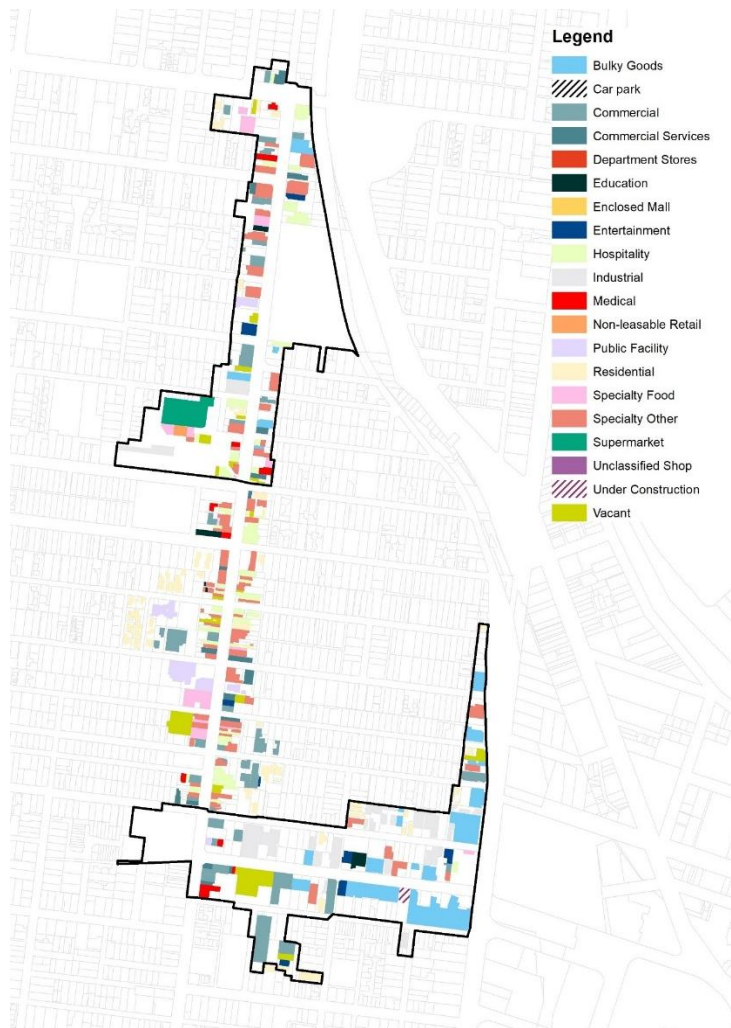


Figure 4 Existing land-use as per floorspace audit undertaken for CoGG Retail Strategy and UDF boundaries

2.9 Change in Floorspace

The difference between the proposed gross floorspace potential (calculated in Section 2.7) and the existing floorspace (calculated in Section 2.8) is calculated to identify the Change in Floorspace. Considering all lots currently zoned as GRZ and C2Z are proposed to be rezoned to C1Z, results are broken down by zone to demonstrate how much is lost or gained by zone. This is only done for Pakington North. Since the proposed floorspace calculation for Gordon Avenue is directly taken from the Hill PDA report, detailed breakdown by zone cannot be calculated for this precinct.

Overall results are also reported by precinct.

3 Assumptions

This analysis applies the following assumptions to translate the modelled built form into floorspace capacity and population estimates for the Pakington North Precinct.

3.1 General Assumptions

- Building envelopes are modelled across the entire precinct and calculates the floorspace capacity if all sites are redeveloped. It is therefore a maximum scenario and does not consider the floorspace capacity of existing buildings.
- For existing heritage buildings within the site, additional upper levels have not been modelled, irrespective of the proposed height for the site.

