

Amendment C4333 to the Greater Geelong Planning Scheme

Date of Inspection: **24 January 2026**

Date of Report: **10 February 2026**

Report prepared for **GELPROP Nominees Pty Ltd**

Report prepared by **Sophie Jordan**



Amendment C4333 to the Greater Geelong Planning Scheme

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Contents

1	Introduction	3
2	Site and Surrounds	5
2.1	Gelprop Site	5
2.2	Immediate Surrounds	6
2.3	Broader Context	7
3	The Amendment	9
3.1	Overview	9
3.2	Pakington North Precinct Urban Design Framework	10
3.3	Design and Development Overlay Schedule 57	14
4	Current Planning Framework	16
4.1	Municipal Planning Strategy	16
4.2	Planning Policy Framework	18
4.3	Zone	19
4.4	Overlay	20
4.5	Particular Provisions	21
4.6	Strategic Documents	21
4.7	Planning Practice Note	22
5	Strategic Assessment	23
5.1	Preamble	23
5.2	Strategic background	26
5.3	Implication of DD057 on Subject Land	37
6	Conclusion	43

Attachment 1 Professional Experience

Attachment 2 Photographs of the Subject Land
and Surrounds

1 Introduction

- 1 I have been requested by Planning & Property Partners Pty Ltd, on behalf of GELPROP Nominees Pty Ltd (**Gelprop**) to prepare and present planning evidence in relation to Amendment C433 to the Greater Geelong Planning Scheme (**the Amendment**).
- 2 The Amendment affects land along and adjacent to Pakington Street and Gordon Avenue in Geelong West. Specifically, the Amendment seeks to implement the recommendations of 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)* through changes to the Planning Policy Framework, as well as the zones and overlays that apply to land affected by the Amendment.
- 3 Gelprop is the registered proprietor of the land at 95-103 Pakington Street, Geelong West (**Subject Land**), a large parcel of land within the Pakington North Precinct.
- 4 My assessment is primarily concerned with matters relevant to the Gelprop property and does not provide an opinion regarding matters in other precincts or matters not impacting this property.
- 5 In preparing this statement of evidence, I have undertaken the following:
 - Inspected the Gelprop property and surrounds;
 - Reviewed the relevant planning policies and controls contained within the Greater Geelong Planning Scheme applicable to the Gelprop property and the surrounding area;
 - Reviewed the exhibited Amendment documentation, including the background report and documents;
 - Reviewed the written submission lodged by Planning & Property Partners on behalf of Gelprop during the exhibition of the Amendment;
 - Reviewed the Council Meeting Agenda (dated 28 May 2024) and attachments;
 - Reviewed the Council Meeting Minutes (dated 25 November 2025) and attachments;
 - Reviewed relevant state, regional and local strategic policies; and
 - Reviewed relevant Planning Practice Notes and Ministerial Directions that relate to the strategic assessment of Planning Scheme Amendments.
- 6 As detailed in the Letter of Instructions prepared by Planning & Property Partners (dated 23 January 2026), I was requested to



1 Introduction

undertake the following:

- Review the proposed Amendment documents and background materials;
- Consider the appropriateness of the proposed Amendment from a planning perspective; and
- Prepare an expert witness statement considering planning matters.

7 On 5 February 2026 I was provided with additional material that the City of Greater Geelong in its capacity as the planning authority circulated to the Panel. This material included:

- Comprehensive Built Form Testing Pakington North (City of Greater Geelong, February 2026); and
- Pakington Street and Gordon Avenue Built Form Framework (Hodyl & Co, August 2021)

8 I have read these documents and considered the information to the degree I consider relevant.

9 **Attachment 1** provides a summary of my professional qualifications and experience.

10 In the preparation of this statement, I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have, to my knowledge, been withheld from the Panel.

2 Site and Surrounds

2.1 Gelprop Site

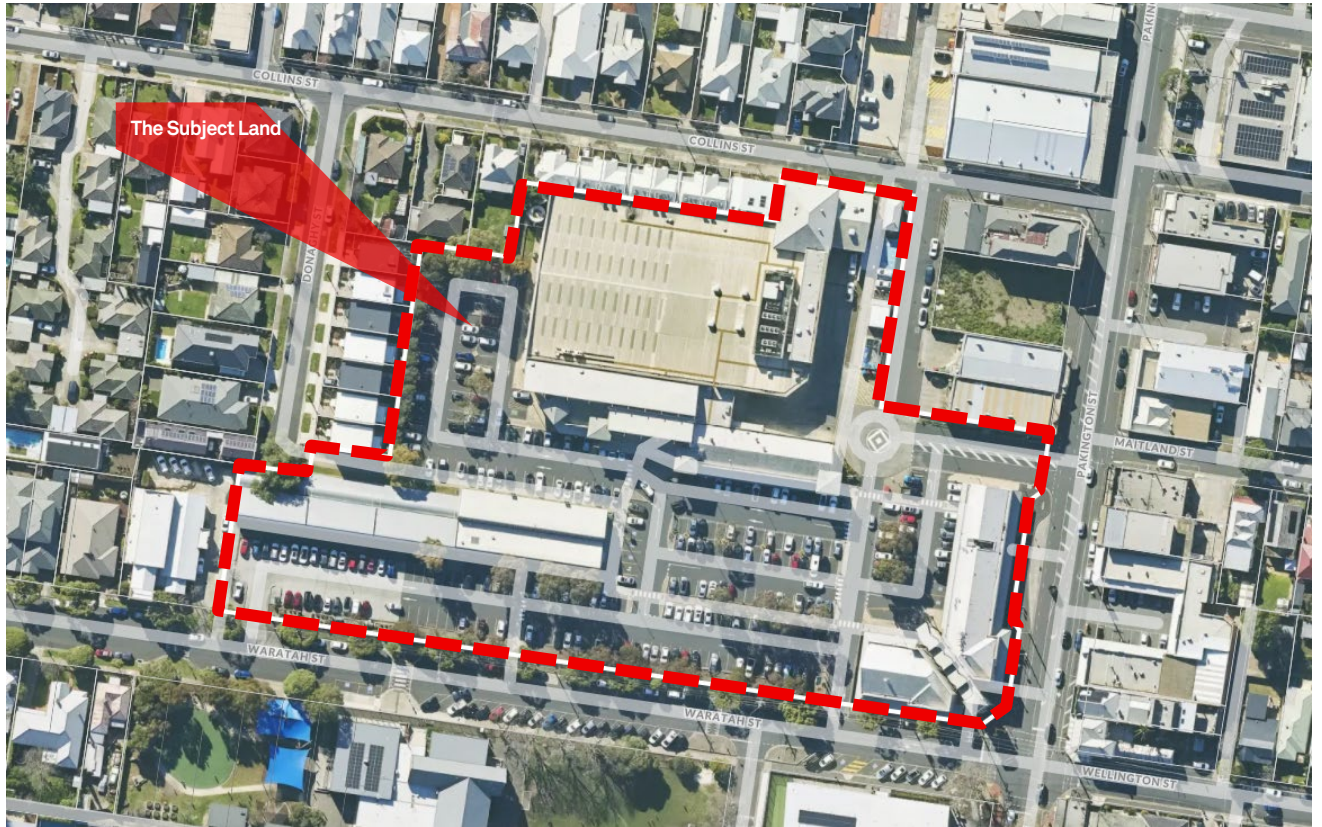
- 11 The Gelprop site (**the Subject Land**) is located at 95-103 Pakington Street, Geelong West. It is formally known as Lot 1 on Plan of Subdivision 611365B. It is encumbered by sewerage and electricity easements and a section 173 Agreement is registered on the Certificate of Title (AF498021V).
- 12 The Subject Land is irregularly shaped with an overall area of approximately 2.089 hectares. It has street frontages to Waratah Street in the south, Pakington Street and Bread Street in the east and Collins Street in the north.
- 13 The Subject Land is currently home to the Pakington Street Shopping Centre, also known as Pakington Strand. It is primarily occupied by a Woolworth supermarket and open air public car parking, as well as smaller shops located internally to the site and along Pakington Street and Collins Street, including retail, office, food and drink premises and a pharmacy.
- 14 Towards the south-west of the Subject Land is the Former Donaghy's Rope Walk Building (part) and Rope-Making Machinery, which is included on the Victorian Heritage Register.
- 15 The Subject Land is shown in the aerial image provided on the following page.
- 16 Photographs of the Subject Land and surrounds are provided at **Attachment 2**.



2 Site and Surrounds

Figure 2.1
Aerial image of the Subject Land

Source: Land Checker (image dated 11 August 2025)



2.2 Immediate Surrounds

17 Owing to the Subject Land's irregular shape and large overall area it has several direct interfaces, as described below.

- To the east is Pakington Street, containing one lane of traffic in each direction and on-street car parking on the eastern side of the street. Properties on the eastern side of the street are one-two storey in scale and commercial in nature. There are some properties that contain on-site public car parking.
- To the north/east are two single storey commercial properties, a vacant lot and a two storey hotel, all fronting Pakington Street.
- To the north is Collins Street, a local road with on-street parking on the northern side of the street. Most of the southern side of the street is 'no stopping', except between Bread Street and Pakington Street.
- The northern side of Collins Street is residential in nature with mostly single storey dwellings. A few properties have been developed with multi-dwelling developments.
- Part of the Subject Land has a direct interface with Collins Street, otherwise the remainder of the Subject Land is separated from the

2 Site and Surrounds

street by residential properties, occupied by a series of two-storey townhouses.

- Along the western boundary, the Subject Land interfaces with Nos. 5-17 Donaghy Street. Each property contains a double storey dwelling with ground floor secluded private open space (SPOS) along the interface with the Subject Land.
- To the west of the heritage building is a one-two storey building currently used as an office for a not-for-profit organisation with on-site car parking.
- To the south is Waratah Street providing one lane of traffic in each direction as well as on street parking. On the southern side of Waratah Street, opposite the Subject Land, are Ashby Primary School and the Geelong West Presbyterian Church.

2.3 Broader Context

Land Affected by the Amendment

- 18 Land affected by the Amendment is within one of three adjacent precincts within Geelong West – Pakington North Precinct (containing the Subject Land), Pakington Heritage Core Precinct, and the Gordon Avenue Precinct.
- 19 Pakington Street is a commercial retail strip that transitions to a mostly residential street further south, outside the precinct areas. It is identified as Geelong’s only Specialised Retail Centre.
- 20 As the name would suggest, the Pakington Heritage Core Precinct is characterised by its historic buildings, with Heritage Overlay 1634 (Pakington Street Commercial Heritage Area) applying between Waratah/Wellington Streets in the north and Autumn Street in the south.
- 21 The Gordon Avenue Precinct to the south-east connects Pakington Street to LaTrobe Terrace, and further east to Geelong CBD.
- 22 The character of Gordon Avenue is more industrially skewed towards large format retail and warehouses, including trade and showrooms and car sales.
- 23 The three precincts are depicted in the below figures.

2 Site and Surrounds

Figure 2.2
Precincts (from Explanatory Report)



Figure 2.3
Precincts (aerial)



Land outside the Amendment

- 24 Geelong CBD is located to the east of the Gordon Avenue precinct, beginning on the opposite side of Latrobe Terrace.
- 25 The areas surrounding the precincts are largely residential in nature and are identified in local policy as 'increased housing diversity areas'.
- 26 The areas around the Pakington North Precinct and south of the Gordon Avenue Precinct have experienced some degree of housing intensification in the form of townhouse and unit development, with less intensification in other surrounding areas, particularly around the Heritage Core Precinct.
- 27 These latter areas that have experienced less redevelopment are also subject to the Heritage Overlay.

