

Memorandum



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|----------|-----------------------------|-------|-------------------------------|
| To: | Michael Henderson (Contour) | From: | James Cossins (Traffix Group) |
| Our Ref: | G33788M-03F | Date: | Wednesday, 11 February 2026 |

424 St Kilda Road, Melbourne – Section 87a Application Traffic Engineering Assessment

Further to your request, the following provides some commentary in relation to the Section 87a application for the redevelopment of 424 St Kilda Road, Melbourne, assessing parking and traffic implications of the amended plans.

The following relates to the Plans dated 18th December 2025.

Background

In December 2024, the City of Port Philip Council issued a permit (PDPL/00115/2024) for a mixed use development, including residential and commercial uses at 424 St Kilda Road, Melbourne.

Plans were endorsed in early 2025.

Reference is made to Traffix Group report (G33788R-01F dated 16 May 2024) that assessed the traffic impact of the approved application.

A summary of the endorsement scheme is provided at Table 1

Table 1: Endorsed Development Summary

| Use | | Endorsement Scheme |
|-----------------|-------------------------|----------------------|
| Residential | 1 bed dwelling | 19 no. |
| | 2 bed dwelling | 98 no. |
| | 3+ bed dwelling | 117 no. |
| | Total | 234 no. |
| Commercial | Retail (Shop/F&B) [NLA] | 1,929 m ² |
| | Office [NFA] | 856 m ² |
| Car parking | | 390 spaces |
| Bicycle Parking | | 144 spaces |

The endorsed plans provided a total of 390 parking spaces across three levels of basement car parking, inclusive of 356 residential spaces, 29 staff spaces and 5 visitor spaces.

The endorsed development includes vehicle access via a widening of the existing access to Queens Lane at the south-west corner of the site.

The approved development also includes a porte cochere for pick-up/drop-off at the Queens Lane abuttal as well as a visitor parking and resident drop-off area in basement. The ground level porte cochere did not allow for loading or waste collection.

A total of 144 bicycle spaces were provided as part of the approved development, inclusive of 94 resident spaces, 20 staff spaces and 30 visitor spaces.

A dedicated on-site loading dock was provided within basement servicing vehicles up to a 6.4 metre Small Rigid Vehicle (SRV).

Proposed Changes

Reference is made to the plans prepared by SOM dated 18th December 2025 which form part of this Application. The key changes from a traffic perspective are:

- Removal of the Queens Lane porte cochere and extension of the ground floor uses fronting Queens Lane to the boundary, with a shift of all vehicle arrivals to being accommodated from the basement porte cochere.
- Change to the internal floor layouts to accommodate a change in the uses on-site within the first levels, including a reduction in the overall retail floor area,
- Shifting of the office from level 1 to the ground level, fronting Queens Lane, and a reduction in the floor area.
- An increase in the overall apartment numbers, through the addition of a number of smaller studio style apartments in the lower levels.

The leisure centre provided at level one of the amended plans will be a for residents of the development only and will not be publicly available.

A comparison of the endorsement and amendment schemes is provided at Table 2.

Table 2: Proposed v Approved Development Summary

| | Use | Endorsement Scheme | Amendment Scheme | Change |
|-----------------|-------------------------|----------------------|--------------------|------------------------|
| | Studio | 0 | 5 | + 5 |
| Residential | 1 bed dwelling | 19 | 91 | + 72 |
| | 2 bed dwelling | 98 | 108 | + 10 |
| | 3+ bed dwelling | 117 | 82 | - 35 |
| | Total | 234 | 286 | + 52 |
| Commercial | Retail (Shop/F&B) [NLA] | 1,929 m ² | 390 m ² | - 1,539 m ² |
| | Office [NFA] | 856 m ² | 641 m ² | - 215 m ² |
| Car parking | | 390 spaces | 388 spaces | -2 spaces |
| Bicycle Parking | | 144 spaces | 179 spaces | + 35 spaces |

A copy of the amended plans prepared by SOM are provided at Appendix A.

The proposal retains the basement porte cochere which is aligned with the primary Residential Lobby, Mail Room, and Concierge Desk, and also retains basement loading.



Assessment of Changes

From a traffic engineering perspective, the key changes relate to the removal of the porte cochere (and its associated traffic and access implications) and the introduction of additional apartments (and proposed parking allocations).

The following is provided to address each of those items.

Removal of Ground Level Porte Cochere

Original Ground Level Porte Cochere Intent

The endorsed development includes an on-site porte cochere for car pick-up/drop-off at the Queens Lane abuttal. The porte cochere was proposed to operate one-way southbound, with an entry located approximately 30 metres from the intersection with Kings Way.

The porte cochere egress was via the shared southern access which serves the ramp to basement.

The ground level porte cochere was originally designed to be supportive in nature, and it was not the sole drop off/pick up location. It did not accommodate vehicles typically larger than a passenger vehicle due to height restrictions limiting the vehicle size able to be accommodated.

Amended Scheme

The Amended Scheme removes the porte cochere at ground floor and the removal of the northern crossover to Queens Lane, and seeks to utilise the basement porte cochere for all vehicular arrivals (non-staff/resident parking) to the site.

A comparison of the endorsed and proposed access arrangements at ground floor is provided at Figure 1 and Figure 2.

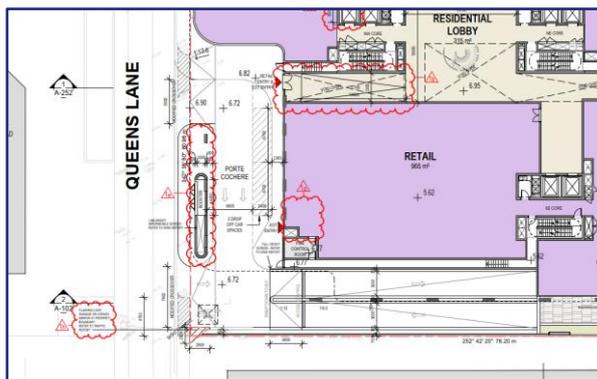


Figure 1: Endorsed Access Arrangement (Ground)

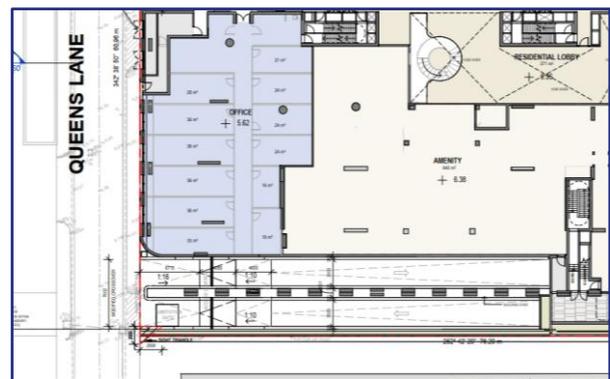


Figure 2: Section 72 Access Arrangements (Ground)

It is noted that it was never intended that the ground floor porte cochere was to be the sole location for pick-up/drop-off movements, as the proposal also included a porte cochere/pick-up/drop-off area in basement where the primary residential lobby and concierge was located.

In this vein, whilst the removal of the porte cochere at ground level will marginally reduce serviceability of the site at ground level for some level of passenger vehicles picking-up and dropping-off, these movements will simply be transferred to the basement pick-up/drop-off area.



Design and Accessibility

In basement, this area will continue to accommodate parking for visitors and pick-up/drop-off movements. A comparison of the endorsed and proposed access arrangements at basement 1 is provided at Figure 3 and Figure 4.



Figure 3: Endorsed Access Arrangement (Basement 1)

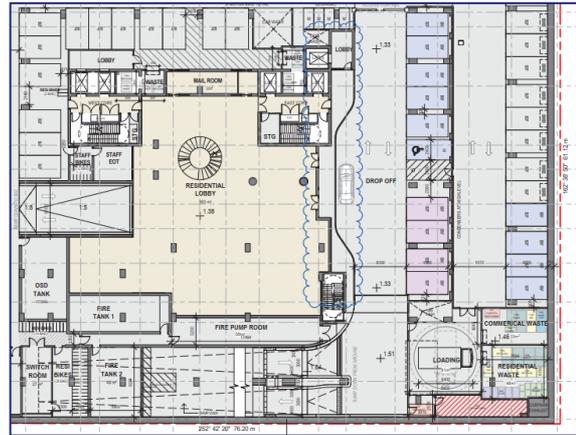


Figure 4: Section 72 Access Arrangement (Basement 1)

Swept Paths demonstrating vehicle movements and turnaround within the porte cochere have been provided at Appendix B.

Whilst access to the site basement car park is intended to be controlled via an access control system, the ground floor controls will be open whilst the concierge is attended 7 days per week, including peak periods. Outside of this time an intercom will be provided allowing drivers to contract security/ enter a code/ contact a resident to access the basement.

A secondary vehicle access control point is provided within basement 1 to separate the secure residential and commercial parking area from a basement drop off area. There is sufficient space in the aisle and porte cochere area for vehicles to undertake a three-point turn such that they can turn around in basement and exit to the street in a forward direction.

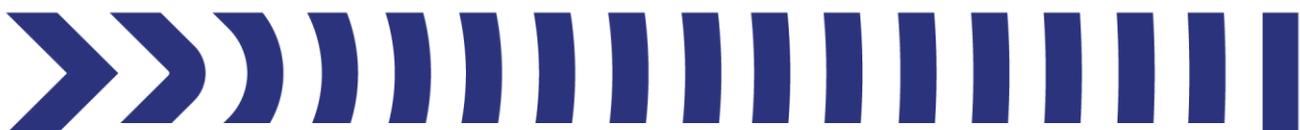
Traffic Impacts

In relation to traffic volumes, pick-up/drop-off movements are a relatively moderate component of the overall traffic generation of the subject site, and the basement area is expected to be able to adequately accommodate the increased number of movements. As noted above, it was never the case that the porte cochere was necessary from a traffic perspective, rather it offered an additional arrival opportunity for guests and visitors.

In relation to impacts on traffic on Queens Lane, the removal of an additional access point for the subject land is expected to be of benefit to overall flows on Queens Lane.

