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VICTORIAN PRIDE CENTRE – CONSIDER INDEPENDENT ADVISOR'S RECOMMENDATIONS AND REQUEST FOR MINISTERIAL AMENDMENT (AMC149) TO THE PORT PHILLIP PLANNING SCHEME

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1. PURPOSE

- 1.1 To consider the report and recommendations of the Independent Advisor appointed to review submissions in relation to proposed Amendment C149 which proposes to facilitate the use and development of the Victorian Pride Centre at 79-81 Fitzroy Street, St Kilda.
- 1.2 To consider whether to request the Minister for Planning prepare and approve Amendment C149 to the Port Phillip Planning Scheme, as a Ministerial Amendment under section 20(4) of the *Planning and Environment Act 1987*.

2. EXECUTIVE SUMMARY

- 2.1 Amendment C149 proposes to rezone part of the land so that it is entirely within the Commercial 1 Zone (C1Z) and introduce a site-specific planning control (the Incorporated Document) to enable the use and development of the Victorian Pride Centre (VPC) in Fitzroy Street, St Kilda.
- 2.2 A site-specific control is required because the proposed development does not meet the mandatory street-wall, building height and upper level setback requirements contained within Design and Development Overlay 6 of the Port Phillip Planning Scheme.
- 2.3 On 20 June 2018, Council resolved to endorse a process to initiate a request to the Minister for Planning to amend the Port Phillip Planning Scheme, via a streamlined amendment process. This would allow the VPC Board to meet milestones related to the release of project funding and to deliver the project by the scheduled opening in November 2020.
- 2.4 The streamlined amendment process included a community consultation period on the proposed Amendment C149, as well as the appointment of an Independent Advisor to review submissions and provide recommendations to Council. Experienced urban planner and current sessional member of Planning Panels Victoria Peter Allen was appointed as the Independent Advisor. Refer to **Attachment 1** for the Terms of Reference for the Independent Advisor.



- 2.5 Community consultation was undertaken from 2 July to 3 August 2018. Responses received from the community were generally positive in relation to the proposal which indicates a level of support for the proposed use and development of the VPC. Some specific concerns were raised which have required further consideration and some changes to the proposed amendment.
- 2.6 On 1 August 2018, Council endorsed a submission to the Independent Advisor, having considered community feedback received up until 26 July 2018.
- 2.7 On 3 August 2018, the VPC Board provided a submission to the Independent Advisor requesting various amendments to the Incorporated Document. This included a number of changes requested to the Development Plans (part of the Incorporated Document), as detailed in **Attachment 2**. The changes requested to the Development Plans include:
- Change to the rooftop to include a significant architectural feature comprising a 'flagpole' and a radio mast, including an increase in height, increase in width and external illumination of the structure during the evening.
 - Additions to the solar array on the rooftop.
 - Addition and deletion to windows.
 - An additional office at mezzanine level.
 - A reduction in the building setback from Fitzroy Street for Levels 3 and 4 by 1.2 metres.
- 2.8 Council received the report of the Independent Advisor on 21 August 2018. The report offers overall support for proposed Amendment C149, both in relation to the appropriateness of the proposed use and development of the VPC (albeit with some specific changes), and the form and content of the amendment. The Independent Advisor's Report is included at Attachment 3.
- 2.9 Many of the recommendations from Council's submission have been agreed by the Independent Advisor (limits land use, parking restrictions in the basement).
- 2.10 The Independent Advisor's Report considers that the built form of the proposed building overall is well conceived, but agreed that considerations from the Crime Prevention Through Environmental Design Report (CPTED) commissioned by Council be incorporated into the detailed design of the portico, the Jackson Street Plaza and the underground car park.
- 2.11 The Independent Advisor highlighted a number of matters that had not been fully resolved, including those related to the provision of car parking, the function of the radio mast / flag pole and the potential for a Good Neighbour Protocol between the VPC and nearby residents. These are discussed in further detail in this report.
- 2.12 Council now needs to decide whether to request the Minister for Planning to prepare and approve Amendment C149, and if changes to the Incorporated Document (Development Plans and conditions) should be made to respond to issues raised through the consultation process and on line with the recommendations of the Independent Advisor.



