

277-281 Ingles Street, Port Melbourne

Application for Planning Scheme Amendment C181port

Appendix 2: Internal referral responses

Department	Response
Heritage	No heritage issues – this site abuts the individually significant former Felton Grimwade building at no.289 (Ingles Street). However, I note the plan shows the proposed adjoining building on this site will be set back from Ingles Street behind a linear park and there is also good separation from the side of the Felton Grimwade building. This will ensure that views to the Felton Grimwade building within the streetscape will be retained.
Traffic	<p>After our meeting last week, and discussions with Strategy and design, I have updated my traffic and parking comments. Please find below:</p> <p>Proposal:</p> <ul style="list-style-type: none">• The redevelopment of the site for a mixed-use development (across 4 towers), comprising of:<ul style="list-style-type: none">○ 7,627sqm of retail space;○ 56,759sqm of commercial space, including:<ul style="list-style-type: none">▪ 1,320sqm supermarket tenancy○ A total of 947 dwellings, consisting of:<ul style="list-style-type: none">▪ 393 x one-bedroom▪ 359 x two-bedroom▪ 195 x three-bedroom○ A 324 room Hotel○ A total of 919 car spaces are proposed within 3 separate multi-level carparks, comprising<ul style="list-style-type: none">▪ 513 residential spaces▪ 39 retail spaces▪ 77 Hotel spaces▪ 26 supermarket spaces▪ 236 commercial spaces▪ 28 Car share spaces○ Access to each of the carparks is proposed via:<ul style="list-style-type: none">▪ a newly proposed connector street linking Ingles Street and Bertie Street;▪ 2 new crossovers from the new connector street (Buildings 2, 3 & 4)▪ 2 new crossovers to unnamed service road (Building 1)

- 1,611 bicycle spaces;
- 119 motorcycle spaces;
- 4 Loading areas.

COMMENTS:

INTERNAL ROADWAYS (FISHERMANS BEND FRAMEWORK)

- The current Fisherman’s Bend framework for street cross sections and intersections indicates that the proposed internal roadway should be a 22m wide Local Street. Key aspects of this local street include:
 - Single trafficable lane
 - Parking / passing areas / tree outstands
 - 2.5m-3m protected cycle lanes
- Draft cross sections of the proposed 22m street are shown below, noting that these are subject to change given in draft stage:





- Given this local road will be handed over to the City of Port Phillip in the future, its design should reflect the current framework. **It is recommended updating the design of the internal local road with regard to the above comments.**
- The Framework has indicated that the roadway marked on the plans as “Roadway (Common Property)” is planned to become a 6m laneway with active frontages, and act as a key pedestrian link between Fennell Street and the development site. **Given this expected future use, vehicle access via this laneway does not represent a very good design outcome given potential conflicts with vehicles and pedestrians. It is recommended relocating all vehicle crossovers for Building I via the internal Local Road and not future laneway.**
- **It is recommended improving pedestrian linkages throughout the site, in particular the north-south corridor. This could include the intersection between the local road and future laneway given its proximity to the proposed laneway. Noting pedestrians will require safe and convenient access across the proposed local road.**

- Plans provided the applicant indicate several line marked pedestrian crossings, given pedestrian crossings are considered major traffic control items they require approval (MoA) from VicRoads. **Noting that the City of Port Phillip does not have authority to approve pedestrian crossings.**

BUILDING I PARKING LAYOUT AND ACCESS ARRANGEMENTS

- Given this expected future use, vehicle access via this laneway does not represent a very good design outcome given potential conflicts with vehicles and pedestrians. **It is recommended relocating all vehicle crossovers for Building I via the internal Local Road and not future laneway.**
- Currently Building I has five (5) separate vehicle access locations, including the porte cochere, separate vehicle crossovers and loading access. This represent a very poor design outcome given potential conflicts with vehicles and pedestrians. **It is recommended reducing the number of vehicle crossovers.**
- I have concerns given the proposed layout that two vehicles (B85 and B99) will be able to circulate the car park simultaneously. **Can the applicant please provide a swept path assessment showing a B85 and B99 design can circulate the access ramp at the same time, with suitable clearance. If this cannot be achieved, please ensure convex mirrors are installed throughout the car park to help reduce any potential conflicts.**

PARKING LAYOUT AND ACCESS ARRANGEMENTS

- The traffic report has indicated that all standard 90-degree car spaces will be provided to be at least 2.6m wide, 4.9m long and accessed from an aisle at least 6.4m long. This is in accordance with the planning scheme and is considered acceptable.
- The traffic report has indicated that all columns have been located outside the door opening envelop for parking spaces, as well as an additional 300mm clearance has been provided adjacent to any walls and/or columns. This is considered acceptable.
- The traffic report notes that aisle extensions been provided at end of blind aisles to facilitate access to parking spaces, in accordance with the planning scheme. **If this cannot be achieved, please provide swept path assessment showing access can be achieved.**
- The traffic report has indicated that if disabled car parking spaces are provided, that 3 standard 90-degree spaces can be converted to two DDA spaces, with a shared area. This will be in accordance with Australian Standards, including the adjacent shard area and considered acceptable.
- The traffic report indicates that critical spaces have been checked for accessibility using a B85 design vehicle. **Can the applicant please provide evidence of this assessment in the form of a swept path analysis (Noting critical spaces include end spaces, spaces adjacent columns/walls, DDA spaces etc)**
- **Can the swept path assessment also include two-way traffic flow for all access ramps located within the off-street car park (B85 and B99 vehicle simultaneously using the ramps with suitable clearance).**
- The traffic report has indicated that parking spaces will be allocated between residential and non-residential uses, and between Buildings. **Can the plans please be updated to reflect the proposed car parking provisions (label non-residential and residential spaces).**
- The traffic report indicates that all motor cycle spaces have been designed at least 1.2m wide and 2.5m long, in accordance with the Australian Standards. This is considered acceptable.

- The traffic report has indicated that all ramp grades and transition changes have been provided in accordance with the planning scheme. This is considered acceptable.
- **Please ensure a minimum height clearance of 3.0m is provided above ramps to align with the directions of the Strategic Framework Plan.**
- All redundant crossovers must be reinstated to Council satisfaction.
- All proposed crossovers must be installed to Council satisfaction.