From a traffic planning and urban design perspective, consolidation of crossovers and access points is often desirable to limit impacts on traffic and pedestrians on the adjacent road network.

It is also relevant that Queens Lane is noted to experience queuing during peak hours which can extend past the subject site at times. It was acknowledged that these queues may have made it difficult to access the previously proposed porte cochere if vehicles were arriving from



the south. In this scenario, vehicles arriving from the south can enter the site further away from the Kings Way intersection and access the basement drop off area. This will assist in reducing the queues and delays for both vehicles entering the site, and also vehicles on Queens Lane (as the subject site will not add to the queue as the entering vehicle waits to access the porte cochere, further north of the basement access).

The consolidation of the site's access to a single crossover will assist in reducing delays to through traffic on Queens Lane and also reduce the number of conflict points for pedestrians walking on the Queens Lane footpath.

On this basis, it is considered that there would be a net benefit to the operation of Queens Lane as a result of the removal of the porte cochere.

Consideration of Relevant Planning / Design Guidelines

Planning Scheme Requirements

The planning requirements of the proposal as it relates to parking, traffic management and loading are essentially outlined in Clause 52.06 and 65.01 of the Planning Scheme.

In addition to the parking, traffic management and loading requirements, the site sits within Design and Development Overlay - Schedule 26-5A.

An assessment of these, in relation to the ground level porte cochere removal, is provided as follows.

Clause 52.06 – Car Parking

The purpose of Clause 52.06 is:

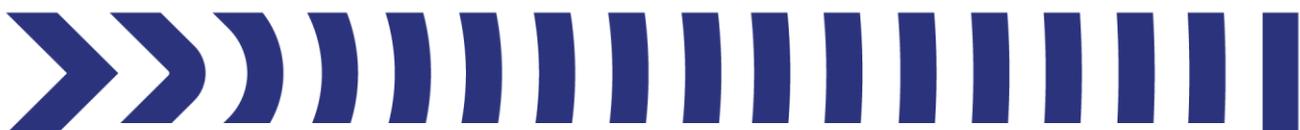
- *To ensure that car parking is provided in accordance with the Municipal Planning Strategy and the Planning Policy Framework.*
- *To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality.*
- *To support sustainable transport alternatives to the motor car.*
- *To promote the efficient use of car parking spaces through the consolidation of car parking facilities.*
- *To ensure that car parking does not adversely affect the amenity of the locality.*
- *To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.*

The updated maps and rates at Clause 52.06 suggest that the development does not need to provide any on-site car parking, and in fact, zero parking could be supported on the site.

There is no requirement under Clause 52.06 of the Planning Scheme to consider short term parking, pick-up drop off arrangements etc, particularly in the scenario where parking is not provided as part of a development.

In this instance, the proposal does include on-site parking. It also provides for a dedicated porte cochere that includes visitor parking, pick-up drop off parking and DDA parking.

Under Clause 52.06 of the Port Phillip Planning Scheme there is no technical or specific requirement to consider pick-up/drop-off facilities for this development.



From a design perspective, the provision of the facility, including aisle widths, access lanes, vehicle entry and exit paths, grading etc all meet the minimum requirements of Clause 52.06 of the Scheme, and also the relevant requirements of the Australian Standard.

Clause 65.01 – Decision Guidelines

Clause 65.01 of the Planning Scheme states that the responsible authority must consider a number of matters as appropriate including:

- *The adequacy of loading and unloading facilities and any associated amenity, traffic flow and road safety impacts.*

The proposed loading dock and the porte cochere have been provided to facilitate and allow all relevant movements (that can be designed for) to take place on-site, away from the street abutments, with convenient access to the building entry.

In this regard, it could be argued that the proposal provides for an outcome that exceeds the requirements under Clause 52.06 and 65.01 of the Planning Scheme, and acknowledges the constraints of the surrounding road network, and seeks to overcome those with the design and provision of the proposed porte cochere and on-site loading bays.

Design and Development Overlay - Schedule 26-5a (DDO26-5A)

The subject site is located within Schedule 26 to Clause 43.02 Design and Development Overlay (DDO). The DDO sets out a number of objectives which relate to Vehicular Access and Car Parking.

A summary of these objectives and the development response is provided at Table 3 below.

Table 3: DDO 26 - Vehicle Access and Car Parking Objectives

| DDO Objective | Development Response |
|---|--|
| Vehicle crossovers should be no more than 6 metres wide, with a maximum of one crossover per site. | The amended scheme reduces the number of crossovers for the site to one aligning with the objectives of the DDO. |
| Vehicle ingress and egress, loading facilities and building services should not be located on frontages along St Kilda Road or Punt Road. | The proposed vehicle access is located via Queens Lane with no access to St Kilda Road. This aligns with the DDO objectives. |
| Vehicle ingress and egress should be located on lanes, where possible. | The proposed access is located on Queens Lane, the lowest order road on the boundary of the site. This aligns with the DDO objectives |
| Car access ways should not visually dominate the façade of a building, and be visually permeable to retain a visual connection through the site and allow for natural surveillance. | The amended scheme relocates the porte cochere into basement reducing the visual dominance of the car park access and parking areas along the building frontage to Queens Lane. The aligns with the DDO Objectives. |
| Car parks should be built underground or located to the rear of the site to enable active uses on the street frontage. Where car parks are built above ground, they should not front the site or be visible from St Kilda Road, Queens Road or Punt Road. | The amended scheme relocates all parking, including short term, to basement with access provided to the rear of the site. This arrangement aligns with the DDO objectives. |



| DDO Objective | Development Response |
|---|---|
| Car parking within a podium should incorporate floor to ceiling heights of 3.5 metres to enable future adaptation for habitable uses. | N/A |
| Open/at-grade car parks should not be located in front setback areas. | The amended scheme removes the at-grade short-term drop off bays at ground floor and relocates these into basement. This aligns with the DDO objectives. |

VicRoads/Department of Transport Traffic Engineering Manual: Supplement to AustRoads Guide to Traffic Management – Part 11: Parking

In addition to the Planning Scheme, we refer to the VicRoads Traffic Engineering Manual: Supplement to Austroads Guide to Traffic Management – Part 11: Parking that includes guidance on managing on and off-street parking to best suit the needs of surrounding developments.

As we understand it, this is a document that Council often refers to in reviewing proposals, however this document has no statutory weight in relation to the proposal.

In any case, we have sought to address the questions it poses regarding loading and pick-up/drop-off requirements where relevant in Table 4

Sections 6 and 7 relate to “Town Planning Applications: Issues to Consider” and includes a series of items to consider in determining the general outcomes achieved by a development and considering what parking requirements a development may have.

Table 4: Commentary RE TEM Parking Guide

| Issue to Consider | Development Response |
|--|---|
| 6. Town Planning Applications: Issues to Consider | |
| Off-Street Loading Bays | |
| <i>Can the loading bay be accessed safely, taking into account pedestrian and private vehicle flow paths within the development?</i> | Yes, the loading bay is in basement, dedicated, and includes a turntable. It is removed from the main car parking areas, and has convenient access to the main lobby. |
| <i>Ask if the proposed off-street loading bay will operate as intended. If it is not located conveniently or of sufficient size to accommodate the particular delivery vehicles, loading may end up out on the street, in traffic lanes or within intersections where it is a hazard and a nuisance.</i> | Yes, the loading bay will be managed by Concierge/Building Management. All deliveries/waste collection will be scheduled and organised through a booking system / private contractors. It is sufficiently removed from the street to not result in potential queueing/loading out on street. |
| <i>Ask what is needed to stop the loading bay being used for staff parking, for storage space or for rubbish bin space.</i> | The loading bay will be signed, and security will manage the use and cleaning of the loading bay regularly. |
| <i>Are the areas set aside for these activities adequate? (Refer to Commentary 2 in this Austroads guide which sets out examples of parking provision rates used in Australia and New</i> | Yes, a single bay is sufficient to accommodate the loading/waste requirements of the proposal, particularly with management of scheduling by the Building Manager. |



| Issue to Consider | Development Response |
|---|--|
| <i>Zealand and Victorian Planning Provisions Cl. 52.06 – Car Parking).</i> | |
| <i>Is the signing adequate?</i> | The loading bay will be signed and entry arrangements clearly visible from the street. |
| <i>Is it possible to enforce the parking controls and also enforce the town planning controls?</i> | Yes. The short-term parking area will be managed by concierge and access controls to the secure resident car park will manage the use of the rest of the car park. When the loading bay is not in use, the roller door will be closed to prevent unauthorised use. |
| <i>Will truck drivers willingly use the access to the loading bay or is it too tight? Is the access safe for all users? Is height clearance adequate? (The national height limit for trucks is 4.3 m).</i> | The bay has been appropriate designed for an SRV and the relevant waste vehicles. A turntable will make access convenient and easy. |
| <i>How will it affect the amenity and visual appearance of the site and nearby areas?</i> | The basement loading and Porte cochere area will mean that ground level is not dominated by vehicle based access points and vehicles reversing to/from street. |
| Passenger Drop-off and Pick Up Areas | |
| <i>Places like cinemas, hotels and schools need short term passenger drop off and pick up areas.</i> | This proposal is not a cinema, hotel or school. |
| <i>Are enough spaces provided? (Refer to Victorian Planning Provisions Cl. 52.06 – Car Parking).</i> | As noted above, there is no requirement for short term parking. Clause 52.06 implies maximum rates for the site. However, the proposal continues to provide long and short term parking. |
| <i>Are they close enough to the front door or front gate?</i> | Yes, the short term parking and porte cochere is directly accessible from the basement residential lobby and concierge desk. |
| <i>Provision of drop off/pick up areas in out of the way places should be avoided, e.g. in underground or multi-storey car parks located away from the front door.</i> | Whilst the porte cochere is in basement, it is not located 'away from the front door'. It is immediately adjacent the residential lobby and staffed concierge desk. |
| <i>If the development is directly fronting a Traffic Route, every effort should be made to provide this space clear of the left traffic lane, either by setting back the development by 3 m and providing an indented parking/loading space, or by an off-road area in front of the building.</i> | The previous proposal (and original application) proposed indented parking on Kings Way. DTP did not support this and requested its removal. The design therefore does not propose at-grade parking setbacks. |
| Courier Deliveries | |
| <i>In addition to one hour and two hour parking for customers, offices and industries will need space for short term parking by couriers and taxis.</i> | This is provided in the porte cochere. |
| <i>Are enough spaces provided? (Refer to Victorian Planning Provisions Cl. 52.06 –Car Parking)).</i> | Yes, as noted above, there is no requirement for courier parking, however the proposal continues to provide long and short term parking. |



