Urban Planning Collective

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Statutory Planning Services
Department of Transport and Planning

Submitted via online portal

4 February 2025

Re: Response to Request for Further Information
Planning Permit Application No. PA2403200
23-47 VILLIERS STREET, NORTH MELBOURNE

Dear Julia

We continue to act on behalf of Sentinel BTR Manager PTY LTD ATF BTR Alpha Unit Trust, the owner and prospective developer, in respect of the land at 23-47 Villiers Street, North Melbourne (**the subject site**).

We refer to Council's correspondence dated 14/10/2024 requesting further information in respect of Planning Permit Application No. PA2403200 (**the application**) pursuant to Section 54 of the Planning and Environment Act 1987 (**the Act**).

To satisfy Council's request for further information and assist the Council with assessing the application, we are pleased to enclose the following further details for your consideration:

- Updated Architectural Plans and Statement List of Changes prepared by *Architectus*.
- Daylight Analysis Assessment prepared by *Ark Resources*.
- Wind Impact Assessment and Pedestrian Wind Study prepared by *RWDI*.
- A Construction Methodology Statement concerning the ongoing operation of the Royal Melbourne Hospital helicopter flight path prepared by *Codicote*.

In addition to the above material, we have provided the commentary below to assist with Council's further consideration of the application.

LTR RFI 332263

RESPONSE TO REQUEST FOR FURTHER INFORMATION

Further Information Requested	Response
Amended floor plans to include	
1a) Car park dimensions on lower ground 2.	Dimensions as relevant incorporated, together with reference to dimension for each relevant carpark noted in the parking space type schedule on plan.
1b) Dimensioned upper level setbacks to the building edges in addition to title boundaries.	Additional setbacks notations have been provided as relevant.
1c) Any level difference between the internal light court/planter on level 2 and the adjacent dwellings.	Section details specific to those environs are now included within A3106 & A3108, noting a raised planter detail.
1d) Details of the interface between the internal light court/planter on level 2 and the adjacent corridor (e.g. is it glazed, will it contain screening etc).	Section details specific to those environs are provided within A3106 & A3108, noting raised sill heights to a minimum 1.7m in order to manage fenestration conditions between the communal trafficable area and the private SPOS interface with the adjoining apartments.
1e) Clear roof details on each level including levels, materials, location of any services and associated screening.	Materials and services at roof level are noted.
2) Dimensions of wall heights measured to the natural ground level directly below.	Measurement notations as relevant have been noted.
3) A section drawing/s of the internal light court/planter on level 2 demonstrating the height of the north-eastern wall.	Section details specific to those environs have now been detailed on A3106 & A3108.
4) A daylight assessment report for the dwellings proposed to have an outlook to the internal light court on Level 2.	We refer to the additional daylight assessment looking at the internal light court environs on Level 2 for the internal facing apartments prepared by Ark Resources. The assessment models the pre-RFI design against design updates that have been adopted in response to this request in order to improve daylight penetration to these environs.
5) Wind tunnel testing as recommended in the Pedestrian Wind Assessment, prepared by RWDI, dated August 2024. Mitigation measures should then be shown on the proposed drawings, where appropriate.	We refer to the enclosed Pedestrian Wind Assessment prepared by RWDI, including recommended design updates for wind mitigation that have been adopted on A2003.

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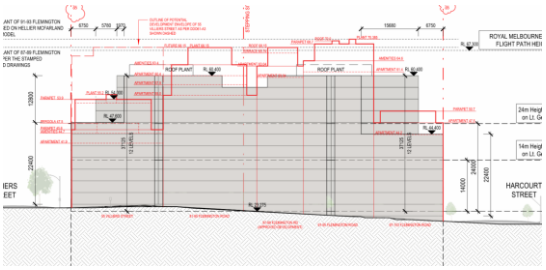
6) *A construction methodology that demonstrates there is no impact on the ongoing operation of the Royal Melbourne Hospital helicopter flight path. Refer to correspondence received from the Department of Health.*	We refer to the enclosed prepared by Codicote.