3. RECOMMENDATION

That Council:

- 3.1 Requests the Minister for Planning prepare and approve Amendment C149 to the Port Phillip Planning Scheme, pursuant to Section 20(4) of the *Planning and Environment Act 1987*, in accordance with the documentation provided at **Attachment 6**.
- 3.2 Notes changes made to proposed Amendment C149 in response to community submissions and the recommendations of the Independent Advisor, including the:
 - introduction of a condition within the Incorporated Document to ensure that the results of the Crime Prevention Through Environmental Design Assessment commissioned by Council are incorporated into the detailed design of the building with particular regard to the portico on Fitzroy Street, the Jackson Street Plaza and the basement car park;
 - specific exclusion of 'nightclub' as a potential land use within the Incorporated Document;
 - reinstatement of the flag pole / radio mast to that version that was subject to community consultation version of the Development Plans forming part of the Incorporated Document; and
 - introduction of a condition within the Incorporated Document to require time restrictions on the public parking proposed within the basement car park.
- 3.3 Advise the Minister for Planning that the recommendations of the Independent Advisor have been accepted by Council as detailed in **Attachment 5**, with variation to the recommendation for a 'Good Neighbour Protocol' on the basis that this is more appropriately addressed outside of the Incorporated Document.
- 3.4 Writes to the Victorian Pride Centre Board requesting that they initiate the creation of a 'Good Neighbour Protocol' directly with neighbouring residents (outside of the process for Amendment C149) to establish a clear understanding of expected amenity outcomes and to provide a pathway to resolve any disputes that may arise.
- 3.5 Authorises the Chief Executive Officer (or delegate) to finalise the Amendment C149 documentation for Ministerial approval.
- 3.6 Writes to all submitters advising them of Council's resolution, and thanking them for their comments and interest in relation to Amendment C149.

4. KEY POINTS/ISSUES

Background to proposed Amendment C149

- 4.1 In April 2016, the Victorian Government announced \$15 million had been allocated to establish the VPC, a new hub for the LGBTIQ community.

ORDINARY MEETING OF COUNCIL 5 SEPTEMBER 2018



- 4.2 Following a competitive selection process in March 2017, the Victorian Government and Council announced Fitzroy Street, St Kilda as the future home of the VPC.
- 4.3 A design competition undertaken by the VPC Board and the Royal Australian Institute of Architects produced a preferred concept design for the development.
- 4.4 The winning design requires an amendment to the Port Phillip Planning Scheme, as it does not meet all of the mandatory requirements of Design and Development Overlay 6 (DDO6) which applies to the St Kilda area. A planning permit cannot be issued.
- 4.5 Proposed Amendment C149 seeks to vary these mandatory requirements on a site-specific basis by incorporating a site-specific planning control (the Incorporated Document) to facilitate the use and development of the VPC. This will effectively approve the VPC and override the need for a separate planning permit.
- 4.6 An amendment is also required to rezone the property at Lot 3/77 Fitzroy Street to a Commercial 1 zone (C1Z), from the current Public Use Zone (PUZ6). The PUZ6 designation on this land reflects its existing use as a Council owned car park. The C1Z reflect the zoning of the Fitzroy Street retail strip.
- 4.7 The VPC Board requested that Council initiate such an amendment, pursuant to Section 20(4) of the Planning and Environment Act 1987, which involves the Minister for Planning exempting himself from the formal notice requirements that relate to planning scheme amendments. This request highlighted a desire for a streamlined amendment process that could meet milestones related to the release of funding, and allow the project to be delivered by the scheduled opening in November / December 2020.
- 4.8 On 20 June 2018, Council provided 'in principle' support for a 'section 20(4) process' to initiate the proposed amendment, following and subject to the outcomes of a robust community engagement process. This was to ensure that the views of the community could be considered, but in a more streamlined manner.
- 4.9 At that time, Council also resolved to request that an independent advisor be appointed to review submissions to proposed Amendment C149 and to provide a report to Council with recommendations on how to proceed.
- 4.10 The community engagement process was designed to provide a genuine opportunity for affected and / or interested stakeholders to make written submissions to the proposal. This process is further explained in section 5 of this report.
- 4.11 A total of 32 written submissions were received during the engagement period, and verbal feedback was received from 54 local traders and community members who attended the drop-in sessions.



- 4.12 A number of specific concerns were raised in the submissions, and through the verbal feedback received through the drop-in sessions. This is discussed in the section below.