| Issue to Consider | Development Response |
|--|--|
| <i>Are they close enough to the front door or front gate?</i> | Yes, they are conveniently located immediately adjacent the residential lobby and staffed concierge desk. |
| <i>If the development is directly fronting a Traffic Route, every effort should be made to provide this space clear of the left traffic lane, either by setting back the development by 3 m and providing an indented parking space, or by an off-road area in front of the building.</i> | As above, the previous proposal (and original application) proposed indented parking on Kings Way. DTP did not support this and requested its removal. The design therefore does not propose at-grade parking setbacks. |
| 7. How and Where to Provide Loading and Short Term Parking Spaces | |
| <i>Loading Bays - Vehicles need to reverse into loading bays. Locate them where reversing does not endanger pedestrians or other motorists. Ensure the location allows room for the required manoeuvring in and out: this manoeuvring should take place on-site, clear of main driveways and circulation areas and must not take place on the roadway on a Traffic Route. Avoid a reliance on left hand reverse turns (i.e. on the driver's 'blind' side).</i> <i>Use AS 2890.2 (Commercial vehicle parking facilities) to design access to the bays.</i> | As noted above, the loading bay is in basement, dedicated, and includes a turntable. It is removed from the main car parking areas and has convenient access to the main lobby. |
| <i>Couriers and Taxis - Short term drop off/set down spaces should be provided close to the front door, in a location which is obvious from the street or driveway. Where the development has a road frontage, provide the spaces in front of the building, clear of traffic lanes and where vehicles do not have to reverse out into traffic.</i> | As noted above, the porte cochere will provide for courier and taxi access, located adjacent the residential lobby and concierge area. DTP does not support indented parking via Kings Way and St Kilda Road. |

On the basis of the above, we are of the view that all of the issues to consider suggested by the Traffic Engineering Manual have been appropriately addressed and considered.

That is, there is no reason, when considering these items, and the constraints of the proposal, that the proposed basement porte cochere and loading area should not be acceptable.

The location of these facilities, whilst underground, are conveniently located to the residential lobby and Concierge/Building Manager. The fact that they are in basement should have no specific bearing on the acceptability of them.

VCAT Decision P1375/2024

This position is ratified and supported by the recent VCAT decision (Ref. P1375/2024) for a hotel at 198-242 Burnley Street, Richmond which included a basement porte cochere. A review of this decision includes specific commentary in relation to whether a basement porte cochere is appropriately legible and obvious from the street.

The key sections of the decision, as it relates to the design and location of the porte cochere are provided below. We have **bolded** the key findings for emphasis:

127. Council submits a key concern with the proposal is the poorly resolved drop-off zone for residential hotel guests, which is located on Level 1 of the basement. Council's concerns are two-fold:



- *The location of the drop-off zone is isolated and not visually obvious from street level, so will have poor legibility from Burnley Street.*
- *Access to the drop-off zone is circuitous. Vehicles enter from Burnley Street, drive past the motor repairs and loading areas, before descending down a ramp into the basement.*

128. Council notes Ms Dunstan's evidence estimates the residential hotel will generate approximately 44 pick-ups and drop-offs in both the AM and PM peak hours. Council is concerned the location of the drop-off zone will not be apparent to guests, including taxis and ride-share vehicles, noting that empirical data in the evidence shows approximately 50 percent of trips are generated by ride-share vehicles.

129 Council submits that unless the drop-off zone is highly visible and immediately accessible, for example by being provided within a porte-cochere adjacent to Burnley Street, it will not be used because hotel guests or their ride-share drivers will be unaware of its existence, or it will not be used as it lacks convenience. Council is concerned that as a consequence, vehicles will instead stop on Burnley Street, relying on on-street parking.

131 **We are not persuaded by Council's submission that access to the drop-off zone is not intuitive or convenient.** On arriving at the subject land, there is a single point of public access for vehicles, via Burnley Street. On entering the accessway, drivers will have a clear line of sight to the basement ramp entrance, which is located a relatively short distance into the site. We accept Ms Dunstan's evidence that almost immediately on entering the curved basement ramp, drivers will have a line of sight to the drop-off zone. We are not persuaded that instances of finding the drop-off zone fully occupied will lead to unacceptable congestion in the basement. The plans show a further four hotel drop-off spaces within the publicly accessible area of Basement Level 1.

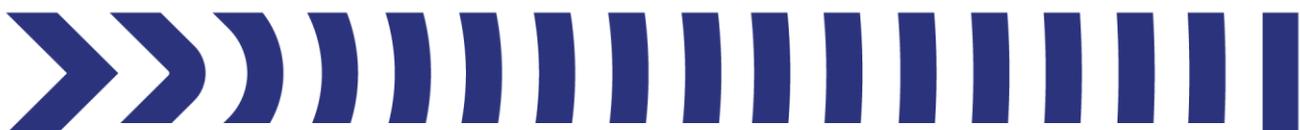
132 **We agree with the applicant's submission that it is 'standard procedure' for arrival information to be given to hotel guests at the time of booking, which would include detailed instructions on how to access the car park and drop-off zone.**

133 We accept Ms Dunstan's evidence that hotel pick-up and drop-off via ride-share or taxi services can be accommodated on-street without detriment to the operation of the road network. We accept that some ride-share and taxi drivers will develop a level of familiarity with the hotel and will utilise the drop-off zone or will access the basement on instructions from their passenger.

Whilst we acknowledge that this example does include access to on-street car parking in the area, it is clear that from this VCAT decision that a basement porte cochere is an appropriate on-site design response.

The practical outcome for this proposal, which does not have the benefit of nearby on-street parking, is that drivers will not have another choice *but* to use the porte cochere.

This confirms that the proposal is acceptable, does meet the objectives of the design guides and planning controls, and does meet all of the requirements of the guide that Council is also referring to in relation to considering the impacts of new developments.



Queuing Analysis

We note that previous queuing analysis providing in relation to the car park access identified that the access was appropriately setback from the street to prevent any queuing external to the site.

The shifting of the porte cochere into basement will result in some additional movements into the basement, however we are of the view that it will not be material in relation to the operation of the car park control.

As previously discussed, the ground floor control will be open during peak periods whilst the concierge is attended. Outside of these hours the level of traffic experienced by the site is expected to be significantly lower.

Nevertheless, we have undertaken an updated queuing assessment of the ground floor control point during the peak hours and note the following:

- The originally permitted development was expected to generate no more 35 inbound movements in a peak hour (the PM peak hour is considered the critical peak hour for inbound movements)
- Even if there was a 10% increase in the traffic generation to the basement entry, to address the removal of the ground floor porte cochere, this would still be less than 40 vehicle movement entering the site in a peak hour.
- There will be a mix of swipe card entry movements (400 vehicles per hour per lane) and manually controlled movements (250 vehicles per hour per lane), with a higher proportion of swipe card movements associated with residents. On this basis, we presume a peak hour capacity of 300 vehicles per hour per lane.
- Based on this, we expect a utilisation ratio of 0.13 for entry movements, which would result in a 98th percentile queue at the access of 1 vehicle.
- The setback of the access control is approximately 8m from the boundary, which would allow a for the 98th percentile queue to be stored on-site.

On this basis, the location of the access control is considered appropriate and there is sufficient queuing to accommodate the change in traffic patterns.

Car Parking Provisions

The existing permit already allows for a dispensation in the car parking requirements for the commercial uses, however the previous proposal included car parking for residents allocated at the statutory minimums.

It is noted that since the original approval, Clause 52.06 has been amended as part of Amendment VC277 to change the way the car parking rates are applied. Clause 52.06-5 now states that:

"Table 1 of this clause sets out the minimum and maximum car parking requirements that apply to a use specified in the table based on the land category identified in the Car Parking Requirement Maps (Department of Transport and Planning, 2025) (CPR maps).

If the land is shown in two or more categories on the CPR maps, the car parking requirements for the higher category applies to all of the land."

An excerpt of the Car Parking Requirement Map is provided at Figure 5.





Figure 5: City of Port Phillip – Car Parking Requirement Maps

The subject site falls within Category 4 under Clause 52.06 of the Planning Scheme, which applies maximum car parking rates to the site. It is noted that Transitional Provision B of Clause 52.06 states:

The maximum car parking requirement in clause 52.06-2 does not apply to - and a permit is not required under clause 52.06-3 - to provide more than the maximum parking provision specified in clause 52.06-5 in respect of an application to use or develop land made before the day Amendment VC277 came into operation.

As such, under the amended Clause 52.06 parking rates, the application could provide for no on-site car parking with no maximum parking rate applied.

The proposal includes the provision of 388 parking spaces which does not exceed the statutory maximums, if they were to apply, and no permit would be sought under Clause 52.06 if the application was lodged today.

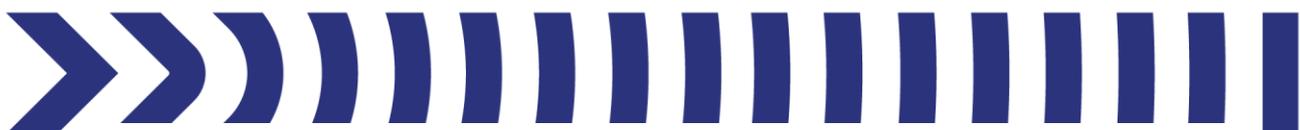
It is understood that the client wishes to allow flexibility in the allocation of car parking, specifically to the residential apartments, and therefore the specific allocations of parking has not been designated on plans.

