

ADVERTISED PLAN

1 March 2024

Julia Smith

Senior Planner | Development Approvals and Design
Department of Transport and Planning (DTP)

Lodged via email

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Referral Response

**Planning Permit Application No. TP-2019-979-1
300 City Road Southbank VIC 3006**

Dear Julia,

Ratio Consultants continue to act on behalf of the permit applicant in respect to the above matter.

In response to the referral comments received from City of Melbourne's urban design¹ and waste management² departments, we provide the following:

- Updated development plans and statement of changes (Fraser and Partners).
 - In summary, the changes include updates to the Lower Ground and Upper Ground levels to address the waste management referral and updates to the bathroom types / living areas of the apartments to ensure compliance with BADS in response to the urban design referral.
- Updated Waste Management Plan (WMP) dated 27.02.2024 (Leigh Design).
- Updated swept-path analysis and traffic engineering memorandum dated 27.02.2024 (Stantec).
- Wind Memorandum dated 28.02.2024 (MEL Consultants).

In respect to the perceived concerns, the applicant responds as follows.

¹ UD referral dated 8.02.2024

² WMP referral (email) dated 8.02.2024 and corrected email dated 9.02.2024

Response to Waste Management Referral

Council Comments	Applicant Response
<p>Commercial waste calculations do not include the function room and bar – please clarify if these facilities are commercial (F&B is purchased by patrons) or only for residents to bring their own food and drinks.</p>	<p>The Level 2 communal facilities are for the use of residents only (not commercial).</p>
<p>Table 1: Office use may be calculated at 5 days per week. This may negate the need for the extra 240L garbage bin.</p>	<p>The commercial bins have been reduced by 1 x 240L garbage bin.</p> <p>Refer to updated WMP prepared by Leigh Design for further details.</p>
<p>Table 2b:</p> <ul style="list-style-type: none"> – For the future commercial scenario, 2 x 1100L bins collected twice weekly is adequate for recycling once glass has been separated. 	<p>The collections per week for the commercial recycling (2 x 1,100L bins) has been reduced to 2 x p/w.</p> <p>Refer to updated WMP prepared by Leigh Design for further details.</p>
<p>The new proposed layout of loading dock and access to the bin stores is unsatisfactory:</p> <ul style="list-style-type: none"> – Previously residents and commercial tenants could access their respective waste rooms without needing to enter the loading dock. In the new proposed layout, all tenants and residents must enter the loading dock to get to their respective bin rooms. Access to the bin rooms is likely to be difficult or impossible if a collection or delivery is taking place. – The goods lift opens directly into the loading dock, less than 50cm from the 2m bin loading area at the rear of the truck. This is a far from safe or accessible arrangement, particularly for residents with mobility issues. – Bin transfer pathways must be 1.5m minimum for the movement of 1100L and 660L bins. If a truck is in the loading bay, there is not sufficient clearance to safely transfer bins out of the bin room to the rear of the truck. – Likewise, there is inadequate room at the rear of the truck to temporarily store 6 x 1100L bins before the truck arrives. 	<p>In response to Council's concerns, the development plans have been updated to show:</p> <ul style="list-style-type: none"> – Layout updated to provide 1.5m clear pathway for bin transfer. This resulted in wider loading bay and minor layout updates. – Removable bollards proposed to the rear of the loading zone to ensure pedestrian safety within the shared zone. – Bin transfer pathway range between 1.5 m to 2.025 m which achieves the minimum width. – A temporary bin zone is not required since the bins in the Bin Stores are deemed sufficiently close to the truck. <p>Refer to updated WMP prepared by Leigh Design for further details.</p>

Please indicate the nature of the bin store doors (roller doors?).	Development plans updated to nominate roller doors to the bin store. Refer to updated WMP prepared by Leigh Design for further details.
The commercial bin store configuration is unsatisfactory: each different type of bin must be accessible without the need for tenants to move bins around.	Development plans updated to rearrange the commercial bin store configuration. Refer to updated WMP prepared by Leigh Design for further details.
Swept path diagrams must show waste room doors.	Updated swept-paths provided. Refer to updated WMP prepared by Leigh Design / traffic memorandum and swept-paths prepared by Stantec for further details.

