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## **Submission: Better Apartments – Draft Design Standards**

Southbank Residents Association (SRA) is a community non-profit organisation, aiming to bring together and support the interests of all who live or work within Southbank, on matters such as planning and development, traffic issues, lack of public schooling, open space and other matters important to residents.

SRA is the convener of the Southbank Owners Corporation Network (SOCN), which is a forum for our building memberships to work together and discuss common areas of interest when it comes to apartment living in Southbank.

Southbank Residents Association welcomes this review and are glad for the opportunity to participate.

### **Introduction**

We are grateful minimum design standards are finally being considered and the community has an opportunity to be part of the conversation. We appreciate the effort that will also be made to train local government planners and building design professionals on the new provisions.

The stated purpose of the Design Standards is to 'protect and enhance Victoria's reputation for liveability and good design, and ensure that, as our cities grow sustainably, they leave positive legacies for future generations'<sup>1</sup>.

Melbourne has been named the World's most livable city for the last five years. The two principal reasons are, Melbourne

- is a midsized city. Larger cities, are often victims of their success and have overstretched infrastructure.
- and has low population density.

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<sup>1</sup> Page 4 of Draft Design Standards

However these two factors are currently changing at an increasing rate. Melbourne is Australia's fastest growing capital city. The population is increasing at a rate of 2.1% per year, which for last year was an extra 1760 people per week <sup>2</sup>. While Melbourne may have overall a low population density, the CBD and adjacent areas have a very high density. Parts of Southbank have a density above 160,000 persons per km<sup>2</sup>. <sup>3</sup>

Without proper planning and infrastructure, the status of Melbourne as the World's most livable city is seriously under threat.

Because the outer areas are so poorly served by public transport, much of this population growth will occur in the inner city area. If the new design standards don't reinforce the livability of Melbourne, then Melbourne is likely to go the way of other larger cities and drop down the livability index.

Two design and amenity issues that determined livability that are not addressed at all in the Design Standards are:

- Set minimum sizes for apartments. Every major city in the World specifies the minimum size for 1, 2 and 3 bedroom apartments. Not to do this condemns Melbournians to third world conditions for accommodation. Indeed to stay at Number One in the livability index, Melbourne should be raising the bar on minimum size, not just matching the standards of Sydney, our nearest competitor on livability.
- Mandate a mixture of 1, 2 and 3 bedroom apartments in each building. If the center of Melbourne is to become a cohesive community it needs to accommodate family groups of various sizes and ages. The current preponderance of exceedingly tiny one bedroom apartments is producing a monoculture in the city. Diversity is needed for livability. The mixture of types of apartments can obviously fall within a range, but it is reasonable to insist that each building has a minimum of 20% of each of the three types.

Two other design and amenity issues for apartments that are also not considered are:

- Size of lifts. Apartment buildings experience a regular changeover of occupants. The movement of household furniture in and out of apartment buildings can be a fraught exercise. The Design Standards need to specify the dimensions of lifts. For example: In buildings of more than 10 storeys a separate goods lift needs to be included. In buildings of less than 10 storeys, the dimensions of the lifts should be specified such that a three seater lounge and a king size mattress can each fit in the lift.

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<sup>2</sup> ABS Media release, 30th March 2016

<sup>3</sup> The Population Experts

- Canopies for wind deflection. The documentation for the Melbourne Planning Scheme Amendment C270 identified 'Pedestrian Level Wind' caused by downwash by tall buildings as a significant discomfort. The document suggested three design solutions, i) podium, ii) setback and iii) canopy. A number of the tall buildings in Southbank already incorporate the podium and setback features to negligible effect. The strength of the wind around Eureka Tower is testimony to that. It is therefore strongly recommended that all buildings above five storeys should have a canopy at street level. The canopy should project to the edge of the footpath.

The other design and amenity issues identified in the draft Design Standards vary in their level of specificity. Some are numerically precise, others provide some wiggle room, while others seem to be mere suggestions. Each of the issues is commented on in turn below.

### **Building Setback**

The standard specifies setbacks only for buildings of five or more storeys. The setback rules should be extended to buildings of three and four storeys with values of 3 metres for minimum setback for side and rear boundaries and 6 metres from buildings within the site.