Based on the preceding the car parking provisions are considered acceptable.

Traffic Generation

Traffic generation of the proposal is strongly related to car parking provision and allocation, and the proposal is not expected to have any material change to overall traffic generation of the proposal as parking allocations and provisions remain generally consistent with that already approved.

The increase in smaller apartments will not generate any material increase in pick-up/drop-off movements to the site in the peak hours that would impact on the operation of the network.



Bicycle Parking

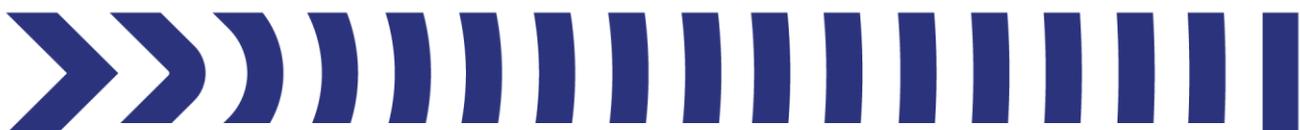
The proposal includes an increase in the bike parking provisions to maintain a resident parking allocation commensurate with that approved as part of the existing permit approval.

Conclusions

Based on the preceding, we are of the view that:

- The removal of the porte cochere is acceptable and access to the site can continue to operate appropriately, with all pick-up/drop-off movements now facilitated in basement.
- There are wider planning benefits to removing the porte cochere entry in relation to the operation of Queens Lane and potential impacts to vehicle queues and pedestrian conflicts along this section of Queens Lane.
- A queueing analysis demonstrates that the ground floor control point is already appropriately located to allow for potential queues as a result of the increase in activity using the basement car park.
- The car parking provisions will continue to be appropriate even with a reduction in the residential parking provisions. This reduction can be supported on the basis of the site's location, access to public and alternative transport modes, and Local and State policy.
- There will be no material traffic impacts as a result of the proposed changes and increase in apartments.
- The bicycle parking provisions will be appropriately increased, commensurate with the apartment number increases.

Based on the above, we are comfortable that there is no traffic engineering reason why the proposed changes would not be accepted.





Appendix A

Amended Plans

PROJECT NAME

424 ST KILDA ROAD

424 ST KILDA ROAD
MELBOURNE VICTORIA 3004
AUSTRALIA

CLIENT

GURNER™
GROUP
GURNER

ARCHITECT

SOM

SKIDMORE, OWINGS & MERRILL
(AUSTRALIA)
LEVEL 3, 351-357 ELIZABETH STREET
MELBOURNE, VIC 3000, AUSTRALIA

KEYPLAN / NOTES

LEGEND

- VISITOR PARKING
- COMMERCIAL PARKING
- RESIDENTIAL VISITOR PARKING
- RESIDENTIAL PARKING
- STORAGE / STORAGE CAGE

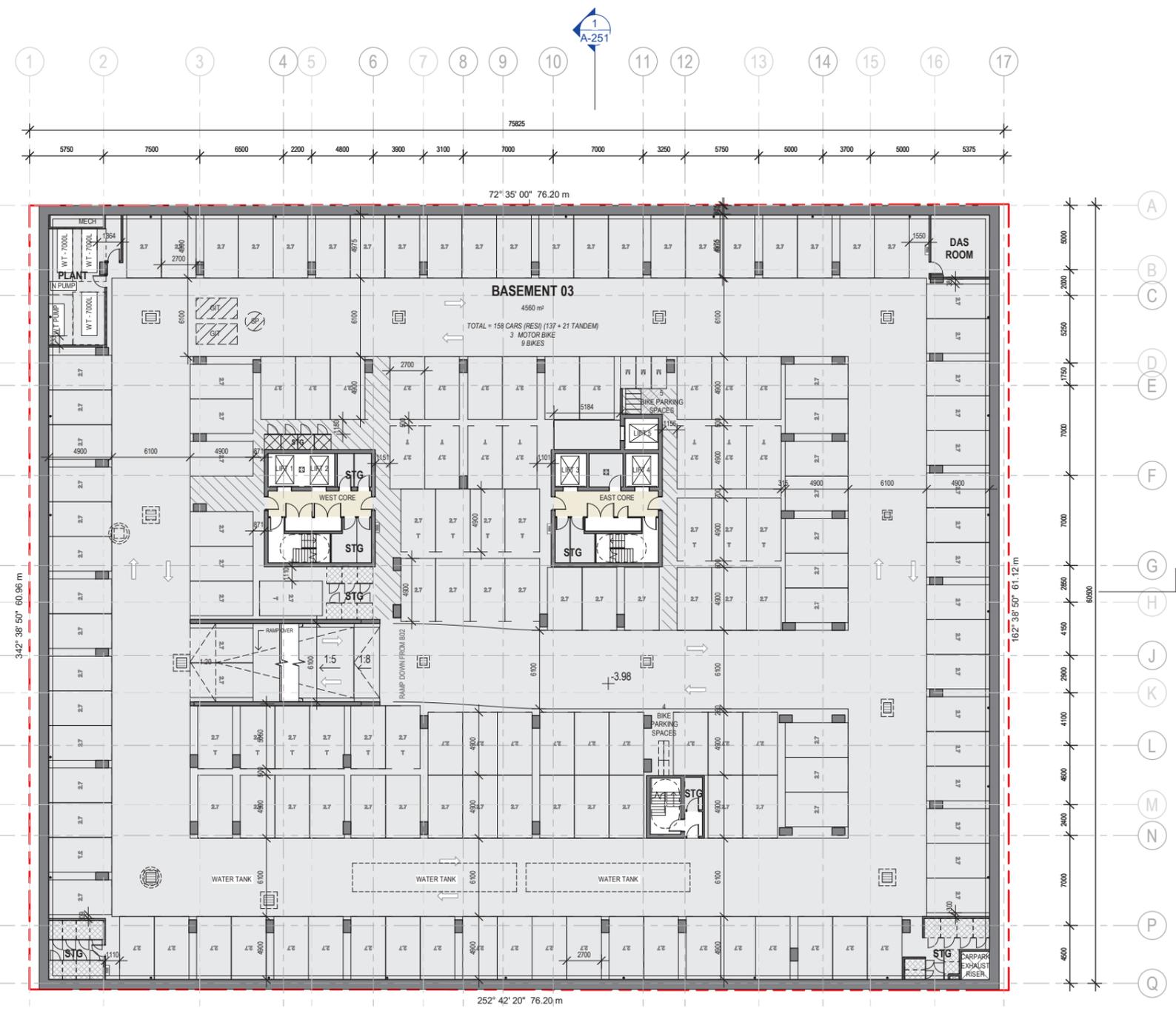
NOTE:
- ALL CAR SPACES ARE 2.7m WIDE BY 4.9m LONG UNLESS SPECIFIED
- ALL CAR SPACES SIZED TO ACCOMMODATE FUTURE INSTALLATION OF EV CHARGERS. EV CHARGERS TO BE EITHER WALL, COLUMN OR GROUND MOUNTED WITH BOLLARD PROTECTION

REFER A01 SERIES FOR GENERAL NOTES & LEGENDS
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| # | DATE | ISSUE DESCRIPTION |
|---|----------|----------------------|
| 5 | 18/12/25 | Issue for Section 72 |
| 4 | 07/11/25 | Issue for Section 72 |
| 3 | 21/03/25 | Endorsement |
| 2 | 30/04/24 | Town Planning RFI |
| 1 | 05/03/24 | Town Planning |

**GENERAL ARRANGEMENT PLAN
- BASEMENT 03**

| | | | |
|-------------|-----------|-----------|--------------|
| PROJECT NO. | 223553 | SHEET NO. | A-097 |
| DATE: | 18/12/25 | | |
| SCALE: | 1:200 @A1 | | |



NOTE: ALL ELEMENTS IN BLUE REPRESENTS GENERAL AMENDMENTS AND IMPROVEMENTS TO THE ENDORSEMENT SCHEME SINCE 18.07.2025.