3 The Amendment

3.1 Overview

28 The Amendment seeks to implement two urban design frameworks (UDF):

- 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)*

29 It applies to land identified in Figure 2.2, in the preceding section of this statement.

30 The Amendment implements the above through changes to local policy, zones and overlays, as follows:

Local Policy amendments

- Deletion of Clause 15.01-1L-02 Pakington Street North urban design
- Insertion of new Clauses 11.03-6L-06 Pakington Street Geelong West and 16.01-2L Social and affordable housing
- Amendments to Clauses 16.01-1L-01 Integrated housing and housing diversity, 16.01-1L-02 Increased housing diversity areas,

Zoning amendments

- Rezoning land within the Gordon Avenue Precinct from General Residential Zone Schedule 4 (GRZ4) and Commercial 2 Zone (C2Z) to Residential Growth Zone Schedule 1 (RGZ1), Mixed Use Zone (MUZ) or Commercial 1 Zone (C1Z).
- Also in the Gordon Avenue Precinct, rezoning a parcel of land from C2Z to Public Park and Recreation Zone (PPRZ), and rezoning part of a parcel of land from C2Z to GRZ4 to be consistent with the zoning of the remainder of the property.
- Rezoning land along Pakington Street from C2Z to C1Z.
- Rezoning part of a parcel of land at the edge of the Pakington North Precinct from MUZ to Neighbourhood Residential Zone Schedule 3 (NRZ3) to be consistent with the zoning of the remainder of the property.

Overlay amendments

- Insertion of new Schedule 56 to Clause 43.02 Design and Development Overlay (DDO56), to apply to the Gordon Avenue Precinct.



3 The Amendment

- Insertion of new Schedule 57 to Clause 43.02 Design and Development Overlay (DDO57), to apply to the Pakington North Precinct.
- Deletion of Schedule 17 to Clause 43.02 Design and Development Overlay (DDO17) from land around Latrobe Terrace.
- Application of the Environmental Audit Overlay (EAO) to properties within the Gordon Avenue and Pakington North Precincts.

31 It also amends the schedules to Clauses 72.08 Background Documents and 74.02 Further Strategic Work.

3.2 Pakington North Precinct Urban Design Framework

32 The Subject Land is included within the Pakington North Precinct Urban Design Framework (**Pakington North UDF**).

33 The Pakington North UDF provides direction for the growth and development of this precinct.

34 It outlines the vision for the precinct as:

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.

35 It provides objectives and guidelines related to land use and activity, development and interface management, access and movement and public realm and open space.

36 This includes maps and diagrams that depict built form outcomes.

37 The Urban Design Framework is depicted in the following figures.

3 The Amendment

Figure 3.1
Urban Design Framework

Source: Pakington North Urban Design Framework (City of Greater Geelong, May 2024)

3.2 URBAN DESIGN FRAMEWORK

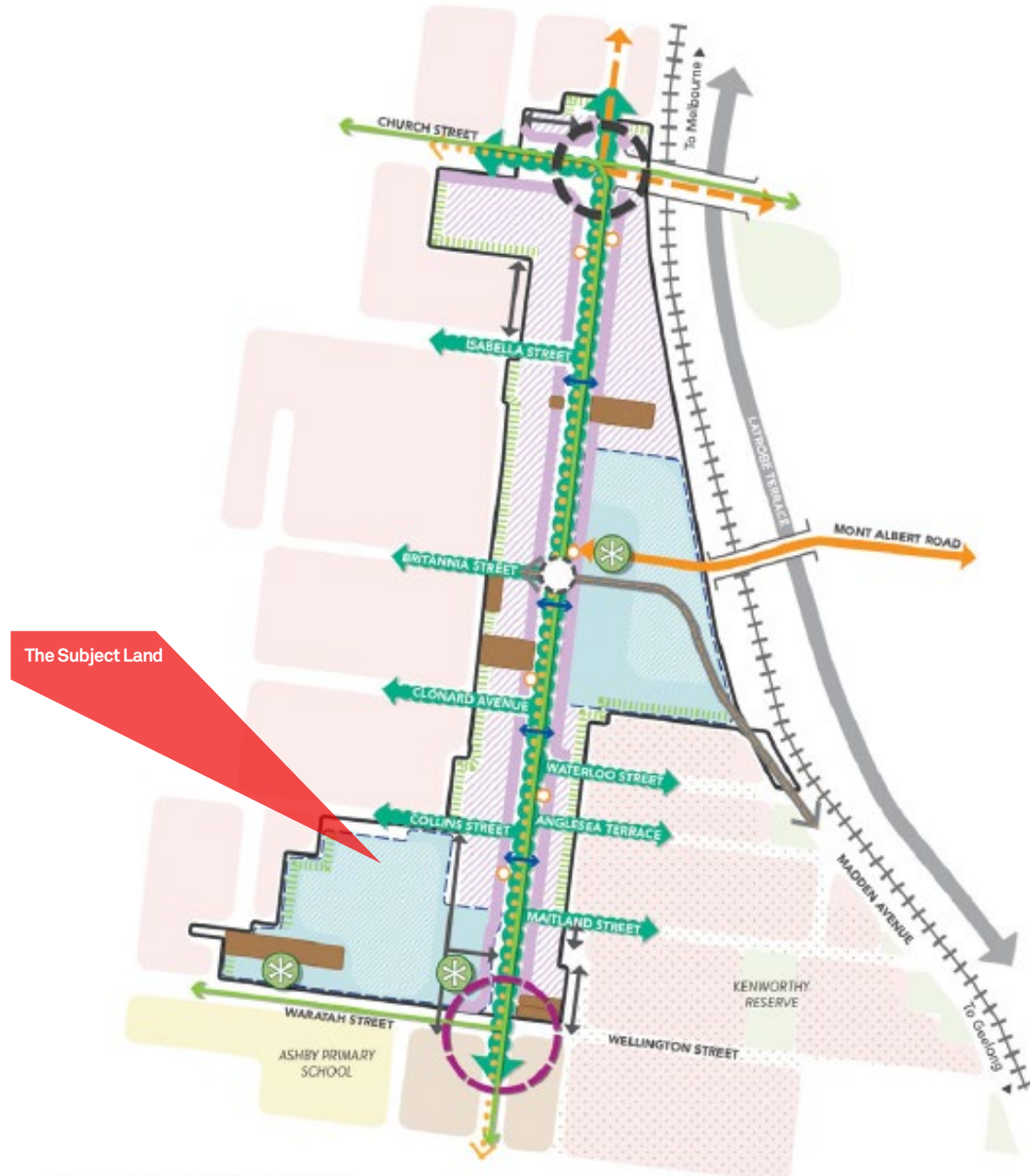
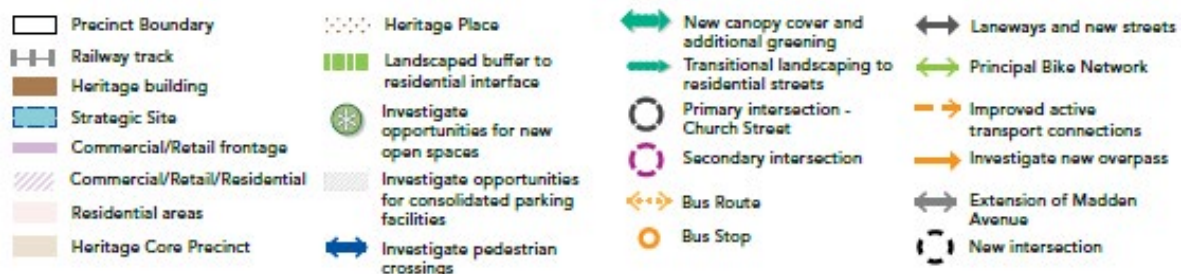


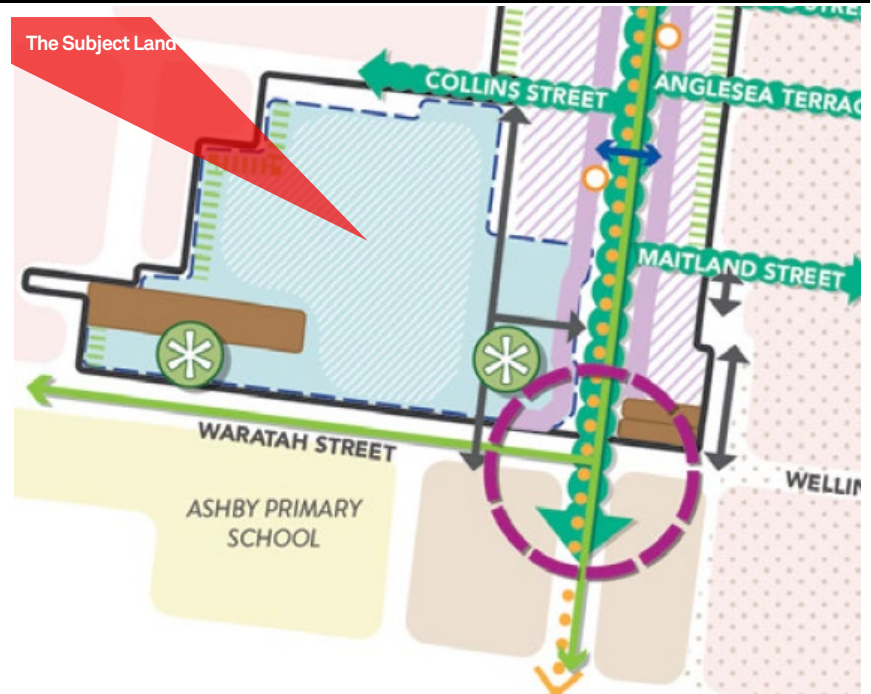
Figure 09. Urban Design Framework



3 The Amendment

Figure 3.2
Urban Design Framework Extract

Source: Pakington North Urban Design Framework (City of Greater Geelong, May 2024)



38 In regard to the Subject Land, the Urban Design Framework depicts the following applicable features of note:

- The Subject Land as a *strategic site*.
- Central portion of the Subject Land nominated as *Investigate opportunities for consolidated parking facilities*.
- Identification of the heritage building located on the south eastern portion of the Subject Site.
- The south-eastern corner and the south of the heritage building nominated as *Investigate opportunities for new open spaces*.
- A commercial/retail frontage along Pakington Street and the corner of Pakington and Waratah Street.
- A landscaped buffer to the residential interface to the west.
- A north-south *laneways and new street*, and one connecting east to Pakington Street.

39 Pakington Strand (the Subject Land) and the Rail Sidings Yard are identified as **strategic sites** with further details about these two properties provided at Chapter 4 of the document, which notes that:

These sites offer an opportunity for more intensive development alongside new open spaces to be delivered within the precinct.

3 The Amendment

- 40 The aspirations of the Pakington North UDF for Pakington Strand (Subject Land) is:

Pakington Strand will be a vibrant gateway to Pakington North Precinct, setting the tone for the area. Underpinned by precinct’s aspiration to be a destination, future development will reflect on the existing heritage values whilst delivering on a variety of building typologies and heights that are innovative, high quality and sustainable. It will provide space for activity and culture with an inclusive and welcoming environment for residents and visitors to pause, explore and connect.

- 41 A series of objectives are nominated and an Indicative Concept Plan provided, as per below.

Figure 3.3
Pakington Strand Indicative Concept Plan

Source: Pakington North Urban Design Framework (City of Greater Geelong, May 2024)



Map 12. Indicative concept plan for Pakington Strand

KEY			
Precinct Boundary	15m (4 storeys)	Key Street Type 1A	Existing Street Network
Heritage building	22m (6 storeys)	Waratah Street 2A	Indicative new streets
Investigate opportunities for new open spaces	29m (8 storeys)	Side Street 2B	Indicative new pedestrian links
	36m (10 storeys)	New Street Type 3	Investigate opportunities for consolidated parking facilities
		Open Specia Type 5	
		Residential Type 6B	

3 The Amendment

3.3 Design and Development Overlay Schedule 57

42 Design and Development Overlay Schedule 57 (DDO57) applies to land in the Pakington North Precinct, including the Subject Land.