3.2 Rationalisation Factor (Site Coverage Compliance)

To align modelled floorspace with the UDF site coverage control, since the 3D envelope's footprint represents a maximum built form outcome and exceeds the permitted site coverage, the following formula is applied:

$$\text{Rationalised Floorspace} = \text{Modelled Floorspace} \times \frac{(\text{Permitted site coverage})}{(\text{Modelled footprint coverage})}$$

3.3 Model Output Treated as Gross Floor Area (GFA)

All floor areas extracted from the 3D horizontal sections are treated as GFA (i.e., include common areas and circulation). This ensures compatibility with the employment density and dwelling conversion assumptions as used in the [Population Projections Report for Gordon Avenue prepared by Hill PDA in June 2023](#).

3.4 Land-Use Split: Residential vs Commercial (Applied After Rationalisation)

The split between residential and commercial floorspace is calculated based on the [Population Projections report for Gordon Avenue by Hill PDA \(June 2023\)](#), Chapter 3.2 “Built Form Capacity” as follows:

- Ground floor: 85% employment uses and 15% residential (to support active frontage outcomes).
- Upper floors: 30% employment and 70% residential (average mix across upper levels).

3.5 Residential Yield & Population Conversion Assumptions

Residential yield & population conversion assumptions are adopted directly from the [Population Projections report for Gordon Avenue by Hill PDA \(June 2023\)](#):

- Average apartment size (net): 80 m² net.
- Gross-to-net conversion for apartments: 95 m² GFA per dwelling (i.e., 80 m² net + common areas). Floorspace to dwellings is therefore calculated using 95 m² GFA per dwelling.

- Average household size: 1.8 persons per dwelling (reflecting typical apartment occupancy).
- Average worker density: 35 m² of gross floorspace per job (gross average of various retail, office and community service sectors)

4 Calculation Methodology Summary

	A	Lot Area (as per cadastral)
	B	Proposed Site Coverage (as per Pakington North UDF and DDO 57)
	C	Modelled Building Envelope Ground Floor Footprint (as per 3D Model)
$C / A =$	D	Modelled Envelope Site Coverage
$B / D =$	E	Rationalisation Factor
	F	Modelled Total Building Envelope Floorspace (as per 3D Model)
$F \times E =$	G	Gross Floorspace Potential (Rationalised Total Floorspace Area)
$C \times E =$	H	Gross Ground Level Floorspace Potential
$G - H =$	J	Gross Upper Level Floorspace Potential
$85\% \times H + 30\% \times J =$	K	Commercial Floorspace Potential
$15\% \times H + 70\% \times J =$	L	Residential Floorspace Potential
$K / 35 =$	M	Job Potential (Worker Population)
$L / 95 =$	N	Apartment Potential (Units)
$N \times 1.8 =$	P	Resident Population Potential
$M + P =$	Q	Total Population Potential
	R	Existing Commercial Floorspace (as per CoGG Retail Strategy)
	S	Existing Residential Floorspace (as per CoGG Retail Strategy)
$R + S =$	T	Existing Total Floorspace (as per CoGG Retail Strategy)
$K - R =$	U	Change in Commercial Floorspace
$L - S =$	V	Change in Residential Floorspace
$G - T =$	W	Change in Gross Floorspace

5 Proposed Floorspace Results

The floorspace capacity for the Pakington North Precinct has been calculated by based on the methodology and assumptions above. The aggregated results are summarised below.

5.1 Lot Area Identification

Lot Areas						
Proposed Site Coverage (B):	80%			70%	60%	
Current Zone:	GRZ	C1Z	C2Z	C2Z	MUZ	Total
Lot Area (A):	619	3,645	15,543	24,784	22,767	67,358
Proposed Zone:	C1Z				MUZ	Total
Lot Area by proposed zone:				44,591	22,767	67,358

