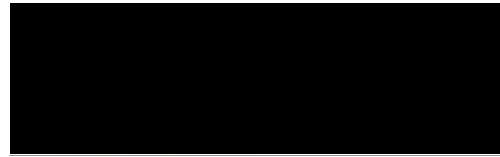




## **BLACKBURN VILLAGE RESIDENTS GROUP INC.**

*Protecting the distinctive features of Blackburn since 1987*



5<sup>th</sup> September 2016

### **Re: Better Apartments Draft Design Standards**

#### **Introduction**

There is no doubt that standards need to be put in place for apartment buildings in Melbourne. There are apartment blocks being constructed in Melbourne that are sub-standard, do not provide amenity for residents of these apartments or for residents living nearby and do not meet the needs of Melburnians, particularly families. Self-regulation has not worked in any field of activity and, without regulation, we cannot be assured that apartments of an appropriate standard will be built in Melbourne.

The question then arises as to what level standards should be set. It has been argued that a “better apartment” is an unaffordable apartment. In *Urban Melbourne*, 7 July [REDACTED] (Plus Architecture) opined that “the introduction of standards (such as the draft standards developed by the Office of the Victorian Government Architect in 2014) can be seen to severely damage affordability and somewhat unnecessarily so.” He also provided estimates of the likely additional costs including [REDACTED] for day lighting, [REDACTED] for natural ventilation and [REDACTED] for larger apartments. However, the BVRG agrees with [REDACTED] (Urban Design Advisory Committee) when he says “you can’t use an argument for affordability to say that you can deliver sub-standard outcomes for the community – particularly apartment buildings – because they’re long-term building stock.”

Moreover when considering affordability of apartments it is important to not only factor in the cost of the apartment but also the ongoing building maintenance costs as well as utility costs such as power, gas and water. Cutting building costs by reducing the investment in sustainable design and through measures such as installing less energy efficient appliances can result in increasing ongoing costs. Furthermore a survey conducted by the Property Council of Australia 7 years after the introduction of SEPP 65 indicated that 82% of those surveyed agreed that it had resulted in improved design and had not had a significant impact on affordability.

## Issues Addressed in the Draft Design Standards

- Building Setbacks

The BVRG supports the inclusion of side and rear setbacks for apartment buildings but considers that front setbacks, where appropriate, should have been incorporated in the Draft Standards. In activity centres where apartment buildings are designed with setbacks that enable canopy plantings the street amenity as well as that of the apartments are improved. Additional benefits include passive cooling and a softening of the canyoning effect resulting from building to boundary. In a suburban context a street setback should align with the prevailing setbacks to accommodate a front garden. It is not necessary here to spell out all the established benefits of more trees and permeable surfaces.

- Storage

Whether the storage provided for in the Draft Standards is adequate is a matter of opinion, suffice to say that the storage space provided for in this draft is consistent with that incorporated in the NSW standards. The draft standards however could provide greater amenity if at least 50% of required storage space were required to be located within the apartment, as applies in the NSW Standards.

- Energy Efficiency.

The draft document is silent on achieving a measurable standard of energy efficiency through design or appliances. We commend water harvesting however believe apartment buildings should be required to reach a minimum NatHERS energy rating better than 7.

Energy standards are required for new houses and town houses and should also apply to apartments and apartment buildings. The ongoing savings in energy consumption will offset over the life of the building the additional costs for installation. Roof top solar, double glazing, thermal insulation, awnings each reduce heating/cooling costs and offset the greater reliance on clothes dryers in apartments. Double glazing and thermal insulation also provide acoustic improvements.

- Natural Ventilation.

Under Applying the Standard – We are sure that it is intended that all apartments have access to natural ventilation however reading the standard it is stated that it is acceptable that 40% of apartments can be without natural cross ventilation. Natural ventilation can be achieved where there are windows only on one side by being able to draw air in from opening windows or vents at floor level and higher at near ceiling level. Warm air escaping through the upper window draws air in the lower one providing circulation.

