

44 Ramsden St
Clifton Hill, Vic, 3068
7 April 2026

The Minister for Housing and Building
The Hon Harriet Shing MLC
Email harriet.shing@parliament.vic.gov.au

The Minister for Planning
The Hon Sonya Kilkenny MP.
Email sonya.kilkenny@parliament.vic.gov.au

CC. Homes Victoria
email. cliftonhill@homes.vic.gov.au

RE Proposal for Noone and Rutland St Clifton Hill social housing redevelopment

Dear Ministers,

East Clifton Hill Residents Inc (No A0114110I) (ECHRI) is a not for profit association of East Clifton Hill residents and friends to provide a forum for local residents as members to express their opinions of proposals for developments in the local area. ECHRI's prime focus is to encourage development in the East Clifton Hill precinct which respects the existing heritage and community values of the area.

ECHRI supports more social housing, and is in favour of redevelopment and use of this site for social housing.

ECHRI hereby request that, prior to any planning approval by the Minister,

1. Homes Victoria redesign the proposal to limit the development to 6 storeys, noting that
 - a. the proposed site is zoned General Residential 2 with a normal limit of only 3 storeys. However we are aware of the permit exemptions outlined in Clause 52.20 of the Yarra Planning Scheme and anticipate that any development will be cognisant of the controls and precedents established for the rest of East Clifton Hill, especially recognising:
 - the site is adjacent to single story heritage properties, and
 - other nearby developments are of no more than 6 storeys
2. Homes Victoria redesign the proposal to meet or exceed the standards prescribed
 - a. in the City of Yarra Planning provisions, and as reflected in the motion by the City of Yarra at their meeting of 24th March 2026 (refer to Appendix A). and
 - b. and to the Analysis of Clifton Hill Neighbourhood Collective (CHNC) which details breaches of planning provisions (Appendix B)
We refer you to Homes Victoria policy (refer extract at Appendix C) which requires that Homes Victoria developments shall conform to the local planning provisions, which has to date NOT been complied with;
3. The Minister or their representatives meet with ECHRI and the CHNC on site to discuss the Homes Victoria Proposal.

As a matter of principle, ECHRI submits that The Yarra Planning Scheme and its standards should in general be adhered to by all project proponents, including all levels of Government. This is the express policy of Homes Victoria (refer Appendix C) who have presented a proposal which ignores this policy. The Yarra Planning Scheme and its requirements are in place to allow development which best ensures the continued best use and amenity of our neighbourhood. The effective operation of these provisions is an important process which protects property owners and residents from unreasonable development, and establishes rules and standards for all owners and developers. It also sets in place appropriate processes for consultation to ensure reasonable outcomes are achieved which allow for sound development whilst also protecting local heritage and amenity.

ECHRI accepts that some discretion is required in assessing development proposals, but submits that any discretion granted should be reasonable and measured with good reasons attached; and where so granted, the proponent should be required where practicable, to provide suitable offsets to moderate the adverse impacts in the areas in which discretion has been granted.

ECHRI Submission on this proposal

1. ECHRI supports the provision of more social housing and agrees that this site is a suitable location which is well serviced by infrastructure and is in accordance with it's current use.
2. ECHRI believes that the Clifton Hill Neighbourhood Collective (CHNC) , whilst expressing support for the provision of more social housing on this site, has provided a clear and factual case outlining the manner in which the planning provisions have not been adhered to in the current proposal; their analysis in the CHNC submission (refer Appendix B) lays out the detail where the those provisions have not been adhered to;
3. ECHRI calls for you to instruct Homes Victoria to moderate the proposal to more closely adhere to the provisions of the Yarra Planning Scheme and recognise the site's proximity to residential areas covered by the Yarra Planning Scheme Heritage Overlay (HO318), and provide offsets where practicable, specifically:
 - a. The proposed building height at 8 stories is excessive, and will unacceptably dominate the surrounding residential area. The site is zoned General Residential 2 with a maximum height of 3 storeys (9m), so the proposal at 8 stories (26m) is way outside this height limit. Whilst

increased set-backs of the upper storeys can moderate the impact, in this case the 8 storeys cannot be reasonably moderated. Accordingly ECHRI supports a maximum height of 6 storeys in the location of the proposed tower as a reasonable compromise