PARKING OVERLAY AND PARKING PROVISIONS

- Clause 45.09 of the planning scheme sets out the following maximum car parking space rates:
 - 0.5 spaces to each one or two-bedroom dwelling
 - 1 space to each three or more-bedroom dwelling
 - 1 space to each 100sqm of gross retail floor area
 - 1 space to each 100sqm of gross office floor area
 - 2 spaces to 100sqm of gross supermarket floor area
- The traffic report has indicated that the residential hotel will adopt a maximum parking rate similar to the residential use for one/two-bedroom dwellings, which is 0.5 spaces to each one or two-bedroom dwelling. This rate has been reviewed and is considered acceptable.
- Based on the above rates, the maximum car parking spaces for each land use is as follows:
 - 375 spaces for one/two-bedroom dwellings
 - 195 spaces for three bedrooms or more dwellings
 - 162 spaces for the Hotel use
 - 61 spaces for retail use
 - 26 spaces for supermarket use
 - 567 spaces for office/commercial use
- The traffic report has indicated that parking will be provided in accordance with the above maximum parking rates and is considered acceptable.
- Clause 37.04 of the planning scheme sets out the following car share parking rates:
 - 2 spaces, plus an additional 1 space per 25 spaces for residential uses
 - 1 space per 60 car spaces for non-residential uses (if exceeds 10,000sqm)
- Based on the above rates, the development requires at least 28 car share spaces to be provided.
- The traffic report has indicated car share spaces will be provided in accordance with the planning scheme, this is considered acceptable.
- Schedule 1 to Clause 37.04 of the planning scheme sets out the following rates for motor cycle parking:
 - In developments of more than 50 dwellings, 1 space per 50 dwellings

- In developments with over 10,000sqm of non-residential floor space, 1 space per 100 car spaces
- Based on the above rates, the number of motorcycle spaces required are:
 - 18 motor cycle spaces for the residential uses
 - 2 motor cycle spaces for the non-residential uses
- The traffic report has indicated that 119 motorcycle spaces will be provided off-street, this exceeds the planning scheme requirement and is considered acceptable.
- **Regarding the car share spaces, Can the Applicant provide more information about the Car Share i.e. what providers will occupy the spaces, have they been in contact with the etc. We suggest referring the planning application to the Strategic Transport team for comments and feedback.**

TRAFFIC GENERATION

- The traffic report has suggested a residential peak traffic generation rate of 0.25 vehicle movements per apartment with a car space. The following AM and PM peak hour traffic distribution splits have been assumed in the traffic report, 25/75 during the AM peak and 70/30 during the PM peak. This has been reviewed and is considered acceptable.
- Based on the above, traffic generation, traffic generation assumptions of 32 inbound and 96 outbound movements during the AM peak and 90 inbound and 38 outbound movements during the PM peak. This rate has been assessed and is considered acceptable.
- The traffic report has suggested that 50% of the allocated non-residential parking spaces will generate a movement during the commuter peak periods. Based on this rate, a traffic generation assumption of 176 movements is expected during the AM and PM peak period. This rate has been assessed and is considered acceptable.
- The traffic generation likely generated by the proposed car share spaces will be negligible.
- The total traffic generation from the proposal is 304 movements for entry and exit volumes during peak hours. This is considered satisfactory.
- The traffic report has undertaken a SIDRA intersection analysis of the critical intersection, which indicates that the intersection will operate in a satisfactory manner (with minimal delays and queues) post development of the site.
- **Please note that no cumulative trip generation for other developments has been considered.**

PEDESTRIAN SIGHTLINES

- The traffic report has indicated that pedestrian sight triangles will be provided in accordance with the planning scheme, being 2m x 2.5m and at least 50% clear of obstruction, on the exit side of each of the accessways at the point where pedestrians cross. This is considered acceptable.

PROVISIONS FOR LOADING & WASTE COLLECTION

- Four loading areas have been proposed on-site, with one located on the ground floor of building 1, two located on the ground floor of building 2 and one located on the ground floor of building 4.
- The traffic report has provided a swept path assessment which indicates that an 8.8m MRV and 12.5 HRV can enter and exit the loading areas with suitable clearance and number of corrective manoeuvres, this is considered acceptable for loading areas located in Building 4.

- I have concerns with the proposed location of the loading area for building 1. The Fisherman's Bend Framework has indicated that the roadway marked on the plans as "Roadway (Common Property) is planned to become a 6m laneway with active frontages, and act as a key pedestrian link between Fennell Street and the development site. Based on this, it is not a suitable location for loading vehicle activities. **It is recommended relocating the loading area with access to/from internal local road. Further comments regarding proposed vehicle access locations are discussed above.**
- The traffic report swept paths indicate that to access to Building 2 loading areas, an 8.8m MRV and 12.5m HRV will be required to stop, prop and reverse along the internal access road used by both commercial and residential vehicles. This represents a poor design outcome as will create potentially dangerous conflicts between vehicles and loading operations. **It is recommended either relocating or redesigning the loading bay to a more accessible location.**
- The loading areas have all been provided with direct convenient access to residential lobbies, this will allow residents to load/unload when moving in/out. This is considered acceptable.
- Waste Management plan to be referred to Council's Waste Management department for assessment.

PROVISIONS FOR BIKE PARKING

- Clause 37.04 of the planning scheme sets out the following bicycle parking rates:
 - In developments of more than 50 dwellings, 1 space per dwelling for residents and 1 space per 10 dwellings for visitors
 - In developments with over 10,000sqm of non-residential floor space, 1 space per 50sqm of net floor area for staff and 1 space per 1,000sqm of net floor area for visitors.
- Based on the above rates, the number of bicycle spaces required is as follows:
 - 947 residential bicycle spaces
 - 95 residential visitor spaces
 - 1,287 non-residential (staff) spaces
 - 64 non-residential (customer/visitor) spaces
- The traffic report has indicated the following provision of bicycle spaces for the proposed land uses:
 - 1,003 residential bicycle spaces
 - 112 residential visitor spaces
 - 437 non-residential (staff) spaces
 - 59 non-residential (visitor) spaces
- Based on the above, the bicycle parking provided for the residential component is in accordance with the planning scheme and is considered acceptable. However, the applicant is seeking a waiver of 850 non-residential (staff) and 5 non-residential (visitor) bicycle spaces.
- The traffic report has indicated that the proposed provision of staff bicycle spaces is 12 times higher than what is currently provided within the City of Melbourne, and the proposed provision will be able to cater for future demands. Noting that car spaces could be converted to additional bicycle parking should more be required in the future.

	<ul style="list-style-type: none"> • The Australian Standards require that a minimum of 20% of all bicycle spaces are provided at ground level. The traffic report has indicated that at least 322 of the 1,611 spaces will be provided at ground level, this meets the standard and is considered acceptable. • Clause 52.34 of the planning scheme sets out the following end of trip facility rates: <ul style="list-style-type: none"> ○ Showers: 1 shower for the first 5 employee spaces, plus 1 to each 10 additional spaces ○ Changerooms: 1 changeroom or direct access to a communal change room to each shower. • The traffic report has indicated that at least 40 showers are required, each with direct access to a change room. Can the plans please be updated to indicate that EOT facilities meet the planning scheme requirements and have direct access to change rooms. • Plans provided by the applicant indicate that several bicycle parking locations have not been provided a clear 1.5m access aisle, including: <ul style="list-style-type: none"> ○ Ground Floor <ul style="list-style-type: none"> ▪ Commercial bike store (400 NO.) / Residents bike store (336 NO.) ▪ Res. Visitor Bike Store (42NO.) ▪ Comm. Bike Store (120 NO.) (also not enough width for Ned Kelly spaces) ○ First Floor <ul style="list-style-type: none"> ▪ Bike Store (40 NO.) ▪ Bike Store (12 NO.) ○ Second Floor <ul style="list-style-type: none"> ▪ Bike Store (15 NO.) ○ Third/Fourth/Fifth Floors <ul style="list-style-type: none"> ▪ Bike Store (12 NO.) • Can all of the above non-conforming bicycle parking spaces please be updated to include a clear 1.5m access aisles (which includes the hallways which provide access to the spaces). • Plans provided by the applicant indicate that a significant number of bicycle parking spaces are located on Level 2 (or above) of the off-street car park. These spaces do not have direct convenient access from the street and are unlikely to be used. It is recommended relocating these spaces to the ground or level 1. • The plans indicate that all visitor bicycle parking spaces will be located within secure off-street locations. It is recommended providing some on-street visitor spaces, located in prominent and safe locations. • All bicycle spaces must be installed in accordance with the Australian standards, ensuring each space has a clear 1.5m access aisle, Ned Kelly spaces are spaced at 0.5m intervals (min.), ground level spaces (i.e. hoops) are spaced at 1m intervals (min.)
Waste	<p>I have reviewed the WMP and have following comments;</p> <ul style="list-style-type: none"> • Inclusions of details of chutes in the drawing for all floors required

