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- Q1. **Title** [REDACTED]
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- Q8. **Email** [REDACTED]
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- Q10. **I am submitting on behalf of a (select one)** Sole provider or company involved in the development industry
- 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 standards do not take in to account the orientation of the windows or the available 'sight lines'. The measures are also at odds with the option of using a lightwell which in my opinion a less desirable design solution but has much less onerous parameters.
- 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?** Yes
- Q16. **If yes, please specify.**
- The staggering of windows to bedrooms of separate apartments to avoid direct views is nonsense when there are views from above, below and across

Q17. **How satisfied are you that the proposed standard addressing room depth will improve the amenity of apartments?** Very Dissatisfied

Q18. **Would you recommend any changes to the standard addressing room depth?** Yes

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

To imply that a room on the south side of a building offers poor amenity if it is greater than 5.4m deep (assuming the minimum 2.7m ceiling height) is a nonsense. There is no parameter for the size of the window - where windows are larger than the minimum size a deeper room may have acceptable amenity Finally, the standard as drafted may restrict the development of larger apartments - large family size penthouse apartments may not conform to the standard as drafted - eg a 6m deep bedroom on the south side of a building would not comply

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

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

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

1. the standard assumes that all rooms are rectangular - if a room extends in a 'dog leg' manner there will be a location from which the window will not be visible which demonstrates that the standard is poorly drafted 2. if there is a column in the room there will be some parts within the room where the window is not visible - again demonstrating a huge deficiency in the drafting 3. it would make more sense that either (a) the window can be seen from 75% of the floor area in the room OR (b) the window can be seen from that section of the floor area that is 1m or more from a wall (that is, everywhere except the edges of the room - like on your examples!). 4. The standard is too prescriptive on the habitable rooms that this standard applies. If a kitchen has what is now commonly called a 'butler's pantry' which is really part of the kitchen but a utility area, it would be inappropriate to demand that this space have direct line of sight to the window as the point of the butler's pantry is to hide the 'kitchen mess' from the occupants and visitors. 5. Why does a study nook need direct line of sight to the window. These spaces are often located adjacent to entries etc and are an important contribution to efficient design. Similarly, if a master bedroom has a large dressing area there should be no confusion that it is not part of the habitable room definition. What about a sewing room, hobby room, workshop space, etc - none of these should automatically be assumed to be a habitable room. In any case a space of less than 10sqm shouldn't be a 'habitable room' 6. And is a home theatre in a luxury apartment a habitable room? It shouldn't have to have windows which compromises the theatre functionality, but it probably will have to under the current criteria - which demonstrates that the standard is too wide in its drafting.

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

Q24. **Would you recommend any changes to the standard addressing storage?** Yes

Q25. If yes, please specify. More information

The standard is too high and should be reduced to 4, 6 & 8 cub metres for studio/1 bedroom, 2 bedroom and 3 bedroom respectively and further reduced by 1 cub m for each bike storage space provided (maximum of 1 per bedroom). Not everyone wishes to accumulate 'stuff' and is committed to a material lifestyle where more possessions is a step up the ladder. The volume of storage is no different to the other parameters such as how many bedrooms, bathrooms and carparks occupants choose to rent or buy. The dwelling that most closely satisfies their highest priorities is the one that is selected and this is generally a compromise that brings in other factors such as cost and travel time to family, friends and work. If you have the largest model train setup, then there is no point in occupying a 1 bedroom apartment! Finally, the prescribed storage bears no relationship to the size of the apartment. On the one hand a 250sqm three bedroom apartment may have adequate spaces within the apartment to meet the needs of the occupants, but if a single apartment occupant has a lot of possessions a 40sqm studio may never meet their needs even if there are 6 cub metres of additional storage.

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

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

Q28. If yes, please specify.

Everyone reacts to noise differently. And acceptance levels are somewhat affected by the location of the property. There are people living in houses adjacent to railway lines, arterial roads, level crossings, etc which based on your standard offer inappropriate amenity, but the noise may not adversely affect their lifestyle. A very quiet and undisturbed environment should not be expected on a busy arterial road or in the heart of the CBD, however modern design and building techniques can provide a liveable dwelling, but not necessarily a perfect dwelling at an affordable price. There is a huge risk that the standard will substantially reduce the quantity of affordable inner city and inner suburban dwellings. Your standard is in line with international recommendations but it is fair and reasonable to include the benefit of window furnishings and fixed floor coverings if these are included in the dwelling.

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

Q31. If yes, please specify.