- b. The quantity of outdoor space should be increased and safety of the residents to bring it closed to meeting the Objectives of Clause 52.20-7.2 of the Planning Scheme.
- c. Increase the provision for on-site parking, which is proposed on site to be half that which would be required under the CoY planning provisions.
- d. Adhere to the motion passed by the City of Yarra as detailed in Appendix A.

ECHRI calls upon the Homes Victoria and the Government in future to adopt a higher standard of consultation on such projects. The questionnaire and government sponsored consultation meetings to discuss the proposal have to date been perfunctory, and undertaken in haste. This is not in accordance with Homes Victoria policy and is not acceptable.

Further, we endorse and reiterate the request of CHNC for a meeting with you to address these issues. The advice provided by officials that any modification of the proposal is unlikely, demonstrates that the current consultation process has been inadequate and akin to a pre-determined outcome.

Yours faithfully



Ray Tonkin
President

Appendices

Appendix A – extract from City of Yarra Planning Decision Committee meeting of 24th March 2026

Appendix B - CHNC Analysis of the CoY Planning provisions

Appendix C - Homes Victoria [Guidance Note v2.0 May 2024](#)

Appendix A – extract from City of Yarra Planning Decision Committee meeting of 24th March 2026

PLANNING DECISIONS COMMITTEE RESOLUTION Moved: Councillor Crossland Seconded: Councillor Jolly That Council:

1. Note the officer report and the application material.
 2. Delegate the Manager Statutory Planning to make a submission to Homes Victoria outlining the following:
 - (a) Council is supportive of a redevelopment of the site that provides an increase in social housing that is well designed and energy efficient, however, Council raises serious concerns if the proposal results in the loss of public housing and its replacement with community housing and submits that the site should be redeveloped to provide 100% public housing. Council reiterates its support for no net loss and an increase in provision of public housing in the City of Yarra;
 - (b) Having regard to the strategic context, zone purpose and non-sensitive interfaces to the south and west of the site, there is opportunity for a mid-rise development on the site;
 - (c) The proposed development provides inadequate communal space facilities for residents, open space on the ground floor and unresolved safety issues concerning the undercroft car park;
 - (d) The rear laneway linear garden and associated footpath has limited passive surveillance, presents potential safety issues, poorly utilises much needed open space contribution, and is not supported. This space should be consolidated to facilitate a larger publicly accessible open space in accordance with the following point;
 - (e) The massing of the building should be reconfigured to the west of the site, and smaller open spaces consolidated to facilitate a larger publicly accessible open space that includes a playground and ideally a full or half basketball court at ground level to the corner of Noone and Rutland Streets;
 - (f) Vehicular access via Alexandra Pde East is inconsistent with and will undermine the rail underpass upgrades associated with the North East Link. Vehicular access to be via Noone St;
 - (g) All dwellings must meet silver standard building requirements and all entrances must be DDA compliant; Planning Decisions Committee Meeting Minutes 24 March 2026 Page 101 of 137
 - (h) There is an inadequate number of bicycle parking spaces. Provision at a minimum should match the number of dwellings being provided (i.e. increased from 95 to 114 bicycle spaces) with further provision of bicycle parking for cargo bikes and bikes with trailers;
 - (i) Stairwells to be unenclosed to common areas (no stairwell walls or doors to common areas). If this is not possible, stairwell walls and doors to common areas to be glazed, if possible;
 - (j) Greater architectural articulation and activation to the upper levels of the north and all levels of the south facades, with an emphasis on enhancing passive surveillance;
 - (k) Common hallway widths should be generously sized with a minimum dimension of 2m;
 - (l) Consideration be given to the provision of a concierge, on-site building manager, and co-located services;
 - (m) Other matters requiring attention include (see Council's assessment table):
 - (i) The disparity of balcony sizes regarding the apartment typology type;
 - (ii) Provision of more prominent entrances with separate cores so that residents share their entrance with a smaller number of neighbours;
 - (iii) More meaningful communal facilities that are accessible to a wider demographic;
 - (iv) Wider footpaths that are DDA compliant with no fragmented footpaths;
 - (v) Provision of a basement car park in lieu of under-croft; and
 - (vi) Retention of more existing fully developed trees on site.
3. Provide as an attachment, the officer assessment table and full suite of referral