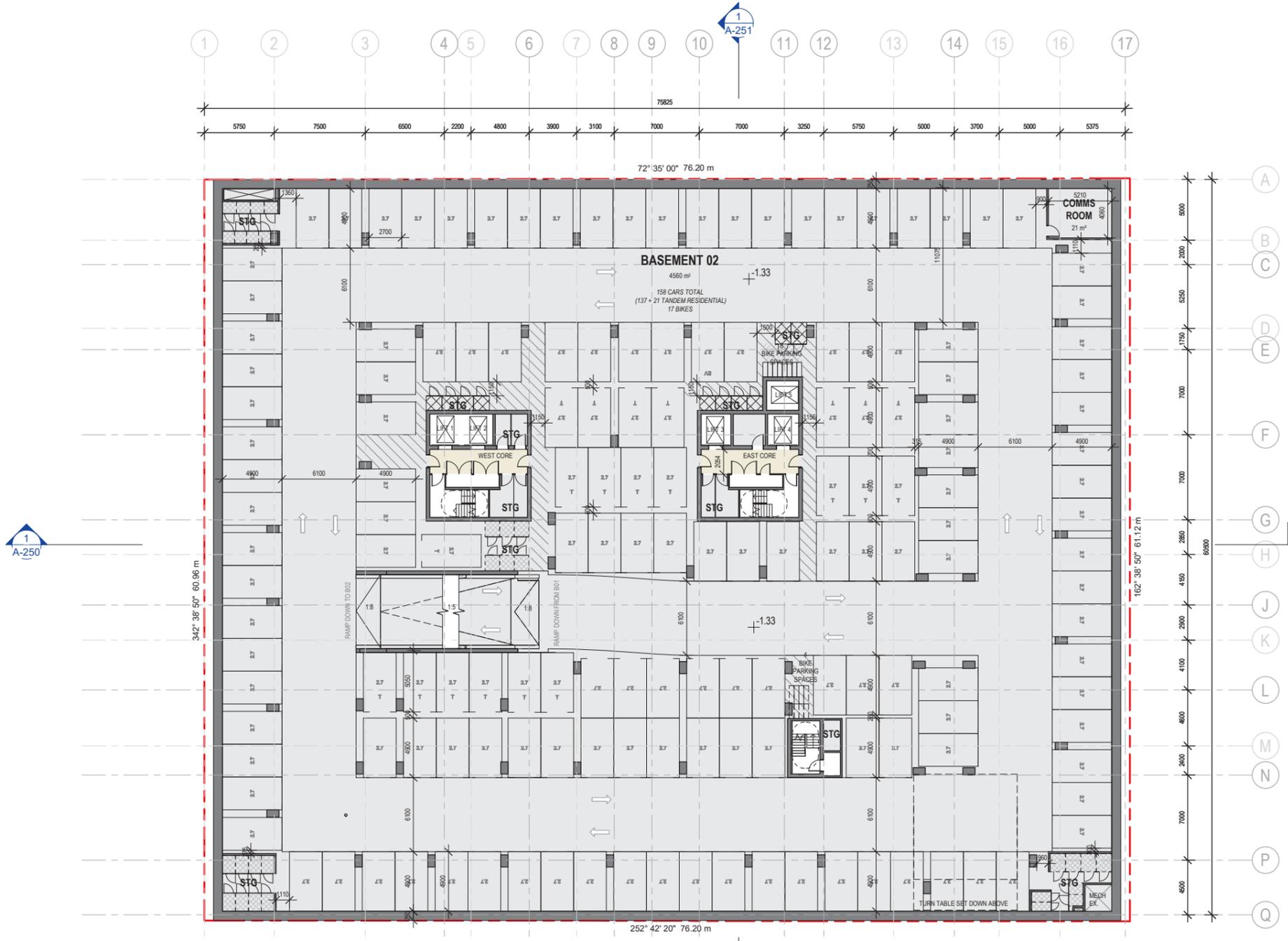


PROJECT NAME
424 ST KILDA ROAD
 424 ST KILDA ROAD
 MELBOURNE VICTORIA 3004
 AUSTRALIA

CLIENT
GURNER™
 GROUP
 GURNER

ARCHITECT
SOM
 SKIDMORE, OWINGS & MERRILL
 (AUSTRALIA)
 LEVEL 3, 351-357 ELIZABETH STREET
 MELBOURNE, VIC 3000, AUSTRALIA

KEYPLAN / NOTES
 LEGEND
 VISITOR PARKING
 COMMERCIAL PARKING
 RESIDENTIAL VISITOR PARKING
 RESIDENTIAL PARKING
 STORAGE / STORAGE CAGE
 NOTE:
 - ALL CAR SPACES ARE 2.7m WIDE BY 4.9m LONG UNLESS SPECIFIED
 - ALL CAR SPACES SIZED TO ACCOMMODATE FUTURE INSTALLATION OF EV CHARGERS. EV CHARGERS TO BE EITHER WALL, COLUMN OR GROUND MOUNTED WITH BOLLARD PROTECTION



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| # | DATE | ISSUE DESCRIPTION |
|---|----------|----------------------|
| 5 | 18/12/25 | Issue for Section 72 |
| 4 | 07/11/25 | Issue for Section 72 |
| 3 | 21/03/25 | Endorsement |
| 2 | 30/04/24 | Town Planning RFI |
| 1 | 05/03/24 | Town Planning |

**GENERAL ARRANGEMENT PLAN
 - BASEMENT 02**

NOTE: ALL ELEMENTS IN BLUE REPRESENTS GENERAL AMENDMENTS AND IMPROVEMENTS TO THE ENDORSEMENT SCHEME SINCE 18.07.2025.



| | | | |
|-------------|-----------|-----------|--------------|
| PROJECT NO. | 223553 | SHEET NO. | A-098 |
| DATE: | 18/12/25 | | |
| SCALE: | 1:200 @A1 | | |

424 ST KILDA ROAD

424 ST KILDA ROAD
MELBOURNE VICTORIA 3004
AUSTRALIA

CLIENT

GURNER™
GROUP
GURNER

ARCHITECT

SOM
SKIDMORE, OWINGS & MERRILL
(AUSTRALIA)
LEVEL 3, 351-357 ELIZABETH STREET
MELBOURNE, VIC 3000, AUSTRALIA

KEYPLAN / NOTES

LEGEND

- VISITOR PARKING
- COMMERCIAL PARKING
- RESIDENTIAL VISITOR PARKING
- RESIDENTIAL PARKING
- STORAGE / STORAGE CAGE

NOTE:
- ALL CAR SPACES ARE 2.7m WIDE BY 4.9m LONG UNLESS SPECIFIED
- ALL CAR SPACES SIZED TO ACCOMMODATE FUTURE INSTALLATION OF EV CHARGERS. EV CHARGERS TO BE EITHER WALL, COLUMN OR GROUND MOUNTED WITH BOLLARD PROTECTION

REFER A01 SERIES FOR GENERAL NOTES & LEGENDS

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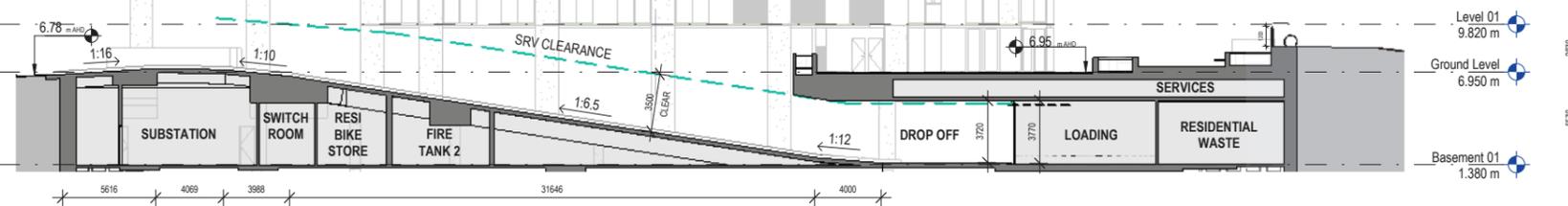
| # | DATE | ISSUE DESCRIPTION |
|---|----------|------------------------------|
| 6 | 18/12/25 | Issue for Section 72 |
| 5 | 07/11/25 | Issue for Section 72 |
| 4 | 21/03/25 | Endorsement |
| 3 | 16/05/24 | Town Planning RFI Amendments |
| 2 | 30/04/24 | Town Planning RFI |
| 1 | 05/03/24 | Town Planning |

**GENERAL ARRANGEMENT PLAN
- BASEMENT 01**

PROJECT NO. 223553
DATE: 18/12/25
SCALE: 1:200 @A1

A-099

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12/11/2025 2:57:53 PM



2 Section C-C - Basement Ramp

NOTE: ALL ELEMENTS IN BLUE REPRESENTS GENERAL AMENDMENTS AND IMPROVEMENTS TO THE ENDORSEMENT SCHEME SINCE 18.07.2025.