43 The design objectives of DDO57 are:

To support opportunities for urban renewal, commercial development, and increased housing density by implementing the Pakington North Urban Design Framework (City of Greater Geelong, May 2024).

To create a vibrant mixed-use precinct with retail, offices and community spaces at lower levels and residential spaces above.

To promote high quality medium and higher-density built form which transitions to sensitive interfaces including heritage and adjoining established low scale residential areas to protect the amenity of existing and future residents.

To establish a vibrant public realm which reinforces the sense of place, supports multi modal movement, and improves local accessibility and amenity.

To protect the amenity of key public spaces including footpaths, future plazas and new public open spaces from overshadowing impacts.

44 Clause 2.0 of DDO57 sets out buildings and works requirements related to

- Building and floor heights, including minimum floor-to-floor dimensions dependent on the use and the floor
- Street interface, including mandatory ground level setbacks, preferred maximum street wall/podium heights and preferred setback above street wall/podium
- Rear interface
- Laneway interface
- Open space interface (Note, Council Meeting Minutes (25 November 2025) noted “DDO57 referenced winter solstice incorrectly”(p523))
- Building separation
- Building design
- Active frontages
- Solar access, wind and weather
- Access, parking and services

3 The Amendment

- Site coverage

45 A number of maps are included depicting building heights and street interface requirements (map 1), rear interface requirements (map 2) and site coverage requirements (map 3).

46 Requirements relevant to the Subject Land are outlined below. All requirements are preferred, except where specified as mandatory.

- Building heights between 15m – 29m.
- 60% site coverage.
- 8m street wall height with a 5m upper level setback to Pakington Street.
- 15m street wall height, with a 3m ground floor setback (mandatory) and a 5m upper level setback along Waratah Street.
- 11m street wall height, with a 2m ground floor setback (mandatory) and a 2m upper level setback along Collins Street (northern boundary of the Subject Land).
- Along the residential interface to the west, an 11m high wall setback 5m from the boundary with a minimum 5m upper level setback.
- New 'public open space' indicated to the south of the heritage building and on the corner of Pakington Street and Waratah Street.
- Development that does not overshadow more than 50% of the new public open space between 11am and 2pm on the winter solstice. I note that the figure in the Pakington North UDF references the winter solstice as the time for assessment of shadow impact, although Council Meeting Minutes (25 November 2025) indicate this should be equinox.

4 Current Planning Framework

47 The following summary is of the relevant provisions of the current Greater Geelong Planning Scheme which provide guidance for the long term vision for the development of the Pakington North Precinct.

48 I note the Amendment proposes changes to some of these clauses.

4.1 Municipal Planning Strategy

49 Clause 02.03-2 Settlement identifies an anticipated population growth of 152,000 additional people by 2036, with a demand for over 73,400 additional dwellings. This will be met through a combination of greenfield and infill development.

50 In terms of the latter it is outlined that:

Targeted infill development is supported in areas with access to infrastructure, goods and services. In order for medium and high density housing to be embraced by established communities it needs to deliver high quality design and achieve a high level of amenity for future residents while being appropriate for the site and neighbourhood.

51 Pakington Street is identified as a 'Specialised' centre with the following role and function:

Tend to capture niche trade from wider catchments in addition to having an important community role as the focus for retail, civic, and community uses.

52 The Municipal Framework Plan, Housing and Settlement Framework Plan and Retail Activity Centre Hierarchy are depicted in the following figures.

53 The Pakington North Precinct is located in an area of 'Increased housing diversity area' on the Housing and Settlement Framework Plan.



4 Current Planning Framework

Figure 4.1
Municipal framework plan



Figure 4.2
settlement framework plan

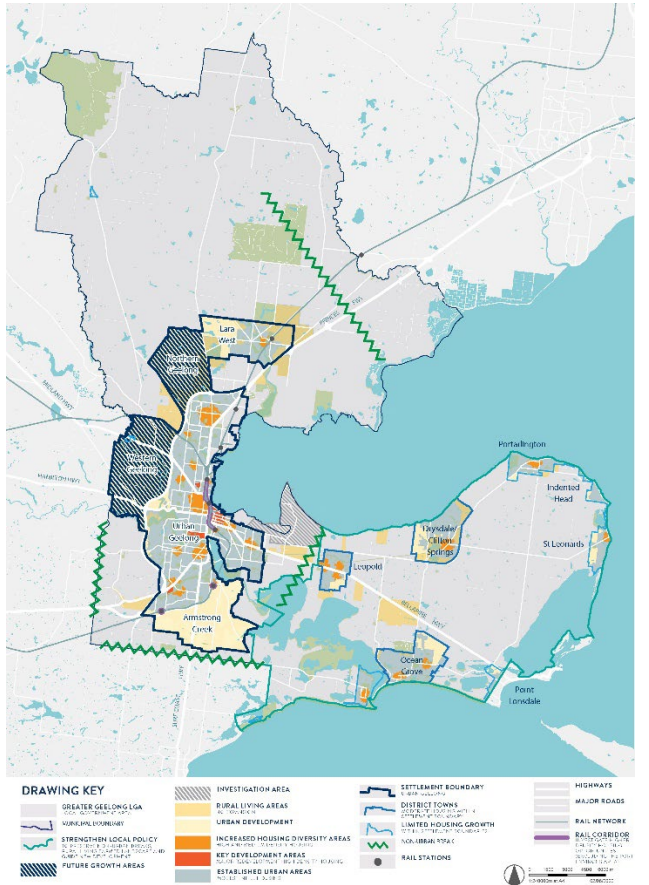
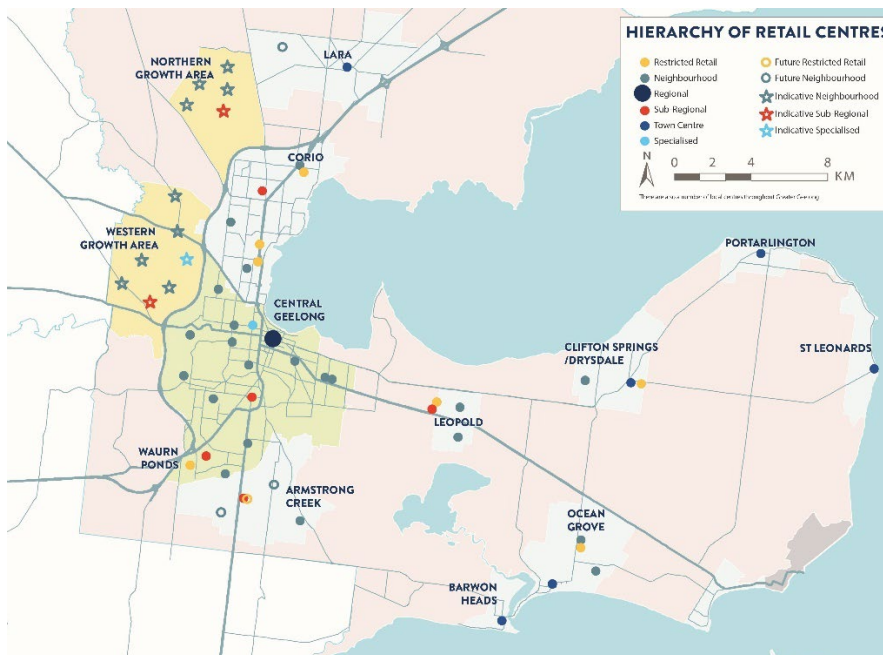


Figure 4.3
Retail activity centre hierarchy



4 Current Planning Framework

4.2 Planning Policy Framework

54 The Planning Policy Framework (PPF) seeks to develop the objectives for planning in Victoria (as set out in the Act) to foster appropriate land use and development planning policies and practices that encompass relevant environmental, social and economic factors.

- **Clause 11 Settlement:** This clause is focused on recognising the needs of Victorians and identifying how planning should appropriately respond to these needs through the provision of zoned and serviced land that provides for a range of land use activities in order to create a healthy and sustainable community. **Clauses 11.01-1S Settlement and 11.01-1R Settlement – Regional Victoria** identify Geelong as a major regional city which should be a focus for investment and growth. **Clause 11.01-1L-01 Settlement – Greater Geelong** directs the majority of future housing to urban Geelong. **Clause 11.03-1L Activity Centres in Greater Geelong** supports the role and function of centres in Geelong, encourages a mix of retail, office, cafes, higher density housing, education and community facilities to locate within centres, and supports increased intensity and vertical growth.
- **Clause 15 Built Environment:** This clause seeks to ensure that all new development appropriately responds to its landscape, valued built form and cultural context and delivers liveable and sustainable cities, towns and neighbourhoods. **Clause 15.01-1L-01 Development in Activity Centres** seeks to ensure development in centres minimise amenity impacts while positively contributing to the streetscape and surrounding area. **Clause 15.01-1L-02 Pakington Street North Urban Design** outlines strategies and guidelines applicable to built form outcomes in Pakington Street North, including in regard to streetscape, siting, form and finishes, as well as heritage, sustainability, walkability and vehicle access and car parking. **Clause 15.03** provides for the appropriate conservation of heritage places.
- **Clause 16 Housing:** This clause promotes the provision of diverse housing in appropriate locations to meet the needs of the local community and expected future population. **Clause 16.01-1S Housing Supply** nominates a housing target for Greater Geelong of 128,600, inclusive of an established area target of 77,500. **Clause 16.01-1L-02 Increased Housing Diversity Areas** identifies the majority of Pakington Street North, as well as the surrounding residential areas, as an Increased Housing Diversity Area (IHDA). **Clause 16.01-2S Housing Affordability** encourages the provision of affordable housing in areas with good access to opportunities and services.
- **Clause 17 Economic Development:** This clause seeks to foster economic growth and prosperity and provides guidance around commercial and industrial growth.

4 Current Planning Framework

- **Clause 18 Transport:** This clause provides guidance around new development providing an integrated solution to both sustainable and private transport networks.
- **Clause 19 Infrastructure:** This clause supports the development of efficient, equitable, accessible and timely social and physical infrastructure. Accessible community resources, such as education, cultural, health and community support facilities are encouraged to meet growing communities. **Clause 19.02-6L Open Space** encourages *open space enhancements of the private and public realms when residential densities are increased.*

4.3 Zone

55 The Subject Land is governed by the Mixed Use Zone (MUZ).

56 The purposes of the MUZ are:

To implement the Municipal Planning Strategy and the Planning Policy Framework.

To provide for a range of residential, commercial, industrial and other uses which complement the mixed-use function of the locality.

To provide for housing at higher densities.

To encourage development that responds to the existing or preferred neighbourhood character of the area.

To facilitate the use, development and redevelopment of land in accordance with the objectives specified in a schedule to this zone.

57 Pursuant to Clause 32.04-2, a dwelling is a Section 1 – Permit not required use.

58 The schedule to the MUZ does not specify any objectives, requirements of variations.

59 Most properties within the Pakington North Precinct are zoned Commercial 2 Zone (C2Z). The properties between Collins Street and the Subject Land are zoned Commercial 1 Zone (C1Z) and the Rail Sidings Yard is zoned Transport Zone 1 (TRZ1).

60 Accommodation (other than Community care accommodation, Corrective institution, Rooming house and Small second dwelling) is a Section 1 – Permit not required use in the C1Z provided its ground floor frontage is less than 2m, else it is a Section 2 – Permit required use.