Key issues raised in submissions

- 4.13 Written and verbal feedback demonstrated general support for the proposed use and development of the VPC in the most part. Community comment highlighted that:
- the proposal supports diversity and the LGBTIQ community;
 - the proposed development would provide a catalyst for the revitalisation of Fitzroy Street;
 - the proposed building design would visually improve the Fitzroy Street streetscape;
 - there are perceived social and economic benefits associated with the proposal; and
 - the uses proposed would increase day-time activity along Fitzroy Street which would increase passive surveillance and vibrancy.
- 4.14 However, specific concerns were raised in relation to the following key issues:
- Building height and setbacks to Jackson Street.
 - The design of the portico element on the Fitzroy Street frontage.
 - Safety issues related to Jackson Street and the underground car park.
 - Traffic impacts and car parking provision.
 - Proposed licensed areas and amenity impacts.
- 4.15 At its Ordinary Council Meeting on 1 August 2018, Council resolved to endorse a submission to the Independent Advisor which specifically sought advice on the above issues.
- 4.16 The VPC Board also provided a submission to the Independent Advisor on 3 August 2018. This submission requested changes to the Incorporated Document (including to the Development Plans and its associated conditions). This submission was accompanied by the following documentation:
- Amended proposed Incorporated Document (VPC Alternative).
 - Amended Development Plans, prepared by BAU-GAA JV Partnership.
 - Daylight Analysis of portico, prepared by BAU-GAA JV Partnership. Refer to **Attachment 4**.
 - Design Rationale, prepared by BAU-GAA JV Partnership.
 - Aboricultural Inspection Report, prepared by Aboriculture Pty Ltd.



- Traffic Impact Assessment Report, prepared by Irwin Consult.
 - Draft Green Travel Plan, prepared by Ratio Consultants, dated 27 July 2018.
 - Draft Sustainability Management Plan, prepared by Hype Sustainability.
- 4.17 In relation to the draft Green Travel Plan and the draft Sustainability Management Plan, it is noted that these are typically matters that are provided pursuant to conditions on planning permits and have been provided early as drafts to assist with the Council's consideration of the proposed development. In this regard, it is noted that the draft Green Travel Plan is of direct relevance to determining the appropriateness of the proposed car parking dispensation.
- 4.18 As part of the above, the following changes to the Development Plans were requested by the VPC Board (noting these changes have not been subject to the community consultation process):
- Mezzanine level (internal changes) – deletion of the shower and the addition of a new office space.
 - Level 4 – revised flagpole / radio mast design.
 - Level 2 to 4 – reduced setback to Fitzroy Street by 1.2 metres (this matter was considered and agree to in the previous Council Submission to Independent Advisor).
 - Changes to window locations / design:
 - Level 2 – deletion of the window recess to the elliptical window opening to terrace / outdoor amenity space to Fitzroy Street façade.
 - Level 1 and 2 – deletion of the window recess to the elliptical window opening to the north-west façade.
 - Level 1 to 4 – revised number and location of hexagon shaped windows to the south-west façade.
 - Mezzanine and Level 1 – hexagon shaped windows introduced to north-eastern façade.
 - Changes to the provision of photo-voltaics:
 - Roof level – revised height and appearance of photo-voltaic support structure over service roof.
 - Level 4 – photo-voltaic pergola structure shown in sections and elevations, previously only shown in plan.

These changes are highlights on the plans included at **Attachment 2**.

- 4.19 In addition, the VPC submission requested the following changes to requirements within the version of the Incorporated Document that was subject to community consultation:
- Providing for a greater level of flexibility for the use of the building.
 - Separate references to 'endorsed plans' and 'development plans'.



- Reference to building as 'multi-level' rather than 5-storey to avoid confusion over the proposed mezzanine level within the overall 4-level structure.
- Making updates as required from the approval of Amendment VC148 (related to the State Government led 'Smart Planning' reforms).
- Introduction of greater flexibility to ensure that any requirement to amend plans does not trigger the need for a further planning scheme amendment.
- Introduction of wording in relation to the subdivision of land.
- Modification to car parking condition to remove requirement to secure off-site car parking if required.
- Deletion of the condition requiring amplified music within the building to be played only through a permanently installed sound system.
- Deletion of a condition disallowing any 'prohibited' land use in the underlying Commercial 1 Zone.