KINGS WAY

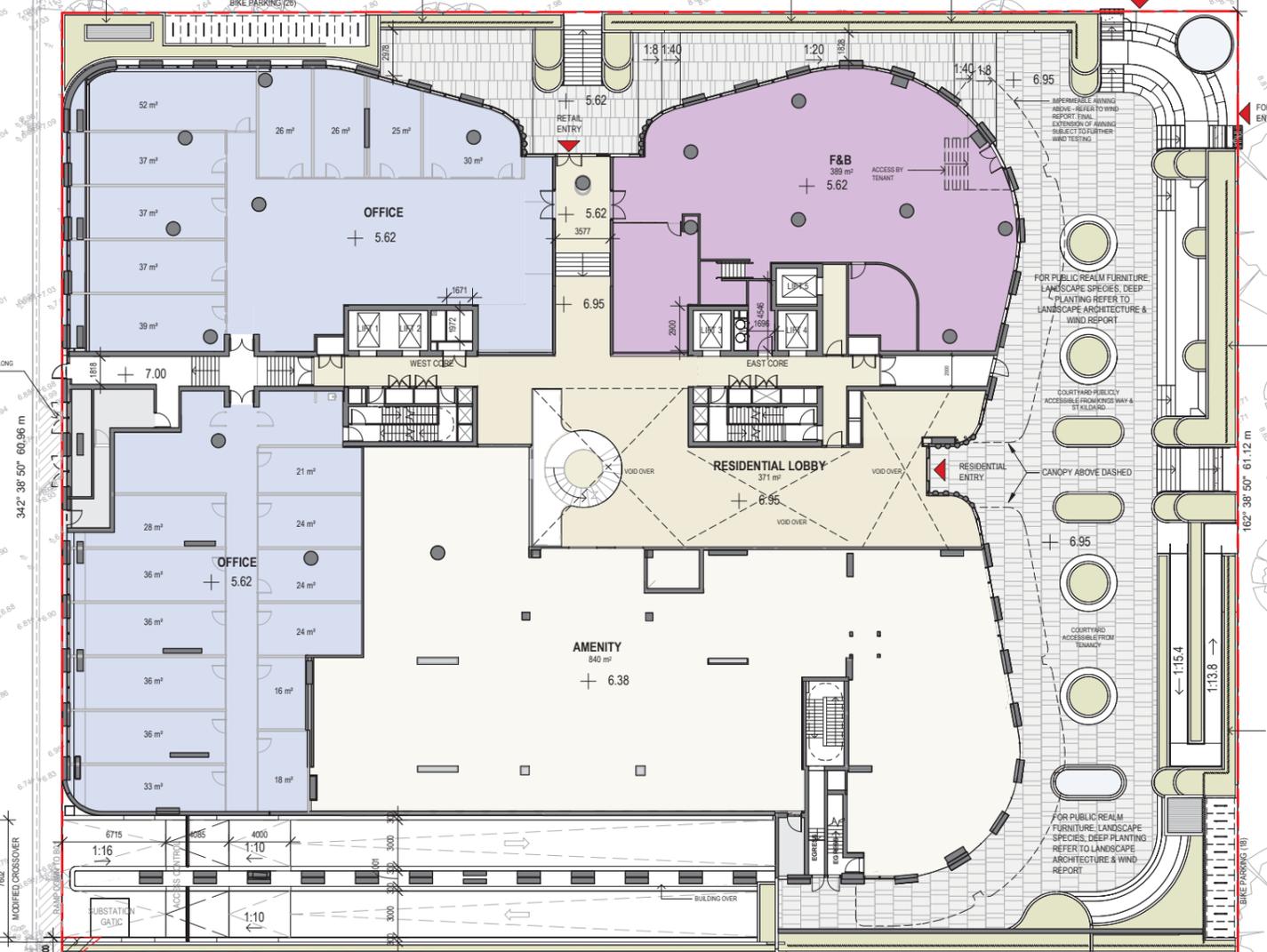


QUEENS LANE



ST KILDA ROAD

72° 35' 00" 76.20 m



5 QUEENS ROAD
11 STOREY
OFFICE

BAYVIEW EDEN
8 STOREY
HOTEL

LUCIENT
430 ST KILDA ROAD
19 STOREY
RESIDENTIAL

PROJECT NAME
424 ST KILDA ROAD
424 ST KILDA ROAD
MELBOURNE VICTORIA 3004
AUSTRALIA

CLIENT
GURNER™
GROUP
GURNER

ARCHITECT
SOM
SKIDMORE, OWINGS & MERRILL
(AUSTRALIA)
LEVEL 3, 351-357 ELIZABETH STREET
MELBOURNE, VIC 3000, AUSTRALIA

KEYPLAN / NOTES
LEGEND

- RETAIL
- OFFICE
- STUDIO
- 1 BEDROOM APARTMENT
- 2 BEDROOM APARTMENT
- 3 BEDROOM APARTMENT
- PENTHOUSE APARTMENT
- STORAGE / STORAGE CAGE
- AMENITY
- SOUTH FACADE BALCONY LOCATION AS PER ENDORSED TP

NOTE:
 - TYPICAL RESIDENTIAL CEILING HEIGHTS ARE 2700MM UNLESS INDICATED. REFER TO SERVICES REQUIREMENTS FOR FLOOR TO CEILING HEIGHTS.
 - 430 ST KILDA ROAD WINDOWS AND FLOOR TO FLOOR HEIGHTS INDICATIVE ONLY. HABITABILITY TBC. ALL WINDOWS ASSUMED HABITABLE.

REFER A00.01 SERIES FOR GENERAL NOTES & LEGENDS
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| 5 | 18/12/25 | Issue for Section 72 |
| 4 | 07/11/25 | Issue for Section 72 |
| 3 | 21/03/25 | Endorsement |
| 2 | 30/04/24 | Town Planning RFI |
| 1 | 05/03/24 | Town Planning |
| # | DATE | ISSUE DESCRIPTION |

GENERAL ARRANGEMENT PLAN
- GROUND FLOOR

NOTE: ALL ELEMENTS IN BLUE REPRESENTS GENERAL AMENDMENTS AND IMPROVEMENTS TO THE ENDORSEMENT SCHEME SINCE 18.07.2025.



PROJECT NO. 223553
DATE: 18/12/25
SCALE: 1:200 @A1
SHEET NO. **A-100**



Appendix B

Swept Paths

VEHICLE PROFILE

VEHICLE USED IN SIMULATION

5.20*

0.95 3.05

99th percentile
(AS/NZS 2890.1:2004)

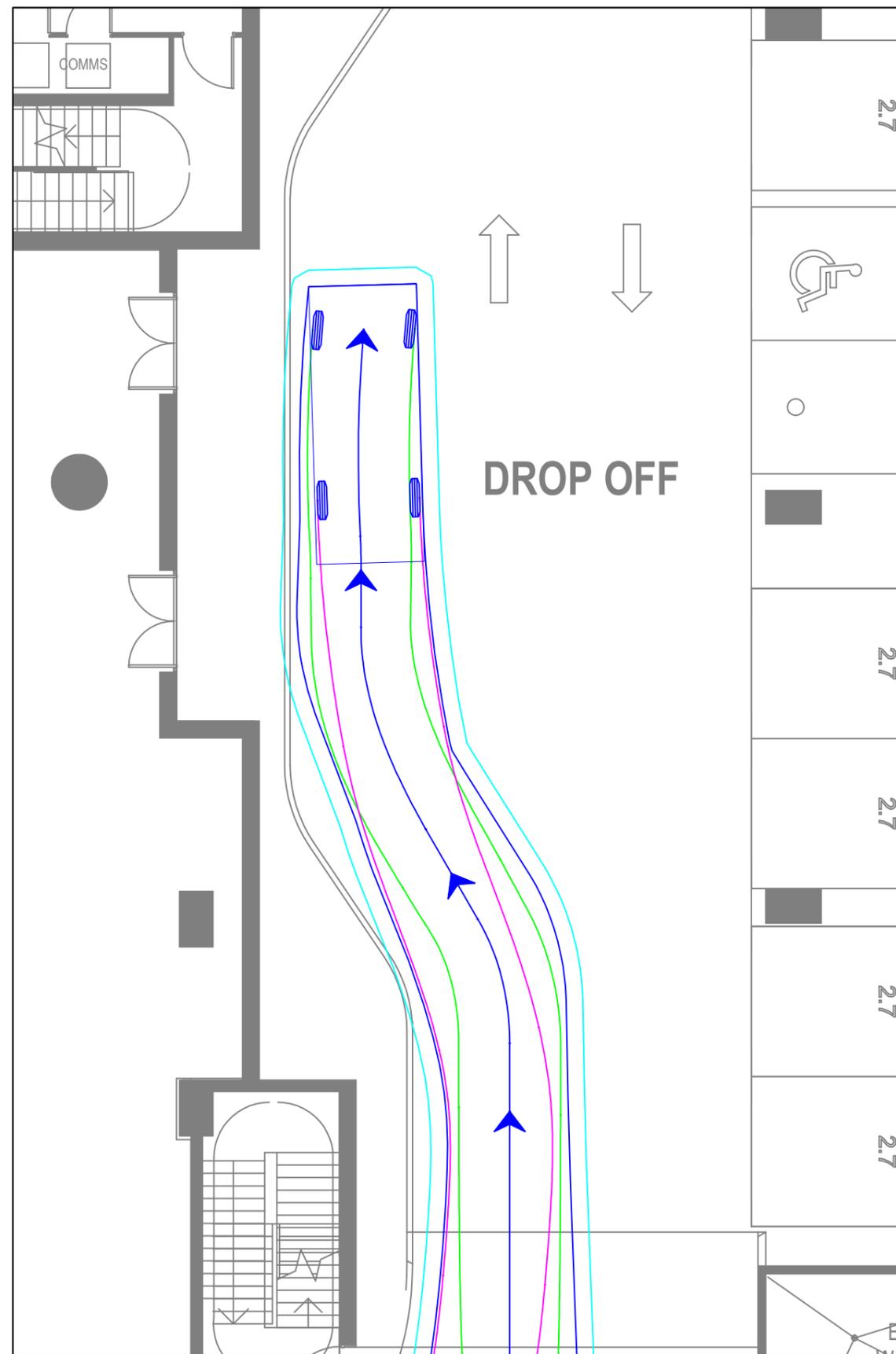
Width : 1.94
Track : 1.84
Kerb to Kerb Radius : 12.5m

* actual template based on 'relevant longitudinal dimensions that affect swept path' as set out in Section B2.1 of AS/NZS 2890.1:2004