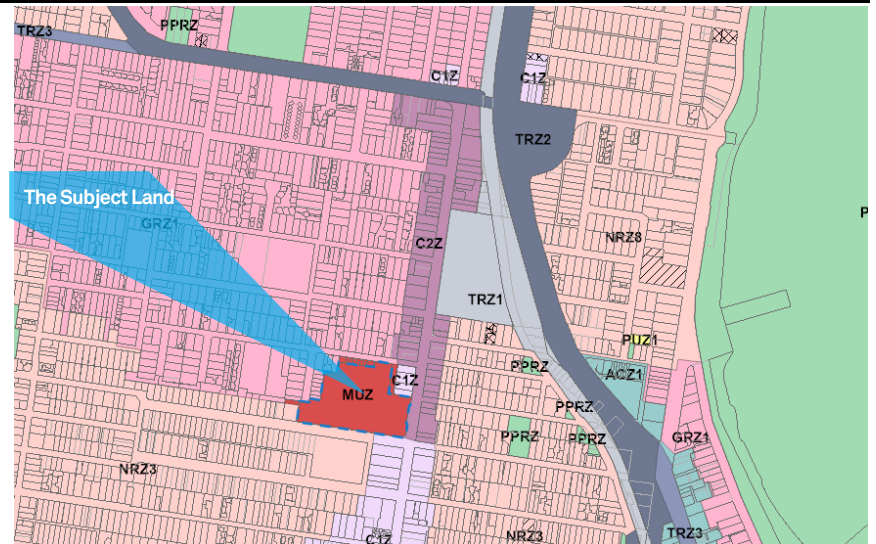
61 Accommodation (other than Caretaker's house and Residential Hotel) is a Section 3 – Prohibited use in the C2Z.

62 Accommodation is prohibited in the TRZ1.

4 Current Planning Framework

Figure 4.4
Zoning Map

Source: Vic Plan



4.4 Overlay

63 Part of the Subject Land is within the Heritage Overlay (HO).

64 The purposes of the HO are:

To implement the Municipal Planning Strategy and the Planning Policy Framework.

To conserve and enhance heritage places of natural or cultural significance.

To conserve and enhance those elements which contribute to the significance of heritage places.

To ensure that development does not adversely affect the significance of heritage places.

To conserve specified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.

65 Heritage Overlay Schedule 741 (HO741) is a site specific control for the *Former Donaghy's Rope Walk Building (part) and Rope-Making Machinery*.

66 It is included on the Victorian Heritage Register - Number H1169. It's significance is described as follows:

The Former Donaghy's Rope Walk Building (Part) and Rope Making Machinery is historically significant as a surviving remnant of one of Victoria's largest ropeworks which opened in 1874. The building, machinery and documentary evidence demonstrates the process of making ('laying') large ropes by the walk method. The Rope Walk Building (Part) contains equipment from at least three periods, possibly including the 1870s original machinery, early twentieth century

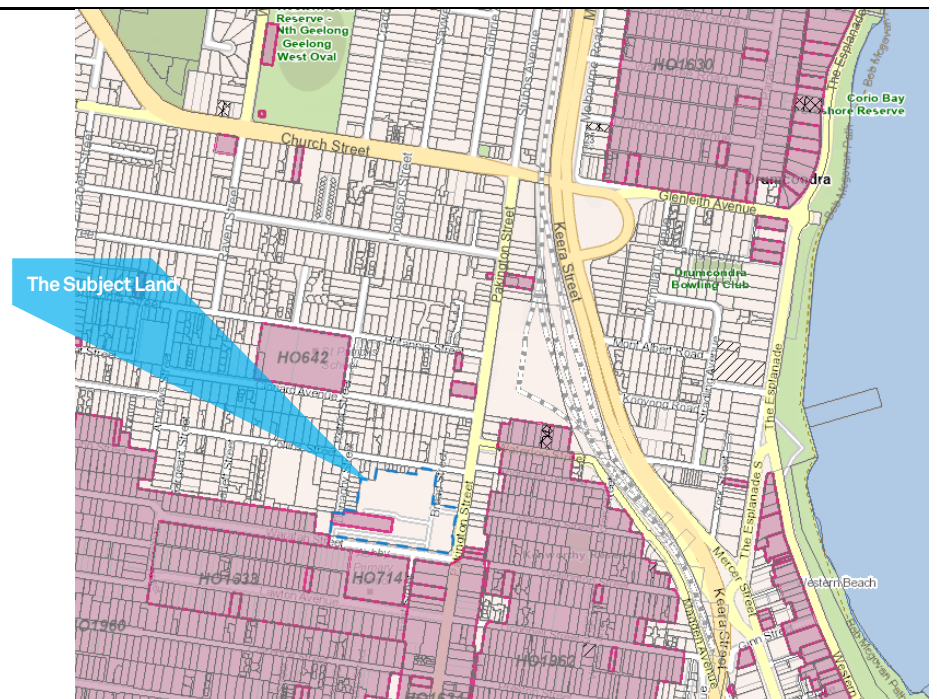
4 Current Planning Framework

improvements and 1950s imported components with local adaptations. Some machinery was designed and manufactured by Donaghy's, such as such as the gallantyne and steel 'top'.

- 67 Some other properties, or parts of properties, within the Pakington North Precinct are also covered by HOs, while precinct wide HOs and some site specific HOs apply to land to the south of the Subject Land.

Figure 4.5
Overlay Map

Source: Vic Plan



4.5 Particular Provisions

- 68 In addition to the abovementioned zoning and overlay requirements, there are a number of Particular Provisions contained at Clause 52 through to Clause 58 relating to matters of detail including car parking, bicycle parking, signage and residential development of one or more dwellings. These Particular Provisions apply to various types of permit applications, depending on the scope of works and land use activity.
- 69 Subject to the nature of future permit applications, other Particular Provisions may also be of relevance and are dependent on the particular detail of the proposal.

4.6 Strategic Documents

- 70 There are a number of strategic documents that are relevant to the Amendment:
- Victoria's Housing Statement, the Decade Ahead 2024-2034
 - Plan for Victoria (2025)
 - G21 Regional Growth Plan (2013)
 - City of Greater Geelong Housing Diversity Strategy (alphaPlan, David Lock Associates and City of Greater Geelong, 2007)

4 Current Planning Framework

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- City of Greater Geelong Retail Strategy 2020-2036 (City of Greater Geelong and SGS Economics and Planning, August 2020)
 - City of Greater Geelong Settlement Strategy (City of Greater Geelong, August 2020)

⁷¹ *Pakington Street North Urban Design Guidelines (Planisphere, 2004)* is nominated as a background document but is to be superseded by the proposed *Pakington North Precinct UDF*.

^{4.7} Planning Practice Note

⁷² In the preparation of this statement, I have also reviewed the relevant Planning Practice Notes, including:

- Planning Practice Note 17: Urban design frameworks
- Planning Practice Note 46: Strategic assessment guidelines
- Planning Practice Note 59: The role of mandatory provisions in planning schemes

5 Strategic Assessment

5.1 Preamble

- 73 Pakington Street and Gordon Avenue are established commercial areas located in Geelong West, immediately adjoining the Geelong CBD. Pakington Street is recognised as the municipality's only 'specialised' centre, while Gordon Avenue performs a complementary role, primarily accommodating trades and bulky goods retailing.
- 74 The proximity of the Pakington Street and Gordon Avenue precincts to the CBD, together with their access to existing services, employment, transport infrastructure and community facilities, places them in a strong position to transition from a predominantly commercial role to a more intensive mixed-use function, including a meaningful contribution to infill housing supply.
- 75 However, the existing planning framework does not adequately reflect or enable this opportunity.
- 76 Currently, much of the Pakington North and the Gordon Avenue precincts are zoned Commercial 2 Zone (C2Z) within which dwellings are prohibited.
- 77 Further, built form guidance is either absent (in the Heritage Core precinct and Gordon Avenue precinct) or operates in a constraining manner that limits development intensity. For example, the *Pakington Street North Urban Design Guidelines (2004)* discourage buildings that exceed the predominant building height of 1–2 storeys by more than a single additional storey.
- 78 In this context, it is both appropriate and necessary that a contemporary planning framework is established to guide the future intensification of land use and development within these precincts, and that this framework is implemented through amendments to zones, overlays and local policy.
- 79 This is particularly important in the context of the recent housing targets that form part of Plan for Victoria. In this regard I note that a housing target for Greater Geelong of 128,600 new dwellings by 2051 is identified, with approximately 77,500 dwellings to be delivered within established areas.
- 80 This statement is primarily concerned with the Subject Land and the Pakington North Precinct, while acknowledging that these areas sit within a broader strategic framework applying across the wider precincts.
- 81 Strategic work undertaken as part of this Amendment identifies the Subject Land as one of only two strategic redevelopment sites in the Pakington North Precinct. These sites are identified due to their substantial land area, single land ownership, limited sensitive interfaces and multiple street frontages.
- 82 The Pakington North UDF outlines that:



5 Strategic Assessment

These sites offer an opportunity for more intensive development alongside new open spaces to be delivered within the precinct.

- 83 The other identified strategic site is the Rail Sidings Yard. This property is understood to be owned and controlled by the State Government and performs an ongoing transport role that is essential to the operation of rail services in Geelong. Whilst it is identified as a 'strategic site' with nominated built form outcomes as part of the work undertaken for this Amendment, its current and ongoing function means it is unlikely to contribute to urban renewal or redevelopment outcomes within the foreseeable future.
- 84 I note that the Amendment does not seek to apply DDO57 to the Rail Siding Yard, yet it is included within the mapping figures within DDO57.
- 85 In my opinion, it may be premature to include the Rail Sidings Yard within DDO57 mapping while its zoning remains unchanged (TRZ1) and while redevelopment consistent with the policy vision is not realistically anticipated.
- 86 I note that the Council Meeting Agenda of 25 November 2025 documents the concerns raised by Head, Transport for Victoria in their submission to the Amendment, including a request that the essential operational role of the Rail Sidings Yard be expressly acknowledged.
- 87 The agenda records Council officers' agreement with this position, recommending the inclusion of the following local policy at Clause 11.03-6L-06:

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.

- 88 This position indicates both an acknowledgement by Head, Transport for Victoria and an acceptance by the City of Greater Geelong that the site will continue to perform its transport function for the foreseeable future, rather than contributing to urban renewal outcomes.
- 89 Regardless of whether the inclusion of the Rail Sidings Yard within DDO57 figures is appropriate, it is evident that the Subject Land represents the only genuine strategic redevelopment opportunity within the Pakington North Precinct. It is also the only strategic redevelopment site across the combined precincts, noting that neither the Heritage Core Precinct nor the Gordon Avenue Precinct identify any strategic sites.
- 90 Accordingly, the strategic importance of the Subject Land, and the opportunity it presents to deliver a meaningful outcome for the precinct cannot be overstated.
- 91 It is my opinion that the Subject Land is significant for a number of strategic and physical attributes. These features include (but are not

5 Strategic Assessment

limited to) its multiple street frontages and its large overall site area, characteristics that provide a unique opportunity to accommodate a diverse range of built form typologies and development outcomes.

- 92 The 'Site Aspiration' as detailed in the Pakington North UDF is that it will serve as a "*vibrant gateway*" with development that delivers "*a variety of building typologies and heights that are innovative, high quality and sustainable*" with an "*inclusive and welcoming environment*" that provides "*space for activity and culture*".
- 93 The Pakington North UDF objectives for the Subject Land include that it should:
- Provide a coordinated, master planned approach to redevelopment.
 - Make a significant contribution to housing delivery, including social and affordable housing.
 - Reflect the built form objectives and guidelines outlined in the Pakington North UDF.
 - Provide improved vehicular and pedestrian connections through the site.
- 94 These aspirations and objectives are to be realised through the application of DD057 to the Subject Land, noting there is no change to its existing zoning of the land (MUZ) which already enables a broad range of land uses consistent with the activity and land use objectives of the precinct.
- 95 The DD057 in turn imposes a number of requirements on future development outcomes for the Subject Land. These include:
- Three preferred maximum building heights ranging between 15 metres and 29 metres.
 - Preferred floor-to-floor heights.
 - A preferred site coverage of 60%.
 - Four distinct street interface requirements, including mandatory ground floor setbacks, preferred street wall/podium heights and preferred upper level setbacks.
 - Preferred GRZ interface requirements, including wall height, boundary setbacks, and upper level setbacks requirements.
 - Indicative new public open space to the south of the heritage building and near the corner of Waratah Street and Pakington Street, area or final ownership of the open space unknown.
 - Preferred open space interface controls, including podium height, upper level setback and solar access requirements.

