

**240-246 Normanby Road, South Melbourne (Site 04) - 6/2015/MIN/A - C195port  
City of Port Phillip Site – Internal referral responses**

**Property Services**

Council currently doesn't have any properties in the vicinity and we note that the applicant is building to title boundaries, so we don't see any concerns from our end.

**Development Engineer**

The only comment I have from an asset management perspective is that Council do not accept subterranean water from the basement into its stormwater system.

**Waste Management Officer**

I have reviewed the plan and have following comments;

- Please note collection times on the WMP. May refer to Port Phillip Local Law. 1 <https://www.portphillip.vic.gov.au/media/uxyj0vjw/copp-local-law-number-1-community-amenity.pdf> for guidance.
- Please provide the storage capacity of the dehydrator and also how much material it can process weekly.
- Please confirm if the dehydrator is used for Residential/Commercial or for both.
- The ground floor entrance height shows as 3.9m and the waste truck operating height is 4.0m.

Rest looks good.

**Heritage Advisor**

No heritage issues – I note your comment about the podium height, but this an urban design/response to context matter rather than a heritage issue per se, so I'll let this be addressed as part of the UD referral

**Building Department**

1. I have serious concerns about the egress distance (“to a point of choice”) on levels 3-5, which currently measures approximately 36m in lieu of 6m as required by “deemed to satisfy” Clause D1.4(a)(i)(A). I am not convinced that this could meet the performance provisions of the National Construction Code after assessment by a fire engineer. Even if a fire engineer were to conduct an assessment which were to support this, I do not believe a prudent building surveyor should support this outcome.
2. There are some other more minor “deemed-to-satisfy” non compliances in relation to emergency egress. These issues will very likely be dealt with under the performance provisions of the Regulations (i.e. fire engineering) and will likely not impede the building approval process.
3. The development is likely to undergo minor design development.

**Sustainable Design Planner**

Please find attached referral comments for this application. Let me know if you need to discuss any aspect of this advice.

**Documents Reviewed (Plans, Documents, Author & Date):**

E31144/21 - ARCHITECTURAL DRAWINGS (Rev 02 - 02-02-2021)

E31141/21 - SUSTAINABILITY MANAGEMENT PLAN (Rev 3 - 27-11-2020)

**Application Status:** VCAT/ Panel

**Outcome:**  The application does not demonstrate best practice for ESD

**Suggested Action:**  ESD improvements required prior to decision > Re-Refer to Sustainable Design

### **ESD improvements required prior to decision:**

The following key ESD matters must be improved/addressed prior to approval, whereas the other matters discussed in the referral could be resolved in an amended SMP to be endorsed prior to commencement of works. Please re-refer to Sustainable Design Advisor:

- Integrated Water Management: The proposal has not demonstrated that it would meet the mandatory rain water tank and third pipe requirements pursuant to CCZ1 Clause 4.3, nor the stormwater quality requirements of Clause 22.12
- A Climate Adaptation Plan should be appended to the SMP and any resulting design changes included on the plans.
- Additional details for energy efficiency of non-residential spaces and details of proposed solar PV system.

### **Items required to be addressed via conditions:**

#### **Details for condition 1 plans:**

- *Rainwater tank size and reuse notation*
- *Solar PV system capacity*
- *Urban Heat Island mitigation for 75% of the site area showing vegetation and appropriate surface types.*

#### **Other conditions required:**

In addition to the mandatory permit conditions for Green Star, Rain Tanks and Third Pipe, listed at Clause 4.3 of Schedule 1 to the Capital City Zone (CCZ1) the following conditions are required:

#### ***Stormwater Treatment Maintenance Plan***

*Prior to the endorsement of plans under condition 1 of this permit, a Stormwater Treatment Maintenance Plan detailing the on-going maintenance of the stormwater treatment devices must be submitted to and approved by the Responsible Authority, addressing the following points;*

- *A full list of maintenance tasks for each device,*
- *The required frequency of each maintenance task (e.g. monthly, annually etc.),*
- *Person responsible for each maintenance task.*

