

**Submission
No 11**

INQUIRY INTO APARTMENT DESIGN STANDARDS

Organisation: City of Port Phillip

Date Received: 22 October 2021



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File Ref: [REDACTED]

22 October 2021

The Committee Manager
Legislative Assembly Environment and Planning Committee
Parliament House

via email: apartmentdesign@parliament.vic.gov.au

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Dear Committee Manager

CITY OF PORT PHILLIP SUBMISSION TO INQUIRY INTO APARTMENT DESIGN STANDARDS

Thank you for your invitation to make a submission to the Inquiry into the Apartment Design Standards.

The City of Port Phillip strongly supports the introduction of measurable apartment design standards to improve the quality of apartment design and increase certainty for the development sector and the community.

Our submissions are as follows. Please be aware that these submissions represent the views of Council officers.

We would be pleased to discuss this correspondence or any queries you may have. Please do not hesitate to contact us through the details above or via email

Yours sincerely

[REDACTED]
Kathryn Pound
Manager City Strategy, Design & Sustainability

a. current apartment living standards in Victoria

Over the last 10 years there has been a series of apartments in inner city areas and surrounding suburbs that have presented a series of poor outcomes including borrowed light to bedrooms, inadequate daylight access to key living areas, inadequate sizes of balcony areas, wind impacts to outdoor communal open spaces and inadequate balcony sizes.

Council supports the process of developing the content and themes in the current apartment design standards. Furthermore the Standards are legible, with ease of access on the web with supporting diagrams, illustrations and photos as well as decision criteria for Councils to assess.

Breaking down the guidelines into siting and building arrangement, building performance and dwelling amenity shows a hierarchy of contextual influences as well as individual site responses.

The most recent addition and introducing the four additional standards of green space, external materials, wind impacts and integration with the street are furthermore more improvements in response to ongoing discussions with local government in identifying gaps in assessing development applications.

As the standards have progressed there has been an uplift in the quality of development applications that Council have received.

b. improvements that can be made to the liveability in apartments and apartment building developments, including communal areas

While the current standards do address several key issues that were previously lacking – the following are some improvements to assist in providing quality outcomes for the design of apartments.

- Council notes that standards relating to Building Setbacks, Room Depth and Windows are intended to address the issue of access to daylight. However, Council is concerned that where elements such as building setbacks are reduced or deeper apartments are provided, daylight could be severely compromised-especially with the use of lightwells and light courts. Therefore, it is recommended that:
 - a minimum amount of sunlight to be received in apartments in mid-winter. (For example, the approach adopted in BESSIEQ 1.3 Winter Sunlight requires that the living rooms of at least 70% of apartments receive a minimum of 3 hours direct sunlight between 9am and 3pm at the winter solstice.)
 - Expand the standard relating to room depth to ensure that each apartment is able to receive an adequate amount of daylight, including south facing single aspect apartments. Lux level testing be required (through decision guidelines) to ensure that adequate amounts of daylight are maintained.
- There are no mechanisms to control the size of apartments under the current Victoria Planning Provisions. Councils lack the necessary statutory mechanisms (i.e. 'tools') to ensure that diverse, accessible, adaptable and affordable housing is delivered by the market. Council believes that:
 - Adaptability should be included separately to Accessibility as a mandatory standard.
- Housing adaptability should have a greater prominence. Greater thought should be given to not just meeting disability access requirements but to supporting different household structures and changing household lifecycle needs. A more adaptable and flexible approach to the construction of buildings and apartments will enable the use of buildings to reflect changing social, economic and environmental conditions and preferences over time.

- Non-load bearing internal walls should be removable or able to be reinstated to adapt to changing household composition and size, e.g. enlarging living spaces when an additional bedroom is no longer required, or reinstating bedrooms to allow for increased household size, e.g. additional child or for families supporting grandparents.
- Apartments of varying sizes should be able to be keyed together to create larger apartments.
- Currently there are no mechanisms to ensure apartments are of sufficient size and layout to achieving a high standard of amenity. There is insufficient guidance as to what apartment size and layouts constitute a minimum acceptable standard for healthy human habitation.
 - If the apartment sizes continue to be excluded from the standards, there needs to be a commitment to continuing to monitor this issue and if the trend for poorly sized or configured apartments continues, a mandatory minimum size provision should be considered in the future.
- A key issue where intensive higher density housing is proposed is spacing between buildings. Controls need to ensure adequate building spacing through setback requirements which establish a minimum separation distance between towers.
- Another critical outcome of providing adequate building setbacks is ensuring equitable development outcomes across adjoining sites, and ensuring that a development's amenity is not reliant on lower scale development on adjoining sites.

c. initiatives undertaken by other states or nations that have improved apartment design standards

The following are examples of benchmarks and strong initiatives that are and have been improving design standards:

- New South Wales State Environmental Planning Policy No 65 – Design Quality of Residential Flat Development (SEPP 65) and the Residential Flat Design Code 2002 addresses design quality of residential apartment development.
- The City of Moreland Planning scheme – 22.07 for Developments of 5 or more storeys and 22.08 Complementary provisions are also suitable initiatives that have had a significant impact to improving apartment design standards.