Appendix B - CHNC Analysis of the CoY Planning provisions

Community response to Other Relevant Planning Controls and Ordinance

1. Reduce height to 6 storeys and maintain neighbourhood character

Design Proposal	Relevant Ordinance	Assessment Against Relevant Ordinance	Community Concerns
<p>Planning Provisions</p> <p>General Residential Zone - Schedule 2 'Residential Areas' (GRZ2)</p>	<p>The objectives of the GRZ2 are as follows:</p> <ul style="list-style-type: none"> · To implement the Municipal Planning Strategy and the Planning Policy Framework. · To encourage development that is responsive to the neighbourhood character of the area. · To encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport. · To allow educational, recreational, religious, community and a limited range of other non-residential uses to serve local community needs in appropriate locations. <p>The Schedule does not identify any specific neighbourhood character objectives.</p> <p>Maximum building height:</p> <p>A building used for the purpose of dwellings must not exceed the height of 9 metres. Pursuant to Clause 32.08-11 (Maximum building height requirement for a dwelling or residential building) a building must not be constructed for use as a dwelling that exceeds 11 metres in height or exceeds three storeys at any point.</p> <p>Decision Guidelines:</p> <p>Which should be considered by the responsible authority including;</p> <ul style="list-style-type: none"> · The amenity impact to surrounding land uses, · Whether opportunities exist to avoid a building being visually obtrusive through alternative building designs, particularly for developments with overall building heights in excess of 9m. 	<p>Not Achieved:</p> <p>Maximum Height</p> <p>8 Storeys is unprecedented in the suburb. An 8 Storey building in a residential zone, directly across the street from predominantly single storey dwellings which are subject to a heritage overlay is not 'responsive to the neighbourhood character of the area'.</p> <p>GRZ2 nominates a discretionary height limit of 3 Storeys. A 6 storey building would double this height limit. The proposed building is nearly triple the discretionary height limit.</p> <p>Per the Decision Guidelines, there are several opportunities to develop the site without being visually obtrusive including increased setbacks, exploration of less dominant materiality to reduce the visual bulk, reduced height.</p>	<p>The Planning Report comments on recent local development as <i>'an emerging mid-rise fill-in character'</i> but of the example reference the 3 highest in the suburb and none of them are 8 storeys. These are selectively picked and still do not support an 8 storey building which is 33% higher again than the tallest buildings in the suburb which is subject to a heritage overlay presumably to preserve the value of the East Clifton Hill Neighborhood. A building exceeding the discretionary height limit is not appropriate.</p> <p>Most 5+ Storey Clause 52.20 developments are not in the Residential Zones. Of the three that are - none of them exceed the height limits by as much as this proposal (2 storeys in excess of the limit) all while fronting a single storey streetscape.</p> <p>This area is classified as an "Incremental Change Zone" serviced by council to support a sudden 114 dwelling units.</p> <p>17/20 (85%) neighboring buildings are 1 storey 65/79 (82%) buildings within 100m are 1 storey</p>