It should also be noted that the standard assumes that adjacent buildings have parallel walls. The standard should have an addition to cover oblique walls, such as 'the setback is measured as the smallest separation between two buildings'.

### **Light wells**

The standard specifies that bedroom windows in separate dwellings should be staggered to avoid direct views. This rule should be extended to include living room windows.

### **Room depth**

This standard is about ensuring each apartment receives an adequate amount of daylight, by defining the depth to ceiling height ratio. However the dimensions of the window are not defined, which would surely effect the amount of daylight entering the room. A minimum size for the window should be specified.

### **Windows**

The standard seeks to ensure that all habitable rooms have direct access to daylight from any point in the room. However the standard ignores that fact that the height of the window will have an effect as well as its width. A minimum height for the window needs to be specified.

### **Storage**

The standard is acceptable. It is worth considering that while it is acceptable to provide storage in a car park, that the amount of storage that is exposed to the elements and vehicle exhaust/dust is further considered. Also some consideration should be given to minimum sizes for storage spaces such as those for white goods and appliances. I have seen a number of apartments recently where the refrigerator recess is only big enough for a small refrigerator and microwave, yet it was a 3 bedroom apartment.

### **Noise impacts**

The reference to off-site noise sources should include examples such as traffic, construction, wind, buskers and waste removal. However methods to control internal noise seems to have been overlooked. Dwellings need to ensure noise is controlled between habitable rooms and even between adjoining dwellings and one such way is by incorporating a standard which might include insulation.

### **Energy efficiency**

The standard says in part that 'Buildings should be ... sited and designed to ensure that the energy efficiency of existing dwellings on adjoining lots is not unreasonably reduced.' The word 'unreasonably' is very vague. This needs to be specified in quantitative terms.

### **Solar access to communal outdoor open space**

The standard specifies that ' ... at least 50 per cent of the communal outdoor open space area should receive direct sunlight for a minimum of two hours between 9am and 3pm on 21 June.'. The 50% figure is too low, it should be set higher, at least 60%. That standard also does not specify the amount of sunlight for the other part of the open space. It could be in shadow for the whole day. There should be an additional condition that 100% of the area should receive a minimum of one hour of sunlight in the same time frame.

### **Natural ventilation**

The standard says that 'at least 60 per cent of dwellings with a finished floor level less than 35 metres height should be naturally cross ventilated'. This should be increased to 100%.

### **Private open space**

Acceptable, however developers should be encouraged, where possible, to avoid the provision of this space directly below complex balconies as too often the podium space is littered with cigarette butts and items which might accidentally (or maybe deliberately) fall from higher balconies.

### **Communal open space**

Acceptable, except the space maxes out at 20 dwellings. We feel that the floor area of a development should also be considered in the ratio with dwellings. The larger the floor area then there is a greater opportunity to provide bigger communal open space as usually there will be many more dwellings.

### **Landscaping**

Acceptable, however there should be a strong emphasis to retaining established trees that are appropriate with the development. The planting of mature canopy trees should be strongly encouraged, especially where established canopy trees have been removed.

Token efforts with planter boxes should be outlawed.

### **Accessibility**

Acceptable.

### **Dwelling entry and internal circulation**

Acceptable.

### **Waste**

The standard says in part 'there should be dedicated areas ... for adequate circulation area for waste collection vehicles' and 'waste management systems and facilities should... protect public health and amenity of occupants and adjoining premises from the impacts of odor, noise and waste collection vehicle movements'.

The circulation area for waste collection should be off road to avoid traffic congestion and minimise the impact of noise on occupants of adjacent buildings and pedestrians.

The protection of public health, etc. should be more than an aspiration. There should be quantitative measures to ensure that the standard is complied with.

Waste should be considered as part of the energy efficiency plan. In multi-level developments, there should be a space on each floor for the storage of recyclables for internal collection and managed in accordance with the buildings management plan.

### **Water management**

Acceptable



## Conclusion

The residents of Southbank are passionate about their neighbourhood and have grave concerns that unless these standards are mandated then the quality of their community will continue to be eroded by uncaring developers

We thank you for the opportunity to make a submission on this review.

Regards

A handwritten signature in black ink, appearing to read "Tony Penna", with a long horizontal stroke extending to the right.

Tony Penna  
President  
Southbank Residents Association