*The Stormwater Treatment Maintenance Plan can be part of the Water Sensitive Urban Design (Stormwater Management) response, or can be contained in a stand-alone manual. When approved, the STMP will be endorsed and will form part of this permit.*

#### ***Construction Management Water Sensitive Urban Design***

*The developer must ensure that throughout the construction of the building(s) and construction and carrying out of works allowed by this permit;*

- a) No water containing oil, foam, grease, scum or litter will be discharged to the stormwater drainage system from the site;*
- b) All stored wastes are kept in designated areas or covered containers that prevent escape into the stormwater system;*
- c) The amount of mud, dirt, sand, soil, clay or stones deposited by vehicles on the abutting roads is minimised when vehicles are leaving the site.*
- d) No mud, dirt, sand, soil, clay or stones are washed into, or are allowed to enter the stormwater drainage system;*
- e) The site is developed and managed to minimise the risks of stormwater pollution through the contamination of run-off by chemicals, sediments, animal wastes or gross pollutants in accordance with currently accepted best practice.*

### **FULL REFERRAL COMMENTS BY CATEGORY:**

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 5,000m<sup>2</sup> or more of floor space = 5 star*

The Sustainable Management Plan (SMP) states that the project is targeting a benchmarked (as in not certified) 5 star Green Star rating using the Design and As Built rating tool v1.2. The planning scheme requires this development to gain certification with the Green Building Council of Australia (GBCA), so a benchmarked rating is not acceptable. The SMP must be updated to commit to certification with the GBCA.

The SMP targets 60.8 Green Star points, which, if achieved, would narrowly meet the 60 point requirement for a 5 star Green Star rating Design & As Built rating. The credits targeted in the SMP should be updated to include a 10% buffer above the minimum 60 point requirement to ensure that at least 60 points are achieved during construction if unforeseen changes arise along the way.

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.

**IEQ:**

**Comments below are based on the targeted Green Star credits:**

**Ventilation System Attributes (9.1)**

This credit is targeted but the SMP is lacking in detail. It should state how the entry of outdoor pollutants, design for ease of maintenance and cleaning prior to occupation is going to be approached, consistent with the requirements of the Green Star Design & As Built submission guidelines v1.2 (the GS Submission Guidelines).

**Lighting Comfort (11.0 & 11.1)**

This credit is targeted but the SMP is lacking in detail. Details should be provided of how the requirement of these credits will be met. There is not much reference to the objectives of these credits in the SMP text.

**Glare Reduction (11.1)**

This credit is targeted but the SMP refers to reducing and controlling glare from sunlight, whereas the GS credit requirement is to limit glare from lamps. Therefore the details in the SMP demonstrate that this credit would not be met. It is also noted that, for glare reduction from sunlight (which is considered under credit 12.0) the SMP states that the internal fit outs will have the opportunity to install blinds, which is not considered to be a solid commitment.

**Localised Lighting Control (11.3)**

This credit is targeted but the SMP is lacking in detail as to how localised lighting controls would be implemented in accordance with the GS submission guidelines.

**Daylight (12.1)**

This credit is targeted but the SMP is lacking in detail. The GS Submission Guidelines set three pathways available to achieve this. The SMP does not nominate which pathway would be used or provide any details of how this would be achieved.

**Energy:**

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. For residential developments, this includes achieving an average 7 star NatHERS rating for all buildings. - This commitment is included in the SMP under the Green Star credit for Thermal Comfort (14.1 and 14.2).

The SMP opts for the NatHERS pathway under the Energy section of Green Star (Greenhouse Gas Emissions credit 15.B). Six out of 16 points are targeted in the GS pathway at Appendix A. The SMP should provide details of how these six points would be claimed.

The SMP does not address exceeding NCC for the non-residential components of the development, noting that the NatHERS rating pathway for the Energy section of Green Star applies only to multi-unit residential dwellings. The SMP must address energy efficiency for the retail and residential hotel components, as well as building services and any element that is not covered by NatHERS.

The application must demonstrate how the proposal incorporates renewable energy generation, on-site energy storage and opportunities to connect to a future precinct-wide or locally distributed low-carbon energy supply. - A solar PV system is proposed and shown on the roof plan. However, the SMP does not provide any details of this and the system capacity is not stated. There is no commitment to storage, i.e. a battery.