Total Lot Area: 67,358 m²

5.2 Building Envelope floorspace extraction from 3D Model by level

Building Envelope Calculation							
Proposed Site Coverage (B):	80%			70%	60%		
Proposed Zone:	C1Z				MUZ		
Current Zone:	GRZ	C1Z	C2Z	C2Z	MUZ	Total	
Lot Area (A):	619	3,645	15,543	24,784	22,767	67,358	
Modelled Envelope Floorspace	Ground Floor Footprint (C)	578	3,170	14,420	20,993	13,854	53,015
	First Floor	578	3,170	14,420	20,993	13,854	53,015
	Second Floor	578	2,796	13,726	17,796	11,413	46,309
	Third Floor	451	2,684	13,075	14,607	10,931	41,748
	Fourth Floor	451	2,252	11,855	6,168	7,026	27,752
	Fifth Floor	451	2,252	11,813	7,449	5,938	27,903
	Sixth Floor			10,642		2,728	13,370
	Seventh Floor			10,642		2,728	13,370
	Eighth Floor			2,609			2,609
	Nineth Floor			2,609			2,609
Total Building Envelope Floorspace (F):	3,087	16,324	105,811	88,006	68,472	281,700	
Total by proposed zone:				213,228	68,472	281,700	

Total Modelled Building Envelope Floorspace: 281,700 m²

5.3 Rationalisation by Site Coverage

Site Coverage Rationalisation						
Proposed Site Coverage(B):	80%			70%	60%	
Proposed Zone:	C1Z				MUZ	
Current Zone:	GRZ	C1Z	C2Z	C2Z	MUZ	Total
Lot Area (A):	619	3,645	15,543	24,784	22,767	67,358
Modelled Envelope Footprint (C):	578	3,170	14,420	20,993	13,854	53,015
Modelled Envelope Site Coverage(D):	93%	87%	93%	85%	61%	
Rationalisation Factor (E):	0.86	0.92	0.86	0.83	0.99	
Building Envelope Floorspace (F):	3,087	16,324	105,811	88,006	68,472	281,700
Gross Floorspace Potential (G):	2,645	15,016	91,241	72,729	67,514	249,145
Rationalised floorspace area by current zone:	2,645	15,016	163,970		67,514	249,145
Rationalised floorspace area by proposed zone:				181,631	67,514	249,145

Gross Floorspace Potential: 249,145 m²

5.4 Residential Yield and Population Calculation

Apartment and Population Potential						
Proposed Site Coverage(B):	80%			70%	60%	
Proposed Zone:	C1Z				MUZ	
Current Zone:	GRZ	C1Z	C2Z	C2Z	MUZ	Total
Modelled Envelope Footprint (C):	578	3,170	14,420	20,993	13,854	53,015
Rationalisation Factor (E):	0.86	0.92	0.86	0.83	0.99	
Building Envelope Floorspace (F):	3,087	16,324	105,811	88,006	68,472	281,700
Gross Floorspace Potential (G):	2,645	15,016	91,241	72,729	67,514	249,145
Gross Ground Level Floorspace Potential (H):	495	2,916	12,434	17,349	13,660	46,855
Gross Upper Level Floorspace Potential (J):	2,150	12,100	78,807	55,380	53,854	202,290
Commercial Floorspace Potential (K):	1,066	6,109	34,211	31,361	27,767	100,513
Commercial Floorspace Potential by proposed zone:				72,746	27,767	100,513
Residential Floorspace Potential (L):	1,579	8,907	57,030	41,368	39,747	148,631
Residential floorspace potential by proposed zone:				108,885	39,747	148,631
Job Potential (Worker Population) (M):	30	175	977	896	793	2,872
Job Potential (Worker Population) by proposed zone:				2,078	793	2,872
Apartment Potential (N):	17	94	600	435	418	1,565
Apartment Potential by proposed zone:				1,146	418	1,565
Resident Population Potential (P):	30	169	1,081	784	753	2,816
Resident Population Potential by proposed zone:				2,063	753	2,816
Total Population Potential (Q):	60	343	2,058	1,680	1,546	5,688
Total Population Potential by proposed zone:				4,142	1,546	5,688

