



**Respondent No:** 177

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**Responded At:** Sep 19, 2016 14:59:55 pm

**Last Seen:** Sep 19, 2016 14:59:55 pm

**IP Address:** n/a

Q1. Title	■
Q2. First name	■
Q3. Last name	■
Q4. Position title	■
Q5. Phone	■
Q6. Name of organisation	MGS Architects
Q7. Postal address	■
Q8. Email	■
Q9. Confirm email address	■
Q10. I am submitting on behalf of a (select one)	Architect or building designer
Q11. How satisfied are you that the proposed standard addressing building setback will improve the amenity of apartments?	Satisfied
Q12. Would you recommend any changes to the standard addressing building setback?	No
Q13. If yes, please specify.	
not answered	
Q14. How satisfied are you that the proposed standard addressing light wells will improve the amenity of apartments?	Satisfied
Q15. Would you recommend any changes to the standard addressing light wells?	No
Q16. If yes, please specify.	
not answered	
Q17. How satisfied are you that the proposed standard addressing room depth will improve the amenity of apartments?	Satisfied

Q18. **Would you recommend any changes to the standard addressing room depth?** No

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Q19. **If yes, please specify.**

not answered

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Q20. **How satisfied are you that the proposed standard addressing windows will improve the amenity of apartments?** Dissatisfied

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Q21. **Would you recommend any changes to the standard addressing windows?** Yes

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Q22. **If yes, please specify.**

The Windows standard does not sufficiently ensure adequate provision of daylight and outlook in all bedrooms. We believe that the objective of the Windows standard should be to ensure sufficient daylight in all habitable rooms including bedrooms, which currently can be placed in a saddleback arrangement. While the current standard requires that a window is directly visible for any point of the room, it does not guarantee a window width proportional to the size of the room. The current building code minimum window size is 10% of the floor area, which could result in a window smaller than 1m<sup>2</sup> in smaller bedrooms. Amending this standard to ensure appropriately scaled windows would deliver better provision for outlook and daylight in bedrooms and to a large extent also avoid a saddleback arrangement. 1. VCAT has a daylighting standard as a result of several hearings on the matter. We propose consulting with [REDACTED] regarding established standards for ensuring sufficient daylight in habitable rooms.

Q23. **How satisfied are you that the proposed standard addressing storage will improve the amenity of apartments?** Satisfied

Q24. **Would you recommend any changes to the standard addressing storage?** No

Q25. **If yes, please specify. More information**

not answered

Q26. **How satisfied are you that the proposed standard addressing noise impacts will improve the amenity of apartments?** Satisfied

Q27. **Would you recommend any changes to the standard addressing noise impacts?** No

Q28. **If yes, please specify.**

not answered

Q29. **How satisfied are you that the proposed standard addressing energy efficiency will improve the amenity of apartments?** Satisfied

Q30. **Would you recommend any changes to the standard addressing energy efficiency?** No

Q31. **If yes, please specify.**

not answered

Q32. **How satisfied are you that the proposed standard addressing solar access to communal outdoor open space will improve the amenity of apartments?** Satisfied

Q33. **Would you recommend any changes to the standard addressing solar access to communal outdoor open space? If so, please specify.** No

Q34. **If yes, please specify.**

not answered

Q35. **How satisfied are you that the proposed standard addressing natural ventilation will improve the amenity of apartments?** Dissatisfied

Q36. **Would you recommend any changes to the standard addressing natural ventilation?** Yes

Q37. **If yes, please specify.**

The Natural ventilation requirement should be clarified. The ventilation requirement is positive and we acknowledge that the requirement will result in better outcomes over all, resulting in fewer small apartments with limited amenity and living qualities. However, the 60% proportion will be difficult to achieve in some instances and we would argue that greater flexibility should be allowed. The justification for a certain percentage within the requirement needs to be clearer and implications to building envelope design should be investigated further. The requirement has implications in particular on smaller narrow sites, where issues of overlooking and light well requirements might result in a poorer outcome in general. 2. We propose further investigations regarding built form implications of the natural ventilation requirement, to ensure that the nominated percentage allows for greater flexibility on smaller sites.

