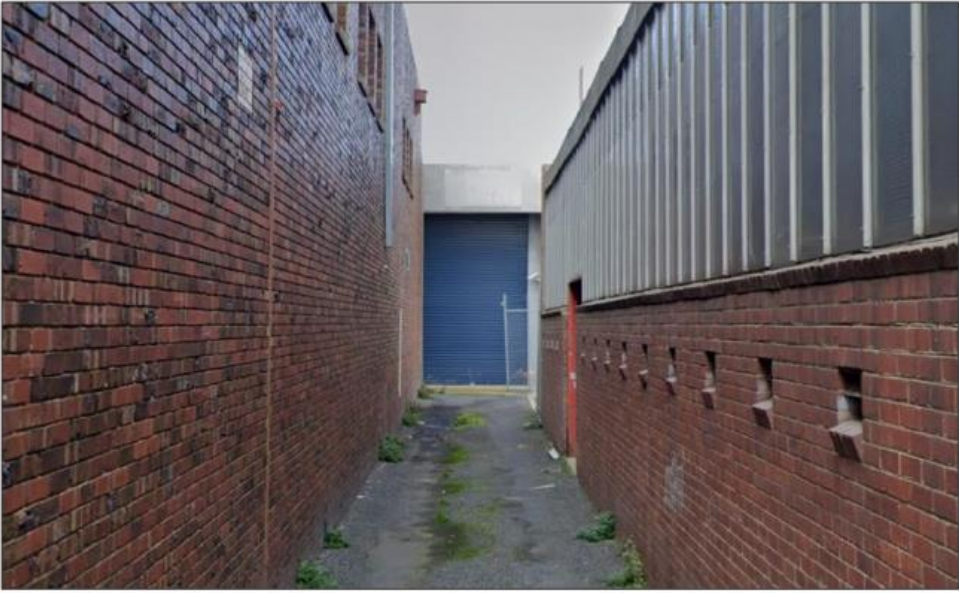



Attachment D – Internal Referral Comments

Internal Department / Referral Officer	Internal Referral Comments (summarised)
<p>Asset Management and Property</p>	<ul style="list-style-type: none"> Ann Street, which runs along the southwest boundary of the site is proposed to be widened at the north to provide a 5.5-metre-wide accessway which will lead to two car lifts. At the entrance to the car lifts, the accessway will be further widened to provide a passing area. <p>Figure 6 Ann Street, looking southeast adjacent the subject site</p>  <ul style="list-style-type: none"> It must be noted however that there is a laneway R3167 on IntraMaps and currently listed on Council's Register of Public Roads, that appears to be perpendicular to Ann Street. 