To guarantee that the energy efficiency of existing dwellings on an adjoining lot is not unreasonably reduced without defining what is meant by 'unreasonably reduced' is a nonsense. A neighbouring dwelling may have solar panels which will be shaded by new buildings or landscaping which should not preclude future development

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

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

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

Direct sun to communal outdoor open space is overrated! Australians get too much direct sun and have a high rate of skin cancer. I know! I just had a melanoma cut off my face and a skin graft to replace the damaged skin. You should not be advocates for environments that will increase skin cancer! The standard is advocating that at least 50% of the communal outdoor open space receive sunlight for a minimum of 2 hours during the high UV period between 9am and 3pm. Shouldn't the requirement be that there is shaded area throughout the day? The other problem with the drafting of this standard is that it will encourage developers to only provide the minimum communal area because if there is spare outdoor area that could be given to communal space it will not if there isn't an area of at least 50% that qualifies under the current solar access criteria.

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.**

1. maximum breeze path is 15m - so this precludes very large apartments from qualifying - nonsense! Even the cited example which is a small 2 bedroom apartment has a approx 12+m path, a large apartment would have no chance! 2. why 60% of dwellings to have cross ventilation? assuming a building has 4 corners = 4 apartments with openings on 2 faces of the building, then there can only be a maximum of 6 apartments on a floor with 2 apartments without cross ventilation - nonsense! 3. Breezeways vertically up the building won't qualify as they will be greater than 15m path - nonsense. Back to the drawing board on this one!

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

Q39. **Would you recommend any changes to the standard addressing private open space?** Yes

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

Poorly worded/drafted - eg all dwellings should have 25 sqm at natural ground level or only those located at ground level? In any case there is no reason why the ground level or podium level or top level apartments should have more private open space than any other apartment in the building - let the building designers work out what works for the building, the streetscape, setbacks, etc Balcony areas - ok Rooftop balconies should not be required on all buildings - there are implications for safety, weatherproofing, overlooking, etc

Q41. **How satisfied are you that the proposed standard addressing communal open space will improve the amenity of apartments?** Satisfied

Q42. **Would you recommend any changes to the standard addressing communal open space?** No

Q43. **If yes, please specify.**

not answered

Q44. **How satisfied are you that the proposed standard addressing landscaping will improve the amenity of apartments?** Dissatisfied

Q45. **Would you recommend any changes to the standard addressing landscaping?** Yes

Q46. **If yes, please specify.**

Landscaping should be based on zoning, site coverage, setbacks etc. It is unfair, unreasonable and inequitable to impose on larger sites a higher percentages of deep planting. Even at the same percentage, larger sites would provide more opportunity for deep planting. Deep planting and large trees is also going to clash with the requirement for 50% of the open space to receive 2 hours of sunshine!

Q47. **How satisfied are you that the proposed standard addressing accessibility will improve the amenity of apartments?** Very Dissatisfied

Q48. **Would you recommend any changes to the standard addressing accessibility?** Yes

Q49. **If yes, please specify.**

Is everyone suffering a disability? I think not! If the government were truly caring about occupants having suitable dwellings, they would allow people to change their dwelling as their circumstances changed without imposing huge taxes - stamp duty charges by the state government! Then it would be simple to have between 5% and 10% of the dwellings setup for accessibility requirements and occupants would move within the building to suit their requirements. The number of dwellings in a development that should meet the disability accessibility requirements should be one dwelling if there are 10 or more apartments, but less than 20, and then 1 additional apartment for every 15 additional apartments in the development.

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

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

Q52. If yes, please specify.

Natural light and natural ventilation to corridors sounds like a great aspiration. But then that is how apartments were built in the 50's with an external stair and access corridor that ran along the outside of the building. What this standard is seeking is aspirational but not always possible, practical or even legal with fire rating requirements, smoke control requirements, energy rating & energy efficiency, etc And when it is 2 degrees on a cool Melbourne morning, do I want the corridor to be 2 degrees too? I don't think so!

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

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

Q55. If yes, please specify.

not answered

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

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

Q58. If yes, please specify.

I don't believe that the practicalities of stormwater recycling have been assessed over the life cycle of a building. There are issues with water contaminants, water quality, cleaning & maintenance of tanks, filters, pumps and control equipment, etc. Who is monitoring water quality? How often? Could this blow up in to a problem like Legionnaires disease that emanated from poor maintenance of water cooling towers? Water recycling is a great idea, but water runoff that is combined with bird and possum faeces, industrial and city pollution, no bacteria or virus controls, storage for unknown periods and usage by humans even if it is for garden watering and toilet flushing introduces a health risk that needs more controls. That is why we have the MMBW in Melbourne to supply us safe water! The water recycling concept has been around for a while, but if it is to be inserted into all apartment buildings there needs to be some thought given to what could go wrong, and if it goes really bad, what are the consequences.

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

Why didn't you make this offer of a word or pdf file at the beginning of the online survey! This is a really stupid location to place this option!

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 I request my comments to be published anonymously with my suburb/town but no other details

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
