

**Submission
No 36**

INQUIRY INTO APARTMENT DESIGN STANDARDS

Organisation: Manningham Council

Date Received: 29 October 2021

27 October 2021

apartmentdesign@parliament.vic.gov.au;

CRM ID: MC0753136

Dear Sir / Madam

RE: Inquiry into Apartment Design Standards by Victorian Legislative Assembly Environment and Planning Committee

Manningham Council welcomes the opportunity to make a submission to the Environment and Planning Committee into apartment design standards. The comments respond to the Terms of Reference from the Legislative Assembly relating to:

- a) Current apartment living standards in Victoria; and
- b) Improvements that can be made to the liveability in apartment and apartment developments, including communal areas; and

It is also noteworthy that in August 2019, Council made a submission to the Department of Environment, Land, Water and Planning's (DELWP) discussion paper on 'Better Apartments in Neighbourhoods' (attached) which also provides useful information.

The following comments relate to the following clauses in the Manningham Planning Scheme:

- Clause 55.07 applies to apartment developments up to four storeys
- Clause 58 applies to apartment development of five or more storeys

Clause 55.07-2 / Clause 58.03-2 - Communal open space objective

To ensure that communal open space is accessible, practical, attractive, easily maintained and integrated with the layout of the development.

Standard B36 / Standard D7:

Developments with 40 or more dwellings should provide a minimum area of communal open space of 2.5 square metres per dwelling or 250 square metres, whichever is lesser.

It is considered that:

- This Standard should also be applicable for less than 40 dwellings, or there should be a threshold that if the site is within proximity to a park/reserve then less communal open space is required.
- There should be a 'trade-off' where if larger secluded private open space (SPOS) balconies are provided, then smaller communal open space within a development is required. This would encourage larger useable balconies.



Interpreter service

9840 9355

普通话 | 廣東話 | Ελληνικά

Italiano | عربي | فارسی

Manningham Council

699 Doncaster Road (PO Box 1), Doncaster, Victoria 3108

p 03 9840 9333 f 03 9848 3110

e manningham@manningham.vic.gov.au

ABN 61 498 471 081 www.manningham.vic.gov.au

- A sliding scale of private vs communal open space could be included in the Standard and this could also be linked to the proximity of public open space.
- There should be incentives that promote useable communal open spaces, such as community gardens, rooftop gardens that are functional and have dedicated purposes.
- Shared working from home arrangements could be provided in communal areas for residents, particularly where work spaces are not provided within a dwelling. These shared areas could include a kitchen, toilet facilities, informal seating areas, desks, charging stations/ports.
- Provision for community facilities should be encouraged within larger apartment buildings, for example, child care, where they are not within a reasonable walking distance of such facilities.

Clause 55.07-8 / Clause 58.05-2 – Building entry and circulation objectives

To provide each dwelling and building with its own sense of identity.

To ensure the internal layout of buildings provide for the safe, functional and efficient movement of residents.

To ensure internal communal areas provide adequate access to daylight and natural ventilation

Standard B40 / Standard D18:

Entries to dwellings and buildings should:

- Be visible and easily identifiable.
- Provide shelter, a sense of personal address and a transitional space around the entry.

The layout and design of buildings should:

- Clearly distinguish entrances to residential and non-residential areas.
- Provide windows to building entrances and lift areas.
- Provide visible, safe and attractive stairs from the entry level to encourage use by residents.
- Provide common areas and corridors that:
 - Include at least one source of natural light and natural ventilation.
 - Avoid obstruction from building services.
 - Maintain clear sight lines.

It is considered that:

- There should be maximum distance requirements to avoid very long corridors with only windows at the end(s).
- Ventilation standards need to be introduced within all common areas, including corridors, particularly given current Covid-19 situation.

Clause 55.07-9 Private open space above ground floor objective / Clause 58.05-3 – Private open space objective

To provide adequate private open space for the reasonable recreation and service needs of residents.

Clause 55.07-9 Private open space above ground floor Standard B43

A dwelling should have private open space consisting of:

- An area of 15 square metres, with a minimum dimension of 3 metres at a podium or other similar base and convenient access from a living room, or
- A balcony with an area and dimensions specified in Table B8 and convenient access from a living room. If a cooling or heating unit is located on a balcony, the balcony should provide an additional area of 1.5 square metres.