	<ul style="list-style-type: none"> • While Council does not have any freehold properties in the vicinity, we suggest that you please touch base with the Assets team to confirm whether this laneway actually exists and whether they consider that the proposed widening of Ann Street would have impact (if any) to the laneway and Ann Street per se (being a local road).
<p>Building Department</p>	<ul style="list-style-type: none"> • Tactile indicators to be provided throughout Ground Floor access stairs • Corridor widths for turning and passing spaces do not comply in the EOT area • Fire pump room and Sprinkler control valve will require approval from Fire Rescue Victoria as typically they would be located on Ground floor • Accessible car parking space to be allowed for • Male and female sanitary facilities need to be separated throughout the office floors, they can't be in the same room • Stair pressurisation to be allowed for in the fire-isolated stairways • Fire-isolated stairs to be fully enclosed with no openings unless fire-engineered solution proposed.
<p>City Design – Urban Design</p>	<p>Built Form: The site is subject to DDO30 with a discretionary height of 43m or 12 storeys and a mandatory streetwall of 4 storeys or less. The DDO permits non-habitable architectural features not more than 3m above the nominated overall height. The proposal is for a 15 storey building, 57.59m tall with rooftop plant/lift overrun and deck of a further 6.85m creating an overall building height of 64.44m. This does not include allowance for rooftop solar panels. Whilst the heights of the podium and the overall building are beyond those anticipated by the DDO they could be supported as long as there are no adverse wind or overshadowing impacts on the public realm.</p> <p>Visual Impact: Each face of the podium presents with a series of variably spaced, light coloured brick columns topped by arches over clear glazed fenestration in dark metal frames. The tower presents with a clear glazed curtain wall framed with darker glazed horizontal spandrel and column panels. All corners of the podium and tower have curved corners referencing the existing brick building on site. The architectural expression of the building is quite well resolved with the solid, textured podium framing and supporting the visually lighter glazed elements of the building.</p> <p>Ground Level: The role and purpose of the setback of the office/café space is unclear. The position of the door on Rosherville Place to this space, whilst contributing to some activation of the laneway, is unusual if the main address should realistically be the Buckhurst St frontage. Further, the note on the drawing for the café <i>“to service building tenants only and not external parties”</i> seems strange, when the renders show the space opening onto Rosherville Pl. Outdoor dining should be encouraged in the ground level setback to provide some activity to the building frontage. The location of the column at the Buckhurst St entry partially obscures and constrains access to the front door of the building. We recommend shifting the column towards Rosherville Pl to open up sight lines and access to the main entry. The fire stair access onto Rosherville Pl will contribute to a degree of activation of the laneway. We recommend further design resolution of the stair lobby and associated internal and external space to ensure that personal safety and security are not compromised. Clear glazing of the end of trip facilities is shown to the rear of the building which will provide a degree of activation to the laneways. It may be appropriate for the glazing to have a degree of frosting or translucence for internal security and privacy.</p>

	<p>Upper Levels</p> <p>Parking is accessed via lifts into carparks with car stackers on levels 2 and 3 along the rear of the building. Access to the spaces closest to the northern or Rosherville PI face of the building appears constrained. We recommend confirmation that these spaces can be readily accessed by medium sized vehicles.</p> <p>We recommend that the planter boxes on the tops of awnings on Buckhurst St and Rosherville PI be deleted as they are located outside the title boundaries.</p> <p>Planting on the façade and terraces is a key element of the building's presentation. We recommend further information be provided regarding the adequacy of maintenance measures for these green elements to ensure their long term care and survival.</p> <p>Materials</p> <p>I wondered about the choice of brick colour as it's different to the prevailing reds, or clinkers in the existing building. Looking at the plans it doesn't appear to be white, but more grey. A lighter shade will be beneficial in the laneways, potentially reflecting more light and making them feel less gloomy.</p> <p>Recommendation:</p> <p>From an urban design perspective the proposal is supported.</p>
<p>City Design - Landscaping</p>	<p>Ground floor plan</p> <ul style="list-style-type: none"> • CoPP has considered raising the level of the footpath to increase the number of active frontages. Can we use a S173 agreement to retrofit the building if the street level increases? • Support column on Buckhurst St impedes the primary entry points and presents a pinch point potentially obstructing access for those using mobility devices. Recommend shifting in front of co-working w café • Step free access to the co-working space/café is only provided from the main entrance. Requiring a mobility impaired person to use an alternate entrance is a poor level of service and does not provide dignity to all. • Entrance from Rosherville Place is not accessible to people with mobility impairments. It appears to be a fire exit, which is not really an active frontage. • Not clear why the street trees are proposed to be removed and replaced? Also not sure that we are at a place where we can approve new landscaping in the public realm, especially because Buckhurst is meant to have a linear park • The façade wall in front of the co-working w/café creates a 'blind' space in which a person is not observable from the street. Eliminate all spaces which can people can hide. <p>Level one plan</p> <ul style="list-style-type: none"> • Unclear how these landscaped areas will be accessed and maintained. Do the windows open or does someone need to use a ladder/cherry picker? Please provide a maintenance plan for all hard to reach places include trained vines to tensioned stainless steel mesh
<p>City Strategy</p>	<p>The following are my strategic planning comments on this amended proposal:</p> <ul style="list-style-type: none"> • The proposed building height is supportable, provided no unreasonable amenity impacts on the public realm (e.g. overshadowing and wind) • The proposal appears to comply with the mandatory overshadowing requirement for the new park to the southeast. The shadow diagrams, however, should clearly show the boundaries of the proposed park to ensure compliance. • The Ground Floor levels do not comply with Melbourne Water requirements in relation to flooding and sea level rise. In particular: <ul style="list-style-type: none"> - The office component of the 'Office w/ Café' tenancy is to be at 3.0m FFL (assumed to be the rear 42.5sqm portion)

