

---

# Response to Better Apartments Draft Design Standards

---

Submission to Victorian  
Department of  
Environment, Land, Water  
and Planning

---

On behalf of 

---



## Introduction

██████████ has a long and proud history of supporting Australian architects working in small, medium and emerging practices. Since our founding 25 years ago ██████████ has operated as a registered cooperative and currently represents over 500 members and 400 architectural practices nationally. With a steadily growing membership ██████████ is now the leading representative of small and growing architecture studios. By utilizing our combined voices we are able to support our members in their work and professional learning, while also raising the profile of our industry and the quality of the built environment.

## Response

██████████ welcomes the proposal to improve minimum apartment standards. We congratulate the Minister for Planning Richard Wynne, and endorse the Government's effort to 'raise the bar' consistent with *SEPP 65* controls introduced in NSW in 2002. ██████████ recognises and commends the proposal, and supports the majority of the proposed clauses.

The rate at which our city is changing is such that change need to be implemented, in full, now, to ensure not only that apartments are liveable, but also that those buildings create an urban context that is rich, people friendly, and in context with our status as "the world's most liveable city". The implementation of the proposed standards will improve the worst apartments, but not represent best practice.

There are two key areas where we consider the standards to be insufficient.

### 1. Minimum apartment sizes:

Whilst it is recognised that small, well designed apartments can be successful, it is also recognised that if this is the case, good design would need to be demonstrated. Additional measures, such as the use of a design review panel, or other expert judgement, should be mandated where apartment sizes of less than 35m<sup>2</sup>, (the minimum apartment size in NSW) are proposed. We ask all readers to visualise a 7m x 5m apartment and consider living within that space. What would be required in order to make that space liveable? Excellent, not average, design.

### 2. Mandate the use of architects for apartments:

The standards fail to mandate the use of architects in the design process. This system has operated in NSW for the last 10 years. The NSW Government 2015 review of *SEPP 65* & Residential Flat Design Code indicated that the quality of apartments has increased significantly over this period. This initiative continues to enjoy broad community and industry support.

There is no doubt that the decision not to mandate the use of architects will result in the average standard of apartment building being lesser than it would otherwise be. This is at odds with Melbourne's reputation as a centre of design, and counterproductive for our long term future.

## Summary

ArchiTeam welcomes the opportunity to work with all parties to achieve the best outcomes for our cities. We look forward to any feedback or comment you may have, and are interested in being a part of the broader conversation.

We submit that the implementation of the draft design standards with our proposed changes would result in a better city for all inhabitants.

## Submission Details

This submission has been prepared on behalf of [REDACTED] by the following architects:

- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED]

[REDACTED] contact details:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]