#### **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. - This requirement is not met with the proposal using rainwater for toilets only. Refer to comment under point no. 4 below.*
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. - The SMP states that the third pipe connection point would be in the basement at one of the building corners, depending on which street the supply pipe will be located in and notes that no supply pipe exists at present. Note that the location of the connection point must be agreed by the relevant water authority, in this case South East Water, which will need to be agreed when the hydraulic plans are finalised. It would assist if the location of the connection point is indicated on the planning drawings.*
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); - The proposed 26kL rainwater tank is incorrectly sized and does not meet this requirement. The proposed catchment of 906.4m<sup>2</sup> would require a 45kL tank. The proposed rainwater catchment excludes the podium. Notwithstanding that the majority of the podium would be trafficable terraces, it should be connected to stormwater treatment.*
  - *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. - The tank capacity must be noted on the floor plans (not currently noted).*
4. *Rainwater captured from roof harvesting areas must be re-used for toilet flushing, washing machine and irrigation or, controlled release. - The Potable Water Calculator details at Appendix C show that the rainwater tanks would be connected to all toilets but that laundries would use 100% potable water, which is not acceptable. There is also no water source*

nominated for landscaping. The planning controls require rainwater to be connected to all toilets and laundries as well as irrigation. The SMP must be update to reflect this requirement.

5. Modelling – For sites above 1000m<sup>2</sup>, **we do not accept STORM calculations** as appropriate stormwater modelling. Provide MUSIC modelling that demonstrate conformance with Melbourne Water’s MUSIC modelling guidelines  
[www.melbournewater.com.au/sites/default/files/2018-02/Music-tool-guidelines-2018.pdf](http://www.melbournewater.com.au/sites/default/files/2018-02/Music-tool-guidelines-2018.pdf)

A STORM report is provided in the SMP which is not acceptable for the scale of development approved. MUSIC modelling must be provided to demonstrate how stormwater quality requirements will be met in accordance with Clause 22.12. It is noted that the project is not targeting any points under the Green Star credit for Stormwater Pollution Targets 26.2. The project should be achieving the requirements of this credit (based on Column B pollution reduction targets in the GS Submission Guidelines) in order to comply with Clause 22.12. The fact that the credit isn’t targeted suggests that insufficient stormwater quality would be achieved, which is not acceptable.

The rainwater tank maintenance manual that has been used in the SMP at Appendix E is taken from a Council template that is for small scale domestic use only. It is not appropriate for a development of this scale. A bespoke WSUD maintenance manual should be included in the SMP for all stormwater treatment devices.

#### **Potable Water (18A.1)**

It is noted that only 1.3 out of 14 points are targeted under the Potable Water Green Star Credit (18A.1), using the performance pathway. The proposal should target a higher score in this key ESD category.

#### **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 above list of objectives is generally addressed but further details are required as per comments below.

#### **Waste Management (8B)**

The SMP states *“Facilities will be in place at the construction site to collect and separate distinct waste streams that meet best practice access requirements for collection by the relevant waste contractor.”* – This is welcomed for the construction phase but it does not address Green Star credit 8B which focusses on operation waste.

#### **Recycling Waste Storage (8B)**

This credit is targeted but the SMP lacks detail. There is no reference to the specific requirements for separation of waste streams, dedicated waste storage areas and access to waste storage areas as set out in the GS Submission Guidelines requirements.

#### **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.*

The SMP commits to the above requirement via Green Star Credit 25 Heat Island Effect, stating that this will be achieved for 75% of the site area through a combination of light reflective materials on terraces and roofs and vegetation on terraces. The drawing set should include a plan to demonstrate how this will be incorporated for at least 75% of the site (consistent with the targeted Green Star credit requirements, which apply to 75% site area, not 70% as per Clause 22.15).

*Non-glazed facade materials exposed to summer sun should have a low solar absorptance. – Not addressed.*

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 through planting selection and design.*
- *Incorporate food plants.*

There is no response to the above list of objectives in the SMP.