RESPONSE TO PRELIMINARY COMMENTS

Preliminary Comment	Response
Scale and transition	
1) The proposal does not clearly achieve an appropriate transition in scale from the lower scale-built form in Courtney Street to the higher scale-built form in Flemington Road. The extent to which the building is proposed to protrude above the transition line shown in Site section 1 – 81-85 Flemington Road (Sheet A-2031) is of key concern. Notwithstanding this, we acknowledge the supporting justification submitted with the application and further advice will be provided on this matter.	It is important to note that the underlying design concept is a confluence of the scale and form that is now embedded as the established 'urban context', together with the design objectives of the DDO61, as they apply. The approach adopted is one that is anticipated under the control, commencing with the consideration of a more 'robust' northern interface where development of scale has been readily established, thereafter transitioning and reducing to the northwest and southeast, concluding as a lower profile form to the sensitive interface conditions at the southern end of the site. Equitable development is maintained to the northern interface, through a defined 9.0m separation of form, including notable improvements to the Little George Street connection and the vesting of large swaths of land through widening and public realm improvements to this interface. The proposal remains several levels lower in height than the established and anticipated neighbouring forms to the north, providing a legible transition from Flemington Road where the Mixed Use Zone commences, through to the cessation of the Mixed Use Zone beyond the subject site to the south (Courtney Street / Courtney Place). That height / context comparison is noted in the following:



In maintaining those design themes, the north-west and south-east 'wings' of the development reduce in scale as a means to transition from the existing built forms of 55 Villiers Street and 97-103 Flemington Road, as well as bringing the scale of development largely in accordance with the DDO61 design guidance for those respective road frontages insofar as the '14m – 24m' anticipated scales.

The design, of course, is notably finessed in the manner through which it achieves this. It doesn't just simply terminate height abruptly in order to arbitrarily meet a certain discretionary metric. It undertakes a proportionate tapering of scale that is commensurate to the existing urban setting and brings about a design solution that is entirely in-keeping with the urban context.

Level 2 Apartments

2) The arrangement on level 2, where dwellings are proposed to face an internal light court, may result in a poor internal amenity outcome for future residents in terms of outlook, access to daylight/sunlight and ventilation. Notwithstanding the further information requested above in this letter, it is recommended this element of the proposal be revised/deleted.

The design team in conjunction with the project ESD consultants (Ark Resources) has undertaken to review and model these apartments to ascertain whether design modifications could be adapted to improve daylight conditions in order to better align with best practice design. This has been readily achieved through design updates hereby enclosed with these submissions.

We also appreciate there has been a common thread arising amongst the referral comments regarding amenity considerations more generally for these apartments.

The BTR model in common ownership gives renters 'choice'. That remains the underlying basis for the BTR product and the strong impetus for providing flexibility and variety in accommodation forms.

More commonly, 'inboard' style design occurs at the subterranean level with apartment design, where outlook occurs to a planted outlook, and /or green

	wall style design solution. That style of development is not uncommon. Provided natural light and air circulation can readily access the apartments (which has been demonstrated in this case), this style of apartment remains highly amendable. Operator experience tells us there is a corner of the market that actively seeks more 'secluded' design environs such as this, due to design benefits associated with noise attenuation and elevated privacy. 'Choice' remains a crucial offering in the BTR residential rental apartment sector and one that our client readily understands and appreciates.
Visual Bulk	
3) The proposed building may cause unreasonable amenity impact, by way of visual bulk, to the owner/occupiers of 16 and 18 Mary Street. This is due to the limited transition in height of Building B where it steps up to 22m.	Appreciably, there is a balance to be struck in terms of achieving State and local government imperatives supporting a critical shortage of inner urban metropolitan housing stock and accommodation choice, particularly those within designated growth locations such as the subject site, to be balanced against the inevitable tensions arising where development seeks to occur proximate to sites that remain underdeveloped having regard that broader strategic vision. So how does the development appropriately respond to the more modest residual context of 16 & 18 May Street? 16 & 18 May Street are inevitably constrained in terms of the broader strategic objectives of the Mixed Use Zone by virtue of the Heritage Overlay. Notwithstanding, the design concept from its inception has been cognisant of this nearby context and consciously designed in a manner that ensures the interface conditions evolve in a way that prevents unreasonable amenity impacts occurring, be it visual bulk, overlooking, or the like. To that end, we note the following items as relevant: a) The development controls under the DDO61 provide design guidance that anticipates built form to occur on boundary with those sites to a height of 14m along the immediate interface. b) Contrary to that, the development opts for boundary setbacks of at least 2.8m at heights typically at the 14m mark.

c) The interface conditions with these sites further benefits from a common laneway that provides an additional 3.0m wide buffer separation to the lawful title boundaries of those properties separated from the subject site, collectively providing circa 5.8m separations.

d) The combination of proposed setbacks within the subject site, together with the setback conditions resulting from the laneway interface, buffer separations at heights of 14m are circa 5.8m, where development potential under the DDO61 is 14m at 0.0m setbacks.

e) In relation to the taller 22m design element referred to, this portion of the footprint provides a minimum setback of 9.0m to site boundary and therefore combined with the 3.0m laneway buffer, creates a 12m setback / separation to lawful title boundary.