5 Strategic Assessment

-
- Preferred building separation requirements.
 - Improved pedestrian amenity and permeability, with reference to the Indicative Concept Plan for Pakington Strand at Clause 11.03-6L-06.
 - Solar access requirements to footpaths on the opposite side of Pakington Street, Waratah Street and to the future (yet undefined) public open space.

96 The remainder of this statement considers whether the Amendment is strategically supported and whether the proposed controls facilitate an appropriate level of development on the Subject Land.

5.2 Strategic background

97 At a high level, there is clear and consistent strategic support for an amendment to the Greater Geelong Planning Scheme that facilitates the intensification of the commercial areas of Pakington Street and Gordon Avenue, particularly to accommodate increased housing and diversify the range of uses provided.

98 The *G21 Regional Growth Plan (2013)* identifies infill housing opportunities as a key mechanism for supporting Geelong's growth. More recently, *Plan for Victoria (2025)* characterised Geelong as one of **three major regional cities** that are expected to accommodate the majority of new housing growth outside of metropolitan Melbourne. It further specifies a housing target that directs approximately 60% of new dwellings within Geelong to infill locations.

99 At a local level, Geelong's *Housing Diversity Strategy (2007)* identifies Pakington Street and its surrounds (although not Gordon Avenue) as 'increased housing diversity areas'. Geelong's *Settlement Strategy (2020)* further directs the majority of new growth to urban infill areas and to increased housing diversity areas.

100 Both the *Settlement Strategy (2020)* and the City's *Retail Strategy 2020-2036 (2020)* recommend the preparation of an urban design framework to guide development along Pakington Street.

101 While I support the preparation of the two Urban Design Frameworks, and the introduction of DDO schedules to guide development outcomes within the defined precincts, I have concern that the analysis and strategic justification that has been documented and exhibited with the Amendment is insufficient to support the planning framework that is to be imposed, specifically as it relates to the Subject Land. This concern is, to a significant degree, related to the designation of the Subject Land as a strategic site and yet the complex and constraining built form requirements that are to be imposed.

102 I have sought to expand on the key areas of concern in the following sections.

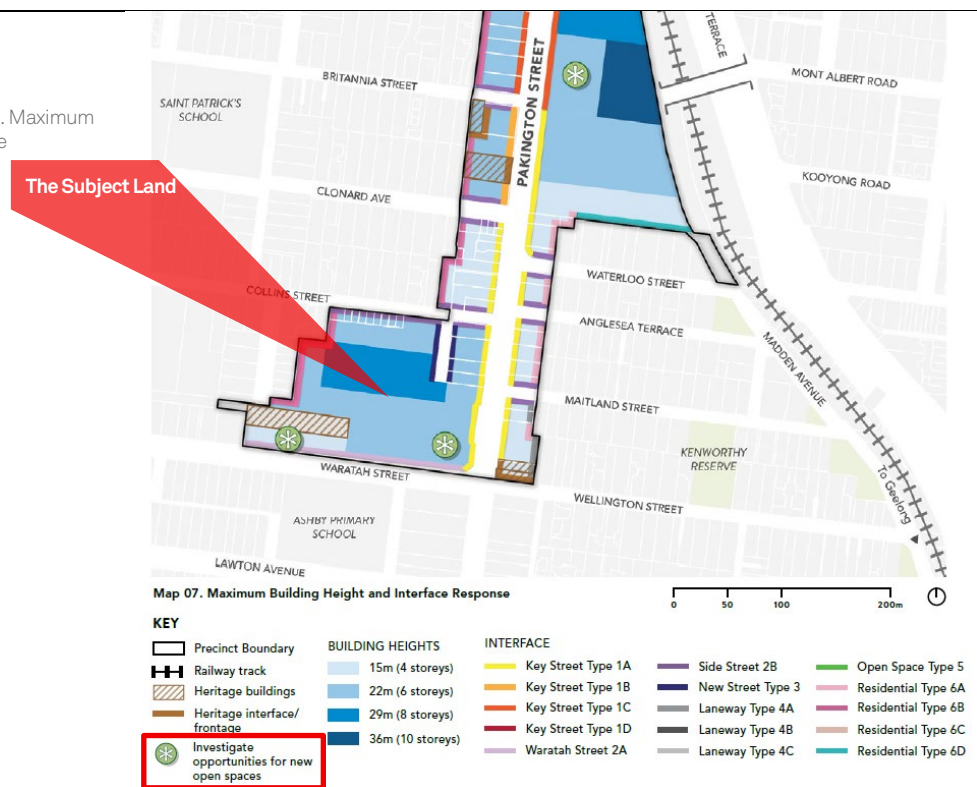
5 Strategic Assessment

Provision of Future Public Open space

- 103 The Pakington North UDF acknowledges that Council considers there is currently a lack of a plaza or open space within the precinct. It is not however identified what impact this has or may have on the community or whether the perceived lack of open space is based on any detailed analysis of need.
- 104 The Pakington North UDF subsequently identifies, across multiple mapping figures, that there is potential for two locations on the Subject Land and one on the Rail Sidings Yard as areas to ‘Investigate opportunities for new open spaces’.
- 105 Figure 5.1, below, provides an extract of one of these mapping figures from the Pakington North UDF.

Figure 5.1
Map extract

Source: Pakington North UDF - Map 07. Maximum Building Height and Interface Response



- 106 Objectives and guidelines at Chapter 3.6 - Public Realm and Open Space are:

To provide public open spaces that are inclusive and functional by focusing on pedestrian oriented places for all genders, abilities and age groups.

- *Identify opportunities for new open spaces within underutilised or vacant sites as well as key intersections for a range of community uses, including at the intersection of Pakington Street and Waratah Street.*

5 Strategic Assessment

-
- *Establish new open space within strategic sites of Pakington Strand and Railing Sidings Yard.*
 - *Co-locate new open space with Ropeworks Shed to provide a landscaped surround to the historic building. New development at the site and surrounds should ensure landscaping and activation whilst responding to the existing heritage context.*
 - *Design open spaces to integrate Crime Prevention through Environmental Design principles to minimise risk of crime and create a perception of safety.*
 - *Investigate opportunities for temporary activation of vacant sites prior to development.*
 - *Provide a balance of flexibility and programmability in new open spaces for activities such as pop-up markets, food trucks and investigate other temporary activation opportunities.*

107 The rationale for identifying the Subject Land and the Rail Sidings Yard as locations for new open space appears to be based solely on the large overall site area of both strategic sites, rather than on a broader spatial or accessibility analysis.

108 There is no strategic analysis beyond statements to the above effect that have been cited to substantiate the rationale for the future open space nor has there been any analysis provided to guide what the size, purpose or ownership arrangements of the future open space might be nor is there any information to justify why two open spaces on the one site have been identified.

109 DDO57 provides that:

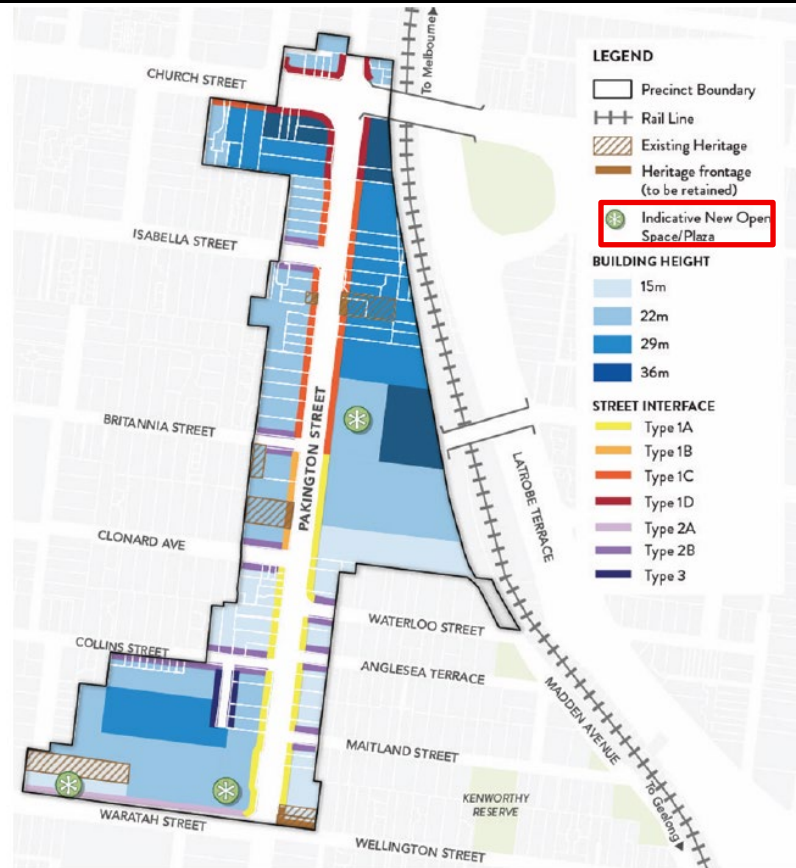
New open spaces and/or plazas should be provided generally in the locations indicated on Map 1 to this schedule. These spaces should be publicly accessible, open to the sky and receive good solar access.

110 Map 1, replicated in the below figure, identifies open space in the same location as those shown in the Pakington North UDF, now labelled as 'Indicative New Open Space/Plaza'.

5 Strategic Assessment

Figure 5.2
Map 1 to Schedule 57 to Clause 43.02

Source: Exhibited DD057



- 111 I have not been able to identify any investigation, testing or analysis that supports the selection of these particular locations as part of the Pakington North UDF.
- 112 Whilst the Pakington North UDF recognises the lack of open space within the precinct there is no discussion, within the Pakington North UDF or the exhibited background material, regarding the broader spatial distribution of public open space across the wider area that may (or may not) be accessed by those using the activity Centre. Nor is there any assessment of where new open space would achieve the greatest accessibility or benefit to the greatest number of users.
- 113 It nominates two open space areas on the one property, at the edge of the precinct and in close proximity to one another. Given that the Rail Sidings Yard is unlikely to deliver public open space in the foreseeable future, this approach effectively results in **all** new open space that Council has deemed necessary being concentrated at the southern edge of the precinct, with no corresponding provision for the northern portion or any other site within the activity centre making a similar contribution.
- 114 While DD057 refers to these locations as 'indicative', I consider that the control nonetheless commits the Subject Land to the provision of open space, and to doing so broadly within the nominated locations, without the implications of this requirement having been adequately assessed.
- 115 Any future proposal that may be submitted to Council for assessment

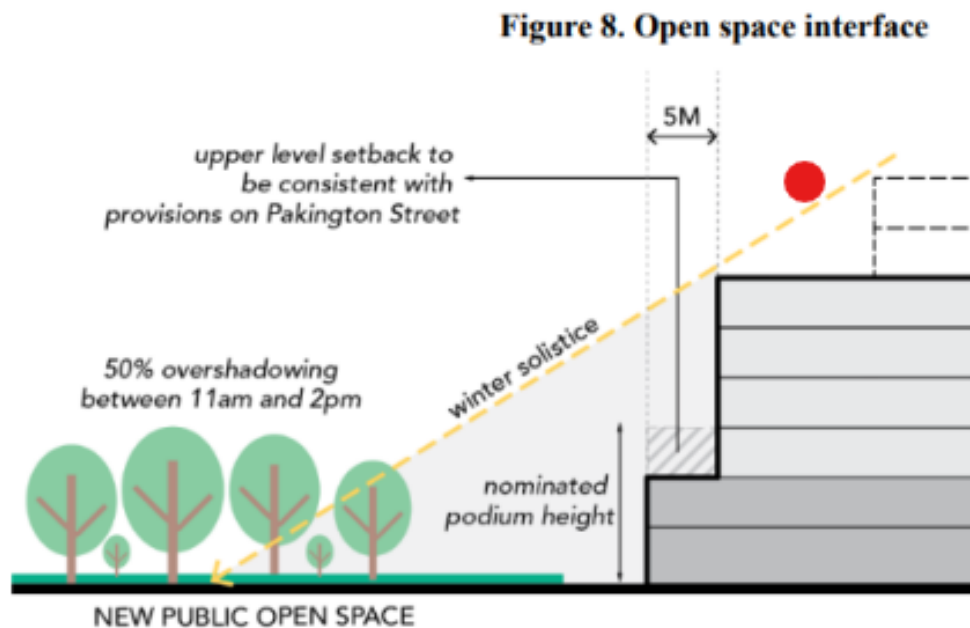
5 Strategic Assessment

would therefore be expected to provide for this open space.