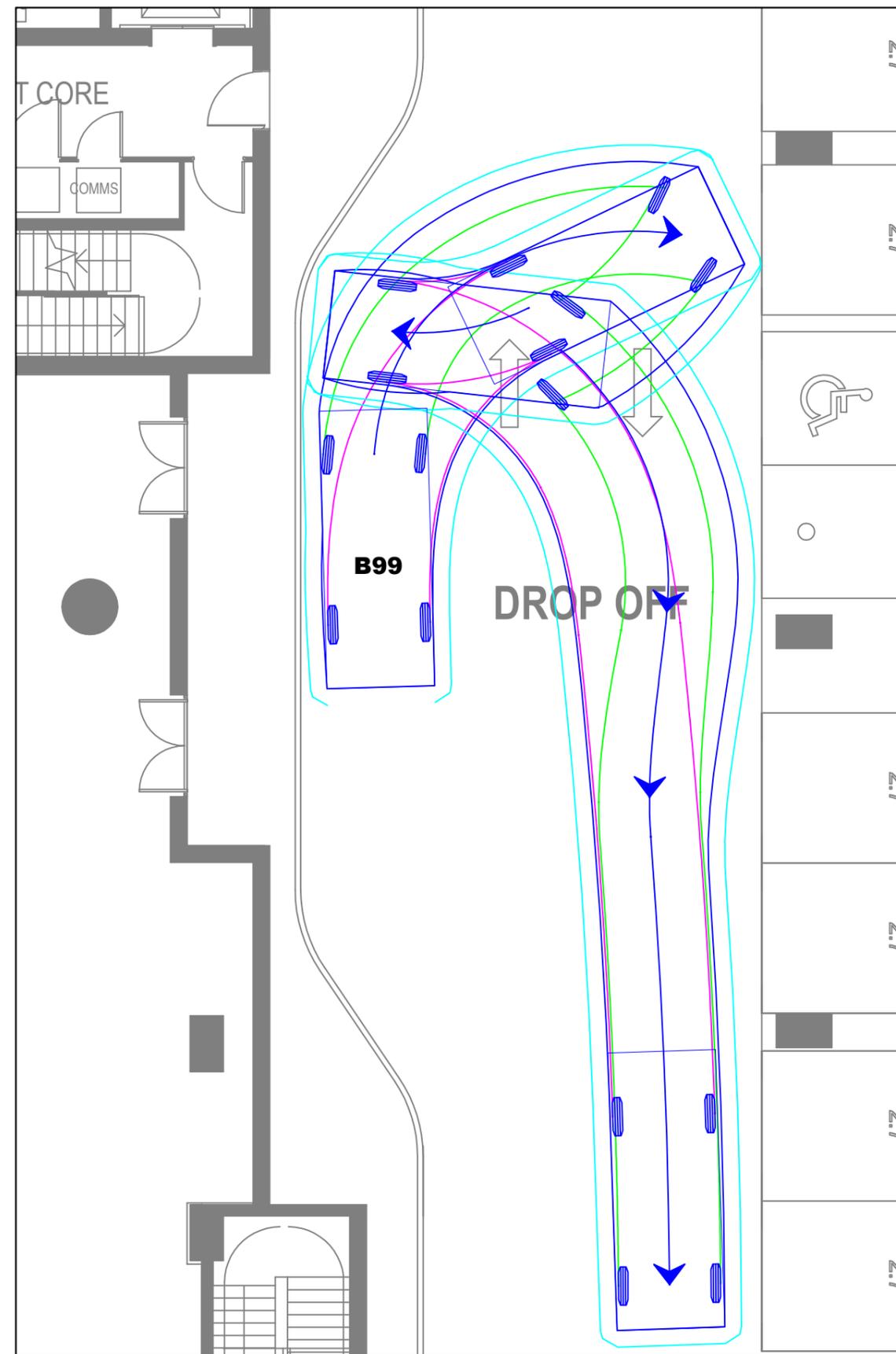
LEGEND

- REAR WHEELS
- FRONT WHEELS
- VEHICLE BODY
- BODY CLEARANCE

DROP OFF BAY - B99 INGRESS



DROP OFF BAY - B99 EGRESS / TURN AROUND



| REV | DATE | NOTES | DESIGNED BY | CHECKED BY |
|-----|------------|-------------------|-------------|----------------------|
| A | 11/02/2026 | SECTION 87a PLANS | J. LEWIS | J. COSSINS (RPE7781) |

424 ST KILDA ROAD, MELBOURNE
PROPOSED MIXED USE DEVELOPMENT

GENERAL NOTES:
PLANS PREPARED BY SOM, RECEIVED
17/12/2025
NOT FOR CONSTRUCTION

FILE NAME: G33788-01
SHEET NO.: 01



SCALE:
1:100 (A3)

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Traffic Group

Level 28, 459 Collins St, MELBOURNE VIC 3000
T: (03) 9822 2888
www.trafficgroup.com.au

VEHICLE PROFILE

VEHICLE USED IN SIMULATION

99th percentile
(AS/NZS 2890.1:2004)

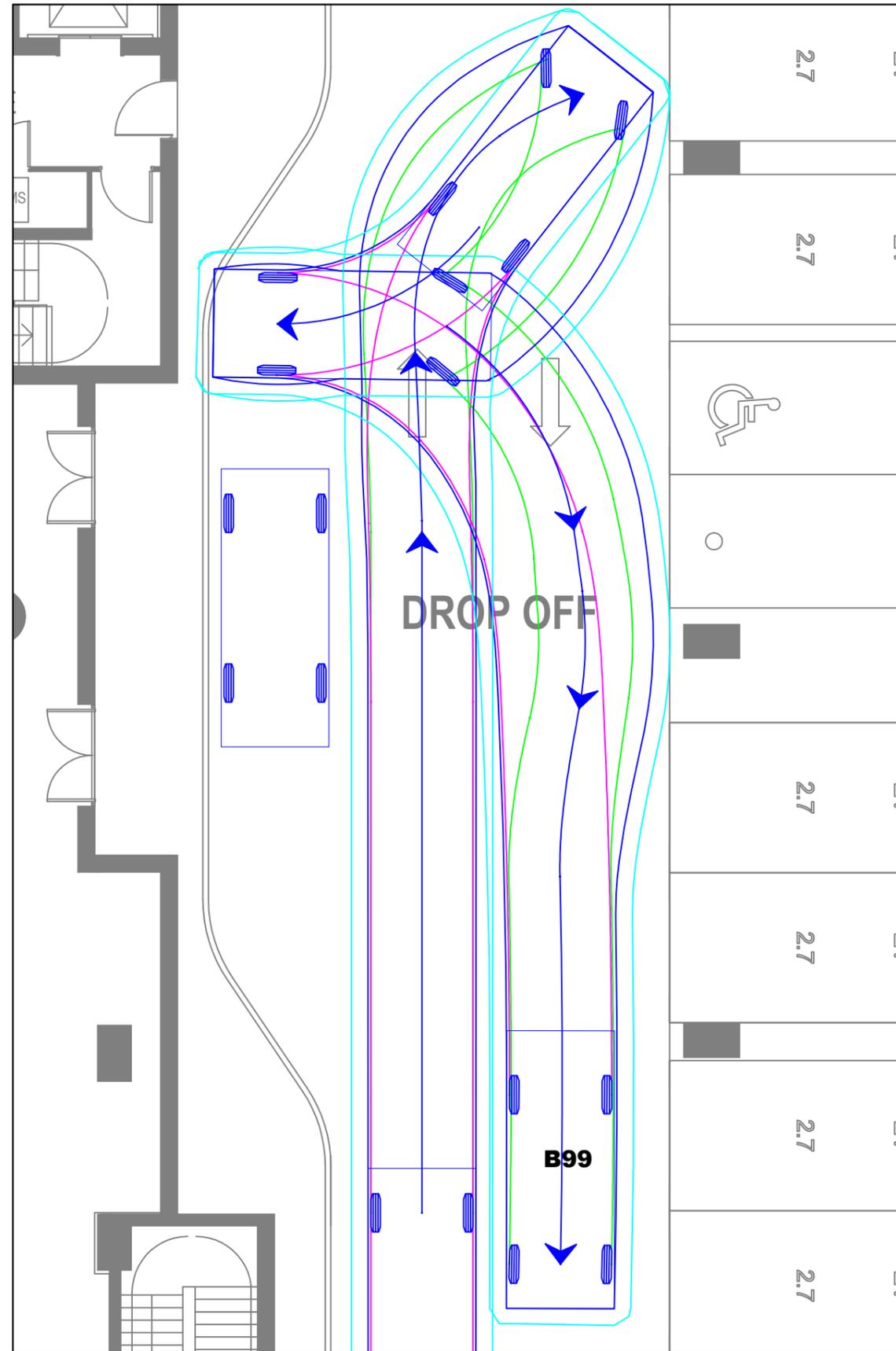
Width : 1.94
Track : 1.84
Kerb to Kerb Radius : 12.5m

* actual template based on 'relevant longitudinal dimensions that affect swept path' as set out in Section B2.1 of AS/NZS 2890.1:2004

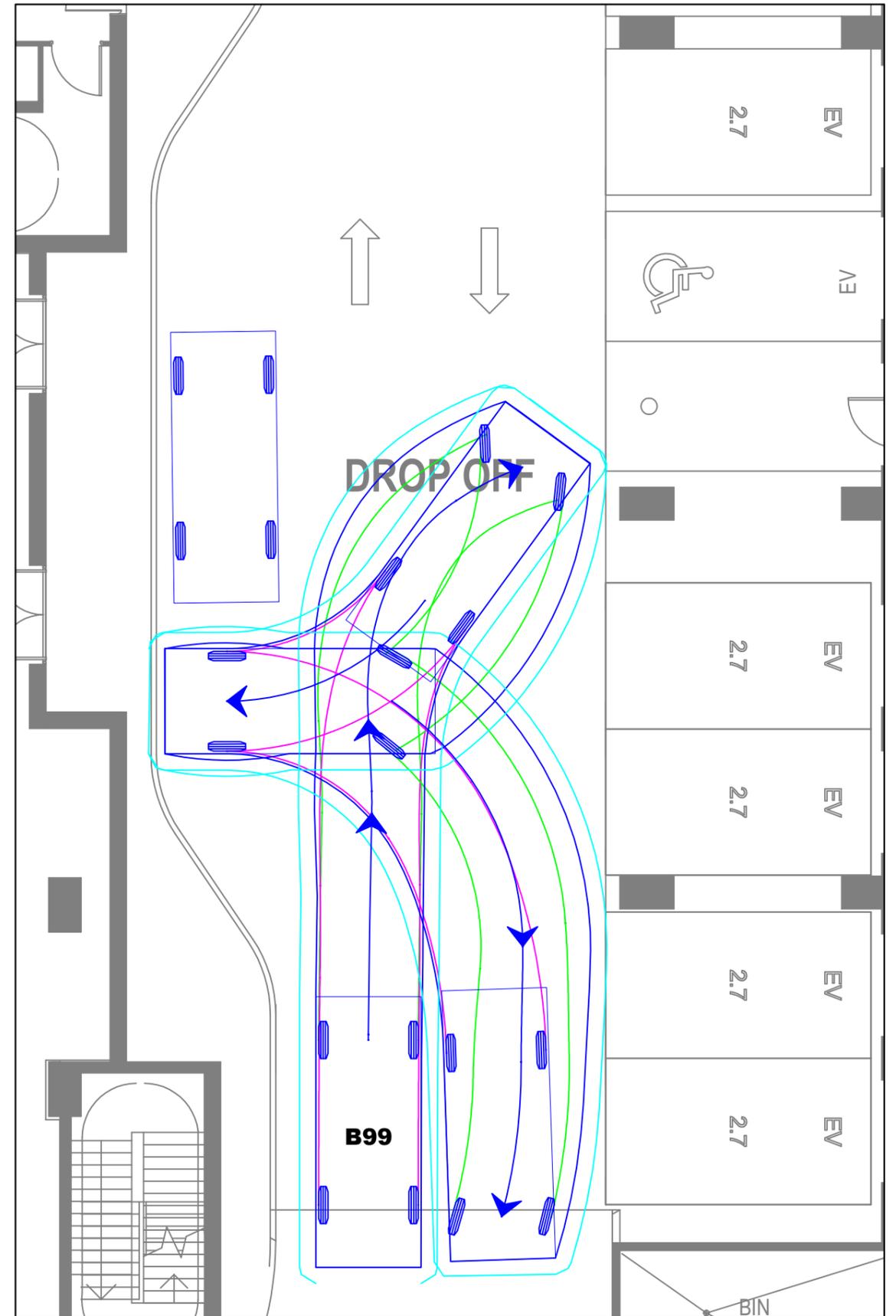
LEGEND

- REAR WHEELS (pink line)
- FRONT WHEELS (green line)
- VEHICLE BODY (blue line)
- BODY CLEARANCE (cyan line)