4.20 The VPC Board also stated in their submission that they do not support the following Council recommended changes:

- Removal of the phrase 'but not limited to' in relation to the extent of land uses to be allowed.
- The introduction of dimensions for building setbacks on the plans.
- The inclusion of a requirement to show the location, net floor area and proposed extent of each specific use as defined by the Planning Scheme.
- The inclusion of a requirement to show the location of crossovers and dimensions on Jackson Street.
- The inclusion of a requirement to erect right-turn only signs for vehicles exiting the basement of the proposed building.
- The level of detail proposed regarding various time limitations in relation to the use of car parking that is to be available to the general public within the basement of the building.
- The inclusion of a requirement to provide electronic signage detail in relation to the availability of public car parking within the basement of the building.

4.21 The above requests (as described in sections 4.18 and 4.19 of this report) are responded to in detail in Attachment 6 which considers the report of the Independent Advisor, and are summarised later in this report.

4.22 The VPC submission supported the following Council recommended changes:

- Amendment to the wording of the 'Place of Assembly' land use to specifically exclude the potential for a 'Nightclub' land use.



- Arborist, Traffic and Acoustic Report conditions to include a requirement to implement report recommendations.
- Responsible Serving of Alcohol course requirement.
- Minor wording change in relation to the use of noise limiters.

4.23 Two new conditions regarding crossover construction and design.

Independent Advisor Recommendations for Proposed Amendment C149

4.24 The Independent Advisor has provided overall support for proposed Amendment C149 to proceed subject to a range of specific considerations and changes. Refer to **Attachment 3** for the Independent Advisor's Report, to **Attachment 5** for a detailed overview and officer response to the Independent Advisor's Report and to **Attachment 6** for a full revised set of Amendment C149 documents having regard to the officer recommendations contained within **Attachment 5**.

4.25 In particular, it is noted that the Independent Advisor is supportive of the height and scale of the proposed building including the proposed portico treatment to Fitzroy Street.

4.26 The support for the portico was provided subject to detailed design considerations recommended in the CPTED commissioned by Council (refer to **Attachment 7**). It is important to note that these changes do not fundamentally alter the original design concept and relate to matters such as maintaining clear sightlines by avoiding concealed corners on the colonnades and avoiding over-vegetation.

4.27 As per Council's original submission, it is reiterated that the portico has the potential to affect the street tree located near the site. Should the portico ultimately compromise the tree to the extent that removal was required (which is not proposed), the Independent Advisor recommends that the VPC be required to provide an equivalent replacement. This is consistent with Council's submission to the Independent Advisor. To manage the intent of this condition, Council's standard condition in relation to this matter is proposed to be applied.

4.28 In addition to the size and scale of the proposed development, the Independent Advisor has agreed with many of the other matters raised in Council's submission including:

- prohibiting the use of the development as a nightclub;
- removing the phrase 'but not limited to' when describing permissible land uses;
- the introduction of a time limit on the public car spaces within the proposed development; and
- requiring the provision of electronic signage to indicate the extent of parking available in the basement of the proposed development.



- 4.29 The major outstanding matters that remain unresolved following the Independent Advisor's report relate to the proposed car parking dispensation and the post-consultation changes to the flagpole / radio mast. The report also makes suggestions in relation to amenity management.

Car parking dispensation

- 4.30 In relation to the proposed car parking dispensation, the assessment from the Independent Advisor noted that:
- there is policy support for a sizeable car parking dispensation due to its location in an activity centre;
 - other nearby non-residential developments provide limited parking and there is a significant amount of parking available elsewhere in the vicinity;
 - the Traffic Impact Assessment and the draft Green Travel Plan from consultants acting on behalf of the VPC Board support this outcome; and
 - the Traffic Impact Assessment and draft Green Travel Plan require updating to Council's satisfaction to determine the extent of the proposed car parking dispensation.
- 4.31 In summary, while the Green Travel Plan is still only in draft form, Council officers consider that with some further refinement, that it will be able to facilitate sustainable transport use by users to a level that would justify the proposed car parking dispensation. Further, it is considered that these refinements can be progressed as a condition of the proposed Incorporated Document. Refer to the discussion and officer recommendations in **Attachment 5** for further information on this issue.