Built Form over Boundary	
4) The building protrudes over the property boundary. This may not be supported.	The design element conveyed in plan is an architectural feature, as distinct from a slab edge or wall, we refer to the concept image below as relevant:  Additional plan notations have been included to clarify this design detail and to convey the relevant compliance with CoM projections policy.

RESPONSE TO REFERRAL COMMENTS

Referral	**Comments**

VHBA

The site is located directly below the primary Hospital Emergency Medical Service (HEMS) Helicopter flight path for the Royal Melbourne Hospital (RMH) Helicopter Landing Site (HLS). The submitted development plans indicate that the proposed development will measure approximately 11 storeys high, with a total maximum height of 63.4 metres AHD. The proposed development itself is therefore below the referral height (67.3 metres) as per Design and Development Overlay 65 (DDO65) in the Melbourne Planning Scheme.

However, pursuant to the HEMS Helicopter Flight Path Protection Areas Incorporated Document, as referenced in DDO65, a permit is required to:

"Construct or carry out buildings and works for a temporary structure for construction purposes including a crane or other construction equipment that is fixed to the ground with a height greater than the referral height."

Given the position of the site, directly underneath the primary flight path, it is required that the applicant prepare and provide a Construction Methodology that demonstrates there is no impact on the ongoing operation of the RMH HLS. The Department of Health will not consider realigning or 'curving' the flight path.

The project team has undertaken to prepare a formal Construction Methodology demonstrating no impacts to the ongoing operations of the current and unmodified flight paths of the RMH HLS. We refer to the enclosed prepared by Codicote dated 9 December 2024.

TRAFFIC (MCC)

Car parking

While the Melbourne Planning Scheme (MPS) requires the provision of 380 car parking spaces, we have no objections to the reduced provision, as it encourages the use of sustainable transport.

A note must be placed on the planning permit, stating: "Council will not change the on-street parking restrictions to accommodate the access, servicing, delivery and parking needs of this development. As per Council's policy, the residents and visitors of this development will not be eligible to receive resident parking permits and will not be exempt from the on-street parking restrictions".

We note these comments as broadly supportive. We would anticipate the requirement for a Loading Management Plan (LMP) could be addressed by way of an appropriately worded permit condition should the application be supported.

Ramp grade of <1:10 must be provided for the first 5m from site boundaries at access points to both car parks and loading bay. Sight triangles of 2 x 2.5m must be provided at all exits from the sites (both at car park and loading bay exits) to ensure visibility of pedestrians. The car spaces, ramps, grades, transitions, accessways and height clearances must be generally designed in accordance with the MPS and/or AS/NZS 2890.1:2004.

Bicycle and motorcycle parking

As MPS requires the provision of 106 bicycle spaces, we strongly support the proposed provision, which is well above MPS requirements. The provision of motorcycle parking is also supported. Comments regarding on-street bike parking will be provided when detailed design plans are submitted to Infrastructure Development team for approval prior to construction.

Loading

A Loading Management Plan (LMP) must be prepared, specifying how the access/egress of loading vehicles is to be managed. The design of the loading bays, including all space dimensions, grades and height clearances, should comply with the MPS and AS2890.1:2018.

Proposed widening of Lt George St

Further comments regarding this road will be provided by various CoM teams, outside the current planning process. The detailed design of this road must ultimately be to the satisfaction of the City of Melbourne's Infrastructure Development team.

Road Safety Audit

A formal independent desktop Road Safety Audit (RSA) of the proposed development must be undertaken prior to construction at the developer's expense, to include vehicular/bicycle/pedestrian access arrangements, loading arrangements, internal circulation/layout and redesign of Lt George St. The findings of the RSA must be incorporated into the detailed design, at the developer's expense.