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<p>General Residential Zone - Schedule 2 'Residential Areas' (GRZ2)</p>	<p>The objectives of the GRZ2 are as follows:</p> <ul style="list-style-type: none"> · To implement the Municipal Planning Strategy and the Planning Policy Framework. · To encourage development that is responsive to the neighbourhood character of the area. · To encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport. · To allow educational, recreational, religious, community and a limited range of other non -residential uses to serve local community needs in appropriate locations. <p>The Schedule does not identify any specific neighbourhood character objectives.</p> <p>Maximum building height: A building used for the purpose of dwellings must not exceed the height of 9 metres. Pursuant to Clause 32.08-11 (Maximum building height requirement for a dwelling or residential building) a building must not be constructed for use as a dwelling that exceeds 11 metres in height or exceeds three storeys at any point.</p> <p>Decision Guidelines: Which should be considered by the responsible authority including;</p> <ul style="list-style-type: none"> · The amenity impact to surrounding land uses, · Whether opportunities exist to avoid a building being visually obtrusive through alternative building designs, particularly for developments with overall building heights in excess of 9m. 	<p>Not Adequately Addressed: Neighbourhood Character (Heritage & Amenity) The Clifton Hill Eastern Precinct area has Heritage Overlay (HO316) and Rutland and Noone St form component character streets. HO316 Clifton Hill Eastern Heritage Overlay Area is aesthetically and historically significant to the City of Yarra (National Estate Register [NER]Criteria E1, A4).</p> <p>Included within the HO are the single and double storey terrace houses and of significance are the continuous row of houses along lower Rutland St.</p> <p>The HO does not cover the project site but borders it on Noone St and Rutland St. The proposal as detailed in the Planning Report does not adequately address the heritage interface.</p>	<p>The local streetscape is an important piece of heritage and the development proposal of an proposed 8 storey apartment block will have significant impact through visual bulk (size, scale, colour) on the broader Clifton Hill East Precinct heritage character. The tower will be visible from most areas of the precinct.</p> <p>The red-on-red material choice increases the visual bulk of the proposed building further obtruding on the single storey homes directly adjacent.</p> <p>While the proposal does apparently endeavour to address materiality in response to the local red brick single/double storey residential and converted factories through use of red brick façade panels and red coloured concrete. The use of red concrete as a suitable design response for the 8 storey tower appears ill thought out as an appropriate response to Clifton Hill's heritage brick character particularly given the comparative size, form and impact on the landscape.</p> <p>Some of the other fieldwork precedent examples do a better job of softening the additional height through materials, setbacks and planting.</p>
<p>General Residential Zone - Schedule 2 'Residential Areas' (GRZ2)</p>	<p>The objectives of the GRZ2 are as follows:</p> <ul style="list-style-type: none"> · To implement the Municipal Planning Strategy and the Planning Policy Framework. · To encourage development that is responsive to the neighbourhood character of the area. · To encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport. · To allow educational, recreational, religious, community and a limited range of other non -residential uses to serve local community needs in appropriate locations. <p>The Schedule does not identify any specific neighbourhood character objectives.</p> <p>Maximum building height: A building used for the purpose of dwellings must not exceed the height of 9 metres. Pursuant to Clause 32.08-11 (Maximum building height requirement for a dwelling or residential building) a building must not be constructed for use as a dwelling that exceeds 11 metres in height or exceeds three storeys at any point.</p> <p>Decision Guidelines: Which should be considered by the responsible authority including;</p> <ul style="list-style-type: none"> · The amenity impact to surrounding land uses, · Whether opportunities exist to avoid a building being visually obtrusive through alternative building designs, particularly for developments with overall building heights in excess of 9m. 	<p>Not Adequately Addressed: Street Setback Noted as a significant design constraint, AS5100 (Bridge design) assessment, appears to not be undertaken or explored further. As a result the proposal dominates over the streets and low rise dwellings while maintaining a generous setback to the rail line.</p>	<p>The design process did not seek an AS5100 (Bridge design) assessment but cites it as a limiting factor preventing the buildings from being positioned closer to the western lot boundary. It's not evident that the standard applies at all, but assuming it does, there are numerous precedents for constructing buildings closer to the train line - notably, one of the existing 1950s era buildings on site, 110 Noone St immediately opposite the site, and The Hub (4-8 Garfield Street, Richmond), a 9 storey, 2014 constructed building in a Mixed Use Zone constructed significantly closer to the same train line than the lot boundary here would allow - and not a low speed siding, as is the case here.</p> <p>Placing the building further west would:</p> <ul style="list-style-type: none"> -Allow a wider floor plate, allowing more units at a lower height -Facilitate a car park entrance directly on to Noone St -Enable a less extreme interface to single storey heritage homes on Rutland St -Make it easier to accommodate the legally required offset (4.0 metres) to Rutland Street -Provide more substantial consolidated green space on Rutland Street for landscaping -Avoid unsafe linear park between rail and car park <p>Maintaining a 20m setback from the train line at the expense of the residential street seems like the wrong priority. At the proposed height (and even at a reduced height) maximising the setback from the single storey residences on Rutland and Noone Street should be prioritized over maintaining a clearance to the train yard</p>
<p>52.20-7.17 Integration with the street</p>	<p>52.20-7.17 Integration with the street Along street frontages, development should:</p> <ul style="list-style-type: none"> -Incorporate pedestrian entries, windows, balconies or other active spaces. -Limit blank walls. 	<p>Not Adequately Addressed: Integration with the Street Proposal sees a 4 storey side wall fronting Rutland St at the corner of Noone and Rutland Street which imposes on the heritage single storey form of the street. The wall appears to have minimal windows and offers no amenity or response to Rutland St.</p>	<p>Amenity of the plain 4 storey brick side wall on Noone St tower fronting Rutland St. This design fails to respond to Rutland St heritage streetscape of an entire row of historic single storey terraces (see HO316). Essentially the gateway to the development, with traffic access likely entering site from the north of Rutland or Noone St, met with a (assumed) concrete precast tilt panel with no response to heritage streetscape in design or scaling back of the four storeys.</p>