We submit the waste management concerns have been adequately addressed.

Response to Urban Design Referral

Council Comments	Applicant Response
<p>Revised building typology</p> <p><u>Increase in overall GFA</u></p> <ul style="list-style-type: none"> – The amended proposal includes five additional levels and results in an FAR increase from 1:13 to 1:18. – The new levels are contained within the endorsed building envelope and achieved through replacing communal levels that had generous floor to floor heights with residential program. – We defer to Planning with regards to appropriateness of these changes within relevant planning controls. <p><u>Lower level residential</u></p> <ul style="list-style-type: none"> – The proposal seeks to replace a genuine mixed-use building with a predominantly residential typology. Understandably, there exists considerable demand for housing, however maintaining the mixed-use program would be supported from an urban design 	<p><u>Increase in overall GFA</u></p> <p>Comments noted.</p> <p><u>Lower level residential</u></p> <ul style="list-style-type: none"> – Dwelling / accommodation is as-of-right under the CCZ3. – The proposed amendment seeks to retain an office use (also as-of-right) on Level 1. – The provision of additional housing in while retaining a mix of commercial offices as per the objectives of the CCZ3. – As acknowledged by Council’s comments above, the current scheme proposes a genuine mix of dwelling typologies, including the introduction of smaller (more affordable) studio apartments and larger family-sized three-bedroom apartments. – In respect to internal amenity considerations, an updated Acoustic Assessment (Acoustic Logic) and Sustainable Management Plan incorporating daylight modelling (IGS

<p>perspective and welcomed in this area of the city.</p> <ul style="list-style-type: none"> – The commercial levels of the endorsed scheme were located at the base of the building and included generous floor to ceiling heights. This would be a suitable approach to deal amenity issues of City Road noise and limited access to natural light at lower areas of the building. – The applicant should confirm that the above issue have been considered and adequately addressed in the proposed residential apartments in the amended application. 	<p>Consulting) was submitted as part of the current application made to DTP.</p> <ul style="list-style-type: none"> – Per the consultant reports, compliant noise and daylight will be achieved to the proposed apartments.
<p>Apartment amenity</p> <p><u>Removal of wintergardens</u></p> <ul style="list-style-type: none"> – The amended application states that all apartments meet the Better Apartment Design Standards (BADs). Meeting these standards is an expected design outcome. The applicant needs to further demonstrate that BADs are being achieved, particularly with respect to proposed removal of winter gardens from all apartments. – An objective of BADs is to ensure private open space is provided to apartments for the reasonable recreation and service needs of residents. Refer Clause 58.05-3 (D-19). – Above a height of 40m BADs outlines that additional space can be provided to living areas or bedrooms in lieu of balconies. Refer Diagram 1 - BADs. – Generally, we would not support the removal of balconies below 40m as it limits the buildings contribution to the streetscape. – The amended application includes a memorandum aiming to justify the removal of winter gardens and resulting updated apartment layouts throughout the building. – The application does include examples where the intended outcome of BADs is clearly achieved as seen in the revised layout of Apartment Type A2. The additional space provided to the living area improves overall 	<p>As previously submitted to DTP, the benefits of removing the winter terraces for all apartments are two-fold:</p> <ul style="list-style-type: none"> – Firstly, the removal of the winter terraces has enabled the introduction of an increased mix of dwelling typologies / increased internal areas for the apartments. – Secondly, the provision of small terraces for each apartment would not be enjoyable nor provide a meaningful contribution to the recreation needs of residents. <p>Winter terraces (unlike balconies) are fully enclosed spaces and would not offer any perceivable contribution to the streetscape when compared to a floor to ceiling living / bedroom window. The current scheme ensures glazing is provided to the external façade to retain activation with the public realm.</p> <p>No trafficable terraces were previously located within the podium levels, whereas the current scheme provides for outdoor terraces on Level 2 facing City Road and Haig Lane which improves passive surveillance over these areas.</p> <p>Each apartment (whether located above or below 40 metres) is provided with additional living / bedroom areas in accordance with Table D9 of Standard D20 and the minimal internal room dimensions specified in Table D11 of Standard D26. Please refer to the enclosed development plans (sheets A2500 to A2502) for further details.</p>

apartment amenity and functionality of the apartment. Refer Diagram 2 – Application Memo: Apartment Type A2.

