

**Submission  
No 9**

## **INQUIRY INTO APARTMENT DESIGN STANDARDS**

**Name:** Name withheld

**Date Received:** 22 October 2021

Name  
withheld

## Inquiry into Apartment Design Standards

**Organisation Name:**

**Your position or role:**

### YOUR SUBMISSION

**Submission:**

Dear Committee

As someone who lives in an inner city apartment and also someone who is involved in the built environment industry I feel the residential apartment design standards try to control too many things and have made people too precious. Standards are long and confusing for planners, designers and decision makers and needs to be significantly cut back. I will provide a few examples but there are many more.

Take privacy for example, requirements about 9m overlooking view cone and internal overlooking are way too precious and should be scrapped. Where did the 9m rule come from? Has this been reviewed in the last 15 years? People living in apartments should be afforded a level of privacy but should also not expect to have no views into their homes, balconies etc at all. The rule should be flipped on its head to recognize some form of overlooking should be expected but try to reduce the severity of it between primary areas - the 9m rule should definitely be looked at.

Side and rear / building setbacks are another area of contention. Apartments under 5 storeys are required to meet setback requirements which were created for detached homes and townhouses (Standard B17) - It is evident the rules should be different. These 3-4 storey apartments are often forced to create a steeped building form in the name of "reducing visual bulk and reducing sheer walls". What is wrong with a 3 storey sheer wall? Take a look at everyone's favourite Victorian terraces, these are rows and rows of two storey sheer walls (at a 3 storey height) and these are known as some of the best architecture we have in Victoria. They are simple, inoffensive and cheaper to build structurally thereby saving in overall development cost. The apartment standards for under 5 storeys should follow the same building setbacks requirement of Cl 58 rather than being forced to use setbacks designed for detached homes and townhouses.

Car parking provisions should also be reviewed. These have not been reviewed in over 20 years and are out of date, especially as it relates to apartments. Take a look at the car parks within apartment buildings, in many cases, these are almost 50% empty in City apartments, granted the occupancy rate is higher for smaller scaled apartments in the suburbs. Has anyone done a thorough post-occupancy survey across the state of built apartments? This needs to be done and a new set of car parking rules should be created with a differentiation between detached homes and townhouses from apartments. At present the calculation based on number of bedrooms regardless of whether you're a detached home or an apartment is not helpful and doesn't reflect the actual on-the-ground results.

Too many times we know Cl 55 and Cl 58 standards are shoulds not musts, however when it comes to issues like overlooking, daylight, overshadowing, planners will be very literal and too scared to allow something which doesn't comply with the standard, but still complies with the overarching objective - Cl 55 and Cl 58 needs to change to give planners clear guidance and permission to depart from the standards. Visual bulk guidance needs to be stronger in that the answer to reducing bulk is not the wedding cake, stepping in of a building and that straight walls at 3 or 4 storeys can also be acceptable outcomes, context and sensitive interfaces permitting - but tall sheer walls should not be seen as a NO without any consideration whatsoever.

Apartment standards (and planning in general) needs to not only consider amenity, but commercial viability and cost. This is something planning has failed to do. The impact of one shift, one move, one setback,

adding more material to reduce bulk, all of these small things that planners love to condition costs money and sometimes for what purpose (lipstick on a pig?). If apartment design standards were to change again in the future, it should be updated to include reference to cost and viability implications as well.

Thank you for taking time to read my submission.



## **FILE ATTACHMENTS**

**File1:**

**File2:**

**File3:**

**Confidentiality:**

{Confidential1:value}

I request the committee publish my submission, but remove my name

**Signature:**