Q38. **How satisfied are you that the proposed standard addressing private open space will improve the amenity of apartments?** Satisfied

Q39. **Would you recommend any changes to the standard addressing private open space?** No

Q40. **If yes, please specify.**

not answered

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<b>Q41. How satisfied are you that the proposed standard addressing communal open space will improve the amenity of apartments?</b>	Satisfied
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<b>Q42. Would you recommend any changes to the standard addressing communal open space?</b>	No
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**Q43. If yes, please specify.**

not answered

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<b>Q44. How satisfied are you that the proposed standard addressing landscaping will improve the amenity of apartments?</b>	Satisfied
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<b>Q45. Would you recommend any changes to the standard addressing landscaping?</b>	No
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**Q46. If yes, please specify.**

not answered

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<b>Q47. How satisfied are you that the proposed standard addressing accessibility will improve the amenity of apartments?</b>	Dissatisfied
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<b>Q48. Would you recommend any changes to the standard addressing accessibility?</b>	Yes
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**Q49. If yes, please specify.**

The Accessibility requirements should apply to all dwellings sharing common entries in buildings over 3 storeys. The standard for accessibility gives an exception to some dwellings: "All dwellings (except for 25% of all two bedroom dwellings) should comply with the following requirements:" Affordability of units can be problematic in many areas and community members with disabilities are not always in a position to choose where to live. Limiting the selection of apartments for community members with accessibility requirements does align with state ambitions of treating everyone equally. In addition, some accessibility needs are not always known from the date of moving into an apartment. In the instance of a resident having an accident and subsequently needing a wheelchair, these members of the community could potentially be forced out of their homes, should their living spaces not meet adaptability requirements. As a large number of existing dwellings already have this issue, it is our responsibility as architects, planners and developers to ensure all new building stock allows for equal treatment of all members of the community. A number of best practice examples can be found in Sweden, where accessibility requirements apply to all developments, resulting in measured success of more spacious apartment configurations and a heightened degree of liveability for residents with special needs. 3. We propose removing the 25% exception to the accessibility requirement for units sharing a common entry in buildings over 3 storeys.

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<b>Q50. How satisfied are you that the proposed standard addressing dwelling entry and internal circulation will improve the amenity of apartments?</b>	Satisfied
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Q51. **Would you recommend any changes to the standard addressing dwelling entry and internal circulation?** No

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Q52. **If yes, please specify.**

not answered

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Q53. **How satisfied are you that the proposed standard addressing waste will improve the amenity of apartments?** Satisfied

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Q54. **Would you recommend any changes to the standard addressing waste?** No

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Q55. **If yes, please specify.**

not answered

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Q56. **How satisfied are you that the proposed standard addressing water management will improve the amenity of apartments?** Satisfied

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Q57. **Would you recommend any changes to the standard addressing water management?** No

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Q58. **If yes, please specify.**

not answered

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Q59. **You can submit your comments in the text box below.**

The desired outcome of meeting the needs for a range of households is not addressed. A number of desired outcomes of the Better Apartments Draft Design Standards have been listed on Page 3 of the Better Apartments Overview document. It clearly states that: "The Better Apartments draft design standards will ensure that: 1. New apartments are well-designed 2. The needs of a range of households (including the elderly, people with disabilities, and families with children) are met 3. There is greater transparency and consultancy for both the community and development industry 4. The effects of climate change are mitigated and environmental impacts are minimised 5. Melbourne's identity, productivity, liveability and attractiveness as a place to live, work, visit and invest in is maintained and enhanced." We agree that these goals are crucial to achieve better apartments and to increase the liveability of apartments in Melbourne. We do however believe there is room for improvement to ensure these goals are achieved and represented in the standards to their full extent. Whilst these draft design standards apply to the design of apartments, there is additionally an opportunity to specifically request diversity in the size of apartments provided, linked to the needs of the local context in each instance. This would ensure residential developments cater for a wider range of needs in the community, allowing not only students and single occupiers but equally so couples and families with children to live in a wider range of locations. By requesting applications for larger development to demonstrate linking to regional and neighbourhood housing plans, aligned with meeting the needs of the surrounding community, the diversity of accommodation provided can be individually adapted.. 4. We propose adding a diverse housing requirement. Any residential or mixed use developments with more than 20 units should demonstrate a nexus to regional and neighbourhood housing plans. The development should need to demonstrate aligning the type of housing provided with the needs of the area and aiming to meet any shortages in types of accommodation available.

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**Q60. If you prefer, your comments may be attached in a separate document in either Microsoft Word or Adobe Acrobat PDF format.**

[REDACTED]

**Q61. Privacy Options**

These comments are being made by an organisation and I understand that it will be published , including the name of the organisation

**Q62. Request for confidentiality reasons**

not answered

**Q63. Do you agree to the third party information statement?**

I agree

**Q64. Do you agree to the intellectual property rights statement?**

I agree