- Additional space is provided to some apartments in lieu of wintergardens through adding to WIR and laundry areas. This is proposed to Apartment Types A1, C1 and C2. Refer Diagram 3 & 4 – Application Memo: Apartment Types A1 and C1.
- We understand that these apartments still meet the requirements of BADS as it is permitted to provide additional space in the form of storage.
- It appears that overall floor areas have reduced in size. The applicant should provide further information to confirm the distribution of additional space throughout apartments.

New apartment types

- The amended application includes new typologies of studio and three bedroom apartments. These apartments similarly do not have access to private open space. The application does not adequately clarify that additional space is being provided to bedrooms and living areas in lieu of private open spaces in these apartment types.
- The new apartment typologies do not appear to provide adequate living space for residents and results in poor design outcomes for residents. Apartment Type D1, for example, provides insufficient living areas for a family of three. Apartment Type B1 does not clearly benefit from additional area in lieu of the removal of a winter garden. Refer Diagram 5 – Apartment Types – Amended Application.
- We recommend design revisions to these apartment layouts to improve amenity for residents or revise overall design to include greater proportion of more successful apartment types.
- The applicant should also provide additional information to clarify the distribution of overall space in these apartments meets BADS

A table outlining the distribution of additional space provided to living areas / bedrooms was provided within our RFI response to DTP dated 2 February 2024.

In support of the removal of all winter terraces (above and below 40 m), a further Acoustic Memorandum prepared by MEL Consulting is enclosed which outlines that in this locale, it is anticipated that wind-gusts would be perceived as unpleasant by the residents and reduce the amenity and utilisation of open balconies.

The residents will continue to be provided with sufficient areas for recreation by way of the communal open space areas (noting both the indoor and outdoor communal open space has increased compared to the previous scheme – see **Appendix A** for further detail).

On balance, it is submitted that the removal of all winter terraces is deemed acceptable in this context.

New apartment types

As outlined above, a table outlining the distribution of additional space provided to living areas / bedrooms was provided within our RFI response to DTP dated 2 February 2024.

The development plans have been updated to show compliant living areas for Apartment Type D1 (minimum 12 sqm for a three-bedroom dwelling as per Table D12 of Standard D26) – see sheets A2500 to A2502 for further details. All apartments are provided with open plan living / dining / kitchen areas which enables greater flexibility for future occupants.

Apartment Type B1 achieves a minimum living area of 10 sqm (as per Table D12 of Standard D26) with an additional 19 sqm of living space provided (exceeding the requirements of Table D9 of Standard D20).

Studios are by nature open floor plan in design and adaptable to the needs of future occupants.

schemes and clearly identify which areas are understood as communal amenity in the new proposal.

- A reduction of communal areas and outdoor space is not supported, particularly with the aforementioned omission of winter gardens from apartments.