Gross Floorspace Potential:	249,145 m ²
Commercial Floorspace Potential:	100,513 m ²
Residential Floorspace Potential:	148,631 m ²
Job Potential:	2,872 workers
Apartment Potential:	1,565 units
Residential Population Potential:	2,816 residents
Total Population Potential:	5,688

5.5 Total for Pakington North and Gordon Avenue Precinct

	Pakington North	Gordon Avenue	Total
Gross Floorspace Potential (m²):	249,145	358,585	607,730
Gross Ground Level Floorspace Potential (m ²):	46,855	62,848	109,703
Gross Upper Level Floorspace Potential (m ²):	202,290	295,737	498,027
Commercial Floorspace Potential (m ²):	100,513	142,142	242,655
Residential Floorspace Potential (m ²):	148,631	216,443	365,074
Job Potential (Worker Population):	2,872	4,061	6,933
Apartment Potential (Units):	1,565	2,278	3,843
Resident Population Potential:	2,816	4,101	6,917
Total Population Potential:	5,688	8,162	13,850

Gross Floorspace Potential:	607,730 m ²
Commercial Floorspace Potential:	242,655 m ²
Residential Floorspace Potential:	365,074 m ²
Job Potential:	6,933 workers
Apartment Potential:	3,843 units
Residential Population Potential:	6,917 residents
Total Population Potential:	13,850

6 Existing Floorspace Results

6.1 Pakington North Precinct

Pakington North Existing Floorspace by land-use (as per floorspace audit undertaken in March 2018 for CoGG Retail Strategy:

Sum of Existing Floorspace by Landuse - Pakington North Precinct					
Proposed Zone:	C1Z			MUZ	
Current Zone:	GRZ	C1Z	C2Z	MUZ	Total
Bulky Goods			1,916		1,916
Commercial		558	4,701		5,259
Commercial Services		439	1,309		1,748
Education			222		222
Entertainment			818		818
Hospitality		1,011	2,956	711	4,678
Industrial			900	1,110	2,011
Medical			1,419	129	1,548
Non-leasable Retail				394	394
Public Facility			1,170		1,170
Specialty Food			1,614	558	2,172
Specialty Other		445	5,661	374	6,480
Supermarket				3,692	3,692
Vacant		94	1,328	508	1,930
Residential		249	1,448		1,697
Grand Total		2,796	25,463	7,476	35,735

Existing commercial and residential floorspace:

Sum of Existing Floorspace - Pakington North Precinct					
Proposed Zone:	C1Z			MUZ	
Current Zone:	GRZ	C1Z	C2Z	MUZ	Total
Existing Commercial Floorspace (R):	-	2,547	24,015	7,476	34,037
Existing Residential Floorspace (S):		249	1,448		1,697
Grand Total (T):		2,796	25,463	7,476	35,735

Existing Commercial Floorspace (Pakington North): 34,037 m²

Existing Residential Floorspace (Pakington North): 1,697 m²

Total Existing Floorspace (Pakington North): 35,735 m²

6.2 Gordon Avenue Precinct

Gordon Avenue Existing Floorspace by land-use (as per floorspace audit undertaken in March 2018 for CoGG Retail Strategy:

Sum of Existing Floorspace - Gordon Avenue Precinct					
Proposed Zone:	C1Z			MUZ	
Current Zone:	GRZ	C1Z	C2Z	MUZ	Total
Bulky Goods			14,224		14,224
Commercial		1,741	6,565		8,307
Commercial Services		546			546
Education			1,213		1,213
Entertainment			1,170		1,170
Hospitality		299	176		475
Industrial			9,270		9,270
Medical		1,465			1,465
Non-leasable Retail		56			56
Public Facility		134			134
Specialty Food			119		119
Specialty Other		631	2,565		3,196
Under Construction			450		450
Vacant		260	3,446		3,706
Residential			2,809		2,809
Grand Total		5,133	42,008		47,141