- The Reception and Manager's Office is to be at 3.0m FFL

Advice from Melbourne Water is needed for the required level of the End-of Trip facilities, Waste Room, Fire Control Room and Car Lift (with / without a pit).

Any changes to floor levels may affect the development's interface with the public realm.

- The ground level 'Office w/ Café' tenancy is supported, however clarification is needed on which area will be a publicly accessible café (assume to be the front 99sqm portion). Outdoor seating is recommended (e.g. the building undercroft fronting Buckhurst Street).
- The exterior glazing to the End-of Trip facilities are supported due to activation of the adjoining laneways. The extent of proposed clear glazing, however, may have safety and privacy concerns, so it could be replaced in some area by decorative translucent panels that maintains a sense of presence in these laneways, particularly on the south and west elevations (see examples below).



- There is no allowance in DDO30 for pergola structures to encroach within mandatory upper level setback requirements.
- DDO30 requires Levels 04 and 05 to have a 3.8m floor to floor height.
- Larger openable windows and/or balconies are recommended for the spaces / tenancies within the podium (particularly Levels 01 and 02) to provide greater interaction and passive surveillance of the public realm (see example below). Balconies could also be used to enhance greening of the building.



- The desktop wind assessment is not acceptable for the following reasons:
 - It does not address how the proposal will achieve the mandatory wind safety requirements
 - It does not address all developments in the assessment area that are proposed (under assessment), approved and under construction. Figure 6 is not current
 - It does not respond to the function and use of the proposed linear park along Buckhurst Street (not just a 'nature strip') and the new park to the southeast. These public open space areas will be heavily used by residents, workers and visitors and high amenity is needed, including meeting sitting wind comfort conditions. I don't agree that these areas are only intended for 'fair weather days' and that people be able to use them in most wind conditions. The wind comfort criteria in DDO30 already include exemptions for extreme conditions. Similarly, outdoor seating for the proposed café should be addressed
 - It does not respond to the intended function and use of the Level 06 terrace areas, which includes outdoor seating (refer to landscape plans). These areas should achieve sitting wind comfort conditions. Wind assessment and management needs to reflect whether the pergolas will remain (refer to comment above).
- Management of vehicle movements associated with the development need to respond to other potential vehicle movements along Ann Street, particularly any redevelopment of 75-77 Buckhurst Street (unless the new laneway to the rear is delivered prior to redevelopment). I defer to assessment by traffic engineer.

Development Engineer

- Please find below my comments from a flood and asset management perspective:
- I assume Melbourne Water (MW) will be commenting on the flood aspect. If this is not the case below are comments on the flood aspect:
 - MW has advised the applicable sea level rise flood level for the land is subsequently 2.4 metres to AHD. Given the existing surface is approx. 1.8m AHD this equals to a flood height of approx. 600mm. MW has not provided the flood extend therefore, my comments below are based on the assumption the flood extend covering the entire building.