Ground floor program

Updated ground floor plan

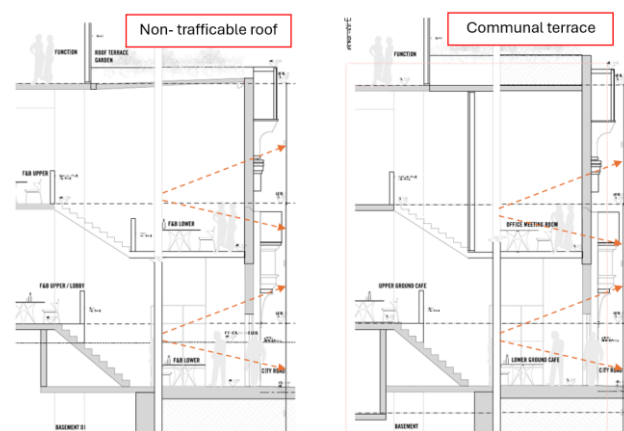
- Revised layout and spatial provision of the café / service area has reduced in size and prominence. There are concerns that the updated design will foster less interaction with the public realm and is not providing the same quality of offering. Refer Diagram 6 – Ground Floor Café.
- This inclusion of a café at ground floor should aim to promote continuity of activation along the streetscape and add activity to the public realm. The revised scheme presents a less enticing interface to the public and could be improved.
- Additionally, the toilets that previously serviced the café and were accessible from the ground floor appear to be now only accessible via residential Bike Storage Area.
- The proposed location is also less connected to back of house areas, which may present issues such as access to storage and waste areas.
- Further design consideration is required to ensure that genuine ground floor activation is facilitated by the hospitality offering and that it is supported by necessary functional requirements.

The current scheme will continue to provide appropriate integration / activation between the public realm and proposed ground floor café (see below figure).

The proposed office use on Level 1 will provide for passive surveillance opportunities to City Road.

In addition, the current scheme proposes a communal terrace on Level 2 (this area was previously non-trafficable) which will further promote surveillance over the public realm.

Figure 2 - Approved scheme (LHS) vs current scheme (RHS) sectional



In respect to the ground floor toilets / connections to back of house (BOH) services, the ground floor is now proposed to be split into Lower Ground and Upper Ground levels.

The café patrons continue to have access to a DDA toilet on Upper Ground level adjacent to the lobby lounge (accessible via stairs and a DDA compliant lift platform).

Similarly, BOH services are accessible on the Upper Ground level with lifts down to the BOH services on Lower Ground level.

Figure 3 - Extract of cross-section showing split level ground floor

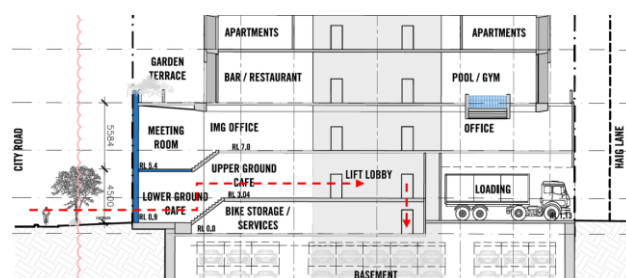
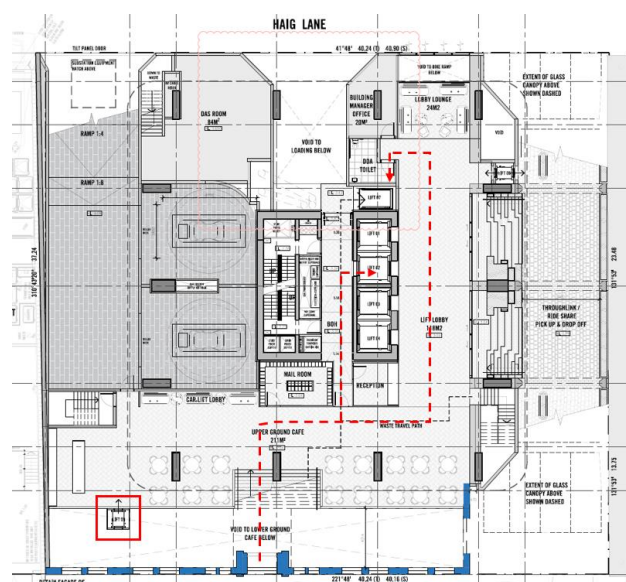


Figure 4 - Extract of Upper Ground level



Public interfaces

Activation to the eastern laneway & rear with bike entry

- The proposed changes to bike storage and access via Haig Lane are welcomed.
- Previous advice encouraged enhanced visibility through to Haig Lane from the lift lobby and this has been maintained in the updated design.

Comments noted.

– The updated proposal creates a welcoming and safe bicycle connection at the rear of the site.

