

Respondent No: 134

**Login:** Anonymous

**Email:** n/a

**Responded At:** Sep 19, 2016 09:29:40 am

**Last Seen:** Sep 19, 2016 09:29:40 am

**IP Address:** n/a

Q1. **Title**



Q2. **First name**

114

Q3. **Last name**

114

Q4. **Position title**

████████████████████

**Q5. Phone**

██████████

**Q6. Name of organisation**

Moonee Valley City Council

### Q7. Postal address

\_\_\_\_\_

**Q8. Email**

\_\_\_\_\_

**Q9. Confirm email address**

\_\_\_\_\_

Q10. I am submitting on behalf of a (select one)

Local government - metropolitan

**Q11. How satisfied are you that the proposed standard addressing building setback will improve the amenity of apartments?**

Dissatisfied

**Q12. Would you recommend any changes to the standard addressing building setback?**

Yes

**Q13. If yes, please specify.**

The draft standards do not allow proper consideration of 'site context' and do not acknowledge different urban contexts. Most apartments over 5 storeys will be constructed in activity centres or commercial areas, but the draft setbacks do not reflect this. A zero front setback will probably be appropriate for most developments in activity centres, in order to achieve a continuous street wall. 'Podium design' is supported, however 'wedding cake' built form is not necessarily desirable and depends on urban context.

**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

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

not answered

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

Satisfied

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

Yes

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

Council would like to see the standard expanded to include requirement for: • Openable windows to bathrooms in order to reduce reliance on mechanical ventilation' • Windows to internal corridors in order to reduce need for artificial lighting.

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?**

Yes

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

Council would like to see the standard expanded to require screening of storage areas in order to make them more secure.

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

Undecided

Q27. **Would you recommend any changes to the standard addressing noise impacts?**

Yes

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

Council submits that it would have no way of assessing whether or not a proposal complies with the proposed standard for noise and Council would like additional information as to whether it is intended that a noise report be submitted with proposed apartment applications.

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

Dissatisfied

Q30. **Would you recommend any changes to the standard addressing energy efficiency?** Yes

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

Council would like to see the standard expanded to include specific environmentally sustainable design (ESD) requirements. In particular, Council advocates that the Better Apartment standards include: • Openable windows for bathrooms (to eliminate the need for mechanical ventilation); • Windows for common corridors (to eliminate the need for lighting during the day and to also provide an outlook); • Sensors for lighting of common areas such as hallways and carparks • Incentives for northern orientation of apartments; • Permanent shading requirements for west facing windows and balconies; • Operable louvres and double glazed windows; • A maximum Heating Load of no more than 35MJ/M2; • Heating and cooling systems designed to target the required habitable spaces rather than the whole dwelling and enable occupant control (eg split systems, adjustable shading) • A minimum of three hours solar access per day for living rooms, private and communal open space areas; • Consideration of the impact of new buildings on existing and potential solar panels on adjoining properties. As previously submitted in regard to the initial Better Apartments Discussion Paper, Council would like to see specific ESD requirements introduced into the VPP section of all planning schemes. Council submits that it is also important for apartments to have appropriate windows, since windows can potentially have a large impact on energy efficiency. Windows need to be of a standard to allow maximum solar gain in winter months in order to minimize heating loads. Windows also require appropriate openings to maximise cooling breezes during the hotter months (i.e. not the cheaper awning or sliding style, but more reinforced casement styles to avoid catching higher wind loads). Ideally, windows should be either thermally broken and/or double glazed.

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

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Q33. **Would you recommend any changes to the standard addressing solar access to communal outdoor open space? If so, please specify.** Yes

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

Council would like to see the standard expanded to include three hours of sunlight between the hours of 9.00am – 3.00pm on 21 June.

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

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

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

Council would like the standard expanded to: • Include either a requirement for all habitable rooms to be naturally ventilated, not just up to a height of 80m, or further explanation of the 80m height limit; • Require living areas to include natural ventilation by way of an openable window, rather than just sliding doors to a balcony; • Address maximum 'unintended' ventilation (air leakage), similar to many other countries, eg require testing to measure thermal performance and air permeability of building envelopes (as per The Australian Standard AS/NZS ISO 99772:2015 – Thermal performance of buildings – Determination of air permeability of buildings – Fan pressurization method). • Include openable windows for bathrooms so as to reduce reliance on mechanical ventilation. This issue is addressed in Council's further comments submitted at the end of this survey form.

