



Respondent No: 57

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IP Address: n/a

- Q1. **Title** [REDACTED]
- Q2. **First name** [REDACTED]
- Q3. **Last name** [REDACTED]
- Q4. **Position title** [REDACTED]
- Q5. **Phone** [REDACTED]
- Q6. **Name of organisation** Low Impact Development (LID) Consulting
- Q7. **Postal address** [REDACTED]
- Q8. **Email** [REDACTED]
- Q9. **Confirm email address** [REDACTED]
- Q10. **I am submitting on behalf of a (select one)** Planning or development consultant
- 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.**

Building set-backs - satisfied but a compliance performance pathway should be included. As set-backs are a means of improving daylight (and hopefully improving sunlight) it should be a requirement that where apartment set backs are not met, the performance compliance path of daylight modelling is required to prove compliance with daylight standards. Proof of sunlight standards should also be required. These standards must be met for 80% of dwellings. Where these standards are not met for 100% of dwellings then it should be a requirement that indoor and outdoor common space with access to daylight and sunlight be made available for residents to have access to. (Note current Council daylight standards should be retained but only amended to be required for 70% of the floor area of habitable spaces rather than the current 90% of floor area).

- Q14. **How satisfied are you that the proposed standard addressing light wells will improve the amenity of apartments?** Very 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?	Dissatisfied
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Q18. Would you recommend any changes to the standard addressing room depth?	Yes
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Q19. If yes, please specify.

Room Depth - satisfied that there are room depth ratios. Unsatisfied that the standard is rudimentary/overly simplistic and does not consider factors such as overhangs and wing walls, height of surrounding buildings etc that have a very significant impact on daylight beyond just room depth ratios. Unsatisfied that if room depth ratios are not met there should be a performance compliance pathway to allow flexibility. The performance compliance path of daylight modelling should be required showing 100% compliance with current standards adjusted per the following: Council daylight standards should be retained but only amended to be required for 70% of the floor area of habitable spaces rather than the current 90% of floor area. Where these standards are not met for 100% of dwellings then it should be a requirement that indoor and outdoor common space with access to daylight and sunlight be made available for residents to have access to.

Q20. How satisfied are you that the proposed standard addressing windows will improve the amenity of apartments?	Very Satisfied
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Q21. Would you recommend any changes to the standard addressing windows?	No
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Q22. If yes, please specify.

not answered

Q23. How satisfied are you that the proposed standard addressing storage will improve the amenity of apartments?	Very Satisfied
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Q24. Would you recommend any changes to the standard addressing storage?	No
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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?	Very Satisfied
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Q27. Would you recommend any changes to the standard addressing noise impacts?	No
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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?	Dissatisfied
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Q30. Would you recommend any changes to the standard addressing energy efficiency?	Yes
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Q31. If yes, please specify.

Energy efficiency - the limits in cooling loads rather than discussing energy ratings will have the desired valued impact of reducing peak power loads from air-conditioning, but may also reduce passive solar gain in winter so not aid improved energy ratings. The limits are also 10MJ/m2 too demanding. Glass is the weak spot in building fabric insulation performance so the required reduction might have significant impacts on the amount of glass able to be included in dwellings. There may be daylight implications of the required reduction in glass levels. Designers could be given the flexibility of if the maximum cooling loads are not achieved then a minimum star rating of 6.5 or 7.0 stars be required for the failing apartments. Energy efficiency - another very significant issue with our dwellings is that there is a shortfall in the energy performance of built dwellings in comparison to the designed dwellings. This is primarily due to the inadequate installation of insulation and sealing air gaps around windows, doors and joints, penetrations in insulation etc. (Note key elements of passive house design is that buildings are well sealed). The best way to resolve this is to mandate the building surveyors add a fourth inspection to buildings ie currently building surveyors are required to inspect buildings at the footings, frame and final stages. They should also be required to inspect buildings after insulation has been installed and prior to plasterboard or other internal linings being installed. As an alternative the Design Standards could require that designers or sustainability consultants inspect and provide a report confirming the appropriate installation of insulation and sealing of air gaps prior to internal linings being installed.

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.	No
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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?	Very Satisfied
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Q36. Would you recommend any changes to the standard addressing natural ventilation?	No
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Q37. If yes, please specify.

not answered

Q38. How satisfied are you that the proposed standard addressing private open space will improve the amenity of apartments?	Satisfied
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Q39. Would you recommend any changes to the standard addressing private open space?	No
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Q40. If yes, please specify.

not answered

Q41. How satisfied are you that the proposed standard addressing communal open space will improve the amenity of apartments?	Satisfied
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Q42. Would you recommend any changes to the standard addressing communal open space?	Yes
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Q43. If yes, please specify.

See my recommendations under Building setbacks and Room ratios: where building setbacks or room depth ratios are not met daylight modelling should be undertaken as a performance compliance method. If daylight and sunlight levels are not met then indoor common space areas that have very good levels of daylight should be provided.

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

The content is good but to improve on the urban heat island aspect could also add a requirement for 80% of the site to be covered by either soft landscaped areas or hard materials with a solar reflective index of no less than 38%.

Q47. How satisfied are you that the proposed standard addressing accessibility will improve the amenity of apartments?	Satisfied
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Q48. Would you recommend any changes to the standard addressing accessibility?	No
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Q49. If yes, please specify.

not answered

Q50. **How satisfied are you that the proposed standard addressing dwelling entry and internal circulation will improve the amenity of apartments?**

Satisfied

Q51. **Would you recommend any changes to the standard addressing dwelling entry and internal circulation?**

No

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

not answered

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

Dissatisfied

Q54. **Would you recommend any changes to the standard addressing waste?**

Yes

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

Content generally good but there could be a requirement for apartment blocks of 10 or more dwellings to include receptacles (eg 500x500mm footprint stackable boxes/tubs) for the collection and recycling as required of other recyclable items such as batteries, e-waste, light globes etc. In practice the owners corporation maintenance contractor could manage the recycling of these items on an as needs basis.

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

Satisfied

Q57. **Would you recommend any changes to the standard addressing water management?**

No

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

not answered

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

I am disappointed there is no mention of minimum apartment sizes. The removal of saddleback apartments has a greater impact on developer yields and housing affordability than would minimum apartment sizes. People practicing in the industry see most developers pushing designers to maximise yields by squeezing in smaller apartment sizes. Unlike Europe we have no relative land shortage in Australia, so can see no need to be judging apartment sizes by European standards. Yes there are well designed smaller apartments in Europe, but well designed slightly larger apartments are better than these small spaces. The Draft Apartment Design Standards also indicate that designers will be trained to inspect and ratify compliance with the new Standard. This is a massive undertaking. There are a large number of trained and experienced sustainability consultants and practitioners at councils. Sustainability consultants should also be eligible to undertake reviews for compliance, as sustainability consultants already focus on much of the work related to issues associated with the content of the draft Apartment Design Standard. If ESD consultants are excluded from this list it will decimate the already trained and functioning ESD consulting industry. Energy efficiency - the great issue with our dwellings is that there is a shortfall in the energy performance of built dwellings in comparison to the designed dwellings. This is primarily due to the inadequate installation of insulation and sealing air gaps around windows, doors and joints, penetrations in insulation etc. (Note key elements of passive house design is that buildings are well sealed). There is an opportunity to action this with the new Apartment Design Standard. Designers or sustainability consultants should be required to inspect and provide a report confirming the appropriate installation of insulation and sealing of air gaps prior to internal linings being installed. The other alternative to resolve this is to mandate the building surveyors add this inspection to their current building inspections at the footings, frame and final stages.

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

not answered

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