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<p>Municipal Planning Strategy Clause 02.02 - Vision</p>	<p>Clause 02.02 outlines the 2036 Spatial Vision for the City of Yarra: Yarra will be one of Melbourne’s most attractive inner -city municipalities, with a strong sense of history, a diverse population and a dynamic economy. The city’s prominent retail strips will attract visitors from across Melbourne and beyond, who are drawn to a vibrant range of shops, artistic and cultural offers and a popular night -time economy. The local economy will include important health and education precincts, businesses seeking to locate in popular activity centres and employment precincts, and a growing number of creative industries and niche manufacturers.</p> <p>Yarra’s historic neighbourhoods and heritage assets will be conserved, with development revitalising areas with capacity for change. New housing will provide homes in a range of sizes to meet the needs of the population, and be supported by the necessary community facilities and infrastructure.</p> <p>High quality urban design will respect the city’s heritage and built form character, provide new public and open spaces, and improved connections for walking and cycling.</p> <p>Landscape and natural assets will be well managed, with enhanced connections to the waterway corridors and their surrounding parks and recreation areas. Through environmentally sustainable development the municipality will reduce its carbon footprint and become resilient to climate change. Yarra will be a city proud of its history and prepared for the future.</p>	<p>Not Achieved: Vision for the City of Yarra 8 Storeys is unprecedented in the suburb. An 8 Storey building in a residential zone, directly across the street from predominantly single storey dwellings which are subject to a heritage overlay is not aligned with 'conservation of Yarra's historic neighbourhoods' & 'high quality urban design that respects the city's heritage and built form character'</p>	<p>This area is classified as an “Incremental Change Zone” and not adequately serviced by council to support a sudden 114 dwelling complex</p> <p>17/20 (85%) neighboring buildings are 1 storey 65/79 (82%) buildings within 100m are 1 storey</p>
<p>Municipal Planning Strategy Clause 02.03-4 - Built Environment & Heritage</p>	<p>Clause 02.03 -4 – Built Environment and Heritage – acknowledges the challenges associated with balancing the need to accommodate for new development and maintaining significant surrounding heritage and character.</p> <p>This clause states that conserving and enhancing heritage places and streetscapes while still allowing appropriate development is very important. This clause outlines the following relevant directions:</p> <ul style="list-style-type: none"> • Respect Yarra’s distinctive features and landmarks, including: The low-rise character of residential neighbourhoods. - Historic retail strips. - Identified buildings and places of heritage significance - Aboriginal and post-contact. - Municipal buildings in Collingwood, Fitzroy and Richmond. - The historic grid of boulevards, streets and laneways. - Historic street and laneway fabric and infrastructure. • Conserve and enhance the municipality’s highly valued heritage places to retain and promote Yarra’s distinctive character and sense of history. • Ensure mid-rise buildings are in accordance with any building height requirements set out in the relevant zone or overlay, or where there are no building height requirements specified, having regard to the physical and strategic context of the site. • Manage the scale, intensity and form of development in activity centres to protect highly intact heritage streetscapes and buildings. • Design development and locate land uses to create people -oriented places with high standards of amenity on-site, for adjoining properties and in the public realm 	<p>Not Achieved: Municipal Planning Strategy At 8 Storeys the proposal is unprecedented in the suburb and does not: 'ensure mid-rise buildings are in accordance with building height requirements' - instead it nearly triples the height restrictions.</p> <p>Across the street from single storey dwellings subject to a heritage overlay, the proposal does not: - 'Respect Yarra's distinctive features and landmarks, including the low rise character of residential neighbourhoods.' - 'Conserve and enhance the municipality’s highly valued heritage places'</p>	