#### **Transport:**

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

For developments of over 50 dwellings:

*Residential Bicycle Parking = 1 space per dwelling + 1 visitor space per 10 dwellings – Provided (134)*

*Residential Motorcycles = 1 space per 50 dwellings – Provided (2)*

*Residential Car Share = 2 allocated spaces + 1 allocated space per 25 car parking spaces – Not demonstrated on plans*

#### **Materials:**

No comments.

#### **Building Management & Construction:**

##### **Environmental Performance Targets (2.0)**

This credit is targeted but the SMP is lacking in detail. It should include details of how the design intent report addresses the specific credit requirements in the GS Submission Guidelines.

##### **Climate Adaptation Plan (3.0)**

This Green Star credit has been committed to in the SMP. The credit requires a climate adaptation plan to be produced and to inform the building design in response to identified climate risk. On this basis, it is expected that the plan be produced prior to application approval so that any necessary design considerations/changes resulting from the plan’s recommendations can be integrated into the design.

##### **Building information (4.0)**

The SMP should contain more detail about the proposed format and delivery method for the building information, to demonstrate how compliance with this credit will be achieved.

##### **Environmental Building Performance (5.1)**

This credit is targeted but the SMP is lacking in detail. The SMP must state which building performance commitment option has been selected and provide metrics in accordance with that option, as per the details in the GS Submission Guidelines.

**Innovation:**

**Innovation Challenge - Occupant Engagement (30D)**

This credit is targeted but the SMP is lacking in detail. The SMP must outline how occupant engagement will be carried out and what methodology will be used as well as providing details on intended use of the information once collected.

**Transport Engineer**

Please find attached traffic comments.

**1. Parking Provision:**

- The Applicant proposes 182 car parking spaces. Update traffic report to provide a clear breakdown of car parking space proposal.

	Number/Area	Clause 45.09	Applicant Proposal
1-bedroom dwelling	5	2.5	?
2-bedroom dwelling	37	18.5	?
3-bedroom dwelling	56	56	?
4-bedroom dwelling	22	22	?
Service Apartments	81	81 – Salt adopted the following parking rate “1 to each unit, and one to each manager dwelling, plus 50 per cent of the relevant requirement of any ancillary use”	?
Retail	570sqm	5	?
Total		185	182

- There are no specific parking rates for “service apartments” in Clause 45.09 and 52.06. Can the Applicant clarify how the park rates for “service apartments” were identified? One space per apartment is considered high. This is higher than typically proposed for new developments in other areas of Port Phillip.
- Eight car share spaces are proposed. I strongly recommend seeking feedback from Strategic Transport team regarding car share proposal.
- Two motorcycle parking spaces are proposed. This satisfy Clause 37.04 requirements
- The report does not provide any information if the number of car parking spaces will be reduced or car park levels will be repurposed for other use in the future as per FB Framework.
- I strongly recommend disabled car parking bays are provided. Any future request for on-street disabled parking spaces will not be supported.
- Note that the assessment for the appropriate rate for car parking provision lies with Statutory Planning.

**2. Parking Layout and Access Arrangements:**

Site access arrangement is not supported.

- Section 10 of the report discuss why three crossovers are proposed. I do not support the reasons and strongly believe a better outcome can be achieved.
- Three crossovers are proposed via Munro Street. This is not supported. Clause 45.09 states accessway should be consolidated. This will ensure a safer outcome for pedestrians using the footpath.
- The proposed crossovers widths are wider then stated in Clause 45.09.
- No consideration has been provided for the location of the adjacent property’s crossover. Note, if the adjacent property crossover is along the edge of this site a pedestrian refuge must be provided.
- Full pedestrian sight triangles have not been provided in accordance with Clause 52.06. Update plans to show pedestrian sight triangles.
- I have concerns of queuing and vehicle conflict because of the proposed access arrangement to the basement level. The Applicant will need to ensure there is sufficient area on-site for cars to queue. The proposed outcome must ensure cars will not queue on the road.
- Can the Applicant confirm if a boom gate (or something similar) will be provided? Any boom gate installed must be setback internally to ensure cars do not prop on the footpath or the road. A queuing assessment will need to be undertaken to determine setback distance.
- A queuing assessment was undertaken to assess the probability of conflict within the two-way one lane ramp. I believe the assessment are based on low traffic generation rates. I have concerns actual or a conservative assessment will indicate cars queuing.