Architectural Feature including flagpole / radio mast

- 4.32 In relation to the post consultation change in relation to the architectural mast including the flagpole / mast, the assessment from the Independent Advisor noted that:
- the VPC submission to the Independent Advisor has significantly changed the design for this feature (refer to **Attachment 8** for a comparison);
 - the current design appears to be more imposing visually than the previous design in terms of bulk and appears taller in height, though no dimensions were provided to the Independent Advisor; and
 - Council should seek further information from the VPC about the intended function of this element to enable consideration around a condition to guide its final design in the Incorporated Document.
- 4.33 Council officers sought further information from the VPC's consultants on this matter. In response, a schematic design has been provided that shows the structure in greater detail (refer to **Attachment 9**).



- 4.34 The VPC Board's advice indicates that the intention is for ten poles to be clad around the actual flag pole and that these are to be coloured to represent each of the ten colours of the LGBTIQ flag and illuminated at night.
- 4.35 Council's City Design Officer does not support the changes to this feature. They consider that the mast appears 'stuck on' to the building and is not consistent with the strong and consistent architectural language of the rest of the building. Further, they note that rather than a celebratory gesture, the overly large and ornate mast seems unnecessary given that the Pride Centre proposal will already be a striking building and a feature of Fitzroy Street.
- 4.36 Council officers understand the desire for this to be somewhat of a symbolic feature for the VPC. However, there is concern that its height (taller than the structure in the consultation plans) and width (almost as wide as the flag itself) will result in quite a bulky element. Further, the proposed illumination of this structure has the potential to further exacerbate this concern.
- 4.37 While the symbolism intended by the design is understood, the structure is substantially different than the version that was subject to consultation with the community and has the potential to create offsite amenity concerns, particularly in relation to residents in Jackson Street. As a result, it is considered that this element should be deleted from the plans and that the mast structure return to as it was in the version of the plans that was subject to community consultation.
- 4.38 Should the VPC Board want to pursue structure in the future, this should be required to seek the necessary approvals at that time.

Amenity management

- 4.39 The Incorporated Document that was referred to the Independent Advisor outlined a comprehensive set of conditions to manage potential amenity and noise impacts (including the sale and consumption of liquor). This included limiting the operating hours of operation and the number of patrons within the proposed licensed areas, as well as managing noise levels. The Independent Advisor agreed with these conditions for the most part. The exception being a requirement for staff serving alcohol to have a 'responsible service of alcohol' certificate (on the basis that it duplicates the requirements of the liquor licence, not because the intent was not agreed).
- 4.40 Notwithstanding this, the Independent Advisor considered that submissions about amenity and traffic impacts on the adjacent residential areas in Jackson Street and Enfield Street does highlight the need for the VPC to be conscious of the potential impacts of its activities on these nearby residential areas and to be respectful of those owners and residents.
- 4.41 As a result, the independent advisor recommended that Council and the VPC should consider the creation of a 'Good Neighbour Protocol' by the VPC in consultation with residents to establish a clear understanding of expected



amenity and interaction outcomes and a pathway for discussion and resolution of issues as they arise.

- 4.42 While the intent of the recommended 'Good Neighbour Protocol' has merit, Council's ability to manage this issue is already addressed by way of the conditions included within the draft Incorporated Document in relation to hours of operation, noise, outside activity and the sale and consumption of liquor. In addition, Council has a Local Law relating to noise and amenity requirements that must be adhered to by the VPC. The EPA also has processes in place to manage noise pollution. Duplication of these formal and binding requirements is not appropriate as it is likely to create confusion amongst landowners and the operators of the VPC in relation to enforcement, if required.
- 4.43 Notwithstanding that this is not a matter that requires a change in the Incorporated Document, there is merit in requesting that the VPC Board develop a 'Good Neighbour Protocol' to provide a process to residents that makes them the first point of contact and a resolution process, if they have a concern with the operation of the VPC. Such a protocol could also cover issues such as notifying nearby residents of large one-off events.