	<ul style="list-style-type: none"> • Strongly recommend the compaction equipment for a development of this size • Number of bins on the WMP and the drawings are varied • Commingle recycling bins for a supermarket is required • Residential and commercial/retail bins must be separate unless the residential bins are only used via chute system and this needs to be mentioned on the WMP and shown on the drawing accordingly. • Allocation of space for Charity and E-waste is highly recommended. • Allocation of space for organic/food waste bin for future council services is highly recommended.
Urban Design	<p>We welcome the opportunity to provide urban design referral advice for the proposal at 277-281 Ingles Street Port Melbourne. This site is one of the most important in Fishermans Bend due to its proximity to potential rail, tram and bus interchange points and its potential to achieve design excellence through integrated land uses and unprecedented public transport projects.</p> <p>We hope that this proposal is developed in a way that guides sustainable development in the Sandridge precinct and delivers the vision for the Precinct as one of Melbourne's premium office and commercial centres that is balanced with diverse housing and retail.</p> <p>This urban design referral has been limited to comments relating to the detailed plans provided for the development proposal of a hotel (Stage One). All other comments relating to the masterplan components and other stages of development will require further consideration once more detailed plans are lodged.</p> <p>Visual Bulk & Massing</p> <p>The masterplan proposes four main towers with heights and land uses that are relatively consistent with Schedule 32 to the design development overlay (DDO32) and Fishermans Bend Framework. This is generally supported, however, with all towers meeting the criteria for high rise (where the buildings are all proposed at 16 storeys or greater as defined in DDO32) it is recommended greater variation be considered that is more representative of a hybrid mix with predominantly high-rise building types. By modulating the street wall with some fine grain retail tenancies and housing types, greater opportunities for vitality, human interactions and exchange is more likely and help realise the distinctive features of the Sandridge precinct vision outlined in the Fishermans Bend Framework.</p> <p>The podium levels have more diverse articulation than previous iterations of the designs, however, from an urban design perspective there are still opportunities to vary parts of the street wall that should be further explored through design competition and review. The massing of the street wall along laneways and linear parks is overwhelming in parts mainly due to its ubiquitous extent in parts more than 100m long. It is recommended the proposal present greater diversity of heights and grain where pedestrian vitality is encouraged to help offset the excessive visual bulk by creating more visual interest from the pedestrian's perspective.</p> <p>Laneways and Pedestrian links</p> <p>The precinct area (S3) seeks high levels of pedestrian permeability and activation on north-south laneways. In response to this, the proposal features a key pedestrian link to the future transport interchange. However, the proposed north-south laneway (between stage 2-3&4) is edged by a 6 storey street wall that should be designed with views to the sky and adequate daylight and sunlight. The pedestrian link sits under a 6m (clear to the sky) building separation for the most part of the linkage. It is recommended that the preferred building separation of 9 metres be maintained along this laneway to ensure a safe and pleasant environment on foot paths and public spaces can be sustained to the point when the density targets of the precinct are eventually realised.</p>

Furthermore, a more responsive street wall should be designed to deliver a distinct human scale laneway that enhances pedestrian amenity and provides an appropriate connection to the future transport interchange hub. To achieve this, it is recommended that the street wall scale be responsive to the laneway width so not to overwhelm the public realm going through the site.

The proposed laneway podium uses are flanked by 5 storeys (above ground level) of predominantly un-sleeved parking provisions. This configuration should be sleeved by other uses as per the DDO32 and solutions be used to contain the emissions of the vehicles and heavy metals that could potentially diminish the pedestrian experience, cleanliness and health of workers in the retail/commercial tenancies facing the street.

As a built form requirement of active frontages outlined in 2.13, in DDO32: *Car parking should be sleeved with active uses so that it is not visible from the public realm or adjoining sites.* It is recommended that all podium parking meet this requirement and extraction devices be included in the design to redirect vehicle emissions away from pedestrian areas and retail frontages.

Stage One integration with future public transport interchange hub

The Fishermans Bend Framework identifies an indicative laneway location on the east interface to the Stage one development. Although the 6m laneway is not being proposed to be delivered in this application, it is important to consider the Fishermans Bend Framework and urban structure that intends this future laneway section as a pedestrian linkage to public transport and not a R.O.W. to multiple car parking provisions.

Based on its proximity to future public transport and the opportunities for high density employment and housing, the interface treatment must maintain the potential for high amenity and safe environmental conditions with the capacity to support high volumes of pedestrian activity conducive to high density areas.

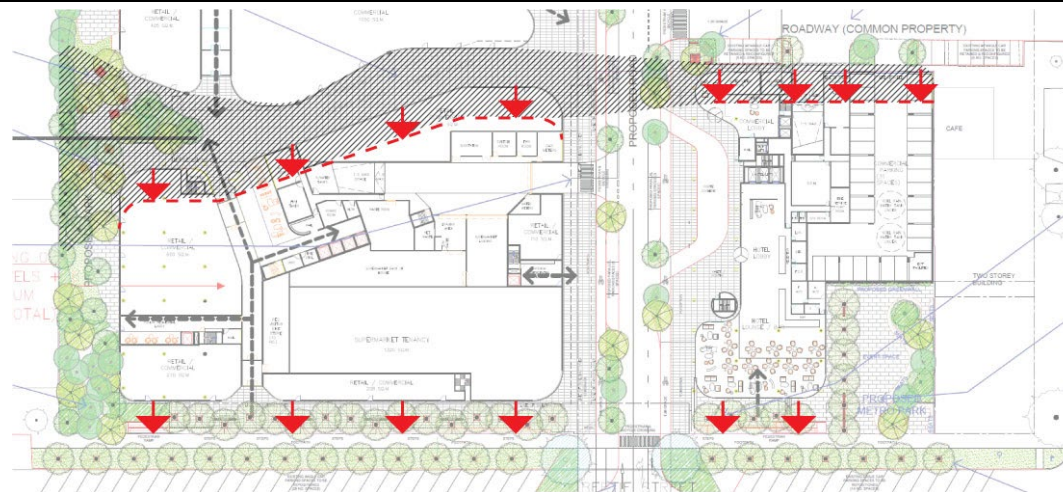
The current proposal aligns two proposed crossovers on the eastern title boundary of the Stage 1 development that should be avoided as a high priority. As the proposal is for a hotel, the valet function of the entrance should be seamless in its configuration and avoid unnecessary vehicle movements travelling around the block and diminishing pedestrian safety. It is recommended the crossover conflicts be removed from the future laneway interface and that the hotel podium parking be made accessible via the portes-cochère off the newly created local road. This will limit pedestrian / vehicle conflict, integrate land use and public transport and future-proof the 6m laneway as a potential pedestrian link connecting all future proposals north of the development to the Fishermans Bend Framework's future public transport interchange hub and Melbourne CBD.

