Referral Responses

Department	Comments
Urban Design	**August 2019** **Urban Context** - The discretionary height limit for this area is 12-storeys, where the preferred character is mid-rise. Mid-rise is defined within the DDO schedule as between 7-15 storeys. The proposed building is 15 storeys, a reduction of 3-storeys from the previous scheme. A strategic rationale should be provided to demonstrate why 15-storeys (as opposed to the preferred 15-storeys) is an acceptable response, consider that the subject site is not a large, strategic site which could reasonably accommodate additional height. **Street Wall** - The maximum street wall height for the area is 6-storeys as proposed, however there is a preferred maximum of 4-storeys here based on an assessment of the current and future anticipated context. Considering that lower street wall heights of the adjoining sites, where a development permit is already approved and the other a remnant character building, it is clear that the design has not adequately responded to the design objective. - At this height, the side boundary party walls are highly exposed, unarticulated and will remain so considering the adjoining development context. The street wall should be lowered to 4-storeys to ensure that there is a consistent built-form along the streetscape. - Any side boundary party walls which project higher than the existing or proposed future street wall should be well articulated and not rely on vegetation. - The site presents as two frontages, Thistlethwaite St being the primary. Further information should be provided to explain how the building is proposed to interact with Buckhurst Lane as the secondary frontage, as it currently presents as a blank concrete façade with no consideration given to any design detail or integration of services. - A hard-edged reading of the street wall is compromised by the current podium design, which is predominantly glazed and framed by a brick finished surround. Considering the robust industrial character of the area, the design should respond better to the material context and consider the rhythm and grain of the wider industrial setting. - The projecting canopy should ensure that it does not impede on the growth of any future proposed street trees **Built Form & Detailing** - The preferred tower setback above the podium is 10m, though only 5m is proposed. As no strategic reasoning has been provided as a response, a reduced setback is not supported.

	- There is no clear distinction between the podium and tower, with no apparent design rationale for the façade strategy
	- There is no clear distinction between the mid and crown of the tower to provide modulation of the tower form
	- Towers are considered to have multiple frontages, it is unclear why the design has not sought a stronger compositional balance with regard to the:
	  o Use of the timber framing of to create reveals on levels 11 and 12, and specific their orientation to the corners
	  o Application of the timber screens do not appear to be informed by any design rationale, nor are they integrated into the overall reading of the tower. For example, the screening could be organised to contribute to solar shading of the façade.
	  o Green wall appears to be an afterthought simply to mask the blank wall of the core, rather than integrated into the tower design. If a green wall is proposed, it should be a compositional element to the design detailing of the façade
	  o An approach to the management of the façade and green wall should be provided to understand the viability of the green wall.
	  o Rationale behind the stepped heights of the battened parapet to the roof, which does little to conceal the plant and services
	  o Location of the toilets on the opposite side of the building core, creating a second expanse of blank wall and breaking the façade
	- The building core could be more centralised to remove the need for a blank wall. The offset area from the core to the façade could be sleeved with the services and kitchen area, as well as access to toilets to conceal them away from the main floor area.
	- A lightwell should be incorporated into the design of the podium to enable daylight access to the rear of the deep commercial floorplates
	
	Public Realm
	
	- Along the primary frontage, the booster cupboards (and mailroom) should be better sleeved to improve the main entrance presentation to the street and establish a hierarchy between the retail entrances.
	- The lifts are located deep within the footprint and illegible from the main entrance. They should be mirrored with the fire escape stair to improve connection to the street.
	- The empty space directly outside of the secondary entrance and fire pump room should be squared off to improve safety and any remove any opportunity for concealment.
	- No disabled access is provided to the carpark or secondary entrance
	- Bicycle parking and EOT facilities should be placed on the ground floor enable ease of use and promote alternative modes of transport
	- Large expanses paved space is proposed to the outdoor landscaped area to the roof the podium, with landscaped elements contained to the edges of the building. A better design approach would be to consider how the spaces

could be designed to complement a range of uses, of varying group sizes to promote higher use, as opposed to an unattractive and expansive open area.

- There is no consistency between what is proposed in the landscape plan and the large tree planting proposed in the elevation drawings. Additional detail is required to understand how the design can support significant tree growth as proposed, and any potential safety concerns regarding impact of wind.

Conclusion

From both the Strategic and Urban Design perspective, the proposed development is not supported. Significant improvements are required to all aspects of the design to raise the overall design quality of the proposal. A more rigorous approach which is more contextually informed and aligns more with the objectives of the DDO30, Urban Design Guidelines for Victoria and the new Fishermans Bend Framework and the Montague Precinct should be explored.

Amended Plans March 2020:
Summary:

Revised drawings reduce podium and tower by 1 storey each and includes a revised facade design.

Urban Context

It has not been demonstrated that the height and size of the proposed 14 storey tower is suitable for a small site with narrow street frontages, because:

- It exceeds the preferred scale and character of the area i.e. higher than discretionary height limit of 12-storeys and close to the upper limit of the site's preferred mid-rise character (7-15 storeys)
- The 14 storey tower height, in addition to its longest facade facing the side boundaries, results in a poor interface with approved tower on neighbouring block 134-142 Ferrars Street.
- A 5m setback for tower behind the podium is not supported as it increases the side boundary interface problems with neighbouring tower. The preferred tower setback above the podium is 10m, which would improve this interface and reduce overshadowing impacts.
- The tower's overshadowing impacts and contextual fit needs to be further assessed against an updated 3D model
- Several unresolved planning and design issues, described below, may also affect the proposed scale and yield.