2. Car park access and safety

Design Proposal	Relevant Ordinance	Assessment Against Relevant Ordinance	Community Concerns
Planning Provisions			

East Clifton Hill Residents Incorporated (No A0114110I)

<p>Clause 52.06 - Car Parking</p> <p>Clause 52.20-6.7 Car Parking</p>	<p>52.20-6.7 Car Parking The requirements of Clause 52.06, which would ordinarily apply, are superseded by the requirements contained in Clause 52.20-6.7 which stipulates a minimum requirement of 0.6 car parking spaces per dwelling.</p> <p>Notwithstanding, it is considered relevant to note the car parking requirements which would apply under Clause 52.06 would apply if a planning pathway under Clause 52.20 was not being pursued. The Site is located within a 'Category 2' area for the purposes of Clause 52.06, which carries a minimum requirement of one (1) car parking space per dwelling.</p>	<p>Not Achieved: Car Parking Requirements Proposal is well under the minimum requirement of 0.6 car spaces per dwelling (nearly half of the required spaces).</p>	<p>This figure is already reduced from the requirements that would normally apply under clause 52.06 to account for the building typology. The reduced resident demand used in the assessment to justify the proposal is already accommodated in the reduced requirements under 52.50. Such a significant further reduction to the already relaxed requirements is not appropriate in a neighbourhood where most existing residents do not have access to off street parking (see heritage terrace size and layout) and thus rely on on-street parking.</p> <p>It is unfair to make assumptions regarding social housing residents ability to own car or obtain license as justification to reduce parking spaces (see Tract 2026 Planning Report). Many residents in social housing require cars to access job opportunities that don't always allow for PT options - either further distance or not on PT lines or early/late times. Further, the 62.20-6.7 amendment and associated parking requirements was made to target government/ social housing so further minimisation of parking requirements should not be justified with outcomes to the detriment of existing residents access to parking.</p> <p>We also note, the only parking assessment, prepared by Traffix and included with the planning report, was undertaken between 2-4pm on a Thursday which is not representative of the peak parking time for the surrounding residential streets. Towne Park consulting suggest suitable assessment times for residential areas would be weeknights or weekends. Limited parking will direct more traffic to the surrounding streets as people search for parks and potentially park illegally/dangerously. This proposal is not equitable to the surrounding residents who will bear the impact of a reduction of spaces.</p>
<p>52.20-7.18 Access</p>	<p>52.20-7.18 Access -Vehicle crossovers should be minimised. -Car parking entries should be consolidated, minimised in size, integrated with the façade and where practicable located at the side or rear of the building. -Pedestrian and cyclist access should be clearly delineated from vehicle access. -The location of crossovers should maximise pedestrian safety and the retention of on-street car parking spaces and street trees. -Development must provide access for service, emergency and delivery vehicles.</p>	<p>Not Adequately Addressed: Access The proposal documents the existence of the pedestrian and cycling underpass (Traffic Engineering Assessment, pp. 7, 17; Design Report Part 1, p. 14) but the traffic assessment does not assess the interaction. This fails to address Clause 52.20-7.18, which requires crossover locations to "maximise pedestrian safety" by directing additional traffic into high use pathway.</p> <p>Opportunities for utilising the existing crossover on Noone St and access to the VicTrack road have not been explored.</p>	<p>The proposed car parking is accessed via the southern edge of the site Alexander Parade East, directing all new traffic along Rutland Street.</p> <p>Proposed design access via south will increase traffic on Alexander Parade East directly through a major cycle and pedestrian access route under the rail line (ie local resident movement to public transport, closest shops, schools and child care). This is already a conflict point with Yarra Council receiving complaints from bike users around safety.</p> <p>This appears like a missed opportunity to utilize Noone Street for the entrance (which may be busier for vehicles but less pedestrian/cycle use) or the western Vic Track laneway to access the parking lot. Ultimately all traffic will flow through Noone so that should be the preferred exit.</p> <p>The proposal documents the existence of the pedestrian and cycling underpass (Traffic Engineering Assessment, pp. 7, 17; Design Report Part 1, p. 14) but the traffic assessment does not assess the interaction. This fails to address Clause 52.20-7.18, which requires crossover locations to "maximise pedestrian safety".</p> <p>Surveillance will still occur at the southern edge of the site as this is a high use pedestrian/cycle route, additional foot/bike traffic will also be added from the new development.</p> <p>Parking at 90 degree on Rutland St is not a preferred parking style for road safety but is acceptable with low/slow traffic use, increasing traffic volumes from proposed southern carpark entrance will increase risk of collision.</p> <p>Such a significant further reduction to the already relaxed requirements is not appropriate in a neighbourhood where most existing residents do not have access to off street parking and thus rely on on-street parking</p> <p>Directing all new traffic down Rutland Street when there is opportunity to provide entry off the western laneway or Noone Street where there is already more traffic is not a good safety outcome as it will result in increased traffic and speeds on an otherwise residential street</p>