### Car park layout

- Traffic report states car parking spaces are designed 4.9m long x 2.6m wide accessible from a 6.4m aisle width. Having reviewed the car park design some car park spaces have not been provided with additional clearance that are adjacent to walls/columns, tandem parking spaces does not have the additional 0.5m space, end parking spaces will need 1.0m from wall and others.
- Plans need to be updated to include reference numbers for each parking spaces.
- Updated Basement Level plans to show correct measurements.
- Swept path diagrams needs to be provided showing cars entering/exiting all critical car parking spaces (such as, end spaces, parallel spaces, spaces via mechanical stacker that should also show the outline of the structural components and available platform area).
- The bike parking room (north-east corner) will require the car parked adjacent to the room wholly within the bay to open the door.
- Traffic report indicate ramps are designed in accordance with Clause 52.06. The Applicant will need to show the length, width and RLs of the ramps on the plan for further assessment.
- Can the Applicant provide a cross-section clearly showing the headroom clearance (floor to ceiling) of the car park levels and ramp sections?
- No information was provided for the proposed mechanical stackers. More information is required such as but not limited to model of the stacker, useable platform dimensions, height clearance, who can use these spaces and others. Note, future occupiers of these spaces will need to be trained.
- Update plans to show the mechanical stackers available platform dimensions.
- The location of the parking bays near the lifts allows for a 1.0m wide pedestrian aisle. This is considered narrow and should be widen.
- Tandem "Car Share" spaces are not supported. I suggest seeking feedback from Strategic Transport team too.
- The parking spaces provided adjacent to the "Plants" rooms will obstruct access to these rooms. It is likely parked cars will overhang onto the aisle and the structural components of the mechanical stacker will occupy this space.
- The traffic report indicates some parking spaces will be provided for staffs. The car park layout only indicates parking for residents. Can this be confirmed and clearly shown on the plans? I suggest numbering the car parking spaces too for reference.

### Other

Plans shows an on-street 'Guest Dropoff' area on Normanby Road. **This is not supported.** Consideration should be provided to provide pick-up and drop-off area on-site.

There is no existing on-street parking here. Given the close proximity to the Normanby Road and Montague Street intersection new on-street parking in this area will not be supported.

### 3. Loading Provision / Waste Collection Area

- As per my previous comments, the proposed three crossovers are not supported.
- Nevertheless, based on what is shown I provide the following comments:
  - No information was provided for the proposed turntable.
  - The Applicant will need to show and confirm the headroom clearance of the loading area.
  - The swept path assessment shows a SRV can access and exit the site in a forward direction. However, the exit movement shows the SRV will require the full width of the carriageway and will prop over two traffic lane if the signal is red, this is not supported. There has been no consideration of potential streetscape changes.
  - I have concerns of service vehicles queuing on Munro Street when the loading area is occupied. Service vehicle queuing will impact cars turning into Munro Street from Montague Street.
- The site should be able to facilitate all loading on site. It is noted, the loading area is not conveniently located for future residents or commercial premises to use and access the Lifts.
- Waste Management plan to be referred to Council's Waste Management department for assessment.

### 4. Traffic Impact Assessment:

- Summary of traffic generation rates SALT adopted and comments:
- **Dwellings** – I have concerns of the traffic generation rates assessed for dwellings. Section 8.1.1 of the report, SALT used an empirical traffic generation rate of 0.12 and 0.21 vehicles movements per dwelling for the AM and PM peak hours respectively. This was surveyed at the "Only Flemington" building (1 Ascot Vale Road, Flemington) in May 2018. I have concerns of the accuracy of this information as the building may not being fully occupied at the time of survey. Using Nearmap, I believe the building completed construction late 2017.

In addition, the Only Flemington building is located approximately 650m (approx.) from Newmarket train station, Tram Route 57 and Bus 404 directly outside the building.

The locality of 240-246 Normanby Road is not located in a similar public transport area as the Only Flemington building.