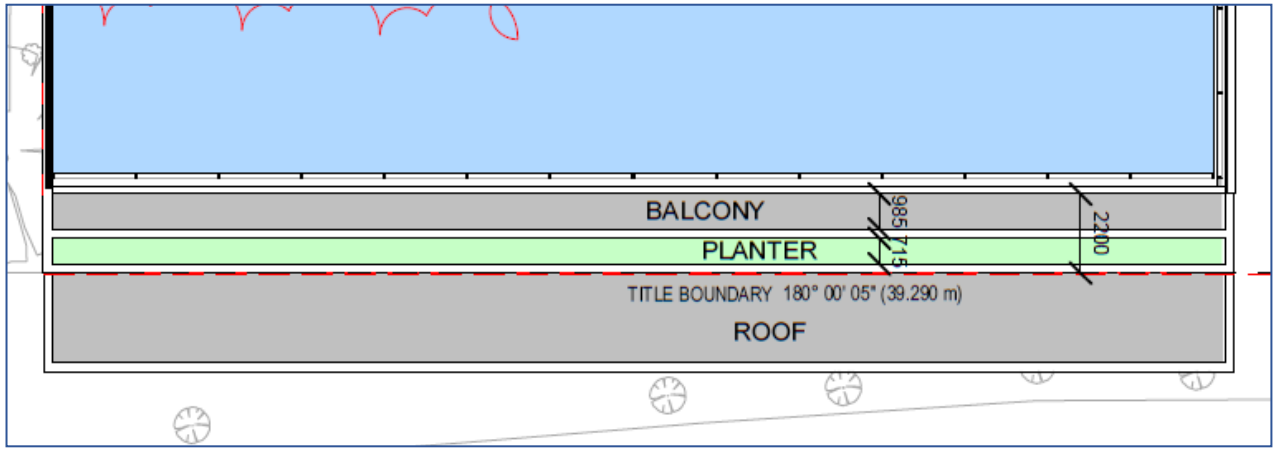
	Street Wall - The revised proposal for a 4 storey podium is a significant improvement with respect to the context of both the current and anticipated building scale. - On the South-West blank side boundary wall, the 'patterned effect aluminium-brown' slats provide questionable benefit in terms of articulation. It would be preferable to modify the concrete boundary wall to be a darker colour to complements brickwork (not white as proposed) and that includes articulated joints and lines as an integral rather than applied decoration. - The podium design is compromised at both street frontages due to the predominantly glazed balustrading, which does not sit well with the brick base and the robust industrial character of the area. It is also unclear how the raised planter beds will integrate with a glazed balustrade or how the intent of supervision of the street below can be achieved if a continuous planter bed runs along the front of the podium. - The projecting footpath canopy needs to be shown consistently in Section BB and Elevations before it can be properly assessed in terms of providing shelter to pedestrians and coordinated with street tree canopy. **Built Form & Detailing** - The revised design improves articulation between the mid and crown of the tower - Improved facade articulation and solar control of glazing should be considered to both the podium and tower, including strategies such as: o providing some depth to the facade by making glazing recessed behind the plane of brick pillars o adding metal external sun louvres o reducing large areas of unshaded glass with solid spandrel panels - The proposed samples, materials and colours do not match the drawings and perspectives. For example, white curtain walls are scheduled but black curtain wall framing are shown in elevations and perspectives. Whether the proposed metallic brick suits the industrial character of the area is also questioned. - As previously advised: o An approach to the management of the façade and green wall should be provided to understand the viability of the green wall. o Location of the toilets on the opposite side of the building core, creating a second expanse of blank wall and breaking the façade o A lightwell should be incorporated into the design of the podium to enable daylight access to the rear of the deep commercial floorplates

	Public Realm - It is critical that Melbourne Water's floor level requirements for flooding are incorporated holistically into the design. For example, the proposed levels of the car parking, lift lobby, services and retail uses may all need to be revised, which may affect yield and scale of the proposed building as well affect accessibility of public and common areas. - The revised proposal of bicycle parking on the ground floor is an improvement, with details of the double height parking arrangement to be provided. Details of convenient access to the EOT facilities on the first floor also need to be provided. - As previously advised: o the proposed Buckhurst Lane facade does not meet the planning requirements for a secondary street frontage, as it is dominated by vehicle access and building services. o along the primary frontage on Thistlethwaite St, the booster cupboards and mailroom should be better sleeved to improve the main entrance presentation to the street. Cladding the booster cupboards in bright white cladding makes it a dominant rather than recessive feature. o the lifts are located deep within the footprint and illegible from the main entrance. o the empty space directly outside of the secondary entrance and fire pump room should be squared off to improve safety and any remove any opportunity for concealment. o no DDA complaint access is shown to/from the carpark or secondary entrance. Equitable DDA access and facilities needs to be included throughout the revised proposal as this is an essential requirement of new buildings that needs to be integrated part of the total design. o large expanses of paved space are proposed to the outdoor landscaped area to the roof the podium, with landscaped elements contained to the edges of the building. A better design approach would be to consider how the spaces could be designed to complement a range of uses, of varying group sizes to promote higher use. o there is no consistency between what is proposed in the landscape plan and the large tree planting proposed in the elevation drawings. Additional detail is required to understand how the design can support significant tree growth, and any potential safety concerns regarding impact of wind. **Conclusion** The revised development is not supported as there remains multiple, significant unresolved design issues. Amended Plans April 2020:

	As far as I can tell, the 30-03-20 plans have only two very minor changes from the 02-03-20 plans: • Main entry door on Thistlethwaite has been inset further from front boundary which, while not very unsafe, is not particularly positive in an architectural or urban design sense. This space features one of the most ambitious green roofs I have seen yet, which I will leave to Shannon to comment on. • Decorative panels on blank side podium wall changed to brick, but the pattern of the new arrangement lacks any visual logic. This is quite minor and could be condition of approval. Therefore most of my 16-03 comments (attached) on the 02-03 plans still stand i.e. not supportive, with many changes required
Strategic Planning	**Amended Plans:** 1. The **floor levels** of various development components on the Ground Floor appear to be less than the standard levels required by Melbourne Water to manage flood risk (e.g. lift lobby, building services and carparking). **It is recommended that advice be sought from Melbourne Water** in this regard. Any changes to floor levels may affect other elements of the proposed built form. 2. There is no strategic justification for the proposed **building height**, which significantly exceeds the maximum 43m / 12 storey height sought for this site under DDO30. The plant room and lift overrun is to be included in height calculations, as they are not set back at least 3m behind the building façade (refer Clause 2.5 of DDO30 and Sheet No. A09 of the architectural plans). The proposed building height is 17 storeys and a maximum of 56.75m (based on 1.9m being the lowest NGL within the tower footprint). This height also exceeds the 7-15 storey range of the mid-rise character required for this site. It is recommended that the building height be reduced to 12 storeys. A height up to 15 storeys, however, may be acceptable if it can be demonstrated that the height (in combination with the proposed setbacks above the podium): ▪ Helps deliver comfortable wind conditions in the public realm (refer to Item 3); ▪ Minimises visual bulk of upper floors when viewed from Thistlethwaite Street and Buckhurst Lane; and ▪ Allows for adequate views to the sky from Buckhurst Lane. The lift overrun will likely continue to be included in height calculations, as relocation of the lift / stair core to achieve a 3m setback behind the building façade will be challenging. Nevertheless, the treatment of this element (particularly the northeast elevation) should be varied to appear more 'recessive'. The plant room should also be set back at least 3m behind the building façade. These changes may affect the visual composition of the tower crown so the façade treatment of Levels 14 and 15 may need to be revised in an integrated manner. The urban design referral may provide further advice on this matter. These changes could potentially be included as a condition (subject to approval of amended built form, etc.).

	3. One of the key requirements for proposed built form (building height and upper level setbacks) is that it helps deliver comfortable wind condition in the public realm (Clauses 2.5 and 2.8 of DDO30). There are concerns with various aspects of the **wind assessment** accompanying the application (Pedestrian Wind Environment Study by Windtech dated 31 October 2019 and commentary letter from Windtech dated 2 April 2020): ▪ Several developments either approved or under construction have not been included in the proximity model, particularly 15-35 Thistlethwaite Street (8 storeys), 171-183 Ferrars Street (18 storeys), 6-70 Buckhurst Street (30 storeys) and 15-87 Gladstone Street (30 storeys). In addition, the nearby South Melbourne Primary School is 6 storeys. Refer to pp. 15-18 of the Urban Design Report by Hansen Partnership. ▪ The assessment area has not been determined in accordance with the requirements of Clause 2.11 of DDO30. Based on the proposed building height, the assessment area (refer red shading) should extend approximately 28m from the site boundaries. As shown in the diagram below, this area would include a greater extent of the pedestrian areas on Thistlethwaite Street (both footpaths), Buckhurst Lane (entire pavement area) and Tates Place (entire pavement area). Additional study point locations are required in these areas of the public realm, as they are located within the core area of Montague where pedestrian activity is encouraged. Furthermore, there is a reasonable risk that these areas will not achieve either safety or comfort criteria, considering the results of Point 05 (Buckhurst Lane) and Point 08 (Thistlethwaite Street). ▪ Standing assessment criteria (4m/s) should be achieved for footpath of the entire Thistlethwaite Street frontage of the site (commercial entry and retail tenancies – Points 1-3). This change will help provide a public realm that is useable and attractive. Walking criteria should be achieved for the remainder of pedestrian areas in the assessment area (as described above). ▪ The recommended treatments have not been substantiated. In particular: o How a more permeable car park entry door will improve pedestrian comfort at Point 05 to achieve the comfort criteria (noting that a canopy is also proposed over the vehicle access (refer to the Northwest Elevation at Sheet A13); o How improve pedestrian comfort at Point 07 will achieve the comfort criteria without reliance on existing street trees; and o How treatment measures on the podium roof described in Figure 7c will improve pedestrian comfort at Point 08 on the opposite footpath on Thistlethwaite Street to achieve the comfort criteria. It is recommended that an amended wind assessment be undertaken that complies with the relevant planning scheme requirements. <u>This requirement should not be included as a condition, as the required wind treatments may significantly affect the built form outcome for the site.</u>

4. It would be beneficial to consider adding narrow **balconies** (which may include planters) along the northern ends of the offices on Levels 1 and 2, to enhance interaction with and passive surveillance opportunities of Buckhurst Lane, whilst benefiting from the northern orientation. An example of this design outcome is shown in the diagram below.



5. The concept of a green wall on the northeast elevation is supported, as it will help manage the heat island effect, improve the amenity of the site and the appearance of the built form to the surrounding area. As previously identified in urban design referrals, the proponent has not provided the approach to the establishment and management of the façade and green wall to understand its viability. In particular, the green wall will be 10 storeys high and 11m wide, with no apparent access points for maintenance apart from the podium roof. As such, there is a risk of failure or ineffectiveness in the long-term, which will expose the blank wall of the core. This is an undesirable outcome and not consistent with planning policy. If a green wall is proposed, it should be a compositional element to the design detailing of the façade. The urban design and sustainability referrals may provide further advice on this matter.
6. As identified in previous referral comments, there should be more opportunities for the commercial tenancies to access natural light, particularly the rear of the deep office tenancies (e.g. Offices 201 / 301, 202 / 302 and 204 / 304). This issue could be addressed by incorporation of one or more lightwells into the design of the podium. The sustainability referral may provide further advice on this matter.
7. As identified in previous referral comments, there is concern with the extent of hard surfaces on the podium roof. It is considered that this outcome will limit the reduction of the impact of the heat island effect, as required by Clause 22.15-4.5. The urban design and sustainability referrals may provide further advice on this matter.
8. I defer to the urban design referral for advice on the proposed entry locations.