- MW's advised "All entry points that could allow entry of floodwaters to a basement (including stairwells) windows, openings and vents must be set no lower than 3 metres to AHD. Basement entry ramps must incorporate a flood proof apex set no lower than 3 metres to AHD to prevent floodwaters entering the basement levels during a flood event." The drawing is showing the apex ramp to the car lift is 2.56m AHD which does not meet the 3m AHD as advised by MW.
- "MW requires that the FFLs for the office components of the building to be constructed to a minimum height of 3 metres to AHD, and retail components be constructed no lower than 2.4 metres to AHD." The drawings show the Office W/ Café has FFL of 2.55m AHD which does not meet the 3m AHD as advised by MW.
- From my understanding the following areas will require electricity to operate:
 - Water Meters
 - Fire Control Room
 - Reception
 - Manager's office

How will the above areas be protected from being affected by flood water?

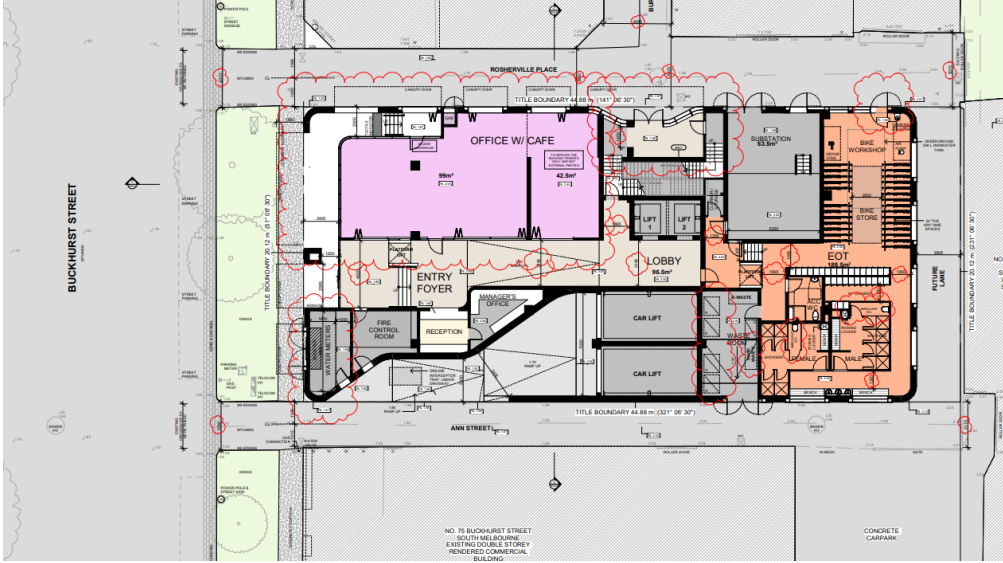
- At the Entry Foyer and EOT area it is proposed a platform lift, assuming the lift will be electrically operated, how will it be prevented from it being affected by flood water entering the entrance.

- **Laneways**

- As part of the development, Rosherville PI will be activated and Anns St is proposed to be used as an entry to the building carpark. Both of these laneways will be required to be upgraded to make them fit for purposes and meets Council's standard. The upgrade includes, but is not limited to the installation of lightings and drainage infrastructure. Furthermore Burgerlove Lane is connected to Rosherville PI. Once Rosherville PI is activated, Burgerlove Lane will likely be used by pedestrians also. At 51-57 Buckhurst St, the resident is currently using Burgerlove Lane as an entry to their carpark off George St. Based on this, once the development at 67-69 Buckhurst St is completed, I am unsure how Burgerlove Lane will be managed while waiting for the surrounding properties to redevelop?
- Currently, there are no drainage assets in Buckhurst St. As mentioned above, both Rosherville PI and Ann St will likely requiring drainage infrastructure therefore, this development will be required to construct drainage infrastructures in Buckhurst St to the nearest existing drainage infrastructure. From drainage perspective, it is more ideal for the drainage to connect to the exiting drainage in Thistlewaite St via the earmarked open spaceCou. Do you have any information when the earmarked open space is likely to be constructed?
- With the future laneway, this laneway will need to be designed to Council's standard. Lighting and drainage infrastructure will be required for this laneway.
- As the development will be required to construct drainage infrastructure in the laneways and in Buckhurst St, it would be best to have an idea what the streetscape plan is for Buckhurst St. It will allow us to inform the applicant what to construct in terms of infrastructure