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<b>Q38. How satisfied are you that the proposed standard addressing private open space will improve the amenity of apartments?</b>	Satisfied
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<b>Q39. Would you recommend any changes to the standard addressing private open space?</b>	Yes
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**Q40. If yes, please specify.**

Council would like to see an increase to the open space standards for three- bedroom apartments in order to encourage families and diversity of households.

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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>	Dissatisfied
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<b>Q42. Would you recommend any changes to the standard addressing communal open space?</b>	Yes
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**Q43. If yes, please specify.**

Council would prefer the standard be expanded to include the provision of opportunities for interactions between residents with communal facilities and spaces.

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<b>Q44. How satisfied are you that the proposed standard addressing landscaping will improve the amenity of apartments?</b>	Dissatisfied
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<b>Q45. Would you recommend any changes to the standard addressing landscaping?</b>	Yes
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**Q46. If yes, please specify.**

Council submits that the landscaping standard is overlay 'domestic' in its focus and should have a stronger 'commercial' focus. The standard is primarily concerned with planting rather than considering all landscaping aspects such as paving, furniture etc. Council would like the proposed standard expanded to include:

- That in circumstances where a continuous street wall is deemed appropriate; the building incorporate landscaping on upper terraces, rooftops or green facades (with an allowance for deep soil areas with structural support), using appropriate resilient plant species for exposed dry conditions and suitable irrigation;
- That in circumstances where building setbacks are provided, tree plantings be in ground – rather than over a basement;
- Provision of well integrated, flexible and functional outdoor communal spaces for residents (and the public where appropriate) with creation of opportunities for meeting, entertaining and gathering with appropriate facilities such as BBQs, shelters, sports and play equipment, community gardens, bike repair stations, washing facilities, pools/spas etc.;
- Creation of sheltered microclimate spaces with adequate solar access and sufficient deep soil areas for the planting of canopy trees;
- Integration of pedestrian paths with adjoining streets and creation of views through large developments in order to connectivity with surrounding streets;
- Explicit reference to water sensitive urban design and urban ecology – requirements to minimise impervious areas, incorporate rain gardens, permeable pavements, grassed areas, vegetated green roofs and other on-site detention systems to reduce the volume of storage required, cool the local area and provide irrigation to landscaping;
- Emphasis on the need to provide water storage tanks for irrigation purposes;
- Encouragement of 'natural ground' planted areas – in order to avoid using permeable paving as the only solution to achieving site permeability. (This type of paving is often rarely cleaned and maintained properly in order to maintain its long term effectiveness.);
- Recognition that although green walls/facades are valuable, they are not considered an appropriate replacement for ground, terrace or rooftop plantings;
- Use of non-potable water and efficient irrigation practices for all landscaped areas;
- Installation of taps and drains to all balconies, courtyards, and roof decks in order to encourage landscaping;
- Use of indigenous and/or productive plantings where possible;
- Use of appropriate resilient trees, shrubs and groundcover species that will tolerate highly exposed dry conditions;
- Additional trees in the deep soil areas;
- A requirement that landscape designs include details of landscape themes, vegetation, paving, lighting, plant densities, all outdoor furniture, and opportunities for equipment (play/sports/utilities);
- Emphasis on creating safe, legible and well-connected thoroughfares for residents and visitors – with adequate connections and links beyond to the surrounding street network. Links should be provided through the development to maintain and establish new public pedestrian/cycling links and passive surveillance. Landscape standards should address minimum widths and dimensions, planting requirements and furniture/seating requirements for passageways, laneways and thoroughfares (informed by existing street cross section). Clear view lines should be maintained for safety and include markers, signage or artwork for legibility;
- Landscape screening of utilities, services and storage facilities;
- Requirement for landscaping materials used in communal or public realm areas of the development to be integrated with materials and furniture used in surrounding streets.