WASTE (MCC)

Items that need to be addressed include:

- *Section 3.2: A private waste collection is not approved for this residential development. Whilst the building may be a single title "Build to Rent", each apartment will receive a separate rates notice. Therefore, each apartment is entitled to a municipal waste collection service, and the building's residential waste service will need to be designed to the 'Residential' specifications in City of Melbourne's Guidelines for Preparing a Waste Management Plan.*
    - *Given it will be a municipal collection, bin volume must be adequate for but not overly excessive in relation to estimated waste volumes. Please review proposed bin allocations to ensure weekly volume provided is appropriate.*
    - *The "commercial leasing" office is effectively the residential building managers office and can share the municipal service, given the very low volume of waste.*
- *Section 3.2: this section describes the waste truck parking adjacent to the bin store, with collection staff taking bins directly from the bin store to the truck. This seems to relate to bin storage room B. Please indicate clearly, on a plan drawing, where the truck will park to collect from each bin storage room. If it is the same location (i.e. next to bin storage room B), then a temporary holding area for bins from storage room A will be required (and needs to be shown) in the loading area.*
- *Section 4.3.4: 4m^2 of shared hard waste storage is required. Residents must have access to leave hard waste items in the provided space between scheduled collections. The residential development is entitled to two shared 4m^3 collections a month. Individual residents do not book collections.*

Our client is amenable to Council collection as the future waste collection method should the Council ultimately prefer.

We note this and other details can be addressed by way of an appropriately worded permit condition should the application be supported.

- *A total of 4m^2 of shared hard waste storage must be shown in Figure 4 and in the architectural plan drawings.*

- *Section 4.3.5: Please edit to make it clear that each of the two bin stores will provide an e-waste bin (as indicated in Figure 4).*
    - *If the e-waste bin is not of an adequate size, there is a risk that residents will dispose of e-waste items in the garbage bins, which is not acceptable. Consideration should therefore be given to providing larger e-waste bins. NB: Council can provide a 240L bin or a 660L bin.*

- *Section 5.2: refers to two retail tenancies. This seems to be an error – please edit accordingly.*

- *Section 5.3 and Figure 4: Residents must not have access to chute outlets – please indicate how this will be achieved for bin storage room B (e.g., a fence with locked gate). For safety, chute outlets must be fully enclosed or at least have skirting.*

- *Figure 4 (and plan drawings): Bin storage rooms must show the required storage area for hard waste.*

- *Section 5.5: please remove the reference to residents cleaning bins – this is the building management's responsibility.*

- *Section 6.3: please consider providing appropriate signage for the e-waste bins*

- *Section 6.6: please edit to make it clear that changes to the building's bin requirements or collection methodology will be subject to Council approval.*

- *Plan drawings (to be supplied as part of WMP):*
    - *Ensure the architectural plans match the bin storage room drawings supplied in the WMP and that these accurately reflect all elements of the WMP*

- *A minimum of 1500mm is required for doors and corridors that large bins (660L or 1100L) will be transferred through. Please indicate these clearly.*

- *Please provide a drawing showing the 8.8m MRV truck in its collection position with clearances indicated (1m at the sides and 2m at the rear).*

- *Please provide typical residential floor plans showing location of chute rooms and transfer pathways, via lifts, to the ground floor bin storage rooms*

- *Also: show how residents and office staff on atypical floors (e.g., ground level, lower ground 1, lower ground 2) will transfer their waste (via lifts and/or corridors, not stairs) to the bin stores*

CITY DESIGN (MCC)

City Design has provided pre-application advice at a number of stages of the projects development.

While we acknowledge some improvements, particularly at the edges, fundamental issues around height and massing have not been addressed.

Improvements over the course of the application relate to preferred vehicle arrangements, using Little George Streets for access, and improved presentations to each of the side streets and amenity for ground floor dwellings.

We maintain that the streetwall presentation to each Villiers and Harcourt Streets is excessive, particularly at the southern ends.

In terms of massing, we have been consistent in raising concerns about the extent of built form in the centre of the site. While it is true the impacts of this mass are not directly felt at in the public realm the edge of the site, it creates poor condition in the development and on Little George Street.

A corridor extending 80m, almost the length of the block from Villers St to Harcourt St, is a poor outcome. This presents numerous significant

City Design has conveyed concerns in relation to building height, transition of scale to the north-east to the south-west frontages, as well as the central composition of form to Little George Street and a preference to provide a public realm connection from Little George Street to Mary Street via the core of the subject site, as distinct from the current proposal from Mary Street to Harcourt Street.

A clear and measured design methodology has been employed across all interfaces of the development having regard for the DDO61 control. That methodology looks at two key items, being;

a) the underlying intent of the DDO61 control to provide an appropriate built form scale, transition and presentation to the various interfaces; and
b) consideration of the existing urban context and the nature through which that context influences scale and transitions of the proposal.

The discretionary design guidance under the DDO61 for building height and transition of scale assumes a 'blank cavass' in considering existing urban context – i.e. no development has occurred, and that future

concerns relating to the liveability of the development, potential to establish a sense of community and security issues. This includes tangible issues relating of anonymity due to the scale and perceived issues due to long dark corridors with blind corners leading to equally long and dark corridors.