- **Access doors**

- It is preferred that doors do not open outwards. However, if this is a safety requirement then the followings:
 - adequate signage must be installed on the doors.
 - Are self closing and can be held fully open against the building wall for the time personnel are occupying the facility;

	<ul style="list-style-type: none"> ▪ In the fully open position do not encroach more than 100mm into the Road Reserve; ▪ Have a minimum clearance of 150mm from the footpath surface; 
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Heritage	No Heritage issues
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Open Space and Recreation (Arborist)	<ul style="list-style-type: none"> • The inclusion of an awning over the footpath conflicts with the canopy of the Lilly Pilly on the nature strip (tree closest Rosherville Place). Pruning of the tree for clearance will render the tree unviable, therefore the applicant will be required to pay Council the amenity value of the tree, removal and replacement costs. If these plans are approved and tree removal is required I will inspect the tree to calculate the costs to be paid by the applicant. • The second street tree, a Desert Ash, is a stunted specimen with decay in the trunk. The tree is currently healthy and structurally sound and so does not meet our tree removal policy; however, removal of both trees prior to construction will provide a better long term outcome and allow for greater construction access. As the development is not in conflict with the tree and the tree has reduced vigour I will waive the amenity value charge and only charge removal and replacement costs for this one. • If the applicant would prefer to retain the Desert Ash they will be require to protect it through all phases of the development. A Tree Protection and Management Plan (TPMP) will be required for endorsement and form part of the permit. The TPMP must detail how the tree will be protected in accordance with AS4970-2009 (Protection of Trees on Development Sites).
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Sustainable Design	<p>I've reviewed the proposed amended plans and have the following comment:</p> <ul style="list-style-type: none"> • The dark colour of materials around the tower staircase on the east/ Rosherville Place elevation and those of the roof level plant screening will contribute to urban heat island effect. Lighter colour materials are preferable. • The amended plans do not include a roof plan for above the roof services/plant level. The Sustainable Management Plan commits to 20kW solar PV which must be included on the plans. • It appears that the SMP hasn't been updated since the previous referral, when the following document was reviewed; Sustainable Management Plan by Ark Resources dated 10/03/2021 • The proposed amendments to plans do not have any significant impact on the commitments in the SMP. However, there are unresolved matters from previous referral advice regarding the SMP that must still be addressed:
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- Commit to certification with GBCA
- Address inconsistency in SMP and NABERS report regarding hot water system type
- Fully address energy objectives of Clause 22.15-4.5
- Provide appropriate rainwater tank size to meet mandatory sizing at Clause 4.3 of CCZ1
- Commit to connecting rainwater tank to all non-potable outlets
- Update WELS ratings of taps to 6*
- Provide an amended Waste Management Plan to meet Green Star credit criteria
- Provide site plan addressing Green Star Urban Heat Island credit

Development proposals in the Fishermans Bend Urban Renewal Area (FBURA) are subject to the following requirements for Environmentally Sustainable Design:

[Schedule 1 to the Capital City Zone \(CCZ1\) – Clause 4.3](#)

[Clause 22.12 Water Sensitive Urban Design](#)

[Clause 22.13 Environmentally Sustainable Development](#)

[Clause 22.15 Fishermans Bend Urban Renewal Area Policy](#)

Green Star:

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:

- *Developments of 10 or more dwellings or 5,000m2 or more of floor space = 5 star*

A certified 5 star Green Star Design and As Built rating is required as the proposal incorporates 5,644m2 of office floor space.

The Sustainable Management Plan (SMP) references the Green Star Design and As Built v1.3 rating tool in order to demonstrate that the project is able to achieve a 5 star outcome. However, the SMP refers to benchmarking the development against the Green Star rating tool. The project must commit to achieving a certified rating via the Green Building Council of Australia, as required by mandatory permit requirements at Clause 4.3 of the CCZ1.