DROP OFF BAY - B99 TURN AROUND 01



DROP OFF BAY - B99 URN AROUND 02



| REV | DATE | NOTES | DESIGNED BY | CHECKED BY |
|-----|------------|-------------------|-------------|----------------------|
| A | 11/02/2026 | SECTION 87a PLANS | J. LEWIS | J. COSSINS (RPE7781) |

424 ST KILDA ROAD, MELBOURNE
PROPOSED MIXED USE DEVELOPMENT

GENERAL NOTES:
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17/12/2025
NOT FOR CONSTRUCTION

FILE NAME: G33788-01
SHEET NO.: 01



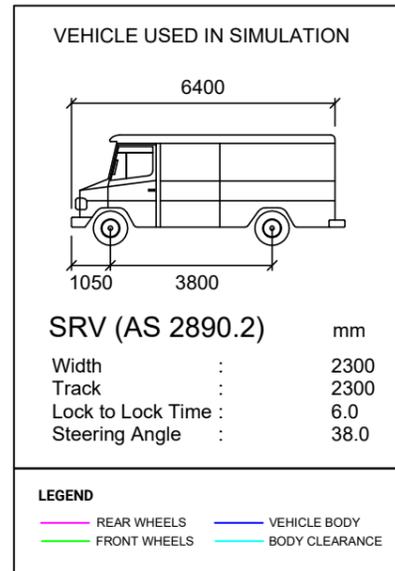
SCALE: 1:100 (A3)

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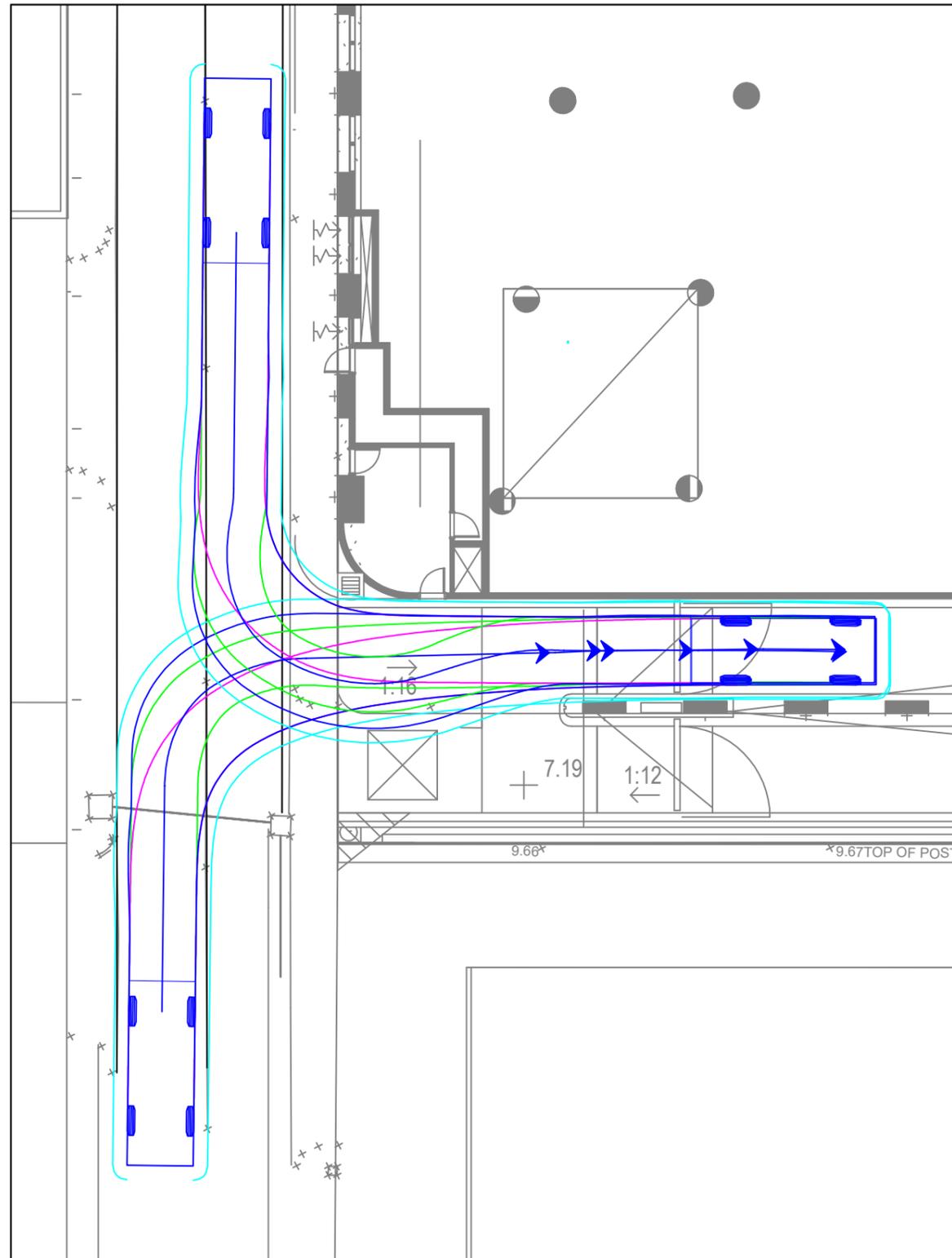
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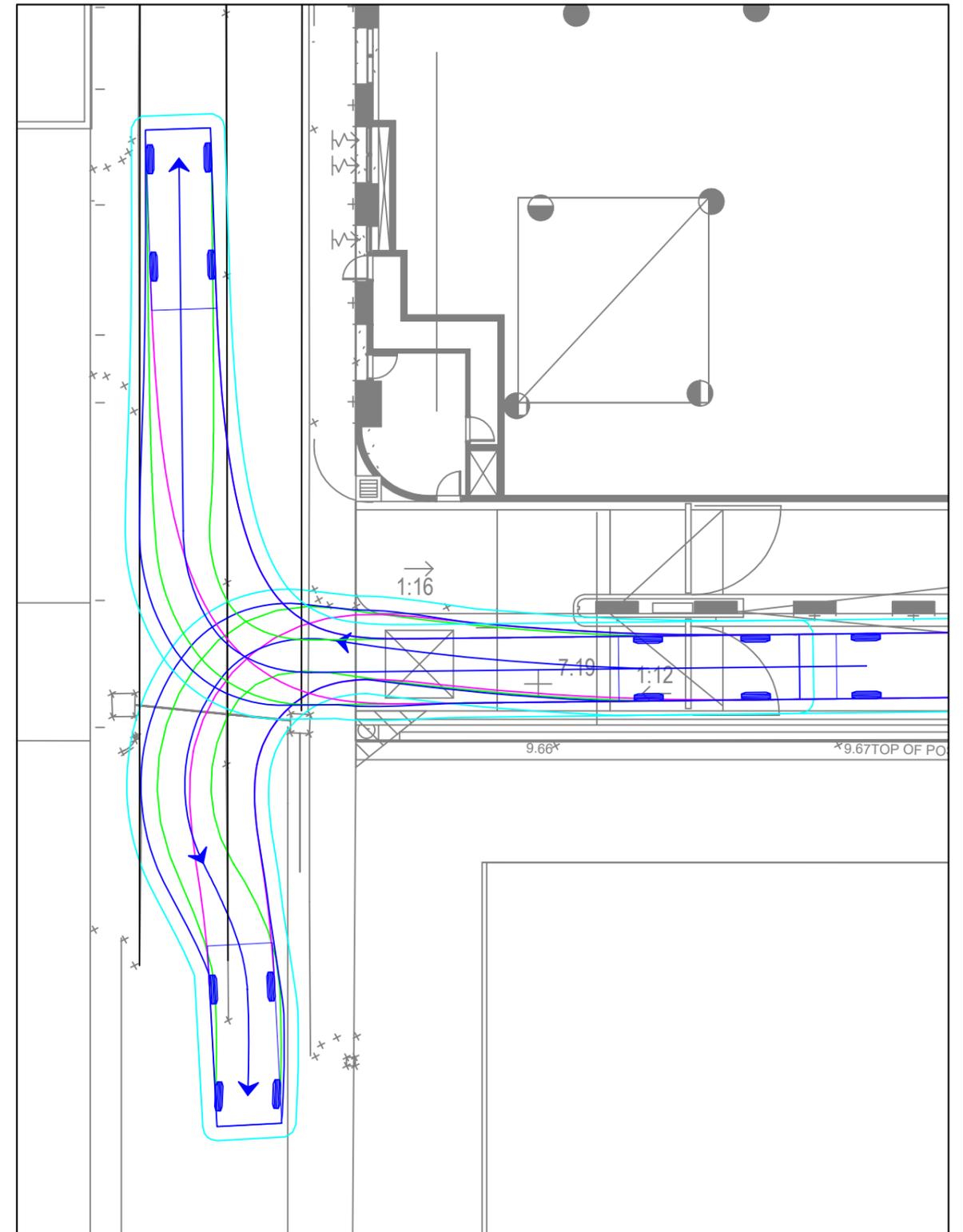
VEHICLE PROFILE



BASEMENT INGRESS - SRV



BASEMENT EGRESS - SRV



| REV | DATE | NOTES | DESIGNED BY | CHECKED BY |
|-----|------------|-------------------|--------------|------------|
| A | 01/03/2024 | TOWN PLANNING | E. O'FARRELL | C. MORELLO |
| B | 05/03/2025 | 25% DD | J. COSSINS | C. MORELLO |
| C | 11/02/2026 | SECTION 87a PLANS | J. COSSINS | C. MORELLO |

424 ST KILDA ROAD, MELBOURNE
PROPOSED MIXED USE DEVELOPMENT

GENERAL NOTES:
 PLANS PREPARED BY SOM, RECEIVED
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