Ideally separate forms would be presented to each of the side streets with an internal north-south road connecting Mary Street and George Street (as was presented in Architectus' initial urban design analysis). Failing this superior response to establish a more viable urban structure, if attached forms are to be advanced, the buildings and their corridors should be truncated with dual aspect dwellings (north and south aspect) provided at the end of corridors. Such a treatment would also allow greater modulation of the mass in Little George Street.

We recommend that the streetwall to Harcourt Street is reduced by 2 levels to achieve a better fit with the existing heritage stock and achieve a more sensitive streetscape in the lower scale environs of the North Melbourne Primary School.

We feel that the top level of dwellings on Villiers Street, 6 outer dwellings on level 2, must be deleted. They enclose internal dwellings (the primary concern) and present excessive height to Villers Street.

We maintain the proposed 'heart' is a poor design response which serves the development yield rather than the urban structure (existing or proposed) or the community (existing or future). The internalised location is not legible, it lacks sufficient visibility from the public realm (primary or secondary roads), sunlight access and activation at its edges.

development should be guided by the DDO61 discretionary metrics. We can observe that City North Structure Plan - Figure 3.7 - page 41.

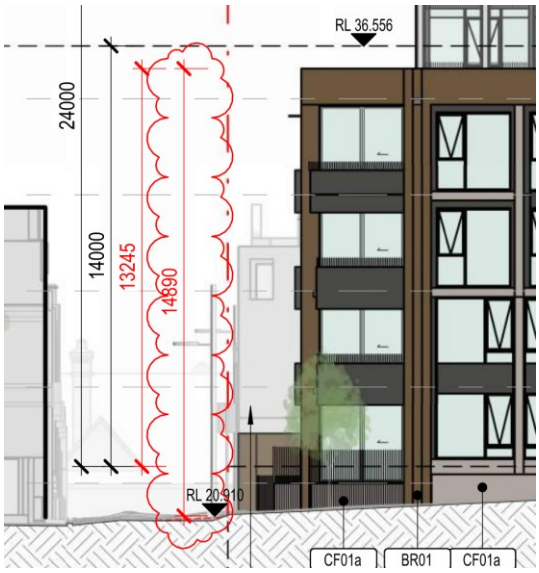
The reality on the ground is an array of constructed and pending developments directly adjacent to the subject site that don't align with the discretionary design guidance of the DDO. Therefore, consideration of the established urban context is fundamentally relevant to the development context. Arbitrary application of height and setback guidance to the measure without due consideration of the existing urban context is a fraught exercise. It lacks contextual understanding and relevance to the established urban character, and often stymies design ingenuity and excellence.

The approach adopted with the proposed development is one that is highly resolved in the sense of assessing and addressing existing character elements and providing a design response that is commensurate to the existing urban context and that is 'integrated' with the existing urban fabric.

The concerns regarding height and transition focus on the southeast frontage to Villers Street, the north-west frontage to Harcourt Street, as well as the central form to Little George Street.

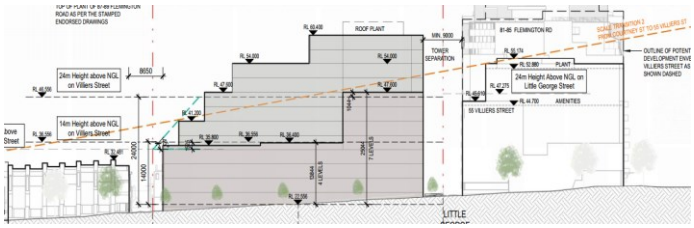
Villiers Street – the discretionary design requirements of the DDO61 for 14m podium height are generally met to this road frontage. Land slope plays a role in terms of a podium form that in part sits slightly above that height, and slightly below. However on balance, approximately two thirds of this façade sits below the 14m discretionary height.

The southeastern corner at Mary Street sits slightly above 14m due to said slope, however, we note that proposal avoids a hardedge alignment to the Mary Street corner, despite that being generally contemplated under the DDO61, and alternatively the envelope and podium are setback in the realm of 2.8m to the predominant façade a that corner. This is an appropriate compromise having regard to the application of the DDO61 design guidance.