It is also recommended that the portes-cochère be shifted west from the proposed location away from the pedestrian links and intersection.

Interface to Bertie Street

Bertie Street interface illustrates two proposed pedestrian ramps and steps linking the Stages 1 and Stages 2 developments to the street and metro park. These have not been illustrated in any of the preliminary detailed elevation drawings and in principle, are not supported. It is recommended that universally accessible gradients be incorporated in landscaped areas throughout the site to improve connectivity and access for all. Any steps or ramps linking the public realm on such a large-scale proposal can easily be avoided and justified using standard principles of universal design and landscape treatments.

The built form requirements outlined in table 3 of DDO32 support a 6 storey street wall however, without ground floor residential uses proposed, the building should not be setback from the foot path off the title boundary causing separation from the street. Any building in this location should abut the title boundary and therefore, it is recommended that both Stage 1 & 2 components of the masterplan be shifted west to create a street wall on the Bertie Street title boundary and to open up the laneways the same distance for improved amenity and pedestrian linkages. The supermarket corner with Bertie Street also needs resolution to ensure the frontage is visible and accessible from both the new local road and Bertie Street concurrently. This will help activate the corner and promote internal movements in and around the retail components.



Move building west to improve street wall connection with Bertie Street and open internal laneway to improved amenity

Interface to Metro park

The interaction between the hotel and the future metro park has improved however, the podium parking includes a green wall in a location that will never receive direct sunlight. Often green walls fail to achieve the illustrated potential and given the size and orientation of the car park treatment, it is recommended that the proposed configuration of the car park, its treatment and its interaction with the future Metro Park be avoided. As per the DDO32 built form requirements, Car parking should be sleeved with active uses so that it is not visible from the public realm or adjoining sites. The green wall solution should be reconsidered and replaced with active uses as outlined in the DDO.

Interface to linear parks

The landscape plans illustrate encumbered planting and paved areas that should not be limiting the functions of linear parks and pedestrian linkages. The alignment of planting has to consider the dual aspect of them and planting schedules outlined in the landscape plans at ground level should not assume the planting alignment separates the proposed development from adjacent areas. It is recommended that further interrogation of the Fishermans' Bend Framework is undertaken and proposals for landscape treatment be discussed separately with open pace and landscape architects to ensure these linear parks provide appropriate connections and interfaces to all adjacent properties and not be aligned to serve one or the other.

The wind assessment identifies a few locations for trees in park areas and street scapes be used to mitigate excessive wind conditions and an awning feature fronting the Ingles Street linear park and the new 22m local road. In principle mitigating wind impacts should be done within the boundary of the development and not in the public realm. The comfort levels of the proposed design cannot be achieved or externalities off set by generic modelling of tree placement assuming they are positioned and scaled to meet the requirements of safe and pleasant pedestrian environment on foot paths and other public spaces by blocking them with mitigation tactics. It is recommended the wind effects be mitigated to meet the

	<p>standards of safe sitting, walking and standing outlined in DDO32 and that any proposal to offset amenity impacts be achieved in the building's design rather than the public realm.</p> <p>Conclusion</p> <p>From an urban design perspective, the proposed masterplan and Stage One hotel development is generally supported. However, some elements need to be adjusted to ensure the vision of the Precinct is realised and the health and safety of people in the pedestrian areas are prioritised in the design response. It is recommended that for support from an urban design perspective that the proposal is adjusted to ensure:</p> <ul style="list-style-type: none"> • the podium heights are responsive to context and more diverse uses and retail frontages are incorporated along linear parks and laneways. • the hotel's valet parking and basement parking Ensure appropriate environmental conditions are safe along laneways and linear parks. • the human scale of development is maintained, and the podium is responsive to the street and laneway widths. • the north south laneway connection can sustain high density pedestrian movements and pedestrian safety and amenity is the highest priority. • any wind mitigation strategies are designed in to the buildings and not encumbering the public realm. • all parking provisions in podium space are sleeved by active uses. • all building treatments function as intended including the interface to the Metro Park. • all laneways have the potential to be car free and that active linkages to planned public transport infrastructure has the capacity to provide for a planned high-density employment and residential population. • the Bertie Street street wall is aligned to the title boundary and that the proposed stage two supermarket addresses the corner of the new local road and Bertie Street accordingly. • no stairs or ramps are used to create linkages in the public realm. • The porte-cochere does not conflict with pedestrian movements around the junction area and has direct connection with the hotel's parking provisions to maintain on-site vehicle movements within the proposed development area.
<p>City Strategy</p>	<p>The key issues are:</p> <ul style="list-style-type: none"> • Amended wind assessment to ensure acceptable wind impacts to public realm (my usual approach) • Improved street level activation / interaction • Improved integration of metro park with adjoining building and street • Review of interface of Stage 01 building with laneway between new road and Fennell Street • Review of interface of Stage 01 building with future development of site on corner of Bertie and Fennell Streets • Review of interface of Stage 04 building with the site of the heritage building fronting Ingles Street (including associated driveway / access easement over site) • Management of level changes at public / private interface to ensure good urban design and equitable access outcomes • Addition of FFL for all areas • Natural ventilation to car parking areas that doesn't impact on air quality in laneway

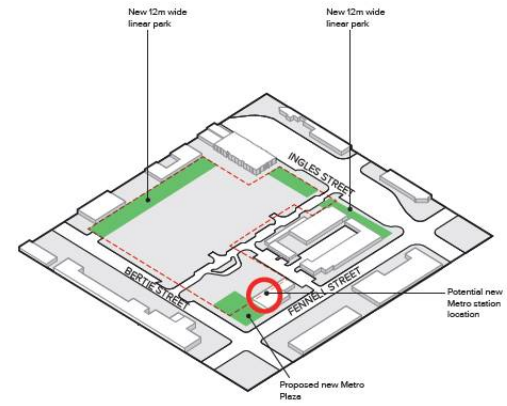
- Equitable and easy access to bicycle parking
- Communal open spaces and internal communal areas to accommodate all potential users and be flexible for changing needs
- Affordable housing residents to have equitable access to communal open space and facilities
- Developer to contribute (works or money) to streetscape improvements of frontage streets (Bertie and Ingles), as well as construction of new road and public open spaces. Standards to be in accordance with Council's standards (once they're finalised)

Landscape Architect

Policy:



Submitted drawings:



Comments:

DDO32 notes that there is a linear park and street on the north end of the site. The design response diagrams don't note the new street as a connection. This is reflected in the landscape plans where the linear park is a series of spaces related only to the adjacent buildings. The linear park is not private space. It needs to address the public function of the street and not the private functions of the buildings ground floor uses. The linear park needs to function as an eventual connection from Ingles Street to Bertie Street.