- **Serviced Apartments** – SALT has referred to RTA guide for motel guest with a traffic generation rate of 0.4 movements per room with a parking rate.
  - AM split of 30% in and 70% out.
  - PM split of 60% in and 40% out.
- **Retail** – Section 8.1.3 indicates five staff car parking spaces will be provided on-site. It is assumed five trips during AM (inbound) and PM (outbound) will occur during each time.
- Section 8.2 indicate a large proportion of traffic will leave the site turning right heading towards Montague Street. Given this they suggest all traffic will either drive through (which Munro Street then becomes a dead-end road) or turn left to head to the Westgate Freeway or into the city.
- I note, there is an existing No Right turn from Munro Street into Montague Street and Johnson Street will be closed as part of Fishermans Bend Framework we expect an increase in traffic at either Munro/Boundary and Boundary/Normanby (or the next intersections).
- SALT's assessment is based on the current street configuration and made no assessment or reference to future streetscape and traffic volumes.
- There has been no cumulative traffic assessment for future developments in this area that will impact Munro Street, Normanby Road, Montague Street or nearby streets.

#### 5. Bike Facilities:

- For the Residential component the Applicant incorrectly referred to Clause 52.34. Can the Applicant review the number of bike parking requirements in accordance with Clause 37.04?
- Plans indicate 79 bike parking racks is provided on the southern side of the basement level. The location is not conveniently located to access from the ground level. They should consider providing bike racks on ground level (within their site).
- More information is required regarding bike parking:
  - Will resident, visitor and staff bike parking be separated?
  - can the Applicant confirm they can provide at least 1.5m walkway between the bike facilities?
  - Will shower and change rooms be provided in accordance with Clause 52.34?
  - The make and model of bicycle facilities. I note, at least 20% of bike racks must be installed horizontal (i.e. not wall mounted) as per AS 2890.3.

#### Munro Street:

- Currently there are no footpath along Munro Street. We suggest a new footpath to be constructed along this section.
- Adequate street lighting must be provided for the footpath.

#### Arborist

There are no street trees adjacent the site so we do not require any Arboricultural reports.

There is very limited detail on the planters and landscaping proposed on level 6. If planting trees, or tree-like plants, ensure the applicant sources stock with large enough root balls to provide adequate anchorage, planters are large enough to support future growth, and engineers have assessed the impact of wind on the canopies with respect to anchorage.

The grassed nature strip on Normanby Rd has the potential for tree planting, depending on the minimum setback required from this traffic light. If the drop off / loading spot on Normanby Road is not appropriate and the appropriate traffic light set back can be met, we would like to plant a tree in this location, post construction.

#### City Strategy

My comments on the amended plans are outlined below, which generally align with those I've raised previously:

1. The proposed setbacks above the street wall from all boundaries are less than the minimums mandated in DDO30. Variations to mandatory requirements are not supported.

2. The proposed setback above the street wall from the southwest boundary is less than the 10m minimum mandated in Clause 2.9 of DDO30. There is concern that any setback to the southwest boundary less than 10m will not achieve the built form outcomes of Clause 2.9. In particular, equitable development outcomes for the adjoining site at 248-250 Normanby Road appear not have been addressed. Further, the proposed setback (in combination with future development on the adjoining property) will result in the appearance of a continuous wall when viewed from street level and may worsen wind conditions in the public realm.
3. The current wind assessment does not demonstrate that the proposal will achieve the built form outcome of Clause 2.11 of DDO30 – *“local wind conditions that maintain a safe and pleasant pedestrian environment on footpaths and other public spaces for walking, sitting and standing”*. Further, Clause 22.15-4.4 requires developments to contribute to a *“high quality public realm and deliver spaces, including open spaces, for people to meet, gather, socialise, exercise and relax”*.