If a cooling or heating unit is located on a balcony, the balcony should provide an additional area of 1.5 square metres.

Clause 58.05-3 – Private open space Standard D19:

A dwelling should have private open space consisting of:

- An area of 25 square metres, with a minimum dimension of 3 metres at natural ground floor level and convenient access from a living room, or
- An area of 15 square metres, with a minimum dimension of 3 metres at a podium or other similar base and convenient access from a living room, or
- A balcony with an area and dimensions specified in Table D5 and convenient access from a living room, or
- A roof-top area of 10 square metres with a minimum dimension of 2 metres and convenient access from a living room.

If a cooling or heating unit is located on a balcony, the balcony should provide an additional area of 1.5 square metres.

Table B8/D5 Balcony size

Dwelling Type	Minimum area	Minimum dimension
Studio or 1 bedroom dwelling	8 square metres	1.8 metres
2 bedroom dwelling	8 square metres	2 metres
3 or more bedroom dwelling	12 square metres	2.4 metres

It is submitted that the minimum dimensions for balconies needs to be increased to create useable space. In particular, a 1.8m wide balcony for studio or 1 bedroom dwelling is inadequate.

Clause 55.07-10 / Clause 58.05-4 – Storage objective

To provide adequate storage facilities for each dwelling.

Standard B44 / Standard D20:

Each dwelling should have convenient access to usable and secure storage space.

The total minimum storage space (including kitchen, bathroom and bedroom storage) should meet the requirements specified in Table B9/D6.

Table B9/D6 Storage

Dwelling Type	Total minimum storage volume	Minimum storage volume within the dwelling
Studio	8 cubic metres	5 cubic metres
1 bedroom dwelling	10 cubic metres	6 cubic metres
2 bedroom dwelling	14 cubic metres	9 cubic metres
3 or more bedroom dwelling	18 cubic metres	12 cubic metres

It is considered that:

- There should be a minimum requirement of storage for each room (bedroom, bathroom, kitchen, etc) to improve the quality, quantity and distribution of storage throughout a dwelling.
- Innovative storage techniques should be actively encouraged, such as under window built-in bench seats.

Clause 55.07-12 / Clause 58.07-1 – Functional layout objective

To ensure dwellings provide functional areas that meet the needs of residents.

Standard B46 / Standard D24:

Bedrooms should:

- Meet the minimum internal room dimensions specified in Table B10/D7.
- Provide an area in addition to the minimum internal room dimensions to accommodate a wardrobe

Table B10/D7 Bedroom dimensions

Dwelling Type	Minimum width	Minimum depth
Main bedroom	3 metres	3.4 metres
All other bedrooms	3 metres	3 metres

Living areas (excluding dining and kitchen areas) should meet the minimum internal room dimensions specified in Table B11/D8

Table B10/D7 Living area dimensions

Dwelling Type	Minimum width	Minimum area
Studio and 1 bedroom dwelling	3.3metres	10 sqm
2 or more bedroom dwelling	3.6 metres	12 sqm

It is submitted that:

- The living room dimensions only specifies a minimum width, which is not always being interpreted as the shortest dimension of a room.
- The minimum area in a living room should specify that the area is to be clear of dining areas, bench seating, etc as well as circulation paths, which should be clearly delineated.
- There should be limitations on the extent of the minimum living room area that can be used for circulation areas, openings to other rooms/ sharing of areas and spaces.
- All dwellings should be required to provide a study / study nook given the demand for working at home arrangements.

Clause 55.07-14 / Clause 58.07-3 – Window objective

To allow adequate daylight into new habitable room windows.

Standard B48 / Standard D26:

Habitable rooms should have a window in an external wall of the building.

A window may provide daylight to a bedroom from a smaller secondary area within the bedroom where the window is clear to the sky.

The secondary area should be:

- A minimum width of 1.2 metres.
- A maximum depth of 1.5 times the width, measured from the external surface of the window

It is submitted that:

- The minimum depth requirement for snorkel windows (ie where the secondary area requirement applies) should be measured from the external surface of the window, so that any external corridor or cantilevered floor above the window can be taken into account when assessing the amount of light that can penetrate the bedroom.
- The minimum depth requirement for snorkel windows should be wider than 1.2 metres for improved daylight, and improved useability options, such as desk space, under window storage/seating.