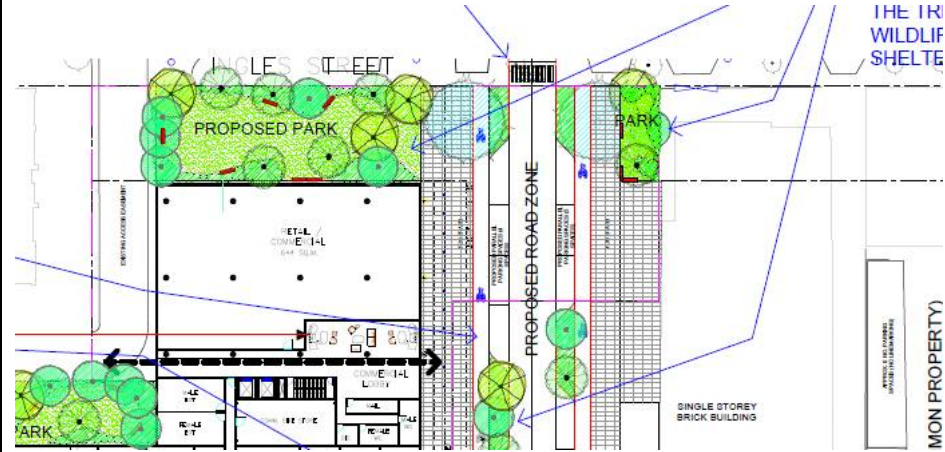
Suggestion condition

	<p>Comments:</p> <p>The landscape plans show the linear park is a series of spaces related only to the adjacent buildings. The linear park is not private space. It needs to address the public function of the street and not the private functions of the buildings ground floor uses. The linear park needs</p>	<p>Suggestion condition:</p> <p>Provide at least a 2.2 metre pedestrian footpath adjacent to the buildings within the linear park. (more pedestrian space would be better 2.2m is a minimum for two-way pedestrian traffic)</p> <p>Street trees on the proposed road should be regularly spaced between 8-15 metres depending on the species.</p>

to function as an eventual connection from Ingles Street to Bertie Street.

On the proposed road, the tree planting should be regularly spaced. Tree selection to the satisfaction of the City of Port Phillip.

Street tree species must be to the satisfaction of the City of Port Phillip.



Comments:

The intersection of Ingles St and Proposed Road Zone also have a linear park on either side. CoPP should consider the width of the linear park be extended across the carriageway to increase the functionality between these spaces. Potentially with a raised surface. Proposed park should provide more of an active function than urban forest.

Suggestion condition:

Query if the proposed park to be delivered by the applicant? If so than should require that the space function in an active way and is connected to the other linear parks adjacent.



Comments:

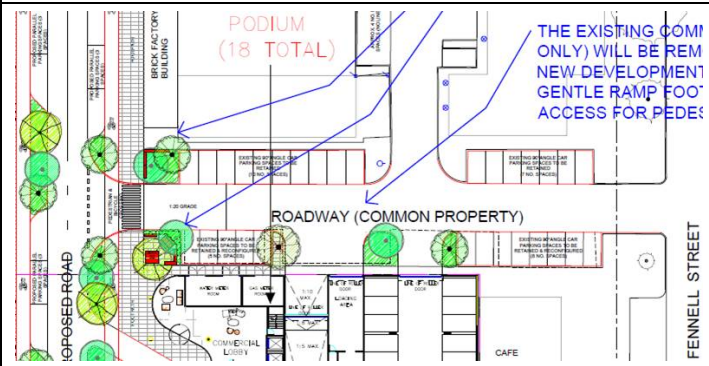
Intersection of Bertie St of Proposed Road Zone could have a wider pedestrian crossing that integrates the desire lines between buildings. The pedestrian crossing being so far from that desire line will mean that people will not cross legally. Suggest creating a raised table across the entire pedestrian/bicycle desire line.

Suggestion condition:



Comments:

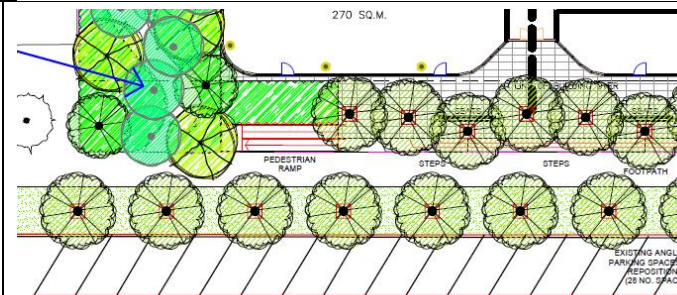
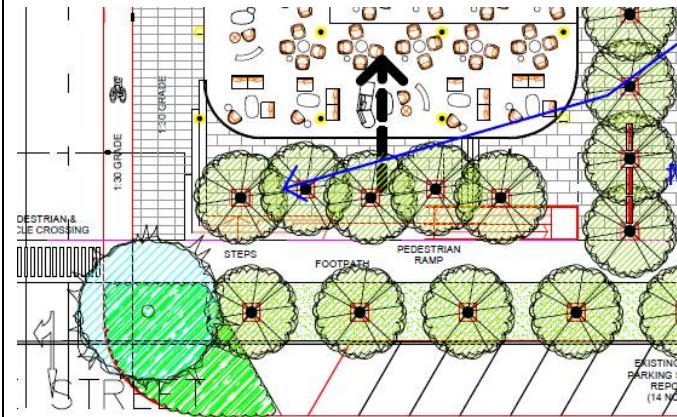
Suggest removal of car parking in the laneway (common property) and the reimagining of these spaces to more pedestrians uses. In the DDO32 the common roadway



Suggestion condition:

Roadway (common property) should be redesigned to create an active frontage with 60% permeability.

should be a secondary type I (60% permeability) active frontage.



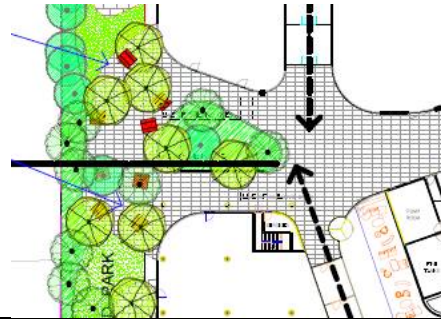
Comments:

The public realm should be inclusive to all and not just accessible. Case-in-point, ramps should be integrated with the public realm rather than placed to the fringes. From McKenzie group: “The Building Code of Australia has adopted key accessibility and DDA legislation into the 2011 and subsequent BCA. In particular adherence to the Access to Premises Standard (2010) (APS); AS1428.1 2009; AS1428.4.1 2009 and AS2890.6 2009 has become mandatory. This means that compliance with the relevant

Suggestion condition:

The applicant should ensure that the public realm provides equality, dignity and functionality for all people regardless of ability.

sections of the BCA, ensures compliance with the relevant 'Premises' component of the DDA. However, compliance with the BCA alone does not necessarily mean compliance with the Disability Discrimination Act if the elements of equality, dignity and functionality remain compromised within an environment. The building owner/occupier should therefore ensure that their policies, practices and procedures promote equality in all employment, education and services provided, within their built environment."