3. Shared outdoor spaces to improve the whole community

Design Proposal	Relevant Ordinance	Assessment Against Relevant Ordinance	Community Concerns
Planning Provisions			

East Clifton Hill Residents Incorporated (No A0114110I)

<p>General Residential Zone - Schedule 2 'Residential Areas' (GRZ2)</p>	<p>The objectives of the GRZ2 are as follows:</p> <ul style="list-style-type: none"> · To implement the Municipal Planning Strategy and the Planning Policy Framework. · To encourage development that is responsive to the neighbourhood character of the area. · To encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport. · To allow educational, recreational, religious, community and a limited range of other non -residential uses to serve local community needs in appropriate locations. <p>The Schedule does not identify any specific neighbourhood character objectives.</p>	<p>Not Adequately Addressed:</p> <p>A Diversity of Housing Types</p> <p>The apartment mix sees this development as 62% 1 Bedroom Dwellings, 26% 2 Bedroom Dwellings, and 12% 3 Bedroom Dwellings.</p>
<p>52.20-6.4 Safety</p> <p>52.20-7.4 Landscaping</p>	<p>Clause 52.20-6.4 Safety</p> <ul style="list-style-type: none"> -Planting which creates unsafe spaces along streets and accessways should be avoided. -Developments should be designed to provide good lighting, visibility and surveillance of car parks and internal accessways. <p>52.20-7.4 Landscaping</p> <p>Development should:</p> <ul style="list-style-type: none"> -Provide a safe, attractive and functional environment for residents. 	<p>Not Achieved:</p> <p>Safety / Landscaping</p> <p>The proposal fails to account for safety and behaviour mitigation in its current design. The lack of passive surveillance of the "Linear Pocket" and the rail access road and car park. Proposed landscaping and harbour further block views to this awkward area and do not appear inviting to resident use.</p> <p>Concerns have also been raised about the use of the rooftop garden as well and if the area will be frequently used to allow for surveillance. A preference for lift for upper storey residents.</p>
<p>52.20-7.4 Landscaping</p>	<p>52.20-7.4 Landscaping</p> <p>Development should retain existing trees and canopy cover.</p>	<p>Not Adequately Addressed:</p> <p>Landscaping</p> <p>Majority of the trees within the site are to be removed to accommodate the proposed development. That Medium Value trees 1-5 sit outside the site boundary (on council land) and the other Medium Value tree (tree 13) to be retained is of Low Value. Limited canopy and deep soil areas are present.</p>
<p>52.20-6.3 Permeability</p>	<p>52.20-6.3 Permeability</p> <p>The site area covered by the pervious surfaces should be at least 20 percent of the site.</p>	<p>Not Adequately Addressed:</p> <p>Permeability</p> <p>Permeability of 17.6% falls short of target.</p>