We submit that the urban design concerns have been appropriately addressed.

Other matters

We understand that the heritage and ESD referral comments from the City of Melbourne and the referral from Melbourne Water remain outstanding.

Please provide a copy of these comments once received for us to review and respond to.

We submit that the above and enclosed satisfactorily addresses the outstanding matters and respectfully request DTP progress the application at its earliest convenience.

If you have any further queries, please do not hesitate to contact me on (03) 9429 3111 or by email at angela.mok@ratio.com.au

Yours sincerely,



Angela Mok
Associate
Ratio Consultants Pty Ltd

Appendix A – Development Summary Tables (approved vs current amendment)

ELENBERG FRASER

17155 300 City Rd. Southbank

DATE 11/21/2023 Current amendment
 STAGE TP
 REV D

Notes and Disclaimer:
 1. This scheme has been produced without planning advice or preliminary meetings with the responsible authorities and as such may not comply with building or other statutory regulations. It represents a possible development that may be achieved with full consultation and liaison with state government and other relevant authorities, however no warranty is given that the yield or layouts will be acceptable to the authorities or other interested parties. Hence Elenberg Fraser presents this information as a possible solution only, subject to council approval.
 2. This scheme and schedule have been prepared for preliminary feasibility purposes only. The information herein is based on the limited information available at the time of preparation and is believed to be correct at the time of preparation however is not guaranteed.
 3. The layouts contained herein were prepared without structural or services advice hence no allowance has been made at this stage.
 4. Changes to the layouts and associated figures will be made during the development of the project hence recipients must rely on their own enquiries to satisfy themselves in all aspects.
 5. Apartment areas have been measured to the centreline of party and/or bounding walls. Areas do not allow for services, risers, or structure.

DEVELOPMENT SUMMARY																									
STAGE 01.B																									
No.	LEVELS	APARTMENT NO./FLOOR	APARTMENT TOTAL	GFA RETAIL/F&B /FLOOR	GFA RESIDENTIAL /FLOOR	GFA COMMERCIAL/OFFICE /FLOOR	GFA COMMUNAL /FLOOR	GFA SERVICES/BOH /FLOOR	TOTAL GFA/ FLOOR	TOTAL GFA	NSA RETAIL/F&B /FLOOR	NSA COMMERCIAL/OFFICE /FLOOR	NSA RESIDENTIAL /FLOOR	TOTAL NSA /FLOOR	TOTAL NSA	COMMUNAL TERRACE GFA /FLOOR	EFFICIENCY /FLOOR	BIKE SPACES /FLOOR	GFA CARPARK /FLOOR	CAR SPACES /FLOOR	STUDIO	1B	2B	3B	PENTHOUSE
STAGE 01																									
1	B1							909	1069	1069	160			160	160			370	1355	128					
1	L00_LG			160					1069	1069	160			160	160										
1	L00M_UG			211				178	656	656	211			211	211	47			303						
1	L01					900		170	1070	1070		772		772	772	316									
1	L02							31	927	927															
5	L03-07	10	50		742			87	829	4145			668	668	3340		81%					6		4	
1	L08	10	10		742			87	829	829			672	672	672		81%				2	4	2		2
1	L09	5	5		493			336	829	829			423	423	423		51%					1		2	2
20	L10-29	10	200		742			87	829	16580			672	672	13440		81%				2	4	2		2
1	L30				40			355	395	395						435									
1	L31							401	401	401															
33																									
TOTAL			265	371	19825	900	1074	4731	26901	26901	371	772	17875	19018	19018	798	73%	370	1658	128	42	115	64	44	0
																				0.48	15.8%	43.4%	24.2%	16.6%	0.0%

SITE AREA 1508
 PLOT RATIO 18

NOTE:
 AREA FOR THE STAIRS TO ACCESS UPPER GROUND FROM THE THROUGHLINK IS INCLUDED IN THE COMMUNAL TERRACE GFA ON UPPER GROUND LEVEL.
 GFA RESIDENTIAL INCLUDES APARTMENT NSA AND CORRIDOR GFA