Existing commercial and residential floorspace:

Sum of Existing Floorspace - Gordon Avenue Precinct					
Proposed Zone:	C1Z			MUZ	
Current Zone:	GRZ	C1Z	C2Z	MUZ	Total
Existing Commercial Floorspace:	-	5,133	39,198	-	44,331
Existing Residential Floorspace:			2,809		2,809
Grand Total:		5,133	42,008		47,141

Existing Commercial Floorspace (Pakington North): 44,331 m²

Existing Residential Floorspace (Pakington North): 2,809 m²

Total Existing Floorspace (Pakington North): 47,141 m²

6.3 Total for Pakington North and Gordon Avenue Precinct

	Pakington North	Gordon Avenue	Total
Commercial Floorspace (m ²):	34,037	44,331	78,369
Residential Floorspace (m ²):	1,697	2,809	4,507
Gross Floorspace (m²):	35,735	47,141	82,875

Total Existing Commercial Floorspace: 78,369 m²

Total Existing Residential Floorspace: 4,507 m²

Total Existing Gross Floorspace: 82,875 m²

7 Additional Floorspace Results

7.1 Change in floorspace by zone for Pakington North

Pakington North			
	Existing	Proposed	Difference
Commercial Floorspace (m²):	(R) 34,037	(K) 100,513	(T) 66,476
GRZ	-	-	-
C1Z	2,547	72,746	70,199
C2Z	24,015	-	(24,015)
MUZ	7,476	27,767	20,291
Residential Floorspace (m²):	(S) 1,697	(L) 148,631	(U) 146,935
GRZ	-	-	-
C1Z	249	108,885	108,636
C2Z	1,448	-	(1,448)
MUZ	-	39,747	39,747
Gross Floorspace (m²):	(T) 35,735	(G) 249,145	(V) 213,411

7.2 Additional Floorspace by Precinct

Pakington North	Existing	Proposed	Additional
Commercial Floorspace (m ²):	34,037	100,513	66,476
Residential Floorspace (m ²):	1,697	148,631	146,934
Gross Floorspace (m²):	35,735	249,145	213,410

Gordon Avenue	Existing	Proposed	Additional
Commercial Floorspace (m ²):	44,331	142,142	97,811
Residential Floorspace (m ²):	2,809	216,443	213,634
Gross Floorspace (m²):	47,141	358,585	311,444

Total	Existing	Proposed	Additional
Commercial Floorspace (m ²):	78,369	242,655	164,287
Residential Floorspace (m ²):	4,507	365,074	360,568
Gross Floorspace (m²):	82,875	607,730	524,855

8 Summary

This memo has answered the three key strategic questions as follows:

What is the floorspace capacity, the anticipated residential yield and anticipated residential and worker population for the Pakington North Precinct under the proposed Pakington North UDF?

Gross Floorspace Potential:	249,145 m²
Commercial Floorspace Potential:	100,513 m ²
Residential Floorspace Potential:	148,631 m ²
Job Potential:	2,872 workers
Apartment Potential:	1,565 units
Residential Population Potential:	2,816 residents
Total Population Potential:	5,688

How does this compare to that of the Gordon Avenue Precinct?

	Pakington North	Gordon Avenue	Total
Gross Floorspace Potential (m2):	249,145	358,585	607,730
Gross Ground Level Floorspace Potential (m2):	46,855	62,848	109,703
Gross Upper Level Floorspace Potential (m2):	202,290	295,737	498,027
Commercial Floorspace Potential (m2):	100,513	142,142	242,655
Residential Floorspace Potential (m2):	148,631	216,443	365,074
Job Potential (Worker Population):	2,872	4,061	6,933
Apartment Potential (Units):	1,565	2,278	3,843
Resident Population Potential:	2,816	4,101	6,917
Total Population Potential:	5,688	8,162	13,850

How does this compare to the existing floorspace?