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<b>Q47. How satisfied are you that the proposed standard addressing accessibility will improve the amenity of apartments?</b>	Satisfied
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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.**

Council would like to see the objective for the Accessibility standard be expanded to include requirement for new developments to offer a range of fit out options to best suit the physical needs of the purchaser' Council would also like to see the standard expanded to include: • Mandate that a certain % of apartments be made suitable for people of any level of ability, • Mandate that a certain % of wider car spaces in order to accommodate disabled drivers (1:3 older people have disabled parking permits). A key action within Council's adopted Disability Action Plan 2014-23 is to 'develop a strategic approach to the inclusion of the Adaptable housing Standard (AS 4299) into the Moonee Valley Planning Scheme'. Council recently supported the following recommendations to the 'Inquiry into Environmental Design and Public Health in Victoria' by the Victorian Parliament Environment and Planning References Committee: • Recommendation 10 – that the Victorian Government support the introduction of design standards for new housing in order to ensure access for seniors and people with limited mobility. • Recommendation 11 – that the Victorian government work with local government, developers, the building industry and community groups to ensure that universal design principles to improve accessibility are applied to all aspects of the built environment, including maintenance and retrofitting of existing building stock, roadways, cycling and pedestrian paths, and public transport infrastructure. Council has consistently advocated that: • A new requirement be introduced at Clause 16.01-4 of the planning scheme to mandate universal design in new housing, (with reference to the national strategy for universal housing design) and • Plan Melbourne 2016 also identify a review of the BCA standards to ensure that they are commensurate with current universal standards.

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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>	Dissatisfied
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<b>Q51. Would you recommend any changes to the standard addressing dwelling entry and internal circulation?</b>	Yes
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**Q52. If yes, please specify.**

Council would like both the objective and actual standard expanded to require that apartment entries be a key design feature of developments rather than an afterthought and be clearly visible and accessible to public realm rather than being hidden. Council would also like to see this standard moved closer to the beginning of the document – its location towards the end does not reflect its importance.

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<b>Q53. How satisfied are you that the proposed standard addressing waste will improve the amenity of apartments?</b>	Satisfied
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<b>Q54. Would you recommend any changes to the standard addressing waste?</b>	Yes
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**Q55. If yes, please specify.**

Council submits that waste management systems should be designed to meet best practice standards outlined in 'Guide to Best Practice Waste Management in Multi-Unit Developments' (Sustainability Victoria October 2010 and as updated), giving considerations to any local requirements. The draft standard for waste disposal should be expanded to facilitate recycling of waste and give it equal priority to general disposal of landfill. Standards should include provision of dedicated waste storage areas for separation, collection and recycling of waste, with easy access for both occupants and waste collection contractors. This area should be large enough to accommodate various types of recyclables. Council repeats its previous submission and considers that developments greater than 4 storeys should be required to incorporate on each floor, collection infrastructure, a chute or equivalent system for both landfill and recycling waste. Council also considers that developments of more than 10 storeys should be required to use either twin chutes or a single chute dual stream technology, with openings on each floor. This will enable chute disposal of both landfill and recycling. (It is noted that separate cardboard recycling may be necessary to ensure that chutes do not become blocked.) Council considers that the draft standards only address the issues of waste disposal in general terms, rather than actually specifying appropriate standards. The draft waste standard needs to be expanded to include sufficient space on site for both the collection of the bins and for a waste truck to safely enter and exit without having to reverse.

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<b>Q56. How satisfied are you that the proposed standard addressing water management will improve the amenity of apartments?</b>	Satisfied
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<b>Q57. Would you recommend any changes to the standard addressing water management?</b>	Yes
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**Q58. If yes, please specify.**

Council considers that there is currently a gap in state planning policy with regard to stormwater management and water sensitive urban design (WSUD). In order to address this gap at the local level, Council introduced Clause 22.03 - Stormwater Management (Water Sensitive Urban Design) to the Moonee Valley Planning Scheme in March 2014. The policy establishes requirements in the planning application process for new developments to apply best practices for stormwater management. Council submits that its local policy should be implemented state wide as part of the apartment good design standards to ensure WSUD requirements are mandated equitably across the state.

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

Council appreciates the opportunity to provide further comment and has uploaded them as a separate document. A covering letter will also be submitted but is currently being finalised As suggested by [REDACTED] the letter will be submitted separately, as soon as signed by the Moonee Valley CEO.

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

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

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

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

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