	In conclusion, the revised development proposal is not supported, due to significant issues that cannot be reasonably addressed through conditions.
Landscape	**Amended Plans April 2020:** **Level 1** **a) Planting on level 1 provides a poor amenity value to street** Green roof will only be visible to those in Office 102 and will be partially obscured to those in Office 101 (Sheet A04). Ideally this space would provide benefit to those on the street, not just a discrete few within an office space. Recommend the use of overhanging planting or taller forms of planting to improve amenity value from street (Clause 21.05-2, point 11). **Podium Level 4** **b) Wind impacts suggest the scale and design of the building is not appropriate** The wind report is responding to an outdated submission, dated Oct 31, 2019, and does not reflect the current building proposal. For example, level 4 is now the podium not level 5. The recommendations from the report propose the use of a number of two and three metre high impermeable screens extending out from the corners and centrally, a total of nine locations, from the central tower façade at podium level. Ideally wind impacts should be dealt with in the architecture and scale of the building. Wind impacts that can only be dealt with through the strategic placement of physical obstructions in pedestrian spaces suggest that the scale and design of the building is not appropriate to the context of the site. Please review the design and scale of the building and update the wind report to ensure that wind impacts do not restrict the use or amenity of open space at podium level (DDO30 point 2.5, 2.8, 2.9, 2.11, Clause 22.05-3). **c) Physical barriers to mitigate wind impacts do not contribute to the open space at podium level** Addressing the presence of the physical barriers, without reference to whether the scale and design of the building is appropriate, they form part of the landscape of the podium level. However, no attempts have been made within the landscape plan to incorporate these elements into the landscape design. They sit within the podium level as monolithic concrete walls, the landscape plan having no regard to their location and vice versa. There is no clear purpose of these walls within the landscape design or how they contribute to the amenity of the communal open space. Recommend that the landscape design use these walls in some way, either artistically, or to create discrete spaces or 'rooms' within the outdoor space of the podium. **d) Level 4 landscape plan should reinforce activation of the street below by creating an edge condition that allows overlooking of the street** Clause 21.05-3 states that communal open space should be located to provide passive surveillance opportunities. All Level 4 landscapes propose planted buffers preventing pedestrian access to the edge and any views of Thistlethwaite Street below. Landscape plans show a one metre high raised planter box with evergreen capable of growing up to two metres and

	a further row of shrubs in front of the hedge. Level 4 landscape plans should create edge conditions that allow access to the edge and overlooking of the street to support activation at street level. **e) The area of substantial planting on the podium is obscured and access is restricted** Substantial podium planting is obscured, and access is restricted by a two-metre-high wall on either side. A fully private space cannot be considered part of the communal open space if fully obscured and access is restricted. The provision of this landscaping is a welcome amenity and should be able to be viewed and ideally accessed from the podium level. **f) Renderings and landscape plans convey contradictory messages** All renderings of the building show a glass balustrade at podium level with five small trees/large shrubs behind. These renderings are misleading as the landscape plan indicates the podium will be buffered with a one metre high raised planter box with evergreens capable of growing up to two metres. Thistlethwaite Street will be further buffered with another row of shrubs. The application should provide consistent graphic communication in all submissions. Please update the drawings and renderings accordingly. **g) No information provided on green wall** No information has been provided on the design, planting or construction of the green wall on the north side of the tower. Please provide as part of the landscape submission how the green wall will be constructed, planted and maintained. **h) Unclear how tree planting on the podium will be achieved** A typical lightweight planter box detail has been provided, however the podium level landscape plan has not indicated whether this detail is intended to be used. Detail lacks specifics on soil depths sufficient to sustain continued healthy growth of proposed planting (Clause 22.15-4.8). The proposal is not supported at this time. To gain support: • Provide an updated wind report that shows acceptable impacts on the public realm and podium level without the use of physical barriers to mitigate wind • Update the design/scale of the building to reduce the impacts of wind on the podium and street levels without the use of barrier walls • Allow those using the podium level to be able to view the olive grove, and ideally to be able to access it • Respond to all the elements within the landscape, so that those using the podium may overlook the street level and other physical elements of the design support an amenity function of the landscape • Provide renderings and drawings that reflect what is being proposed in the application • Provide design, planting layout and construction details on the green wall and substantial planting on the podium level. • Level 1 planting is visible from the street rather than discrete spaces within the building.

Sustainable Design	**August 2019** I've reviewed the plans by Ammache Architects, dated 24 June 2019, A01 to A14 inclusive, the Sustainability Management Plan by Eco Results dated 23 May 2019, Green Travel Plan by ttm Traffic Engineering dated 26/06/2019 and landscape plans by John Patrick TP01 and TP02 dated May 2019. The proposed development has changed in typology since I preliminarily reviewed plans back in March. Where those plans included office and residential use, the current proposal is now solely commercial with office floor space proposed on all but ground floor, with ground floor containing retail and car parking. Applicable comments from my review of previous plans are copied below *in italics*. I have commented after each **in bold** to note whether these concerns have been addressed or not. - *"Podium level offices up to 19 metres deep with single aspect, therefore natural daylight will be poor, particularly given the long, narrow layouts. If this layout is to be retained I would expect to see a more bespoke podium design including insets along the east and west side boundaries to incorporate light courts to the offices (as opposed to the podium being just a standard box to all boundaries)."* **– This element of the proposed design remains and has not been addressed. Poor natural daylight outcomes are therefore still a concern. There are clear missed design opportunities to ameliorate natural daylight provision, such as lightcourts. Daylight modelling required for podium offices on levels 2 – 4 to demonstrate what proportion of the floor space of each tenancy would achieve a daylight factor of 2% or greater.** - "*Bike parking located on mezzanine – preferable to have it located on the ground level for convenient street access. However, if the residential bike parking is located on mezzanine, we would at least want to see ground level provision of retail and office bike parking. Some end of trip facilities should be provided for employees."* **– Current proposal has no ground level bike parking, with all bike parking proposed on level 1 (note there is no longer a mezzanine) to be accessed via main lifts from ground floor entrance. End of trip facilities are provided adjacent to bike parking. Some bike parking should be provided for visitors and retail customers at ground level, in a location that is visible from Thistlethwaite Street.** - *"Provision of green walls is encouraged and aligns with the Fishermans Bend Framework objectives of responding to urban heat island effect and creating comfortable microclimates. However, when the application is lodged we would expect to see a serious management plan and details of proposed species, establishment program, irrigation methods and maintenance plans, to ensure that the planting will establish and remain (comments notwithstanding matters relating to planting on boundaries*)." **– The current application retains the proposed green wall on the north-east elevation. As per previous comments this is supported but the application is completely lacking on details. Therefore the application does not justify the design details and likely longevity of the green wall. A landscape plan with details of the wall composition and proposed species, establishment program, irrigation methods and maintenance plans must be provided prior to the application being determined. All of the aforementioned details are required in order to provide substance to the green wall proposal and to demonstrate that measures will be taken to ensure it is successful for the**