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Appendix C – Homes Victoria [Guidance Note v2.0 May 2024](#)

Homes Victoria
[Guidance Note v2.0 May 2024](#)

Applicants seeking to deliver housing ‘on behalf of’ the CEO are required to demonstrate compliance with this guideline to ensure that the social and affordable housing projects are of high-quality design and that consultation has been undertaken appropriately.

Guidance on consultation is provided within a separate [Homes Victoria Consultation Guidelines](#)

The Responsible Authority is the Minister for Planning (the Minister) for projects submitted under Clause 53.20 seeking ten dwellings and above. DTP is responsible for the management, assessment and recommendation to the Minister for these applications.

The following principles guide the CEO in determining which projects are eligible to be undertaken on the CEO’s behalf. The expectation is that the CEO will support projects that:

Principle 1: Demonstrate public benefit through the provision of new social and or affordable housing.

Principle 2: For development comprising social housing dwellings, assist households on the Victorian Housing Register.

Principle 3: Maximise the longevity of the social and or affordable housing provided.

Principle 4: Achieve mixed, inclusive, diverse and balanced communities.

Principle 5: Achieve good planning and urban design outcomes.

Projects on behalf of Homes Victoria

Guidance Note v2.0 May 2024 3

Criteria Projects that seek ‘on behalf of’ the CEO status should meet all the criteria specified below unless otherwise agreed upon in writing by the CEO:

Criterion 1: The project comprises: • at least 30% of dwellings for social housing; or, • if less than 30% of the dwellings in the proposal are social housing, at least 75% of all dwellings should be a combination of affordable and social housing, with at least 10% being social housing.

Criterion 2: The social or affordable housing: • will be owned or managed by either the CEO or a registered housing agency; or, • the CEO has a financial or proprietary interest in the social or affordable housing or the land on which the housing is built.

Criterion 3: The project is informed by and responds appropriately to Homes Victoria’s Design Principles (see Attachment 1).

Criterion 4: The CEO is satisfied that the applicant can continue to comply with the relevant requirements below and any other relevant ongoing requirements the CEO outlines in written correspondence.

East Clifton Hill Residents Incorporated (No A0114110I)

Requirements

Projects seeking 'on behalf of' the CEO status **must** meet the following requirements before an assessment is undertaken.

It is strongly recommended that applicants meet these requirements before requesting 'on behalf of' status from the CEO.

Unless with the written consent of the CEO, failure to meet all requirements below may result in delays in the process to grant 'on behalf of the CEO' status.

All projects

- All projects must be informed by the strategic planning context and the planning provisions that would ordinarily apply.
- The relevant council and community consultation on the project must be undertaken in accordance with the Homes Victoria Consultation Guidelines.
- Proposals over three above-ground storeys and or 100 dwellings, or are determined to benefit from a formal design review process by Homes Victoria officers, will be referred to the Victorian Design