- 116 It is of interest that both of the nominated open space locations to the Subject Land are situated to the south of future built form, which is to be of some significant scale (6-8 storeys) and therefore imposes a constraint on development outcomes. To this end I have identified that while DDO57 outlines built form interface requirements to new open space areas (see Figure 5.3 below), including overshadowing impacts, it is unclear what built form testing has been undertaken to justify these requirements. Furthermore, it is noted that the existence of public open space on a site (the Subject Land specifically) will temper the development potential that is in fact identified elsewhere in the DDO provisions.

Figure 5.3
Extract from draft DDO57

Source: Amendment C433 exhibition documentation.



- 117 The Built Form Analysis at Chapter 6.1 of the Pakington North UDF contains inconsistencies in its discussion of shadow impacts, referring to both the spring equinox and the winter solstice. Whereas the Access to Sunlight discussion and figures in the Comprehensive Built Form Testing refers to the **Spring** equinox.
- 118 In any case, the Solar Access Study at Chapter 6.4 of the Pakington North UDF, which tests the spring equinox between 10am and 2pm and includes the Subject Land, does not depict the open space at the corner of Waratah Street and Pakington Street at all and therefore the Pakington North UDF does not assess equinox shadow impacts on that portion of the Subject Land that has been nominated for future open space.
- 119 Similarly, the Access to Sunlight Solar Access to New Open Space figures in the recently provided Comprehensive Built Form Testing,

5 Strategic Assessment

which tests the spring equinox at 10am and 2pm for three built form scenarios and includes the Subject Land, does not depict the open space at the corner of Waratah Street and Pakington Street.

- 120 Furthermore, the exact height of built form that has been modelled to produce the Solar Access Study and the setback of any upper levels is undefined.
- 121 To my knowledge, no modelling has been released by Council that examines whether the potential for open space on the corner of the Subject Land has been undertaken to demonstrate if the built form outcomes, as envisioned in the Pakington North UDF and DD057, can be achieved. Specifically, it is unclear whether accommodating open space in this location and maintaining an appropriate level of solar access can be achieved.
- 122 Notwithstanding that thorough built form and solar access testing has not been done, it should be self-evident that positioning new open space to the south of new built form (with a preferred height of between 6-8 storeys) inevitably imposes constraints. The same constraints would not apply to open space situated to the north of built form and all other properties within the Pakington North UDF area are not burdened with this obligation.
- 123 Further, there are a number of other fundamental matters that remain unresolved in relation to the nominated open spaces, including whether one or both spaces are required (objectives at Chapter 4.3 suggest the open space may be an “and/or” in terms of the two locations identified), their intended role and function within the activity centre more broadly, their maximum or minimum size, the expected treatment of the open space or potential use by adjacent buildings, the mechanism for their delivery and their ongoing ownership and management.
- 124 It is also undefined as to whether the open spaces are intended to be delivered by the landowner and remain in private ownership with public access, or whether they are intended to be acquired by Council. No acquisition of private land has been suggested in the Pakington North UDF and no consideration given as to the impact on the development potential as a result of this requirement or relevant compensation.
- 125 The only other area nominated for open space in the other precincts is a Council owned car park on Autum Street, proposed to be rezoned to Public Park and Recreation Zone (PRPZ). As publicly owned land, this site does not raise the same delivery, equity or feasibility considerations as privately owned land. See figures below for further detail.

5 Strategic Assessment

Figure 5.4
Proposed zoning

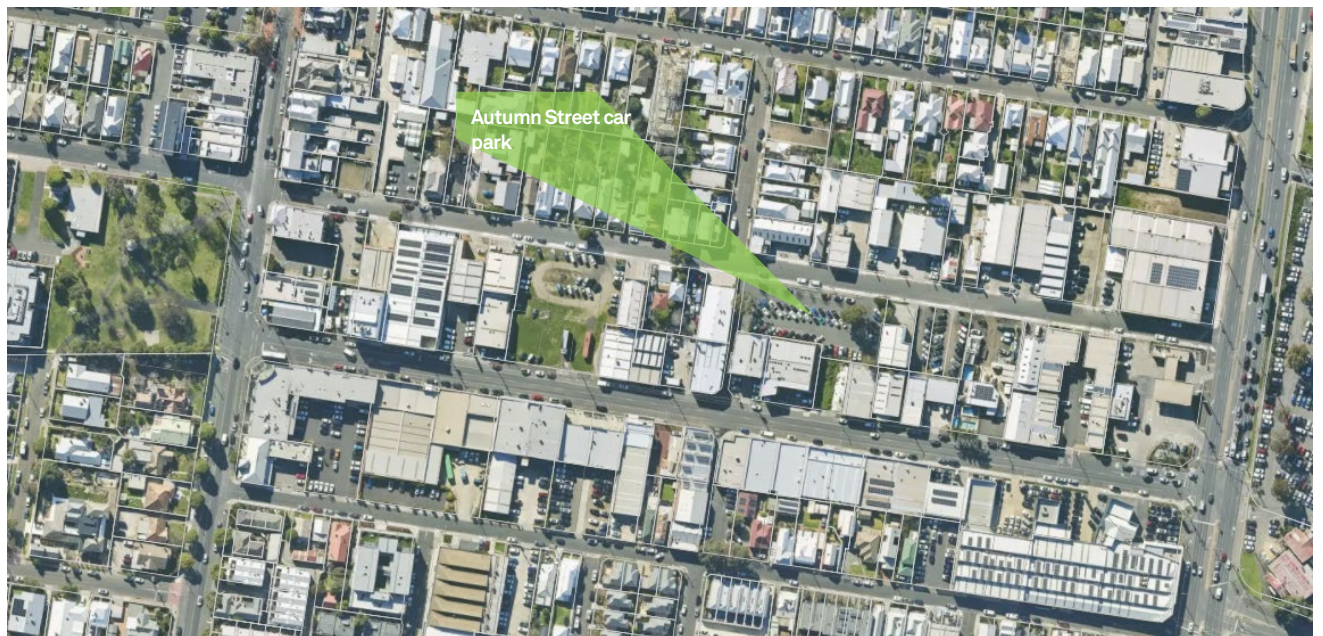
Source: Pakington Street and Gordon Avenue UDF



Figure 18. Proposed Planning Provisions

Figure 5.5
Aerial of Gordon Avenue Precinct

Source: Land checker (image dated 11.08.25)



- 126 It is not unusual for large or consolidated sites to incorporate areas of publicly accessible open space as part of the redevelopment. However, such outcomes are typically achieved through negotiation between the developer and the responsible authority.
- 127 The provision of open space on a development site also is commonly linked to, and used to justify, a variation or exceedance of an applicable built form control, such as building height, which provides development uplift. In this context, a public benefit is secured in return for an increased development capacity.

5 Strategic Assessment

128 This approach is reflected in the decision guidelines for variations to preferred requirements of DDO57, which includes the following:

Whether the development results in, or substantially facilitates, the delivery of appropriately secured community benefits including:

- *Incorporation of social or affordable housing.*
- *Upgrades or delivery of new local infrastructure including public spaces to meet the needs of the community and provide spaces for residents to linger and enjoy.*
- *Provision of pedestrian links or public open space in excess of any minimum requirement in this Scheme.*

*my emphasis

129 It is therefore unclear if the Subject Land would have to provide even more than what's already nominated as part of DDO57 if a variation to any of the preferred requirements nominated in the control are to be sought.

RECOMMENDATIONS

130 In the absence of any detailed or comprehensive analysis in line with the concerns raised in this statement I am of the view that specific references to future open space locations on the Subject Land should be removed from Map 1 in DDO57.

131 I consider the planning authority should be directed to undertake further analysis to justify the intended role, function, size, mechanism for their delivery and their ongoing ownership and management of the future open space, including clarification as to why there are to be two areas on the same land and what other opportunities elsewhere in the activity centre may exist.

132 Furthermore, I consider as a minimum there must be more extensive built form and solar access testing undertaken which (a) defines building envelopes that accord with the preferred requirements of DDO57 and (b) examines an open space area in the south-eastern corner of the Subject Land and the impact that solar access requirements will have on the height and interface of built form to its north.

Built Form Testing

133 As noted in the preceding section of this statement, the Pakington North UDF includes a Built Form Analysis at Chapter 6.1, which outlines the parameters considered as part of establishing the built form controls (DDO57). These parameters include access to sunlight, scale and character, interface and transition, equitable development, visual bulk and amenity, and car parking and services.

5 Strategic Assessment

- 134 A separate Built Form Testing report was also exhibited as part of the Amendment documentation. The report purports to demonstrate “*how the adopted building heights deliver a built form outcome that is consistent with the vision and objectives of the Pakington North Urban Design Framework (UDF).*”
- 135 I note that this document includes a comparative assessment against what is referred to as ‘maximum’ and ‘minimum’ development scenarios.
- 136 The recently provided Comprehensive Built Form Testing report was circulated by the planning authority (not part of exhibited material) and dated February 2026. It provides some further detail of the testing methodology, the built form parameters that informed the testing and a discussion of how each scenario responded to the vision and objectives of the Pakington North UDF.
- 137 Having reviewed this material, I observe that there are a number of discrepancies between the built form outcomes illustrated in the built form testing and the controls introduced through DD057.
- 138 The below figures provide a comparison between the building height and interface outcomes illustrated in the Pakington North UDF and those identified in Map 1 to DD057.

