

**Submission
No 18**

INQUIRY INTO APARTMENT DESIGN STANDARDS

Organisation: Frankston City Council

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28 October 2021

Dear Sir/Madam

RE: Apartment Design Standards

Frankston City Council welcomes the opportunity to comment on the enquiry into draft Apartment Design Standards (2021).

Current Apartment Living Standards in Victoria

A review of the current *Better Apartment Design Standards* (BADs) located at Clause 55.07 Apartment Developments (under 5 storeys) and 58 Apartment Developments (over 5 storeys) and recent planning approvals highlight the following concerns:

- Poor building quality and lifespan
- Lack of internal storage
- Poor internal amenity due to lack of outlook and daylight
- Lack of housing mix including market, affordable and social housing
- Poor external private open space which lacks functionality
- Lack of bicycle spaces
- Assumption all apartments require parking

Improvements to the liveability in apartments

Council Officers welcome the improvements to the liveability of apartments and the changes proposed in the draft *Better Apartment Design Standards* (BADs) 2021. It is however noted, the review is silent on the following which warrant consideration:

1. Housing affordability through design

Demonstration to on-going sustainability in regards to servicing, maintenance and management for apartments. (I.E. many apartment complexes now contain lifts which significantly increases ongoing body corporate costs and poor quality materials are often utilised for façade treatment).

Whilst some developments may be cheap to build, with low cost materials, lifts and car stackers etc. This can result in a development that has higher than normal ongoing maintenance costs in terms of needing to replace cheap finishes that aren't durable and maintenance of mechanical services.

A review of ongoing running costs and services changes of apartments should be considered at the planning permit application stage.

1. Environmental Sustainable Design (ESD)

An all of Government approach needs to be taken in relation to the implementation of ESD in order to reduce the ongoing running costs of housing.

2. CPTED (Crime Prevention Through Environmental Design)

The draft BADS 2021 and design guidelines make reference to the importance of passive surveillance. Further investigation should be undertaken to incorporate CPTED principles into the design of apartments including entry ways, service areas, lighting, planting etc. An all of Government approach needs to be undertaken with CPTED principles and guidelines to be included within the Planning Scheme to ensure that these outcomes are delivered.

3. Cycle storage

Consideration should be given to the provision of cycle storage per apartment to encourage alternative modes of transport. Exploration should be given to the provision of cycle storage for each apartment with multi bedroom dwellings provided at a higher rate.

4. Electric Vehicle Charging Points (EV)

A growing trend in electric vehicles requires additional infrastructure in apartment buildings. Further exploration into the provision for active and passive EV charging points should be considered.

5. Noise attenuation

While discussed briefly within the draft BADS 2021 further exploration should be undertaken to understand the impacts on occupants' health due to poor noise attenuation in buildings outside of noise influence areas (freeways, train lines etc.) Consideration should be given to expanding the requirements for acoustic reports for development adjacent to tram lines, arterial roads etc. within the Planning Scheme to make noise attenuation mandatory, not just something that is considered.

Initiatives from interstate and overseas

A review of the following *Croydon Council, UK Local Plan* identified:

- Policy DM10.4 that flatted (apartment) development and developments of more than 10 dwellings, provide 10m² per child of play space (located in communal areas) using a population yield calculator. The play space to be designed as a condition on the planning permit and usually includes fixed structures.
- Strategic Policy SP8.12 and SP8.13 encourages electric vehicles charging infrastructure and car sharing facilities for new development supported by Policy DM30.

A link to the Croydon Council Local Plan is below:

https://www.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon_Local_Plan_2018.pdf

A review of UK Local Plans found common similarities as discussed below:

- Provision for the requirement of apartments over 10 dwellings to provide a mix of affordable housing (including social). This is secured by via a S106 Agreement (similar to a S173 Agreement) via a permit condition to ensure that this is provided at an appropriate mix and percentage.
- Detailed information surrounding the typology of housing required in each council area (I.E. studio, 1 bed, 2 bed, 3 bed etc.) to meet future population projections. This is further broken down into the required number of social and affordable housing and the dwellings which are required to meet housing targets.
- Blind tenure designs for new housing development to ensure all buildings look the same and have equitable access, daylight, outlook etc.
- Daylight/outlook is important to ensure that new developments receive appropriate levels of daylight and encourages the reduction in single aspect dwellings. Consideration is given to the Building Research Establishment (BRE) 'Site Layout Planning for Daylight and Sunlight' <https://www.right-of-light.co.uk/services/daylight-sunlight-reports/>.

We hope that the above submission provides assistance into the enquiry into Apartment Design Standards and we look forward to seeing improved development and living outcomes being addressed within the Planning Scheme for all apartments within Melbourne.

If you have any queries about this letter please contact Justine Aldersey Strategic Planner on [REDACTED] or at [REDACTED]

Yours faithfully

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Justine Aldersey
Strategic Planner