Comments:

Similar comment to below.

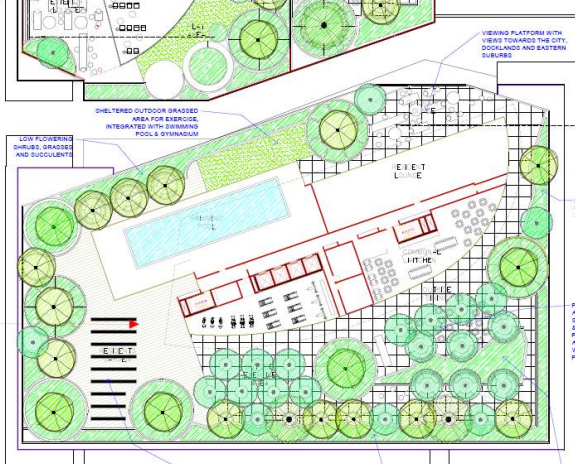
Suggestion condition:

Create an urban plaza from the linear park into buildings 3 and 4 from the proposed road



Comments:

Suggestion condition:

	<p>Just because a space exists doesn't mean that it needs to be filled. This is a key entry point to the building from the street. Perhaps the applicant should consider this space as a more urban square</p>	<p>Create an urban plaza from the proposed road into buildings 3 and 4 from the proposed road</p>
	<p>DDO32 2.12 2.12 Communal open space Built form outcomes Communal open space that:</p> <ul style="list-style-type: none"> • Meets the needs of residents. • Delivers significant opportunities for landscaping, including large trees, within the development and contribute to the visual amenity of apartments. • Supports a range of recreational uses. <p>Can be readily accessed from within the development and provide direct pedestrian connections to the street.</p>	
	<p>Comments: Communal open space should provide for a range of activities, not just passive activities.</p>	<p>Suggestion condition: Communal open spaces should support a range of recreational activities at podium level to residents, not just passive activities.</p>

		<p>ROOF GARDEN BUILDING 03 - LEVEL 06 1:200</p> <p>'BUSH GARDEN' WITH INDIGENOUS & NATIVE TREES, GRASSES, WILDFLOWERS & ROCKS. RESIDENTS WILL BE ABLE TO SIT AND RELAX IN THIS LEAFY GARDEN.</p> <p>LOW FLOWERING SHRUBS, GRASSES AND SUCCULENTS UNDER SHADE TREE</p> <p>LOW FLOWERING SHRUBS, GRASSES AND SUCCULENTS UNDER SHADE TREE</p> <p>SEATING TO RELAX, CHAT & ENJOY THE VIEW, SET AMONGST LOW SHRUBS AND GRASSES</p> <p>CONCRETE PAVEMENT</p> <p>Proposed Mixed-use Develop 289 Inglis Street, Port Melbourne, Victoria, Aus Roof Garden Landscape Plan</p>
	<p>Comments:</p> <p>Communal open space should provide for a range of activities, not just passive activities.</p>	<p>Suggestion condition:</p>

	<p>Comments:</p>	<p>Suggestion condition:</p>
	<p>Recommend that the porte-cochere is removed and replaced with a lay-by so that vehicles can pick up and drop off without significant disruption to the pedestrian environment.</p> <p>Use the reclaimed space to create an urban plaza as an entry to the hotel</p>	<p>Remove porte-cochere and replace with a layby from the proposed road.</p> <p>Create an urban plaza at the entrance of the hotel lobby.</p>
	<p>Plant Selection</p>	
	<p>It looks like the applicant has made a big effort to select native plants. There are a few exotics but mostly not</p>	

	<p>invasive with the exception of <i>pennisetum alopecuroides</i> which is a significant environmental weed. I would say that the applicant's plant list supports both the first two matters in Clause 22.15 with that one exception.</p>	
<p>Sustainable Design</p>	<p><u>Green Star:</u> Mandatory certified Green Star Design & As Built ratings are specified at Clause 4.3 of the Capital City Zone, Schedule 1, which apply as follows: <u>Developments of 10 or more dwellings or 5,000m² or more of floor space = 5 star</u> - The Sustainable Management Plan (SMP) should be amended to show how the development will achieve a five star Green Star Design & As Built rating with a 10% buffer above the minimum 60 point requirement. 60 + 6 = 66 points = Five Star "Australian Excellence". General alignment to the Fishermans Bend Framework should also be followed as outlined in the Arup Report Fisherman's Bend Review of Sustainability Standards refer Appendix A for 5 star Pathway for 66 points. The Greenstar Scored card in the SMP targets 60 points, it is missing the 10% buffer requirements.</p> <p><u>IEQ:</u> Concern about the deep floor plates of commercial spaces. The areas away from the perimeter of the building are likely to have poor daylight access. Commitment to with indoor air pollutants is a vague commitment to low VOC. It also does not address another main indoor air pollutant, formaldehyde.</p> <p><u>Energy:</u> The application must demonstrate how the proposal incorporates renewable energy generation, on-site energy storage and opportunities to connect to a future precinct-wide or locally distributed low-carbon energy supply. A renewable energy system has not been specified in SMP nor indicated on plans. It is unclear if there will be a renewable energy system incorporated into this development.</p> <p><u>Integrated Water Management (IWM):</u> The application must address the third pipe and rain tank requirements set out at Clause 4.3 of Schedule 1 to the Capital City Zone, as set out below. The application must demonstrate how these requirements are accommodated into the proposed design:</p> <ol style="list-style-type: none"> 1. A third pipe must be installed for recycled and rain water to supply all non-potable outlets within the development for toilet flushing, irrigation and washing machine unless otherwise agreed by the relevant water authority. 2. An agreed building connection point must be provided from the third pipe, designed to the satisfaction of the relevant water supply authority, to ensure readiness to connect to a future precinct-scale recycled water supply. 3. A rainwater tank must be provided that: <ul style="list-style-type: none"> - Has a minimum effective volume of 0.5 cubic metres for every 10 square metres of catchment area to capture rainwater from 100% of suitable roof rainwater harvesting areas (including podiums); 	

- Is fitted with a first flush device, meter, tank discharge control and water treatment with associated power and telecommunications equipment approved by the relevant water authority.

4. Rainwater captured from roof harvesting areas must be re-used for toilet flushing, washing machine and irrigation or, controlled release. Modelling – For sites above 1000m², we do not accept STORM calculations as appropriate stormwater modelling.
5. Provide MUSIC modelling that demonstrate conformance with Melbourne Water's MUSIC modelling guidelines (www.melbournewater.com.au/sites/default/files/2018-02/Music-tool-guidelines-2018.pdf)

Current SMP does not provide any details of a viable stormwater strategy, neither does it meet the third pipe and rainwater tank requirements. Note that the SMP mentions a possibly using a proprietary stormwater treatment system, this is not acceptable. As per Melbourne Water guidelines, there are currently no proprietary systems recognized to have effective nitrogen and phosphorous removal. The use of a proprietary product is problematic as it would require product specific maintenance. Therefore it is not possible to conclude that the proprietary product would result in meeting the stormwater quality objectives required.