	long term. It is noted that the application plans rely heavily on the green wall as a key feature of the proposed building's aesthetic impact in the streetscape and the wider Montague South precinct. Therefore it is essential that this aspect of the design is carefully considered as part of the design at the planning stage. The submitted landscape plans merely include a notation "allocation for green wall by others", which is insufficient. It is also noted that the proposed plans show a green wall on the north-east podium wall, which is on a site boundary abutting private property. - *"Provision of substantial landscaping on the top of the podium is supported. Application details will need to show cross sections of deep planting zones as well as providing a developed landscape plan with species, irrigation and maintenance details."* – The podium landscaping proposal contains a high proportion of paving. The outcome could be improved by adding other surface medium into the mix, such as areas of ground cover etc. **This will contribute to a reduction of urban heat island effect and reduce glare, making the external space more comfortable for occupants. The proposed podium landscaping plan doesn't include cross sections of deep soil planting areas for trees. It is also noted that the proposed species for the four trees on the podium corners should reach a height of four metres at maturity, according to the plant schedule, whereas the trees shown on the elevations are much larger. This along with the green wall shown on the north-east podium wall provides a false picture of what the proposed landscaping will look like. In reality the podium landscaping will have an insignificant visual impact from the street and surrounding area.** - *"No roof plan has been provided at this stage. The proposal should incorporate solar PV on the roof where it can be accommodated along with standard services. Consideration of Building Integrated Photo Voltaic (BIPV) is also encouraged and could be employed to accommodate solar PV if roof space is limited, as well as providing a potential solution to external shading requirements and providing visual interest."* **– Previous comments still stand. The current plans now include a roof plan. However the roof just contains one notation of "plant area" and no solar PV is proposed.** - *"All standard requirements for developments in FBURA will apply to this proposal, including mandatory third pipe provision, rain water tanks in accordance with the standard conditions of CCZ1, standard conditions requiring Green Star Design and As Built certification (a rating of 5 stars will be required for this proposal). The bike parking, car share parking and motorcycle parking spaces requirements as per the CCZ1 will also apply."* **– Previous comments still apply. It is noted that the non-residential parking provision requirements in table 2 of CCZ1 will not apply as the development contains less than 10,000m2 non-residential floor space.** My previous comments on initial plans referred to the need for provision of external shading to north-east and north-west facing glazing. The previous design included some overhanging balconies in the tower which provided shading to some of the exposed glazing. However the change of design to a purely commercial building has resulted in there being no external balconies or overhanging features. Therefore the north-east and north-west facing glazing will be highly exposed to excessive solar heat gain, which will result in low occupant comfort and high reliance on mechanical heating and cooling. The façade design should be amended to include external shading to glazing within the architectural language of the building. As stated in my comments on previous plans, reliance on "performance glazing" alone to deal with heat loads will not be accepted.

	Comments on the SMP: - A five star Green Star Design & As Built rating is targeted which is consistent with the mandatory Green Star condition under schedule 1 of the Capital City Zone. However, this project should seek a certified rating, as per the mandatory condition requirement in CCZ1, rather than just benchmarking against the Design & As Built rating tool, noting that the project will be required to be registered with the GBCA prior to commencement of works as per the condition wording. - The proposed 30,000 litre rainwater tank is not sufficiently large to meet the mandatory condition requirement for rain water tank sizing under the CCZ1 of 0.5m3 per 10m2 of roof catchment including podiums. The tank size must be increased to respond to this requirement. It is also noted that the SMP states that the tank will only be connected to some toilets for flushing, consistent with the mandatory condition requirements in the CCZ1. The tank must be collected to all toilets within the development for flushing to enable continual draw down from the tank. This will ensure that there is sufficient tank capacity to collect rainwater during a storm event. - The Green Star Design & As Built Scorecard targets 60 points, which will just make it to a five star rating, provided all those credits are actually implemented. The SMP should demonstrate how the development will achieve the rating with a 10% buffer above the minimum 60 + 6 = 66 points Five Star Australian Excellence. General alignment to the Fishermans Bend Framework should also be followed as outlined in the Arup Report Fisherman's Bend Review of Sustainability Standards refer Appendix A for 5 star Pathway for 66 points. **Amended Plans April 2020:** **<u>Green Star:</u>** *Mandatory certified Green Star Design & As Built ratings are specified at Clause 4.3 of the Capital City Zone, Schedule 1, which apply as follows:* *<u>Developments of 10 or more dwellings or 5,000m2 or more of floor space</u>* = ***<u>5 star</u>*** The Sustainable Management Plan (SMP) should be amended to show how the development will achieve a five star Green Star Design & As Built rating with a 10% buffer above the minimum 60 point requirement. 60 + 6 = 66 points = Five Star "Australian Excellence". General alignment to the Fishermans Bend Framework should also be followed as outlined in the Arup Report Fisherman's Bend Review of Sustainability Standards refer Appendix A for 5 star Pathway for 66 points. The implementation schedule in the report does not reflect the green star credit requirements. It is also unclear if the development will even achieve the 60 points claimed. Green star credit specific queries are listed at the end of this referral. **<u>Energy:</u>** The application must demonstrate how the project will achieve a 20% increase on minimum NCC energy efficiency standards, as required in the Fishermans Bend Urban Renewal Area Policy at Clause 22.15-4.5. The application must demonstrate how the proposal incorporates renewable energy generation, on-site energy storage and opportunities to connect to a future precinct-wide or locally distributed low-carbon energy supply.