5. CONSULTATION AND STAKEHOLDERS

- 5.1 The community engagement process was designed to provide a genuine opportunity for affected and / or interested stakeholders to make written submissions to the proposal. The engagement process included:
- the launch of a 'Have Your Say' Council webpage designed to receive community input from the 2 July - 3 August 2018;
 - the display of the proposed Amendment C149 at Council town halls, libraries and on the Council website;
 - three community information 'drop-in' sessions, including with adjacent residents and traders;
 - notification to residents, traders and property owners that may be directly affected by the proposed use and development of the site (1,200 in total);
 - building broader community and stakeholder awareness through, notices in Port Phillip Leader and St Kilda News, and signage on the site; and
 - targeted engagement with key stakeholder and interested parties, including the Fitzroy Street Business Association.
- 5.2 A total of 32 written submissions were received during the engagement period. 22 of these were in support of Amendment C149 and a further 8 provided conditional support subject to changes, while only 2 submissions objected. In addition, verbal feedback was received from 54 local traders and community members who attended the drop-in sessions.



- 5.3 Informal discussions have been held with interested parties as requested, including representatives from the Fitzroy Street Business Association.
- 5.4 Council's submission to the Independent Advisor took into consideration community views expressed at 'drop-in' sessions as well as submissions received up until 26 July 2018.

6. LEGAL AND RISK IMPLICATIONS

- 6.1 The appointment of an Independent Advisor to review submissions provides a level of probity and advice to Council and the Minister for Planning to consider in determining the merits of the proposal.
- 6.2 The combination of the above has been designed to enable a request to the Minister for Planning to amend the Port Phillip Planning Scheme via Section 20(4) of the *Planning and Environment Act 1987*. In this regard, it is noted that State Government *Practice Note 29 - Ministerial Powers of Intervention for Planning and Heritage Matters* refers to circumstances when the Minister may undertake a section 20(4) amendment. This includes where the matter is one of genuine State Significance (Criterion 1), and where the issues have been reasonably considered and the views of affected parties are known (Criterion 2).

7. FINANCIAL IMPACT

- 7.1 Council has committed \$13 million in the form of land to support establishment of the VPC in St Kilda. In turn, this project is expected to deliver significant economic benefits to the Fitzroy Street Precinct, through the provision of a new hub for the LGBTIQ community.
- 7.2 Any significant delays in this project may impact the VPC in relation to project funding.
- 7.3 The cost of the Independent Advisor and the statutory fees associated with the processing of Amendment C149 will be met by the VPC board.

8. ENVIRONMENTAL IMPACT

- 8.1 The proposal retains the two peppercorn trees along Jackson Street at the rear of the proposed building, the established Chinese elm on Fitzroy Street and proposes landscaping for all outdoor spaces including the terrace and rooftop areas.
- 8.2 Further, the VPC Board have now committed to achieving a 5-Star 'Design and 'As Built' certification from the Green Building Council of Australia which would place the development at 'best practice' from a sustainability perspective.



9. COMMUNITY IMPACT

9.1 The VPC project aligns strongly with the Council's commitment to diversity, and is a clear demonstration of its commitment to the wellbeing of the LGBTIQ community.

10. ALIGNMENT TO COUNCIL PLAN AND COUNCIL POLICY

10.1 A four-year priority initiative of the Council Plan 2017-27 under Strategic Direction 1: 'we embrace difference, and people belong' is to establish the Pride Centre in St Kilda.

11. IMPLEMENTATION STRATEGY

11.1 Should Council decide to support the amendment, a request will be lodged with the Minister within 5 business days.

11.2 All submitters will be advised of Council's decision at this meeting and will continue to be informed of the progress of Amendment C149. If Amendment C149 is approved by the Minister, submitters will be directly advised.

12. OFFICER DIRECT OR INDIRECT INTEREST

12.1 No officers involved in the preparation of this report have any direct or indirect interest in the matter.

**TRIM FILE NO:
ATTACHMENTS**

66/27/09

- 1. Attachment 1 - 20180731 Victorian Pride Centre Independent Advisor Terms of Reference Final**
- 2. Attachment 2 - BAU003 VPC Development Plans 180820(1) (Rev K)**
- 3. Attachment 3 - AmC149 Independent Assessment Report FINAL 21 Aug 18**
- 4. Attachment 4 - Daylight Analysis Results**
- 5. Attachment 5 - Table in response to IA Report**
- 6. Attachment 6 - Amendment documents**
- 7. Attachment 7 - FINAL Safety in Design Report - Pride Centre 20180813**
- 8. Attachment 8 - Flagpole Before and After Proposed VPC changes**
- 9. Attachment 9 - BAU003M VPC Flagpole Schematic Design 180822**