Waste:

The proposal must respond to the waste requirements of Clause 22.15-4.5 including the following:

- *Optimise waste storage and efficient collection methods.*
- *Combine commercial and residential waste storage.*
- *Share storage or collections with adjacent developments.*
- *Separate collection for recycling, hard waste, and food and green waste.*

It is unclear how the proposed waste management system detailed on drawings and in the SMP addresses the requirements noted above. There does not even appear to be a waste collection or chute access to each block's floor.

Urban Ecology:

The application must demonstrate how the proposal is designed to reduce the urban heat island effect, in accordance with the requirements of Clause 22.15-4.5, as follows:

At least 70 per cent of the total site area should comprise building or landscape elements that reduce the impact of the urban heat island effect including:

- *Vegetation, green roofs and water bodies.*
- *Roof materials, shade structures, solar panels or hard scaping materials with high solar reflectivity index.*
- *Non-glazed facade materials exposed to summer sun should have a low solar absorptance.*

The SMP proposes that 70% of the site area will be planted with vegetation, however a review of the landscape drawings indicate this is not the case. Proposed design that meets the above requirements needs to be clearly indicated on plans.

The landscape drawings do reflect the landscape requirements in accordance with Clause 22.15-4.7. That said, it has yet to incorporate any flood mitigation and best practice Water Sensitive Urban Design.

Transport:

The application must include all bicycle, motorcycle and car share requirements as set out in “Table 2: Parking Provision” of Schedule 1 to the Capital City Zone, as follows:

For developments of over 50 dwellings:

- Residential Bicycle Parking = 1 space per dwelling + 1 visitor space per 10 dwellings
- Residential Motorcycles = 1 space per 50 dwellings
- Residential Car Share = 2 allocated spaces + 1 allocated space per 25 car parking spaces

For developments of over 10,000m² non-residential floor space:

- Non-res Bicycle Parking = 1 space per 50m² net non-res floor area + 1 visitor space per 1,000m² of net non-res floor area
- Non-res Motorcycles = 1 space per 100 car parking spaces
- Non-res Car Share = Min 2 allocated spaces per 60 car parking spaces

Bicycle parking spaces indicated on plans do not meet the requirements. The location of bicycle parking space are also very inconvenient to EOT facilities. There does not appear to be any provision for car share spaces.

Greenstar Assessment

NOTE: The comments following can be ignored if the development commits to achieving a GBCA certified 5-star Green Star – Design & As Built rating.

Many of the statements in the body of the report (section 3 page 13-24) do not reflect the design and specification commitment required of the relevant green star credits. This would lead us to conclude that the development in its current state does not meet the five star Green Star Design & As Built rating requirement. The following are credit specific issue to be addressed:

- Man-2.0 Environmental Performance Targets – No statement in report that reflects this credit requirements.
- Man-2.1 Services and Maintainability Review – No statement in report that reflects this credit requirements.
- Man-2.2 Building Commissioning – No statement in report that reflects this credit requirements.
- Man-3.0 Implementation of a Climate Adaptation Plan – No statement in report that reflects this credit requirements.
- Man-4.0 Building User Information – Commitment in report p24 does not meet this credit requirements.
- Man-5.1 Environmental Building Performance – No statement in report that reflects this credit requirements.
- Man-7.2 High Quality Staff Support – No statement in report that reflects this credit requirements.
- Man-8A Performance Pathway - Specialist Plan – Commitment in report p22 does not meet this credit requirements.
- Acoustic Comfort credits 10.1-3 – No details besides “Double glazing to be provided to all occupied areas” is provided on how these credits are met, they affect internal wall specification and more. Please provide further information.
- 12.0 Glare Reduction – Building 03 and lower podium levels appears to have minimal shading, provide further information on how this credit is being met.

	<ul style="list-style-type: none"> • IEQ 12.1 Daylight – It is not apparent on the architectural drawings that the development will achieve this credit as there are deep floor plates and the towers obstruct daylight access to each other. To claim this credit, include calculations (modelling or hand calculations) in the report to demonstrate how the spaces are predicted to perform in relation to daylight benchmarks. • IEQ 13.1 Paints, Adhesives, Sealants and Carpets & 13.2 Engineered Wood Products – Section 3.1 only discusses Low VOC with no reference to specific VOC levels or formaldehyde limits. • ENE 15.E & 16.1B – Report is missing an energy modelling report that justifies credits claimed. • TRA 17 B.1, 3 to 5 – Plans and report p20 do not reflect all these credit requirements. • WAT 18.1B – Fixtures and fittings specification in report p16 does not reflect green star credit requirements. • Wat-18-B.5 Fire System Test Water – Unclear what the development initiative/commitment is to claim this credit. Please indicate the system on plans. • MAT 19.B.2A/B Steel – No statement in report p19 that reflects this credit requirements. • Mat-20.1 Responsible Steel Maker and Fabricator – No statement in report p19 that reflects this credit requirements. • Mat-20.2 Timber – Commitment in report p19 does not meet this credit requirements. • Mat-20.3 Cables, pipes, floors and blinds – No statement in report p19 that reflects this credit requirements. • Mat-22.1 Reduction of Construction and Demolition Waste – Commitment in report p19 does not meet this credit requirements. • Emi-26.1&2 – No stormwater management plan has been proposed or assess, unclear how the project will achieve these 2 credits. • Emi-27.1 Light Pollution to Night Sky – No statement in report that reflects this credit requirements. • Inn-13.a INNOVATION: Improving on Green Star Benchmarks - Zero VOC Paints –Statement in report p19 does not meet this credit requirements. • Inn-22 INNOVATION: Improving on Green Star Benchmarks - Reduction of Construction Waste – No statement in report that reflects this credit requirements. • Inn-26b INNOVATION: Innovation Challenge - Water Sensitive Urban Design – No statement in report that reflects this credit requirements. • Inn-28a INNOVATION: Innovation Challenge - Microbial Control in DHW – No statement in report that reflects this credit requirements. • Inn-30.D6 Local Procurement I – No statement in report that reflects this credit requirements. • Inn-30.D10 Design for Active Living – No statement in report that reflects this credit requirements. • Inn-30.D12 Market Intelligence – No statement in report that reflects this credit requirements. • Inn-30.D15 Financial Transparency – No statement in report that reflects this credit requirements.
Housing Officer	<p>I provide the following comments on the affordable housing proposal:</p> <ul style="list-style-type: none"> • The exploration in application’s Affordable Housing Assessment by PwC of four affordable housing options, and an assessment of these options, is welcome. This is because it provides an indication of the applicant’s vision, objectives, and assumptions for the affordable housing component.

