



12th December 2007

Ms Anita Lange
Corporate Planning and Performance
City of Port Phillip
Private Bag 3
PO ST KILDA VIC 3182

Dear Ms Lange

Re: St Kilda Triangle Site Development Plan – Additional Public Submissions

We refer to our report, "St Kilda Triangle Site Development Plan: Consideration of Submissions" previously provided to you. Since providing that report Council has received additional submissions on the development plan. Your Coordinator Business Support & Systems Development advises us that all submissions received by Council up to 9:00 a.m. today have been forwarded to us and we confirm that the last batch which was couriered from your office this morning was received by our office today.

The submissions received since we completed our earlier report include three new matters, which we summarise as:

1. There has been no thorough assessment of net community benefit, including a thorough economic impact analysis on the Fitzroy Street and Acland Street retail centres.
2. Two submitters respectively suggest that a skate park and a children's recreational centre, such as rock climbing, should be provided within the development.
3. One submitter questions the legality of building under The Upper Esplanade and that this is outside of the Land (St Kilda Triangle) Act, 2006.

We respond to the submissions as follows:

1. No thorough assessment of net community benefit, including an economic impact analysis on existing centres

Response

This submission is in the form of an urban economist's report and advice to the Unchain St Kilda group.

The development plan does not include a thorough economic impact assessment on existing centres from the proposed development, and given that third-party notice, decision and appeal rights are extinguished by the provisions of the Development Plan Overlay, we agree that the appropriate time for that assessment to be provided is at the development plan stage rather than at the permit application stage. However, as previously noted in our earlier report it is difficult to ascertain the precise retail and commercial floorspace proposed and therefore to undertake a proper economic impact assessment.

Matrix Planning Australia Pty Ltd

A.C.N. 096 741 552

2nd Floor, 50 Budd Street, Collingwood, Victoria. 3066
Tel: +61 (3) 9419 3222 Fax: +61 (3) 9419 3244



We note that none of the planning controls including the schedule to the Development Plan Overlay require the provision of an economic impact assessment. However, we would qualify that comment by noting that the planning policy and control framework for the site does not, in our view, envisage a substantial retail/commercial component.

We therefore consider that considerable weight should be given to this submission.

We recommend that in the event Council approves the development plan that it requires or undertakes its own economic impact assessment at the planning permit application stage, so that at least Council can be informed of the impacts on other centres and factor that into its decision on the permit application(s).

We understand that Council's planning officer will be providing Council with a net community benefit assessment of the development plan.

2. *A skate park and children's recreational centre should be provided*

Response

These two uses are additional to the various additional uses suggested in earlier submissions. Whilst these two uses would also be consistent with the planning policy and control framework they do not form part of the development plan presently before Council, and it is therefore considered that little weight should be given to these submissions.

3. *The legality of building under The Upper Esplanade, which is outside the area covered by the Land (St Kilda Triangle) Act 2006*

This is essentially a legal submission about which we are not qualified to advise Council. Council should seek its own legal advice in this regard.

No other new issues were raised in the additional submissions that have not already been dealt with in our previous report.

We have reviewed every submission thus far provided to us by Council.

We would be pleased to elaborate as required.

Yours faithfully

Matrix Planning Australia Pty Ltd

Andrew Clarke
Director