The SMP must be amended to clearly commit to achieving a certified 5* Green Star rating.

Evidence that the project is registered with the GBCA, targeting a 5* rating should be provided.

IEQ:

Daylight modelling has been carried out with a report provided as part of the SMP. The daylight modelling shows that the office floor area would achieve an acceptable amount of natural daylight and that the project is eligible for the daylight credit of Green Star.

Energy:

The SMP demonstrates that five points could be achieved via the NABERS pathway for greenhouse gas reduction under the energy section of Green Star, plus an additional two points via a commitment to off-site renewables.

The SMP commits to purchase of off-site renewable offsets for a period of ten years. A permit condition should require that the associated power purchase agreement, with a minimum duration of ten years, be provided to the Responsible Authority for endorsement.

The submitted Preliminary NABERS assessment refers to a 6 star gas hot water system being used, whereas the SMP refers to electric heat pump hot water. The details in these two documents must be consistent. Electric heat pump hot water is preferable to eliminate the use of gas in the development, which would contribute to the building's ability to operate with net zero greenhouse gas emissions.

	<p>This proposal includes a 20kW solar PV system. However, provision of a battery is not committed to in the SMP, which is a policy objective of the Energy section of the Fishermans Bend Urban Renewal Area Policy at Clause 22.15-4.5</p> <p><u>Integrated Water Management (IWM):</u></p> <p>The proposed 25kL rainwater tank does not meet the requirement for provision of a rainwater tank with 0.5m³ storage capacity per 10m² of suitable roof catchment (including podium). The SMP notes that the catchment size is 570m², which would require a tank size of 28.5kL. However, the report states that a smaller tank is provided as no further water saving would be achieved with a larger tank. The mandatory tank sizing at Clause 4.3 of CCZ1 relates in part to flood mitigation by requiring tank sizes that provide capacity for on site detention during storm events. A smaller tank size cannot be accepted.</p> <p>The rainwater tank size must be increased to ensure an effective capacity of at least 28.5kL. The tank must be connected to ALL non-potable outlets throughout the building to ensure constant drawdown of harvested stormwater to free up tank capacity for stormwater capture in the event of a significant storm.</p> <p>MUSIC modelling results provided in the SMP demonstrate that the stormwater quality of the proposed WSUD treatment would comply with (exceed) the requirements of Clause 22.12 and would achieve 2 Green Star points (Green Star column B pollutant reduction targets).</p> <p>Water Section of SMP states taps to be 5 star WELS rated but sink taps to be 4 star WELS rated. What's the difference between a tap and a sink tap? All taps should be 6 star WELS rated in order to claim the credit for water efficient fixtures in the Potable Water section of Green Star. I note this credit is claimed in the Green Star scorecard. Therefore the SMP must be updated to commit to 6 star taps.</p> <p><u>Waste:</u></p> <p>The Green Star Design and As Built Scorecard shows that credit 8A is targeted requiring a specialist Waste Management Plan to be prepared. In order to claim this credit the site specific waste management plan must set waste reduction targets and include strategies to achieve those targets, in accordance with the Green Star Submission Guidelines. The submitted Waste Management Plan (WMP) does not address waste reduction or include waste reduction targets or strategies. Therefore this credit cannot be claimed and should be removed from the Green Star scorecard, unless the WMP is updated appropriately.</p> <p><u>Urban Ecology:</u></p> <p>The SMP commits to reducing the urban heat island (UHI) effect through a combination of vegetation and materials with low solar absorbance, for 75% of the site area, in order to claim the associated Green Star credit (25). If achieved, this would meet the requirements of Clause 22.15-4.5.</p> <p>A site plan should be provided demonstrating how at least 75% of the site area would consist of vegetation or appropriate materials to reduce UHI in accordance with the submission guidelines of Green Star credit 25.</p>
<p>Traffic Engineers</p>	<p>Parking Layout and Access Arrangements</p> <ul style="list-style-type: none"> • Proposed access to off-street parking facilities is via a proposed crossover to Ann Street. I have concerns regarding the proposed access arrangements specifically: I have concerns for the ability of two vehicles to pass one another with adequate clearance from the opposing vehicle and surrounding structures. Two B85 vehicles have been shown. Swept path diagrams should be updated to ensure a B99 and B85 vehicle can adequately pass one another. The propping of vehicles along Ann Street will not be supported. All queuing should be contained within the site. <ul style="list-style-type: none"> - SPA101 fails to provide adequate clearance from the wall adjacent to the accessway - SPA202, SPA203, fails to provide adequate clearance from the column