- It is understood that the application proposes 6.44% affordable housing (61 dwellings), comprising 29 x 1 bedroom, 18 X 2 bedroom, and four x 3 bedroom dwellings.
- The application refers to the need for the affordable housing to meet the project's vision, but does not outline the nature of the vision. Consequently, it is not clear in the application why certain affordable housing options are considered to not meet the project's vision, while two options are considered to meet the vision.
- The Affordable Housing Assessment report by PwC correctly refers to the [6%]affordable housing as an 'obligation'. The application assumes that the 'affordable obligation' under this option (and generally any option) needs to provide a financial return to the developer. There is no basis for assuming that a return to the developer is required under this option, as the need for a return is not specified in the Planning Scheme.
- I am generally of the view that there is inadequate information to justify the preference for the head leasing or discounted purchase options. Consequently, while noting that the application is preferring either the head-lease or discounted purchase options, at this stage I will provide comments on all four options:

1st option - 'developer contribution' (ie. unit gifting) option

It is assumed that 61 dwellings (6.44% as per the 2nd or 3rd options) is gifted to a CHP (or 56 dwellings if based on 6%).

- This option assumes the need for a return to the developer, to avoid conflict between the developer and Community Housing Provider (CHP) and planning, the delivery of less [affordable] dwellings, or the need for other purchasers to subsidise the cost of the affordable housing through increased purchase prices and resultant sales risk. This is not adequately justified. However, in general there is no basis for assuming that a return is required (refer to general comment above).
- The option refers to the risk of the CHP negatively impacting on the project's amenity and success, as the CHP may not share the developer's vision for the precinct. This assumes that social housing will not be able to successfully mixed with private housing, under suitable parameters, such as-
 - being 'tenure blind' (indistinguishable from private dwellings, aside from limited internal differences to materials and finishes, and accessibility)
 - targeting a suitable target group for mixed housing
 - being well managed.

This assumption is not justified, as it could be possible to negotiate an outcome that addresses the objectives of the developer and a CHP.

- In the USA, social housing is regularly and successfully mixed with market rate private housing, including high-end private housing, under Regulatory Agreements. The private sector in Australia is not experienced in responding to affordable housing obligations, and consequently perceives such a housing mix as creating a market risk. The option needs to explain why the developer could not select a CHP and negotiate an affordable housing option under an Agreement which mitigates the perceived risk, such as with the case study provided by PwC involving Lendlease delivering 55 social housing dwellings (to Melbourne Affordable Housing- now Housing Choices Australia) in 'The Merchant' building the Docklands. While this case study included a density bonus provided to the developer, it occurred in the absence of any affordable housing policy obligations, and is not considered suitable for this application, as it does not involve take-up of the Social Housing Uplift incentive.

2nd option - head lease option

This option leases 61 dwellings (6.44%) to a CHP for 30 years for a 'small' but undefined rent paid to the developer.

- The 30 year term is better than the 10 year term used by NRAS, but is inferior to the long-term period (the economic life of the building) used in the PRADS model that is being developed by Housing All Australians. This period defers the affordability problem to a future generation to solve, when affordability problems are likely to be deeper and broader.
- The Affordable Housing Assessment states that at the termination of the 30 years, the CHP 'can move to newer and higher quality stock which is a better outcome for the occupant.' (page 10). The way this can be achieved and the location of the alternative affordable housing is not provided, and there is a strong likelihood that the affordable housing will be lost at the end of the 30 years, as Fishermans Bend dwellings will be less affordable than present, and CHPs will be unable to purchase replacement housing in the numbers resultant from a number of fixed term lease agreements that may occur in Fishermans Bend. This is acknowledged by the assessment stating 'There is a risk that tenants will be evicted or priced out of the rent cost at the conclusion of the head lease period.'
- While this option is one of the two being proposed, the Affordable Housing Assessment states that the head lease model conflicts with the developer's operating model, as it locks up the developers capital for the term of the lease, rather than allowing the developer to exit the project after completion of construction. This suggests that the first (developer contribution) or third options (discounted purchase) are advantageous for the developer, as they enable the developer to exit the project on completion.

3rd option - CHP (discounted) purchase option

This option sells dwellings to a CHP at a discounted price - 61 dwellings at 6.44% as per the 2nd or 3rd options, or 56 dwellings if based on 6%.

- The discounted price is not specified in the Affordable Housing Assessment. If it is based on the case study that the Assessment indicates is being currently negotiated with a CHP in the Docklands, the discounts level may be 50-85% of market price. The proposed level of discount needs to be clarified, and specified, rather than being included in a broad range, as a 50% discount has greater potential benefits compared with an 85% discount, and has differing implications for an assessment of the options.
- It is generally not viable for CHPs to purchase dwellings from developers under planning policy, as CHPs cannot afford to purchase dwellings in high value areas in an ongoing manner, as they prefer to use their limited financial resources to fund purpose built community housing. Despite this option being one of the two proposed options, the Affordable Housing Assessment states that concessions (no GST, lower risk margin, no sales and marketing costs) '...may not reduce the price far enough to be affordable for the CHP.' (page 11). It is noted that the success of the Dockland case study that is referred to as precedent for this option, is unclear as the negotiations seem to not yet have been concluded.
- The Assessment states that the option does not add a material cost to the other purchasers in the development. This assumption has not been substantiated, and compared with the developer contribution or head lease options.

4th option - alternative commitment options

This option involves provision of cash or in-kind affordable housing to a CHP away from the development site.

- It is agreed with the Assessment that this option does not contribute to housing diversity / affordability in the precinct.
- Cash contributions need to be limited to projects that justify cash in lieu of affordable dwellings, such as small projects where a proportion of affordable housing may not be viable.
- The Assessment assumes that the option needs to provide a financial return to the developer, which is not justified.

Concluding comments

- Further information or justification (outlined above) is required so that the proposed options can be properly assessed.

- A discounted sale is generally not viable for CHPs as an ongoing model for affordable housing in Fishermans Bend.
 - Two alternatives are supported -
 - 2nd option (head lease) - a variation should be considered involving extending the 30 year head lease to a long-term period, so that it does not defer the affordability problem to the a shorter period when the lease expires. A long-term period could be based on the economic life of the buildings, as is featured in the PRADS model, and-
 - Not require a rental return (or at most involve a nominal return).
 - Owners Corporation fees should not apply to the affordable housing/ or be nominal, as this makes the operation of the dwellings by a CHP unviable and risky where fees can be arbitrarily increased by OC members.
 - Be documented in a section 173 Agreement.
 - Include a mechanisms for monitoring the maintenance of the affordability.
 - Negotiation of a proportion of dwellings being gifted to a CHP. As with a long-term head lease, Owners Corporation fees should not apply / be nominal.
 - The affordable housing comprise mix of 1,2 and 3 bedroom dwellings, as indicated in the application. The proposed mix of 29 x 1 bedroom, 18 X 2 bedroom, and four x 3 bedroom dwellings is supported. This will address the needs of the 35.4% of singles and the 59.4% of families in Port Melbourne, as stated in the Affordable Housing Assessment (page 6).
 - The following target groups are preferred:
 - Older persons, in particular older single women (requiring one bedroom dwellings).
 - Families, including larger families (requiring three + bedroom dwellings).
 - Low income wage earners (requiring one or two bedroom dwellings).
- Note that this excludes singles at greatest risk of homelessness, which is a target group better suited to being housed in dedicated social housing.