	The SMP provided does not address either of these requirements. **Integrated Water Management (IWM):** The application must address the third pipe and rain tank requirements set out at Clause 4.3 of Schedule 1 to the Capital City Zone, as set out below. The application must demonstrate how these requirements are accommodated into the proposed design: 1. *A third pipe must be installed for recycled and rain water to supply all non-potable outlets within the development for toilet flushing, irrigation and washing machine unless otherwise agreed by the relevant water authority.* 2. *An agreed building connection point must be provided from the third pipe, designed to the satisfaction of the relevant water supply authority, to ensure readiness to connect to a future precinct-scale recycled water supply.* 3. *A rainwater tank must be provided that:* - *Has a minimum effective volume of 0.5 cubic metres for every 10 square metres of catchment area to capture rainwater from 100% of suitable roof rainwater harvesting areas (including podiums);* - *Is fitted with a first flush device, meter, tank discharge control and water treatment with associated power and telecommunications equipment approved by the relevant water authority.* 4. *Rainwater captured from roof harvesting areas must be re-used for toilet flushing, washing machine and irrigation or, controlled release.* Proposed design does not address third pipe requirements and the stormwater strategy needs to be improved. **Waste:** The proposal must respond to the waste requirements of Clause 22.15-4.5 including the following: • *Optimise waste storage and efficient collection methods.* • *Combine commercial and residential waste storage.* • *Share storage or collections with adjacent developments.* • *Separate collection for recycling, hard waste, and food and green waste.* The current waste management provisions need to improve to include requirements noted above. **Urban Ecology:** The application must demonstrate how the proposal is designed to reduce the urban heat island effect, in accordance with the requirements of Clause 22.15-4.5, as follows: *At least 70 per cent of the total site area should comprise building or landscape elements that reduce the impact of the urban heat island effect including:* - *Vegetation, green roofs and water bodies.* - *Roof materials, shade structures, solar panels or hard scaping materials with high solar reflectivity index.* *Non-glazed facade materials exposed to summer sun should have a low solar absorptance.* Provide further information on external elements to demonstrate the above requirements will be met.

	The application must also respond to the landscape requirements in accordance with Clause 22.15-4.7, as follows: *Landscape areas should;* - *Incorporate innovative approaches to flood mitigation and stormwater run-off, and best practice Water Sensitive Urban Design.* - *Plant selection should;* - *Support the creation of complex and biodiverse habitat that includes native and indigenous flora and fauna.* - *Balance the provision of native and indigenous plants with exotic climate resilient plants that provide resources for biodiversity.* - *Support the creation of vegetation links within Fishermans Bend to surrounding areas of biodiversity though planting selection and design.* - *Incorporate food plants.* Commend the green wall proposed, however no details of the plant types have been provided. Proposed landscape design needs to be improved to meet objectives noted. **External Shading** Concerned about the extent of exposed Northeast and Northwest facing glazing (i.e. not shaded by building geometry or shading devices). External shading should be provided to prevent glare and overheating. This could be in the form of external operable awnings, louvers, sliding shutters, venetian or roller blinds. **Greenstar Assessment** NOTE: The comments following can be ignored if the development commits to achieving a GBCA certified 5-star Green Star – Design & As Built rating. 2.0 Environmental Performance Targets Provide detail of commitment in report to claim this credit. 2.1 Services and Maintainability Review Provide review in report to claim this credit. 3.0 Implementation of a Climate Adaptation Plan Provide this plan in report to claim this credit. 8A Operational Waste Management Plan Current WMP is not compliant with Green Star requirements, please clarify and amend. 12.1 Daylight Calculations (modelling or hand calculations) must be included in the report to demonstrate how the spaces are predicted to perform in relation to green star credit benchmarks.

	12.2 Views Calculations must be included in the report to demonstrate how the spaces are predicted to perform in relation to green star credit benchmarks. 15E.1 GHG Emissions Reduction Report need to clearly state a commitment to achieving a minimum 15% reduction in greenhouse gas emissions to reflect the points claimed. 17B.1 Access by Public Transport Provide calculations that justify the points claimed in this credit 17B.4 Active Transport Facilities Provide calculations that show how requirements on Green Star – Design & As Built Tables 17B.4.2-3 are met with the current facilities shown on plans. 18B.2 Rainwater Reuse Proposed system does not meet green star requirements. This credit is incorrectly claimed. 23.1 Ecological Value Provide calculations that result in the 0.5 point claimed. 24.2 Contamination and Hazardous Materials Provide relevant report showing compliance to claim this credit. 25.0 Heat Island Effect Reduction Proposed external finishes do not appear to meet green star requirements. Please provide further information. 26.1 Reduced Peak Discharge To claim this point the project must demonstrate that the post-development peak event stormwater discharge from the site does not exceed the pre-development peak event stormwater discharge, using the Average Recurrence Interval (ARI) specified in Green Star – Design & As Built Table 26.1. Please provide further information on how this will be met. 30A Innovative Technology or Process There is nothing proposed in report that justifies this point claim. Please clarify.
Traffic	**February 2020:** Summary of site proposal includes (based on the TIA): • Retail floor space at ground level – 2842 square metres (area size needs to be updated)

	• Office floor space over 13 levels – 6,266.7 square metres • Access for vehicles from Buckhurst Lane • Stacker parking for 31 cars • Staff bicycle storage for 25 bikes • Pedestrian access from Thistlewaite Street and from a right of way off Tates Place. Traffic and Parking comments below: **1. Parking Overlay and Parking Provisions** a. Clause 45.09 of the planning scheme requires o Retail – 2 parking spaces (assuming the retail floor space is 284sqm; can the applicant clarify this?) o Office – 62 parking spaces o Total 64 parking spaces. b. The TIA comment this site has a maximum allowable car parking for this site is 63 parking spaces. Can the applicant clarify the maximum parking? c. The site proposes to provide 31 car parking spaces. The TIA and the architectural plans does not indicate they will provide a **loading and waste collection area**. This is considered a poor outcome. The site should be self-sufficient, and all loading and waste collection should be undertaken on site. o It is noted a waste bins are located near the lifts. Can the Applicant provide more information how waste vehicles will access this site? Waste Management plan to be referred to Council's Waste Management department for assessment. d. Note that the assessment for the appropriate rate for car parking provision lies with Statutory Planning team. **2. Parking Layout and Accessway** a. It is proposed to provide all parking spaces via mechanical stacker, Klaus Trendvario 4300-200 model. The TIA indicate the specifications of the model proposed includes: o Useable platform length – 2.4m o Useable platform width – 5.2m o Height; Upper Level – 1.75m, Ground Level – 2.05m, and Lower Level – 1.75m b. Can the Applicant clarify if the design of the pit depth is suitable for Klaus Trendvario 4300-200? c. Update swept path assessment to show: o the outline of the useable platforms' width/length/columns etc. o the carriageway width of Buckhurst Lane. d. The swept path indicates vehicles reversing into the mechanical stacker. Can the applicant confirm with the stacker provider that it is acceptable for vehicles to reverse onto the platforms? e. Update plans to show the dimensions of the car door to Buckhurst Lane. f. No sight splay has been provided.