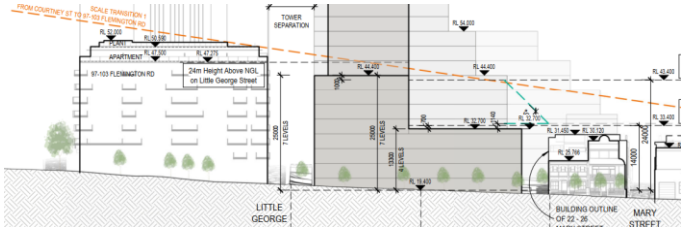


At the northeast corner to Villers Street and Little George Street, development is contemplated to a height of 24m under DDO61, whereas the design sits slightly above that by approximately 1.0m. This interface responds to the existing context of 55 Villiers to the northeast, which sits at a comparable height before transitioning approximately 2-3 levels higher shortly thereafter.

The strength of this corner frontage is important design element in terms of appropriately framing the corner location and emphasising this juncture as a critical sense of address for the development.



In relation to Harcourt Street, 14m remains the preferred design guidance under the DDO61. Approximately 60% of the façade adopts a height that is below the 14m level, thereafter firming at the northwest corner frontage to the taller scale of 25m, where 24m is contemplated along the Litte George Street frontage under the DDO61.



Again, this design element turns its mind to the existing context and provides a legible transition of scale 97-103 Flemington Road, rather than an arbitrary and abrupt height termination. The obvious design rationale for this corner of the building is a podium form that is contextually appropriate to the existing conditions, but also is a form that is effective at influencing view lines from the Harcourt Street pedestrian scale environs, towards the development. This renders the taller central elements of the proposal as either recessive, or largely obscured.

Lowering the corner element to align with a discretionary metric is contrary to the existing built form context and would act to visually emphasise taller built form elements, which we consider would be counterintuitive to the underlying objectives of the DDO61 control.

STATUTORY PLANNING (MCC)

The application with regard to its overall height, massing and layout remain largely unchanged from pre-application discussions. The proposed height, massing, site layout and building program continues to be an inappropriate response with regard to the Design and Development Overlay Schedule 61 and the City North Structure Plan.

Whilst there has been some minor changes to the height/ massing the fundamental concerns with the proposal remain. Therefore, from an officer perspective we object to the proposal in its current form.

Further feedback is outlined below:

- *Height/ Massing*
    - *The scale is not an appropriate response with regard to the DDO61 noting the preferred maximum height of 24 metres. The proposal has a maximum height of 40 metres (excluding building services).*
    - *The development is setback 9 metres from the rear of the Flemington Road developments, largely aligns with the height/ massing of those developments and then subsequently steps downs. The 'stepping down' of massing should occur within the development site (See Figure 1 below from the Structure Plan)*
    - *The small difference between the maximum height of the proposal and the Flemington Road context continues to not be perceived from the street level.*
    - *The overall height does not respect the more sensitives interfaces (DDO32, heritage places, Courtney Street area and the North Melbourne Primary School). The envelopes/ building height*

The summary comments from Statutory Planning largely echo the City Design comments, so the foregoing merits discussion remains relevant to those referral comments also.

In brief, both the City Design and the Planning referral comments reflect an imbalance in terms of prioritising discretionary metric design guidance under the DDO61 over a nuanced consideration of the DDO61 design guidance having regard to the established built form context.

In terms of the concerns regarding the 'green link' heart of the development being located to the rear/ south of the site, this appears to again stem from an underlying preference for a public realm access link from Little Geroge Street to Mary Street. In-keeping with the requirement to provide transition of scale from north to south through the site, there is a stronger logic in locating the principal connection along the lower scale interface to the south as a means to create an additional buffer to those environs, particularly considering the heritage overlays that apply along this interface.

Naturally, new pedestrian desire lines will tend to focus along an east-west axis orientation due to the lower order roads of Mary Street and Little George Street, and where Villers Street and Harcourt Street already provide connection between Little George Street and Mary Street in this location. The new access from Mary Street to Harcourt Street in combination with the public realm improvements of Little George Street as part of the development proposal will greatly improve connectivity of the locale.

The communal open space is obviously a development amenity for use of future residents in its primary role. Naturally taller built form will occur to the northern side of the site where 40+ meter tall buildings are neighbouring the site to the north, therefore

propose a street wall that exceeds the adjoining heritage places/ built form to the south of Harcourt Street and Villiers Street.