Figure 5.6
Pakington North UDF extract

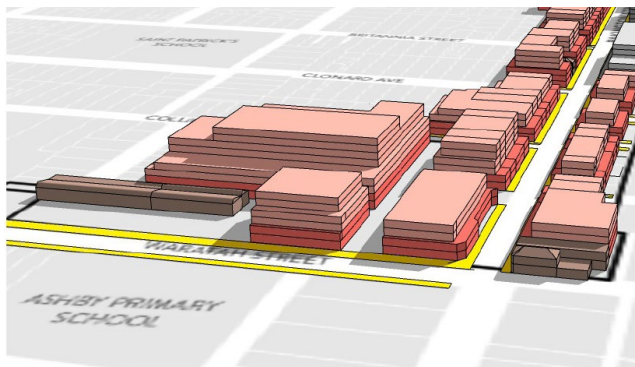
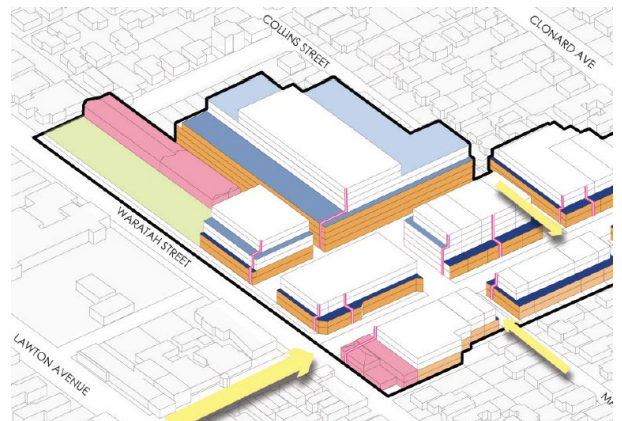


Figure 5.7
Comprehensive Built Form Testing report (February 2026)



5 Strategic Assessment

Figure 5.8
Map 1 to DDO57 extract



139 In summary the key differences include:

- An absence of any new built form to the south of the heritage building in the testing, noting that it is unclear whether this entire area is intended to be occupied by new open space, which equates to 2,600 sq metres (approximately).
- The absence of any new open space to the corner of Waratah and Pakington Streets in the testing.
- Built form on the corner of Waratah and Pakington Street shown as only 4 storeys in overall height in the testing, compared to a preferred maximum of 22m (equivalent to approximately 6 storeys) under DDO57.
- Street wall heights along Waratah Street shown in testing which appear to be 2 storey, stepping back slightly to two additional storeys and then a greater upper level setback. Street interface Type 2A under DDO57 specifies a preferred 15m street wall height (approximately 4 storeys) with only one upper level setback nominated.

140 It is apparent that neither the 'adopted option' in the Built Form Testing, nor 'Scenario C' in the Comprehensive Built Form Testing, which is meant to provide a balanced approach, reflect, at least for the Subject Land, the preferred built form controls found in DDO57.

141 Furthermore, the proposed heights for the Subject Land identified in DDO57 include a preferred 29 metre height for a centralised portion. It is unclear how the extent of the tallest designated area has been informed by built form testing. The portion of the Subject Land rising to what is presumed to be 29 metres (or 8 storeys) does not fully align between the built form testing model and the DDO57, with no other background document available to inform how the final height or the area of the land identified for this preferred height has been reached.

5 Strategic Assessment

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- 142 These inconsistencies noted above raise important questions as to whether the built form controls that are to be introduced through DDO57 have been comprehensively modelled and adequately tested, and whether the testing supports the outcomes that the controls are intended to achieve. If the answer to this question is in the negative, then it is unclear what the purpose of the built form testing has been.
- 143 The Built Form Testing reports include a comparison against 'maximum' and 'minimum' development scenarios. These represent precinct-wide extremes and do not reflect a more nuanced or site-specific response to the distinct characteristics, constraints and opportunities of individual sites.
- 144 Further, I note that the Comprehensive Built Form Testing states that it *"does not introduce new testing, but documents previous work in greater detail to clearly communicate the methodology, assumptions and outcomes."*
- 145 Despite this statement, I note that there is some variation in the built form parameters set for the alternate scenarios included in this more recent publication. For example, the maximum scenario in the Built Form Testing report that was exhibited used a building height of 10 storeys whilst scenario A (the equivalent maximum scenario) in the Comprehensive Built Form Testing report modelled a height of 12 storeys/43m.
- 146 Neither document however provides a rationale for why 10 storeys or 12 storeys/43m has been adopted.
- 147 In my opinion, the issues I have identified call into question the robustness of the testing and reduces its value in justifying the specific controls applied to the Subject Land.

RECOMMENDATION:

- 148 More robust built form testing needs to be undertaken to inform the built form controls that are to be introduced and to demonstrate that the envisioned outcomes for the Subject Land and the precinct are achievable.
- 149 This work should be undertaken and considered further before the Amendment advances.

Shadow Impacts

- 150 I have detailed earlier in this statement my concerns around the absence of new open space at the corner of Waratah and Pakington Street from built form/overshadowing testing.
- 151 The Solar Access Study at Section 6.4 presents the shadow analysis from a 'birds eye view' with buildings shown as 'podium' and 'upper levels'. No specific details of building heights or setbacks are provided and it is unclear if the site coverage required by DDO57 aligns.

5 Strategic Assessment

152 Given my concerns regarding the accuracy of the built form testing, I similarly have concerns around the accuracy of the shadow analysis and the built form parameters used.

153 I also note the Solar Access Study indicates northern footpaths as areas to be protected from overshadowing. This is not reflected elsewhere in the Pakington North UDF and DD057 does not require the northern side of footpaths be protected. This further contributes to my concerns around the accuracy of the testing.

RECOMMENDATION:

154 The built form parameters used for the Solar Access Study should be detailed including all inputs and confirmation of the analysis.

155 This work should be undertaken and considered further before the Amendment advances.

5.3 Implication of DD057 on Subject Land

156 The extent of DD057 requirements applicable to the Subject Land are outlined at the start of this section of my statement. There are varied street wall heights, varied setbacks, varied heights, shadow requirements, open space and new street impositions and interface treatments with boundaries to residential land.

157 This range of control over a site which is deemed to have the most significant potential to contribute to the delivery of housing and a mix of uses does require very careful analysis and justification.

158 Overall I am of the view that the cumulative impact of these numerous requirements and, taken together, may not appropriately support the realisation of the development potential of the Subject Land.

159 As the only genuine strategic redevelopment site across the Pakington North, Heritage Core and Gordon Avenue precincts, the Subject Land presents a unique opportunity to make a substantial contribution to urban renewal and housing delivery.

160 It appears, however, that both the UDF and DD057 results in an outcome where the Subject Land is effectively disadvantaged for the very opportunities it presents in terms of size, location and redevelopment potential.

Site coverage

161 The preferred site coverage of 60% for the Subject Land (and for the Rail Sidings Yard) is in my view inconsistent with the approach applied across the remainder of the Pakington North Precinct and the Gordon Avenue Precinct.

162 In the Pakington North Precinct, higher site coverage of 70 or 80 per cent is generally associated with areas where taller built form outcomes are anticipated, while in the Gordon Avenue Precinct higher site coverage is typically encouraged further away from Pakington

5 Strategic Assessment

Street.

163 These varied site coverage requirements can be seen in the figures on the following page taken from DD057 that applies to the Pakington North Precinct and DD056 that applies to the Gordon Avenue Precinct.

Figure 5.9 Site coverage requirements (DD057)

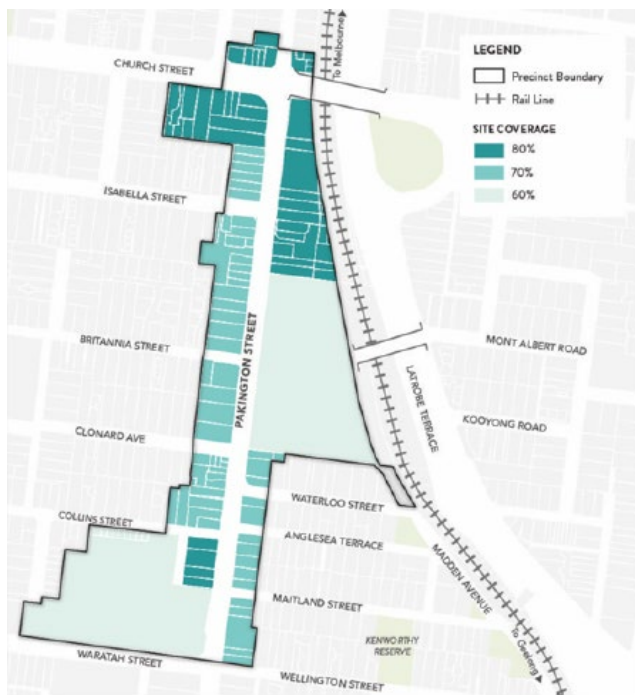


Figure 5.10 Site coverage requirements (DD056)



164 For a site explicitly identified as ‘strategic’ and intended to accommodate more intensive development, a comparatively low preferred site coverage runs counter to the stated objectives of intensification. When combined with additional constraints relating to overshadowing, future public open space provision and interface controls, this requirement materially limits the development capacity of the site.

165 I note that the only justification I was able to identify in the exhibited documentation that explains this low site coverage for the Subject Land is contained in the Pakington Street and Gordon Avenue Urban Design Framework and states:

Lower site coverage of 60% is proposed for strategic sites and sensitive locations where there is either an opportunity to deliver open spaces or a need to respond to the heritage significance (page 10)

166 Given the issues raised in previous section regarding the lack of analysis around the public open space designation for the Subject Land and the absence of analysis to suggest a higher site coverage could not be accommodated and respond to the heritage building, I consider this requirement to be without foundation.

5 Strategic Assessment

RECOMMENDATION:

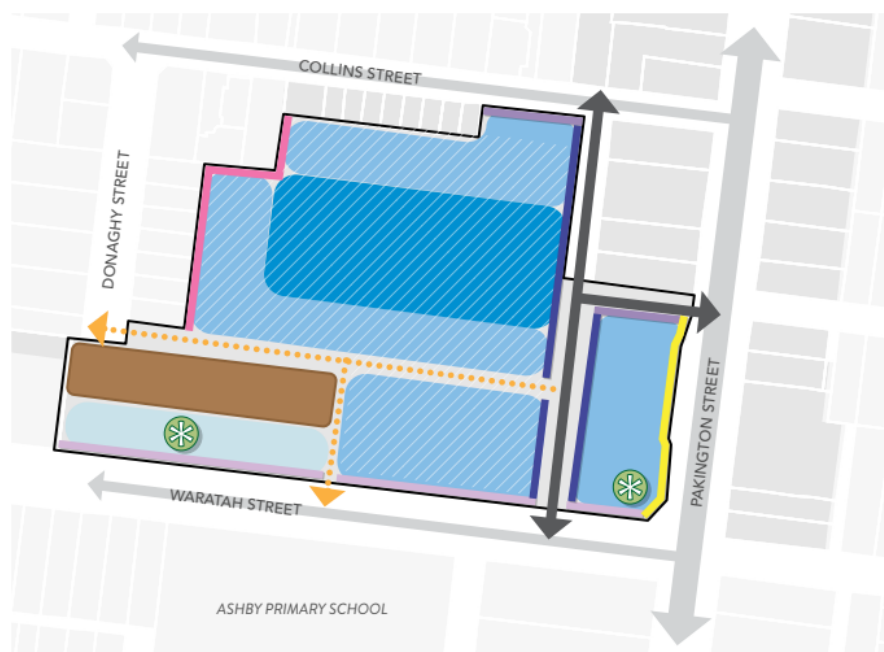
167 The preferred site coverage for the Subject Land should be reviewed to ensure it facilitates an appropriate level of development commensurate to the site’s strategic role and does not penalise the Subject Land as a direct result of imposing a requirement to contribute public open space.

Access and permeability

168 The Indicative Concept Plan with the Pakington North UDF and at Clause 11.03-6L-06 depicts ‘new roads and pedestrian connections’ are to extend through the Subject Land, presumably connecting Collins Street with Waratah Street. However, there is limited information regarding their intended function or design, including matters such as road widths, cross-sections, or whether on-street parking is anticipated.

169 Similar to the open space requirement, it is unclear whether these connections are intended to be delivered as public infrastructure to be vested in Council as a public road, or whether they are to be provided by the landowner and remain in private ownership with public access to be provided.