Clause 55.07-15 / Clause 58.07-4 – Natural ventilation objectives

To encourage natural ventilation of dwellings.

To allow occupants to effectively manage natural ventilation of dwellings

Standard B49 / Standard D27:

The design and layout of dwellings should maximise openable windows, doors or other ventilation devices in external walls of the building, where appropriate.

At least 40 per cent of dwellings should provide effective cross ventilation that has:

- A maximum breeze path through the dwelling of 18 metres.
- A minimum breeze path through the dwelling of 5 metres.
- Ventilation openings with approximately the same area.

The breeze path is measured between the ventilation openings on different orientations of the dwelling.

These Standards should also apply to circulation spaces (communal corridors) to improve ventilation both within each dwelling as well as within the overall building.

General Comments

It is also considered that apartment standards should also incorporate or address the following matters:

Overlooking assessment for apartment buildings five or more storeys

Overlooking matters are required to be considered in Clause 55.04-6 of the planning scheme for apartment buildings up to four storeys in height. However, it is not specifically addressed in Clause 58 for development five or more storeys. Council recommends that there should be consistency in the consideration of overlooking irrespective of building height.

Relationship between Apartment Standards in Planning Scheme and Apartment Design Guidelines

There are numerous extremely useful diagrams in the Guidelines that could be brought into the Standards that apply for all apartment developments (ie Clause 55.7 and Clause 58) to assist in mandating requirements.

Additional Dwelling amenity issues that should be considered

It is also believed that the following matters should also be included in the Standards for all apartments.

- The requirement for a greater number of multi-aspect apartments, with limits on the number of solely southern-aspect apartments.
- Amenity standards for subterranean rooms / apartments, including, but not limited to, daylight, ventilation and open space.
- External shading/shelter of both balconies and communal open space areas, particularly as the use of outdoor spaces is likely to increase in the future

Inconsistency treatment of amenity outcomes between townhouses and apartments

There is a growing trend in Manningham where developers are preferring to develop townhouses over apartments. This has resulted in balconies, living areas, bedrooms,

functional layout and storage provision in townhouses that are considerably below the standards required for apartments. Council considers that there needs to be a consistent approach to both internal and external amenity within all multi-unit development throughout Victoria.

Other matters

Council would also like to

- Encourage multi-level dwellings within an apartment complex, which creates more diversity and enables option of double height windows, mezzanines, etc.
- Require affordable housing to be mandated within State level policy.
- Require vehicle charge stations to be provided for all apartments either within individual or shared parking areas.
- Require Better Apartment Design Standards (BADs) assessment plans to be mandatory documentation to be submitted with an application.
- See Schedules to non-residential zones being capable of including modifications to Clause 58 in the same way Residential zone Schedules can modify Clause 54 and Clause 55.
- Encourage State and local strategies that actively promote apartments throughout metropolitan Melbourne and regional Victoria in response to work/life balances.
- Encourage State and local strategies that actively promote apartments within walking distance of public parks.

From a broader strategic perspective with housing affordability facing many Australians the planning controls should be facilitating more innovative housing models including built to rent housing options. Furthermore, there should be a greater acceptance and encouragement of apartment developments where there is a focus on communal facilities / shared spaces including laundry facilities, co-working spaces, entertainment areas, community gardens, workshop for bicycle repairs etc. Examples of innovative apartment design incorporating shared communal facilities are demonstrated at the Nightingale project in Florence Street Brunswick, and the Assemble development at 402 Macaulay Rd, Kensington.

Furthermore, whilst Clauses 55 and 58 provide landscaping objectives relating to the retention and planting of canopy trees, there is concern regarding the loss of canopy trees in the municipality as a result of increased densification. The minimum private open space areas do not necessarily make it practical for substantial canopy trees to be retained or planted. To reduce the urban heat island effect, consideration should be given to ensure that the size and dimensions of private and communal open space areas are suitable to allow for the retention and / or planting of larger sized canopy trees.

If you have any further questions regarding the matters raised in this submission please contact Gabrielle O'Halloran, Senior Strategic Planner via email at

██, or phone on ██████████

Yours sincerely

████████████████████

ANGELO KOURAMBAS
Director City Planning and Community