This outcome is particularly relevant for the subject site, which is located within the Montague Core Area where a *“high quality, high amenity public realm is to be delivered”* (Clause 21.06-8). Normanby Road is to be a *“pedestrian friendly boulevard”*. Based on the requirements of Clause 2.11 of DDO30, an assessment distance of approximately 54m is required from the site boundaries (based on current building height). As illustrated in the diagram below, this area encompasses the following public areas that will perform important roles in the amenity and livability of the area:

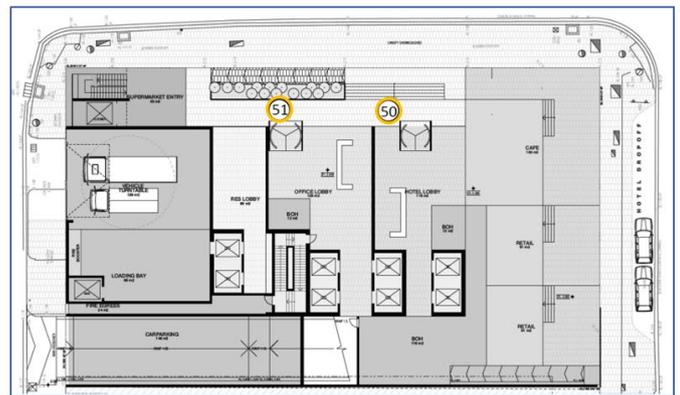
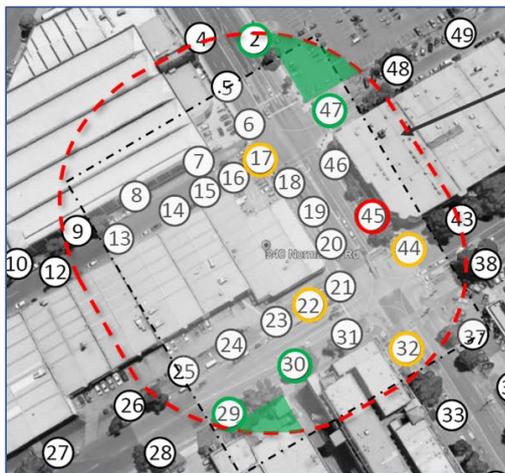
- Footpaths on both sides of Normanby Road and Montague Street;
- New park at the northeast corner of Montague and Munro and Salmon Streets;
- New park on the opposite side of Normanby Road; and
- Proposed through-block laneways.

On this basis, adoption of walking comfort criteria for most publicly accessible areas is not supported, as this undermines the purpose of these areas.

An amended wind assessment is required that demonstrates compliance with the above planning requirements. Managing wind impacts on the public realm is closely associated with built form. Required wind treatments will need to be incorporated into the design of the development. On this basis, the wind assessment needs to be prepared, and the above matters addressed, prior to a decision being made. The amended wind assessment needs to address the following matters:

- The assessment distance used must be in accordance with Clause 2.11;
- The assessment must address approved and proposed development and publicly accessible areas within the assessment distance;
- The mandatory wind safety criteria in DDO33 must be achieved. Where the safety criterium is exceeded under existing conditions, the development must not increase the extent of non-compliance, and should seek to improve the level of safety;
- The following comfort criteria should apply to the publicly accessible areas within the assessment distance (not those recommended in the current wind assessment):
  - Sitting – the future parks on the southern side of Normanby Road (close to Test Locations 29 & 30) and on the northern corner of Montague and Munro Streets (close to Test Locations 2 & 47) (shown as green in the diagram at left below). The current wind assessment does not include test locations within these proposed park locations, however, it is noted that Test Locations 2, 29, 30 and 47 do not meet the sitting comfort criteria as a result of the proposed building. Any proposed areas for outdoor seating in approved / proposed developments within the assessment distance also need to achieve this criteria;

- Standing – both footpaths of Normanby Road and Montague Street, future laneways within the assessment distance and outside retail / commercial tenancies and lobby entries for the subject development and other approved / proposed developments within the assessment distance. As identified in yellow in the diagram at left below, Test Locations 17, 22, 32 and 44 do not achieve comfort criteria as a result of the proposed building. Furthermore, Test Location 45 does not achieve walking comfort criteria. Comparison between existing and proposed wind conditions is not possible for Test Locations 45-49, as Figure 32 does not include their existing wind conditions. Test Locations 50 and 51 in the Montague Street building entry area do not achieve comfort criteria (despite the Ground Floor plan changing significantly from that tested in the current wind assessment, as shown in the diagram at right below). There has not been a specific test location for the Normanby Road building / tenancy entries; and
- Walking – remaining publicly accessible areas.  
Where these criteria are exceeded under existing conditions, the development must not worsen the wind situation.
- Wind management treatments must be located within the development site; and
- Any proposed changes to the built form and/or wind treatments need to be qualified to demonstrate how an amended proposal will achieve the policy requirements in Clause 2.11 of DDO30.