Figure 5.11
Extract from Pakington North UDF



Map 12. Indicative concept plan for Pakington Strand

KEY			
Precinct Boundary	BUILDING HEIGHTS	INTERFACE	ACCESS AND MOVEMENT
Heritage building	15m (4 storeys)	Key Street Type 1A	Existing Street Network
Investigate opportunities for new open spaces	22m (6 storeys)	Waratah Street 2A	Indicative new streets
	29m (8 storeys)	Side Street 2B	Indicative new pedestrian links
	36m (10 storeys)	New Street Type 3	Investigate opportunities for consolidated parking facilities
		Open Space Type 5	
		Residential Type 6B	

5 Strategic Assessment

170 Further, a pedestrian link is also shown connecting through to Donaghy Street to the west. Donaghy Street is a relatively short residential street that connects to Collins Street to the north before terminating in the south without a corresponding connection to Waratah Street. Given the conditions of this street and the residential character, I query the strategic value of this link, noting that its contribution to permeability and connectivity across the broader precinct appears limited and could potentially introduce a level of pedestrian movement that may not be appropriate in a quiet street.

RECOMMENDATION:

171 The pedestrian link through to Donaghy Street should be deleted and clarification be provided around the intended status of the roads and pedestrian links, including width and expected acquisition process.

Street wall requirements

172 A review of the various Street Interface Types identified at Map 1 of DD057 would suggest that the Subject Land has several street frontages and each is subject to distinct interface requirements. It also has several 'corners' with differing requirements both in terms of the street wall height and the setback above the street wall to each frontage.

173 For example, the street wall height preferred to Pakington Street is 8 metres with a preferred setback above the street wall of 5 metres where as Waratah Street has a street wall height preferred to Pakington Street is 15 metres with a preferred setback above the street wall of 3 metres.

174 These varying requirements can lead to potential conflict where interface types transition across a single building envelope, particularly at corners. The outcome is usually difficult to manage from an urban design perspective and the preferred approach is to have the same street wall height and setback intersecting at corners or junctions.

175 There appears to be limited guidance within DD057 or the Pakington North UDF regarding how a transition between different interface types are to be resolved in a coherent and architecturally integrated manner. Again the absence of this guidance is not ideal.

RECOMMENDATION:

176 The identification of street interface types on Map 1 within DD057 should be revised for street corners in particular so that the treatment along the main frontage continues along the side street.

177 Amended text should be included at 'Street interface' to describe the street interface response for corner buildings, including how far the treatment should extend along the side street before transitioning to the side street interface type.

5 Strategic Assessment

178 Suggested wording could include:

The street wall on corner buildings should continue the main frontage street wall height for a minimum of x metres to the side street, with a transition in height to match the rear interface where required.

Master Plan

179 I have acknowledged throughout this statement the importance of the Subject Land as the only genuine strategic site within all three precincts, and the significant opportunity it presents to deliver a transformative urban outcome.

180 The Pakington North UDF encourages “*a coordinated, **master planned** approach to the redevelopment of Pakington Strand as a Strategic Site.*”

*my emphasis

181 The proposed Clause 11.03-6L-06 includes the following objective for Pakington Strand:

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

182 It includes an Indicative Concept Plan for Pakington Strand, which is also referenced in DD057, but only in the context of pedestrian amenity and permeability.

183 In addition to applying DD057, the Pakington North UDF also suggests as an implementation action to:

Apply appropriate Overlay to identified Strategic Sites ensuring the preparation of a masterplan prior to redevelopment or subdivision.

184 This approach has not been implemented. Instead, reliance has been placed on local policy to ‘encourage’ a master planned outcome, while simultaneously applying detailed and prescriptive built form and open space requirements through DD057.

185 DD057 does not expressly require a master plan be prepared.

186 The potential implications of this policy statement for the future development of the Subject Land are ambiguous. There is no requirement for a master plan to be prepared, nor is there a mechanism for it to be approved by the responsible authority as a first stage or for it to have any useful role in the assessment of a permit application of individual buildings or works.

187 None of the exhibited material demonstrates that the Subject Land has

5 Strategic Assessment

been subject to a detailed, site-specific assessment commensurate with its strategic importance, nor that such an assessment has informed the DDO57 controls or the Indicative Concept Plan.

- 188 I acknowledge that requiring a master planned approach for a large, strategically located landholding can deliver significant benefits, including coordinated access, open space, built form and land use outcomes. It can establish the parameters for development and, subject to the statutory control that requires a master plan, can streamline the approval process of permit applications that are consistent with the master plan.
- 189 However, the use of prescriptive controls through a DDO undermines the ability of a master plan to provide an optimal outcome that has been subject to detailed site-specific investigation.
- 190 A master plan process may, for example, demonstrate that the provision of open space in the south-eastern corner of the site unreasonably constrains development capacity and that an alternative location or configuration would achieve superior overall outcomes. A master plan may determine that the maximum building height could be greater or more extensive.
- 191 In such circumstances, a clear tension would arise between the master plan (if one was prepared), the Indicative Concept Plan and the prescriptive requirements of DDO57.
- 192 **RECOMMENDATION:**
- 193 There are several options that could be explored to improve the approach to this important site.
- 194 I recommend that unless the planning authority is proposing to introduce another overlay control on the Subject Land, such as a Development Plan Overlay, all references to the preparation of a master plan and the Indicative Concept Plan for Pakington Strand in Clause 11.03-6L-06 and DDO57 should be deleted entirely.
- 195 Alternatively, if a master planned approach is considered necessary given the strategic importance of the Subject Land, this should be facilitated through the application of a Development Plan Overlay, with the Subject Land removed from DDO57 and from Map 1.

6 Conclusion

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- 196 There is strategic support for an amendment to the Greater Geelong Planning Scheme that facilitates increased densities and mixed use outcomes within the Pakington North and Gordon Avenue precincts.
- 197 This strategic support is largely based on the well documented need for additional housing throughout Victoria and the establishment of a framework and planning controls that will encourage the delivery of housing in this infill location, proximate to Geelong CBD, is appropriate.
- 198 The built form controls outlined for the Subject Land and for the Pakington North Precinct are highly detailed and suggest built form analysis has been undertaken, however I have concluded from the documentation exhibited that this analysis is insufficient to justify the controls or to demonstrate that the envisioned outcomes are realistically achievable.
- 199 I am particularly concerned that while the Subject Land is identified in the Pakington North UDF as a strategic site, this is not adequately reflected in DD057 or the specific requirements that have been applied to the site.
- 200 The intent for a master planned approach to the development of the Subject Land is unresolved and is undermined by the use of prescriptive requirements in DD057 and the Indicative Concept Plan.
- 201 In my view, there is a risk that the cumulative effect of the built form requirements, together with the absence of robust testing, may constrain development to the extent that the intended intensification of the Subject Land is unlikely to be realised.
- 202 Overall, I consider that in the absence of further justification for key aspects of the Amendment, such as the nomination of the Subject Land for open space and the low site coverage, the matrix of built form requirements under DD057 for the Subject Land are not adequately resolved.



SOPHIE JORDAN
DIRECTOR
CONTOUR CONSULTANTS AUST PTY LTD

Attachment 1

Professional Experience

A1

Attachment 1 - Professional Experience

Name and Address	<ul style="list-style-type: none"> • Sophie Millicent Jordan is a Director of Contour Consultants Australia Pty Ltd, Town Planners and Practices from Level 1, 283 Drummond Street, Carlton, in Victoria.
Qualifications and Expertise	<ul style="list-style-type: none"> • Bachelor of Planning and Design (Hons), University of Melbourne, 1996
Professional Experience	<ul style="list-style-type: none"> • 1997 Town planner, City of Stonnington • 1998-2001 Senior planner, City of Melbourne • 2001-2003 Senior planner, Hassell Pty Ltd • 2003 – June 2005 Senior planner, Urbis Pty Ltd • July 2005 – June 2008 Associate Director, Urbis Pty Ltd • July 2008 – Dec 2011 Director, Urbis Pty Ltd • January 2012 – June 2022 Director, Sophie Jordan Consulting Pty Ltd • July 2022 – Present Director, Contour Consultants
Area of Expertise	<ul style="list-style-type: none"> • Extensive range of residential developments including medium density housing projects through to larger high rise apartment complexes across metropolitan Melbourne. • Special needs residential accommodation including student accommodation, retirement villages, nursing homes and social housing projects. • Large scale commercial projects including the development of land within Major and Principal Activity Centres of metropolitan Melbourne. • Expert evidence before the Supreme Court of Victoria and the Supreme Court of Western Australia relating to land compensation matters, VCAT hearings relating to a broad range of planning projects, Planning Panels relating to rezoning of land and major strategic redevelopment projects. • Independent planning advice to government departments and agencies relating to a range of projects including the Public Housing Renewal Project.
Instruction which Defined the Scope of this Report	<p>I was requested by Planning & Property Partners Pty Ltd on behalf of the Gelprop Nominees, to undertake an independent assessment of Amendment C433 to the Greater Geelong Planning Scheme.</p> <p>The instructions received requested consideration of various background reports and the amendments to the Greater Geelong Planning Scheme and to provide an opinion as to the planning implications on the land at 95-103 Pakington Street, Geelong West..</p>
Facts, Matters and Assumptions Relied Upon	<p>My investigations, assumptions, assessment and conclusions have been summarised in the attached report. The work undertaken relates to the land at 95-103 Pakington Street, Geelong and determine, within the scope of my expertise and experience, the implications of the Amendment C433 on the relevant land.</p>

Attachment 1 - Professional Experience

A list of the reports and information I have considered is contained in this report.

I was not required to review any work undertaken as part of steps six or seven of the guidelines.

Declaration

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



Sophie Jordan, Director

Attachment 2

Photographs of the Subject Land and Surrounds

A2

Attachment 2 - Photographs of the Subject Land and Surrounds

Figure A.1
View within the Subject Land looking north



Figure A.2
View within the Subject Land looking west



Figure A.3
View within the Subject Land looking north-west



Figure A.4
View within the Subject Land looking east



Figure A.5
View within the Subject Land of the Woolworths shop entry



Figure A.6
View within the Subject Land looking north toward Collins Street



Attachment 2 - Photographs of the Subject Land and Surrounds

Figure A.7
View within the Subject Land looking south

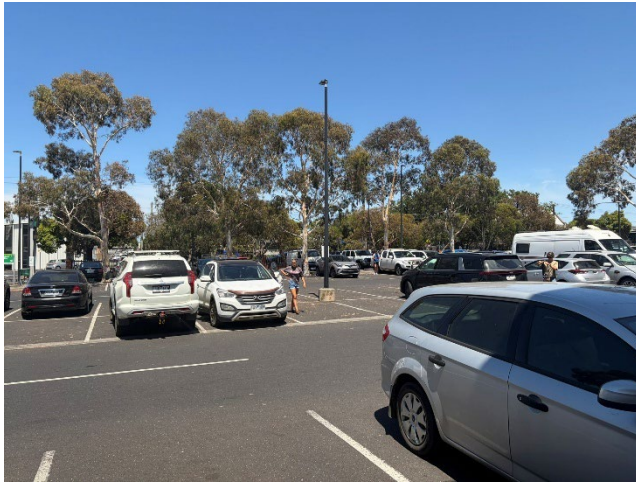


Figure A.8
View within the Subject Land looking south



Figure A.9
View within the Subject Land looking south-east



Figure A.10
View within the Subject Land looking south toward Waratah Street



Figure A.11
View within the Subject Land looking south-west toward heritage building



Figure A.12
View within the Subject Land looking west



Attachment 2 - Photographs of the Subject Land and Surrounds

Figure A.13
View of Subject Land along Pakington Street



Figure A.14
Looking west along Waratah Street from corner with Pakington Street



Figure A.15
Looking south-east from corner of Waratah and Pakington Streets



Figure A.16
Looking north up Pakington Street from corner of Waratah and Pakington Streets