	Existing	Proposed	Additional
Pakington North Commercial Floorspace (m2):	34,037	100,513	66,476
Pakington North Floorspace (m2):	1,697	148,631	146,934
Pakington North Gross Floorspace (m2):	35,735	249,145	213,410
	Existing	Proposed	Additional
Gordon Avenue Commercial Floorspace (m2):	44,331	142,142	97,811
Gordon Avenue Residential Floorspace (m2):	2,809	216,443	213,634
Gordon Avenue Gross Floorspace (m2):	47,141	358,585	311,444
	Existing	Proposed	Additional
Total Commercial Floorspace (m2):	78,369	242,655	164,287
Total Residential Floorspace (m2):	4,507	365,074	360,568
Total Gross Floorspace (m2):	82,875	607,730	524,855

Appendix H

Letter from Minister for Planning to City of Greater Geelong dated 27 January 2026



The Hon Sonya Kilkeny MP

Attorney-General
Minister for Planning

GPO Box 4356
Melbourne, Victoria 3001 Australia

Ref: BMIN-1-25-4351

Cr Dr Stretch Kontelj OAM
Mayor
Greater Geelong City Council
137–149 Mercer Street
GEELONG VIC 3220
Stretch.kontelj@geelongcity.vic.gov.au

Dear Mayor

HOUSING TARGET IMPLEMENTATION AND PLANNING SCHEME REVIEWS

I am writing to provide an update on how the Victorian Government is supporting councils to measure and reach your housing targets and deliver on your obligations under the *Planning and Environment Act 1987*.

Housing targets for a liveable Victoria

Housing targets are crucial for housing affordability and choice. They ensure we can build enough homes in the right places to meet the needs of Victorians. We recently implemented *Plan for Victoria's* housing targets into the Planning Policy Framework (VC283). Updates to Clause 11 (Settlement) and Clause 16 (Housing) give effect to Action 1 of *Plan for Victoria* setting a housing target for each local government area as part of its contribution to deliver 2.24 million homes over the next 30 years.

An easier way to measure your housing capacity

The Department of Transport and Planning (DTP) has developed a new tool to make it easier for councils to assess whether you are meeting your housing targets and help you achieve them. The Housing Capacity Assessment Platform (HCAP) will allow councils to measure their existing capacity, compare housing capacity with accessibility to jobs, services, and facilities, and measure the uplift in capacity from any proposed planning scheme changes. HCAP will also provide a single method to assess housing capacity, so all councils have access to the same tools and modelling.

Reviewing your planning scheme

You will be aware that your council is obliged under the *Planning and Environment Act 1987* to review its planning scheme. To assist councils with their next review, DTP will be assessing

the capacity of regional planning schemes using HCAP. We will be able to advise you of the results in early 2026 along with digital access to the platform.

Outcomes of your planning scheme review are due to be reported to me by the end of October 2026. Associated statutory implementation of the outcomes of planning scheme reviews will commence after October 2026.

Updated and new planning guidance

DTP has updated planning practice notes for housing to provide guidance to planning authorities to ensure housing targets are met. The updated *Planning Practice Note 90: Planning for Housing* and *Planning Practice Note 91: Using the Residential Zones* now account for recent reforms, new policy and release of HCAP.

Action 3 in *Plan for Victoria* is to 'carefully manage the outward sprawl of regional cities and towns'. The action includes introducing a new planning practice note for establishing and amending settlement boundaries. DTP has prepared the practice note and has been engaging with councils on the implementation of existing settlement boundaries into planning scheme maps. DTP will communicate with you when the planning guidance has been published on its website.

If you would like more information about these matters, please email Stuart Menzies, Executive Director, State Planning Policy, DTP, at stuart.menzies@transport.vic.gov.au

Yours sincerely



The Hon Sonya Kilkenny MP
Minister for Planning

Date: 27/01/2026