	<ul style="list-style-type: none"> • Given the number of spaces proposed, I have concerns for the assumption that only 50% of bays will be filled during AM peak periods. Given the size of the office, it would be expected that more than 50% of bays will be occupied during AM peak. Similarly, more than 50% of vehicles are likely to leave the site in PM peak given the office use. Can the applicant provide some evidence to support the 50% used or alternatively re-undertake the queuing and conflict assessment using a more appropriate number? • Car parking bay dimensions based on the stacker specifications will provide a clear platform width of 2.4 metres on upper levels and 2.17 metre width for the entry level. Based on the current design 18 bays will have a width of 2.17 metres. This can not be supported and is well below both Australian Standards and Planning Scheme parking bay dimensions. It is recommended the applicant redesign the site to provide an acceptable width for parking bays and consider at least one DDA bay accommodated via an empty platform. • Car lift: <ul style="list-style-type: none"> - Vehicles fail to maintain adequate clearance from when egressing and entering the lift. Can the applicant amend the design to ensure adequate clearance is maintained? • Ramp grades and transition changes are considered acceptable. Access grade of no steeper than 10% within 5 metres of the frontage has been indicated and must be adhered to. The ramp will need to be redesigned to satisfy levels specified by Melbourne Water. • All redundant crossovers must be reinstated to Council satisfaction. • All proposed crossovers must be installed to Council satisfaction. • Applicant shall be responsible for costs incurred by Council to modify any existing on-street parking signage and line-marking. <p>Traffic Generation</p> <ul style="list-style-type: none"> • Refer to above <p>Pedestrian Sightlines</p> <ul style="list-style-type: none"> • Given the number of traffic movements generated along Ann Street and the site's proximity to South Melbourne Primary School and a childcare centre opposite the site, I have concerns of pedestrian and vehicle conflict given the number of movements from the proposal. The site is proposed to be constructed up until the south – west property boundary. Drivers egressing from the site will not have a view of pedestrians travelling south-west on Buckhurst Street. I have concerns for the number of movements generated along Ann Street and the south-west corner of the site being constructed up to the property boundary. <p>Provisions for Loading & Waste Collection</p> <ul style="list-style-type: none"> • No loading dock has been proposed within the development. • Waste Management plan to be referred to Council's Waste Management department for assessment.
<p>Waste Management</p>	<ul style="list-style-type: none"> • WMP has 3x1100L waste bins and 3x1100L recycling bins (collected twice a week) but has only 2x1100L bins for both streams on the plan, please update accordingly.



- Require more info about bin collection time (has to be in line with CoPP Local Laws requirement <https://www.portphillip.vic.gov.au/media/uxyj0vjw/copp-local-law-number-1-community-amenity.pdf>)
- Please specify on the WMP about who will be responsible to transport waste from each floor to the communal bin room and how will the waste be transported.
- Would highly recommend to install dual chute system to cater for potentially converting this building into a residential building in future.
- Waste truck will potentially block the parking bay/s outside the building or may block the Anne Street access (if a vehicle is already parked on the bay) due to a meter parking area in front of the building as this is a busy street (and will get busier), also possible OH&S hazard for having to transport the number of skip bins that far for collection.