4. The unsleeved car parking on Levels 1 and 2 is a disappointing outcome. Apart from the Ground Floor, these levels will be the most visible from the public realm. The proposed combination of black louvres and dark glazing behind the brickwork is an inert outcome.
5. The Ground Floor layout effectively neutralises the Munro Street frontage of the site. Whilst the emerging 'service' function of Munro Street is acknowledged, it will still be used for pedestrians and will need to provide a level of amenity, safety and equitable access.
6. I assume transport advice will cover this, but I continue to be concerned with the proposed drop-off / loading bays on Normanby Road. The public realm should not be used for private purposes and this arrangement will impact on future streetscape improvements (particularly remaining width of pedestrian footpath and potential for street trees). There will also be conflicts and safety issues with cyclists using the proposed protected bike lanes along the road.
7. The following outstanding matters could be addressed through conditions in the incorporated document:

- The lobby and retail tenancy entries fronting Normanby Road need to be more legible and inviting, as sought in Clause 2.12 of DDO30. This outcome should be addressed in the requested Façade Strategy.
- Details are required of the proposed canopy along the Normanby Road and Montague Street frontages. The awning needs to be integrated into the architectural design of the building and not preclude the establishment and growth to maturity of street trees.
- The viability of basement car parking is uncertain, considering the contamination and groundwater issues in the area. The following advice should be included in the incorporated document:

*Due to groundwater and soil contamination issues in Fishermans Bend, any subterranean water encountered during and after completion of construction that may infiltrate into a basement or site, must not discharge to the stormwater network (either pumped or via gravity). All basements must be fully tanked. Alternative arrangements (e.g. treatment and disposal) for any subterranean water collected onsite (e.g. subsurface agidrain or leaky basements) must be managed by the proponent. Early investigation on how these matters will be managed is recommended to demonstrate that a basement is a feasible outcome in the long-term, including construction and maintenance requirements.*

- Access to the residential and serviced apartment lobbies appears to be challenging for people with limited mobility, particularly with the pillar close to the DDA lift.
- Tenancies 02 and 03 have a 2.1m FFL, which provides an easy transition from the street. Melbourne Water may require higher floor levels to mitigate against flooding due to sea level rise.
- The recessed access on Munro Street to the fire stairs needs to be revised to minimise opportunities for concealment.
- It is unclear how waste from serviced apartments will be moved to the waste storage and collection area of Munro Street. This matter might be resolved with front and rear opening lift, similar to the residential lifts.

On a general matter, I am concerned with the high number of serviced apartments proposed throughout Fishermans Bend, which appear to be used as a way to achieve the required 'non-residential' floor area. The feasibility of this number of serviced apartments in this location at this stage of the renewal of the area is questionable.

### **Strategic Transport Planner**

Some concerns/comments/questions below in relation to layout and access with reference to the CoPP Car Share Policy (see attached for your reference). .....

#### *Layout*

- Concerns around functional layout of 'tandem' car share spaces. Car share users need to book various types of vehicles e.g. Toyota Corolla, 4WD or van. How would a car share operator be able to ensure availability of a certain type of vehicle and not double parked by another car?

#### *Access*

- Are the public able to access this floor of the building? There needs to be access "24 hours a day, seven days a week by any member of the car share provider, and by employees or contractors of the car share operator in order to clean, detail or service the car."?
- Noting these spaces are on level 2, the policy suggests access on the "first level of a multi-storey car park (be it ground level, the first level up or first level down)".

### **Shared Transport Services Officer**

Nothing further to add to this – as Tom highlighted, we would have concerns regarding the tandem parking in particular on the functionality of the layout for this service, public accessibility and location.