- *Urban Structure/ Public Realm*
  - *A Green Link and 'heart' is provided to the rear/ south of the site. The internalised location is not legible, it lacks sufficient visibility from the public realm (primary or secondary roads), sunlight access and activation at its edges.*
  - *It is considered that a north-south link (connecting Little George Street to Mary Street) which separates the two tower forms would achieve an improved urban structure. This would also assist in greater modulation and a reduction in the mass of development which faces Little George Street.*
  - *The Little George Street frontage is dominated by car parking and services. Access to car parking and service areas should minimise impact on street frontages and pedestrian movement.*
- *Adaptability/ Land use mix*
  - *There is a lack of active uses such as retail. Whilst the development includes a 113sqm leasing office which faces Villiers Street this is not considered to be a meaningful offering.*
  - *The proposed 'removable' floor and walls on Villiers Street do not provide a similar level of adaptability to that of a 4m floor to floor height.*
- *Internal Amenity*
  - *Due to the massing of the envelope and the proposed configuration there are dwellings which have a compromised internal amenity and don't appropriately respond to Clause 58. For example:*
    - *There are six dwelling towards Villiers Street on level 2 which are internal to*

positioning the communal areas and public realm connection within the lower scale environs of the development site to the south is the more logical design approach and offers a more cohesive, inviting and 'communal' amenity space. The criticism of the internalised location as being 'not legible' and lacks 'sufficient visibility from the public realm' is ill-conceived insofar as future residents of the facility, together with the local residents of the area, will very quickly become accustomed to the connections and amenities of the new public realm network.

the site and receive daylight through voids.

- *The massing results in extensive internal corridors with limited outlook. There are corridors which extend almost the length of the block from Villers Street to Harcourt Street (approximately 80 metres).*

- *Whilst the proposal includes a widening of Little George Street to allow for a 9 metre setback, the outlook and shadow impact from built form along Flemington Road results in a compromised internal amenity for the future occupants.*

Figure 1: City North Structure Plan Figure 3.7 page 41 *https://mvga-prod-files.s3.ap-southeast-4.amazonaws.com/public/2024-04/city-north-structure-plan-2012.pdf**.***

CIVIL ENGINEERING (MCC)

<u>*General Comments*</u> *All projections over the street alignment must conform to Building Regulations 2018, Part 6, Sections 98 to 110 as appropriate. Reference can be made to the City of Melbourne's Road Encroachment Operational Guidelines with respect to projections impacting on street trees and clearances from face/back of kerb.*	Noted. Such requirements can readily be addressed by way of appropriately worded permit conditions should the application be supported.

The works shall be undertaken in accordance with the current CoM Design and Construction Standards for Infrastructure Works.

The widening of Little George Street will impact existing street light poles in Villiers Street and Harcourt Street and may require relocation or removal to the satisfaction of the relevant authority.

ESD & GREEN INFRASTRUCTURE (MCC)

General
The development commits to a level of sustainability that meets the objectives of Clause 15.01-2L-01 Energy and resource efficiency and Clause 19.03-3L Stormwater management (water sensitive urban design) of the Melbourne Planning Scheme.

There are however issues that still need to be resolved and most relate to providing further information at the planning stage to provide confidence that the development can achieve the aspirations outlined in the SMP.

Certification commitments

The development is seeking to register and certify the development as a 5 Star Green Star Building which is supported. Evidence should be provided that indicates that project has been registered with the GBCA including a project number and reference to the Green Star Building Directory and/or a letter from the GBCA indicating the project has been successfully registered.

The SMP details that a total of 47 points are being pursued which is above the minimum threshold of 35 points (5 star certified standard).

Responsible 7/17 points

01 Green Star Accredited Professional – Provide details of the Green Star Accredited Professional (individual) who has been engaged and has registered the project with the GBCA.

03 Verification and Handover – Schematic design stage should provide a review of the proposed design including an air barrier schematic, and to detail a proposed air tightness target.

We note the comments as being supportive. We would anticipate ESD performance requirements and any future refined version of the ESD assessment can be addressed by way of an appropriately worded permit conditions should the application be supported.

04 Operational Waste Management – Minimum expectation is dependent upon review and approval from the waste team. The submitted waste management plan appears to meet the intention of the credit allowing for the disposal and collection of multiple waste streams.

Healthy 8/14 points

Light quality – Provide preliminary daylight modelling that demonstrates the design can provide best practice access to daylight.

Resilient 2/8 points

16 Climate Change Resilience – Provide a pre-screening checklist and submit a preliminary climate change risk and adaptation plan that demonstrates the project has adequately assessed climate change risks and can demonstrate how they will be managed.

19 Heat Resilience – Provide calculations from the proposed greening and light coloured materials that demonstrate the development has the capacity to meet the 75% target. Ensure a plan is provided that details these areas including specification of materials.