- Private Open Space

Unlike the NSW Standards the Victorian Draft Standards do not differentiate between the minimum dimensions of a balcony for dwellings having varying numbers of bedrooms. Two metres applies across the board whereas in the NSW apartments with three or more bedrooms

require a minimum dimension of 2.4 metres for balconies. Accordingly larger families are afforded greater amenity.

- Landscaping.

Where developers remove trees within 12 months of the application being made should instead be for the period of ownership of the site by the developer. Developers often land bank sites and can easily have it cleared well before the 12 months. We would urge the wording to be strengthened from ‘should’ to ‘must provide for the replacement of any significant trees...’

- Accessibility.

Basic design needs to enable aging in place. Good design ensures ease of use of services for all and adequate space for able-bodied as well as disabled or aged occupants. Appropriate tapware, height of GPO’s, door furniture etc. needs consideration. The draft designs should be referred to experts in this area such as Occupational Therapists. Suggested improvements on the proposed standard include:

- At least 2m wide corridor/space adjacent to the bathroom/toilet doors to enable wheelchair plus carer space to enter doorway.
- A sliding door to the bathroom/toilet that allows space for wheelchair navigation and easy opening from a wheelchair. Current indicative plans would make it difficult for a wheelchair bound person to independently exit the bathroom/toilet.
- The distance from toilet pan from the wall must be specified to ensure sufficient space is left for drop bars if needed to be fitted.
- Reinforced wall and ceiling supports that enable grab rails and hoists to be fitted if required near toilet and shower should be part of the original build. It is expensive and disruptive process to retrofit such structural supports at a later date if the occupant becomes mobility impaired. Additional noggins for rails and rafters or brackets in the ceiling space are an easy addition during construction.
- The bedrooms in one bedroom apartment and at least one bedroom in 2 or 3 bedroom apartments must be wide enough for a queen size bed and accessibility on either side for a wheelchair or scooter. Minimum dimensions must be specified.
- The term ‘Adaptable Bathroom and Adaptable Bedroom needs to be defined or reference made the relevant Australian Standard or Building Code.

Examples of specified standards:

[https://dcsi.sa.gov.au/\\_data/assets/pdf\\_file/0005/6386/Design-Guide-2\\_3.pdf](https://dcsi.sa.gov.au/_data/assets/pdf_file/0005/6386/Design-Guide-2_3.pdf)

<http://connectability.com.au/upload/AS%204299-1995%20Adaptable%20Housing.pdf>

<http://ddadesign.com.au/welcome/Accessible-Bathrooms.pdf>

## Issues Not Addressed in the Draft Design Standards

- Apartment Size

The BVRG considers the omission of minimum apartment size from the Draft Standards to represent a very serious shortcoming of these standards. In NSW minimum sizes are specified for different types of dwellings ranging from 35 sqm for a studio to 90 sqm for a 3 bedroom apartment. This is a key amenity issue and its non-inclusion can give rise to serious consequences of a social nature as well as not meeting the needs of families. Moreover responses from the Victorian Government's Better Apartments survey found that "76% of respondents agreed or strongly agreed that there should be minimum apartment sizes to ensure apartments have reasonable-sized rooms and storage".

- Lift Provisions

In the NSW standards for buildings of 10 storeys and over the maximum number of apartments sharing a lift is 40; however no such requirements are incorporated in the Draft Standards for Victoria. Accessibility to lifts is an important amenity consideration for apartment residents particularly those residents suffering from a disability.

- Overshadowing.

Overshadowing is also a potential issue not addressed in the draft standards. Where apartments will be built in adjoining allotments there needs to be a planning tool to ensure that where new design standards have been met for solar access, ventilation, energy efficiency and private open space in one apartment they are robbed by an adjoining development.

We thank you for the opportunity to provide feedback on the Draft Standards for Better Apartments and trust that you will take our views into account when finalising the Apartment Standards.

Yours sincerely

[Redacted Signature]  
[Redacted Name]