g. Headroom clearance should satisfy Cl 52.06 or other relevant design guidelines specific for Fishermans Bend.
h. Applicant must have an action plan in place for when scheduled maintenance occurs or the lift is temporarily unavailable.
i. The accessway from the carpark to the Lifts are not convenient due to the staircase.

3. Traffic Generation and Impact

a. Update the TIA to also include an assessment of the expected daily, AM and PM (arrivals and departures) vehicle movements?
b. It is noted the TIA indicate during AM peak hour there is an expected 20 inbound vehicle movements.
c. There has not been a cumulative traffic generation/impact assessment for other developments been undertaken.

4. Bicycle Facilities

a. Clause 52.34 of the planning scheme requires:
    - Retail – 1x Employee and 1x Visitor
    - Office – 20x Employee and 6x Visitors
    - Total – 28 bike racks.
b. Can the TIA be updated to show the correct bike provision?
c. The proposed bike racks located on the footpath is not supported.
d. The plan show 25 bike racks are located on Level 1. The bike storage area is not conveniently located to access and the aisle width is too narrow.
e. Design suggestion:
    - The Australian Standards require a minimum of 20% horizontal, ground level bicycle parking spaces (not wall mounted).
    - Secure bicycle parking facility must be provided for staff use.
    - Refer to design guidelines outlined in Clause 52.34.
f. It is suggested to provided visitor bike spaces near the sites frontage (contained wholly within their site)
g. Some consideration to provide electric bike charging stations.
h. It is noted given the parking shortfall it is recommended they provide additional bicycle facilitates.

5. Waste Collection and Loading

a. Development shall be self-sufficient to accommodate car parking and loading needs without over reliance on existing on-street parking. Future streetscape works may result in removal / reduction of available on-street parking supply.
b. As per Clause 65.01 the adequacy of loading and unloading facilities are to be considered prior to approval of a planning application.
c. Waste Management plan to be referred to Council's Waste Management department for assessment.

	6. Green Travel Plan a. In addition to my comments below I suggest you also seek advice from Strategic Transport team too regarding the Green Travel Plan. b. Update 2.1.2 to mentioned Integrated Transport **Strategy**; not Integrated Transport **Plan**. c. Delete sections 2.1.3. The Bike Plan was superseded with the Integrated Transport Strategy 2018-2028. d. The reporting of the GTP should be available on request by Council at any time. e. Should monitoring indicate the Green Travel Plan targets are not met further incentives should be implemented where possible to increase sustainable modes of transport- This could be in the form of but not limited to: o Bike sharing at office- including provision of bike(s) or electric bike(s), helmets and bike locks. o Organised events that for staff that travel to work using sustainable modes of transport. (Public transport, o walking and cycling), eg; Walk to Work Day, Ride to Work Day, impromptu events etc. o Install more bike racks on site given the parking waiver. o Subsidised costs or free Myki for staffs/visitors. o Subsidised Car Share membership cost. o provided / install electric bike charging area/stations. f. **Council's on street Car Share network**: o Given the development's strong commitment to Sustainable Travel choices, Council have identified the frontage of the site as a potential location for a new on-street car share bay. Further information will be provided to the building owner if Council decides to proceed with a proposal at this location. o There are not many existing convenient on-street Car Share to this property. Therefore, I suggest the GTP to be updated to mention the site will support Council, if we decide to install an on-street Car Share bay along the building's frontage in the future. **Amended Plans April 2020:** I do not believe the carpark layout changed. My comments are similar to my previous comments sent on 17 February 2020. Summary of site proposal includes: • Retail floor space at ground level – 281.3 square metres • Office floor space – 6,070 square metres • Access for vehicles from Buckhurst Lane • Stacker parking for 31 cars • Staff bicycle storage for 32 bike racks on-site • Pedestrian access from Thistlewaite Street and from a right of way off Tates Place.

Traffic and Parking comments below:

7. Parking Overlay and Parking Provisions

a. Clause 45.09 of the planning scheme requires
   - Retail – 2 parking spaces
   - Office – 60 parking spaces
   - Total 62 parking spaces.

b. The TIA comment this site has a maximum allowable car parking for this site is 60 parking spaces. Can the applicant clarify the maximum parking?

c. The site proposes to provide 31 car parking spaces.

d. The TIA and the architectural plans does not indicate they will provide a **loading and waste collection area**. This is considered a poor outcome. The site should be self-sufficient, and all loading and waste collection should be undertaken on site.
   - It is noted a waste bins are located near the lifts. Can the Applicant provide more information how waste vehicles will access this site? Waste Management plan to be referred to Council's Waste Management department for assessment.

e. Note that the assessment for the appropriate rate for car parking provision lies with Statutory Planning team.

8. Parking Layout and Accessway

a. 29 carparking spaces via Klaus Trendvario 4300-200 model. The TIA indicate the specifications of the model proposed includes:
   - Useable platform length – 2.4m
   - Useable platform width – 5.2m
   - Height; Upper Level – 1.75m, Ground Level – 2.05m, and Lower Level – 1.75m

b. Plans does not show clearance for end spaces (i.e. adjacent to side walls) as indicated in the stacker specification document.

c. Can the Applicant:
   - Indicate if a sliding door will be installed and what type?
   - provide a cross section of the carpark area and clearly show measurements?
   - Confirm with the mechanical stacker provider if it is acceptable for vehicles to reverse onto the platforms?

d. Update swept path assessment to show the outline of the useable platform's width and length.

e. No sight splay has been provided.

f. Headroom clearance should satisfy Cl 52.06 or other relevant design guidelines specific for Fishermans Bend.

g. Applicant must have an action plan in place for when scheduled maintenance occurs or the lift is temporarily unavailable.

h. The accessway from the carpark to the Lifts are not convenient located due to the staircase.