Positive 16/30 points

21 Upfront Carbon Emissions – Provide preliminary modelling indicating a 20% target can be met via the Upfront Emissions Calculator as evidence of achieving this credit.

22 Energy Use – Preliminary modelling is provided that indicates the development can achieve the credit requirements.

23 Energy Source: Provide a preliminary Zero Carbon Action Plan for the building indicating how and when the project intends to operate as fossil fuel free, indicating 100% of the buildings electricity will come from renewable sources and 100% of the buildings energy comes from renewables.

The development has committed to onsite renewable Solar PV system of 56.4kW which is supported. The planning drawings only show broad areas for solar PV installation. Further detail on

panel system sizes on drawings including total systems sizes, number of panels and panel wattage should be shown.

25 Water Use – The Potable Water Calculator results indicate a 24% reduction in potable water consumption compared to a standard practice building.

Places 5/8 points

27 Movement and Place – The SMP needs to provide a preliminary sustainable transport plan that includes the number and location of bicycle parking facilities including parking spaces, lockers and showers, reduction in car use, proposed electric vehicle infrastructure and spaces. The Movement and Place calculator should be provided as evidence that the development can achieve the credit points being pursued in the SMP.

People 1/9 points

Nature 2/14 points

35 Impacts to Nature – Provide a report that indicates how the minimum expectations for the credit will be met by the design response including the building was not built on, or significantly impacted, a site with a high ecological value.

36 Biodiversity Enhancement – The project should investigate the use of the City of Melbourne's Green Factor tool. If the development can achieve a score of 0.55 it may be eligible for points under this credit.

39 Waterway Protection – MUSIC modelling indicates that the pollution reduction targets and the reduction in stormwater discharge meets the requirements of the credit.

Allocation for rainwater tank shown on basement plan 01 however there is no tank volume or note to indicate reuse for toilets, irrigation and wash down.

Provide a signed maintenance contract with the manufacturer of the Gross Pollutant Trap for a minimum period of 5 years.

Leadership 6/10

Further detail should be provided on the nature of the credits been pursued in this category with some evidence to indicate the initiative is being seriously considered.	
URBAN DESIGN (DTP)	
• *Avoid the use of floor-to-ceiling glazing at key pedestrian interfaces and building entries, including those on Villiers Street, Harcourt Street and the internal 'Communal Heart'. Incorporate pilasters, stall-risers, integrated seating/planting or other elements to enhance design detail and create a more solid, grounded presence at street level.* • *Ensure hand-laid brick is used at pedestrian-level interfaces, particularly at ground level.* • *Clarify the screening treatment for podium car parking within the 'Communal Heart.' Is perforated steel an appropriate outlook for adjacent residents? Ensure the façade's success is not dependent on planting to create an acceptable outlook for dwellings.* • *The residential lifts for the Harcourt Street entrance are not easily visible, legible or direct from the street (see drawing A-1002: Lower Ground 1). Improve the visibility and accessibility from the Harcourt Street interface.* • *Clarify the placement of dwellings on Floor Plan Level 2 (Drawing no. A-1005). The central dwellings are positioned unusually, negatively affecting internal amenity and outlook. Provide sections to better illustrate the siting of these dwellings within the building.* • *Broadly speaking, the lobby and arrival sequences (at upper levels) lacks intuitive wayfinding given the expansive corridor lengths. Ensure sufficient wayfinding and legibility through the building.*	We note the comments as being supportive subject to some further design detail. We would anticipate a number of the way finding and directional items can be formed by way of permit conditions should the application be supported. In terms of the design suggestions, our client is amenable and intends to undertake further design work in the form of concept plans. The intention will be for these to be submitted for review during the course of the next stages of the proposal, and which can be captured via permit condition, or otherwise formally substitute, should Officers deem those concept changes to be further improved design outcomes.
DEPARTMENT OF TRANSPORT	
	Noted

Head, Transport for Victoria, pursuant to Section 56(1) of the Planning and Environment Act 1987 does not object to the grant of a planning permit.

CONCLUSION

We trust the enclosed information clearly explains the proposal, satisfying DTP's request for further information and addressing the preliminary comments received.

Should Officers be of the opinion that the further information request is not satisfactory, on behalf of the permit applicant we request a further 30 days to provide any outstanding information pursuant to Section 54(1) of the Act.

We now look forward to receiving DTP's notification instructions and DTP's favourable assessment of the application.

Should you have any questions, please do not hesitate to contact me on 8648 3500.

Yours sincerely

Adam Haines
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