	9. Traffic Generation and Impact a. Update the TIA to also include an assessment of the expected daily, AM and PM (arrivals and departures) vehicle movements? b. It is noted the TIA indicate during AM peak hour there is an expected 20 inbound vehicle movements. c. There has not been a cumulative traffic generation/impact assessment for other developments been undertaken. d. I have concerns the assessment has not considered the expected traffic volumes by other sites that will have access via Buckhurst Lane. e. Given the expected traffic volume increase it is recommended Buckhurst Lane's carriageway to widen. **10. Bicycle Facilities** a. Clause 52.34 of the planning scheme requires: o Retail – 1x Employee and 1x Visitor o Office – 20x Employee and 6x Visitors o Total – 28 bike racks. b. The plan show 32 bike racks are located on ground level. c. Can the Applicant provide bike rack model and if change room(s) will be provided? d. Two shower rooms have been provided. e. Design guidelines: o The Australian Standards require a minimum of 20% horizontal, ground level bicycle parking spaces (not wall mounted). o Secure bicycle parking facility must be provided for staff use. o Refer to design guidelines outlined in Clause 52.34. f. It is suggested to provided visitor bike spaces near the sites frontage (contained wholly within their site) g. Some consideration to provide electric bike charging stations. h. It is noted given the parking shortfall it is recommended they provide additional bicycle facilitates. i. Remove the proposed bike racks on the footpath, Thistlethwaite Street side. **11. Waste Collection and Loading** a. Development shall be self-sufficient to accommodate car parking and loading needs without over reliance on existing on-street parking. Future streetscape works may result in removal / reduction of available on-street parking supply. b. As per Clause 65.01 the adequacy of loading and unloading facilities are to be considered prior to approval of a planning application. c. Waste Management plan to be referred to Council's Waste Management department for assessment. **12. Green Travel Plan (GTP)** a. The GTP you have attached is the same plan I assessed previously. If there is an updated plan can you send it to me? If not please refer below my comments I sent regarding the GTP last time.

	b. In addition to my comments below I suggest you also seek advice from Strategic Transport team too regarding the Green Travel Plan. c. Update 2.1.2 to mentioned Integrated Transport **Strategy**; not Integrated Transport **Plan**. d. Delete sections 2.1.3. The Bike Plan was superseded with the Integrated Transport Strategy 2018-2028. e. The reporting of the GTP should be available on request by Council at any time. f. Should monitoring indicate the Green Travel Plan targets are not met further incentives should be implemented where possible to increase sustainable modes of transport- This could be in the form of but not limited to: o Bike sharing at office- including provision of bike(s) or electric bike(s), helmets and bike locks. o Organised events that for staff that travel to work using sustainable modes of transport. (Public transport, walking and cycling), eg; Walk to Work Day, Ride to Work Day, impromptu events etc. o Install more bike racks on site given the parking waiver. o Subsidised costs or free Myki for staffs/visitors. o Subsidised Car Share membership cost. o provided / install electric bike charging area/stations. g. **Council's on street Car Share network**: o Given the development's strong commitment to Sustainable Travel choices, Council have identified the frontage of the site as a potential location for a new on-street car share bay. Further information will be provided to the building owner if Council decides to proceed with a proposal at this location. o There are not many existing convenient on-street Car Share to this property. Therefore, I suggest the GTP to be updated to mention the site will support Council, if we decide to install an on-street Car Share bay along the building's frontage in the future.
Waste	**August 2019** I've reviewed the WMP and have comments as below; • We would recommend a dual chute system to improve the separation of recycling. No information has been provided how recycling will take place on floors. • Recommend space for and compost bin for future council services. • Recommend space for Hard waste, charity bin and E-waste. • Require more details about the type of arrangements on ventilation, washing and Vermin-prevention of the waste storage area. • Require swept path diagram for waste vehicle .

Open Space	**August 2019** Below are my comments regarding impacts to trees in relation to the development at 2-14 Thistlethwaite Street, South Melbourne. • Two Council owned nature strip trees are proposed to be retained. Further information will be required as a condition of the permit (as per below), discussing the impacts to these trees and how they will be protected. ○ To satisfy Council that the street trees will not be adversely impacted and protected during development. Before demolition begins, a tree protection management plan (TPMP), setting out how the street trees will be protected during construction, must be submitted to and approved by the responsible authority. When approved the TPMP will be endorsed and form part of the permit. The TPMP should generally follow the layout of Section 5 (i.e. General, Tree Protection Plan, Pre-construction, Construction stage and Post Construction) of AS4970 'Protection of trees on development sites'. • No trees within the subject site are considered significant under the local law. Therefore, Council would not generally object to their removal. • I have concerns about the proposed tree planting on level 5 and how they are going to be stabilised against the effects of high wind loading while the tree is establishing. Cable guys or similar attached to the base structure should be considered. **May 2020** - No concerns from open space planning over the proposal. - Kirrip Park is in close proximity to the site and provides excellent opportunities for short lunch breaks and respite.
Heritage	**August 2019** No heritage issues with this site **February 2020** **Questions –** Could you please provide a response regards the relationship of the podium height and materials to the Urban Character graded building adjacent to the west side at 16-20 Thistlethwaite Street. Planners previously raised a concern that the 5-level podium should not step up from the adjacent 4 level building to the west (and the approved but not constructed 4 level podium to the east). They have not reduced the height of the podium, but have attempted to ameliorate its impact by use of similar brickwork up to level 4 and curtain wall above. **Response -**

	The issue of the façade transition is better answered by the Urban Design team. The adjoining building at the corner of Taits Lane was assessed by the FB heritage review and found not to meet the threshold of local significance due to low integrity, so there are no heritage considerations having regard to the potential impact upon this building.