Appendix 4: Internal Referral Comments

Internal Department/O fficer	Referral comments (summarised)
Urban Design Advisor	Built Form
	Form, mass and visual impact
	The built form closely aligns with the DDO envelope controls in relation to the height, ground, and upper level setbacks. It is therefore considered to be an appropriate response to the controls and the preferred character for the precinct. The lowest three levels of the building present with red face brickwork. Above this, there are fourteen levels defined with profiled, expressed concrete slab edges and floor to ceiling glazing interspersed with some solid panels. The materials and finishes are considered an appropriate response to the preferred character of the precinct.
	Streetwall / setback / separation
	The building is setback 4.5m from the north and east boundaries, 4.2m from the south boundary and abuts the west boundary but with a 5m upper level setback above level three. Balconies protrude into the setbacks on the north, east and west faces as they extend up the building. The extent to which they protrude is considered acceptable given the deepest projections are towards the top of the building and should not have significant impact when viewed from ground level.
	The front face of the building has no upper level setback presenting an uninterrupted façade to its top, other than the change of material at level 3. Whilst the sheer nature of the façade is considered towards the limit of an acceptable outcome, it is commensurate with the form and scale of other buildings in the immediate area. However, this must be assessed against the wind effects that the building is likely to have at the ground and upper levels.
	Amenity & Legibility
	Building entries
	The main entry to the ground floor midway along the northern frontage defines a clear 'front door' of the building and is considered appropriate. Likewise, the vehicle entry is well located in the south west corner on Queens Lane away from the building's primary frontage minimising its impact on pedestrian areas and presentation of the building.
	Ground floor activation/transparency
	The plans show the Louise St frontage and the north-west corner of the Queens Lane frontage with generous expanses of glazing. The viability of the retail may be compromised as it will be concealed from the street by the raised planters and planting. Further design resolution of the Louise St frontage is recommended to optimize the ground level interface in terms of visual and universal access to the main entry and shop and to provide adequate growing conditions to meet the landscape objectives and requirements of DDO26. This should also consider

providing sufficient space in front of the shop for outdoor dining should this be consistent with the type of tenancy.

The position of the circular water feature should be reviewed to ensure safe access to the shop and front door, particularly if set at the pavement level.

Public/Private Open Space

The desk-top wind report identifies that conditions on the corners of upper level balconies and the terrace at Level 3 will only satisfy the criteria for walking and will not be suitable for sitting, an essential activity within these spaces. These windy conditions will be exacerbated at the building's corners. We recommend demonstration of further measures to ensure that the comfort and amenity of these private spaces is improved for their comfortable occupation. The tapered and narrow plan form of many balconies creates numerous inaccessible areas that provide no amenity, will be difficult to maintain and serve no purpose as private open space. We recommend redesign of the narrow spaces to ensure their acceptable function and amenity.

Communal space

A narrow communal space at ground level is located along the eastern face of the building servicing the internal shared facilities. The landscape plan shows areas of planting, including trees, but the necessary soil depth for their growth is not apparent on the plans. Further detail should be provided to demonstrate that the landscape can be successfully delivered with the requisite depth and space for planting.

Service utilities

Most of the service cupboards are appropriately located and integrated within the Queens Lane frontage of the building. The free-standing fire booster cupboard in the Louise St frontage would benefit from being better integrated into the building rather than standing as an isolated element on the property boundary.

Landscaping

The deep soil zone in north-east corner is not taken advantage of in landscape plan. Many of the upper level planter boxes are inaccessible from within the building. Further information should be provided to confirm how access for maintenance will be achieved and sustained over time.

Referral Overview

From an urban design perspective, the proposal is acceptable.

Summary of Recommendations:

From an urban design perspective, the proposal is generally supported. To gain full support the proposal should:

- Provide further information demonstrating physical and visual access to the ground floor terrace and retail tenancy
- Provide further information regarding measures to moderate wind effects in private and shared open spaces
- Better integrate the fire booster cupboard within the ground level interface.

• Provide more accurated information regarding the adequate provision for effective landscaping at ground and upper levels Redesign balcony spaces to remove inaccessible and unusable areas Landscape Referral overview: More information is required. Architect Landscape architects comments are as follows: • Landscape plans and architecture plans are not coordinated from ground floor to level 3. • Landscape plans lack detail regarding hard surfaces, planter walls and barriers. • Many of the shrub selections for the Louise Street planted wall have a final growth height of approximately 1m. Factoring in a raised wall, when the plants reach maturity they will obstruct views from the street into the communal and retail spaces. Suggest that the planting proposed in front of the retail space are adjusted to include lower species to ensure the viability of the retail space and 'eyes on the street'. • No planting, hard surface, or structural details are provided, therefore not possible to determine whether soil volumes will be sufficient, please provide further information on soil volumes • According to DDO 26 "Water sensitive urban design treatments should be incorporated into frontage design to manage and reduce stormwater runoff". It is not clear whether any of the landscape treatments are designed to manage stormwater runoff. Please specifically address this point. • Pedestrian entrances should open directly onto the street, as a key feature of the façade and at the same level as the public footpath. (DDO 26) This proposal has building entrances which are grade separated from the footpath. • Green roofs, roof gardens and vertical gardens should be encouraged in new or refurbished buildings. Green roofs are defined as a vegetated landscape built up from a series of layers that are installed on the roof surface as 'loose laid' sheets or modular blocks. (DDO26) While this proposal does include vegetated planted boxes on upper levels, these could not be considered green roofs or vertical gardens. • It's not clear how the Communal terrace is accessed or how spaces are separated (materials, height). None of the windows appear to be operable. • North elevation is misleading as it shows planted boxes on the east and west frontages from level 4 to 9 whereas the landscape plans only show planted beds until level 7. Potential heritage significance: City Strategy A desktop assessment undertaken in 2018 by Council's heritage advisor identified 8 Louise Street, Melbourne as having potential historic and aesthetic significance.

Notes compiled on this property by Council's heritage advisor include:

Early post-war apartment block, three storeys in a courtyard plan. Unusual hybrid styles including Georgian Revival and Moderne. Very intact apart from balconies. Landene, comprising 19 one and twobedroomflats, was constructed in 1949. The Postmaster General's (PMG) Department purchased the flats in September 1949 prior to completion to provide accommodation for the first batch of postal service engineers brought to Australia from the United Kingdom. The first five engineers had moved in to the partially completed building by December 1949 and about 15 units were expected to be occupied by Boxing Day. These engineers were among about 50 from the U.K. that were brought out to meet post-war skills shortages (The Herald, 'PMG men get new flats', 7 December 1949, p.14).

Part of an enclave of interwar and postwar flats including the individually listed Brookwood flats, Lenshurst, and Stanhill.

Of potential historic and aesthetic significance

Status of interim heritage controls:

Despite the potential significance outlined above, Council Officers are of the view that interim heritage controls should not be pursued on the basis that under Section 29A of the Building Act a permit for demolition has been issued for the site (approval date 29 June 2021), and that the detailed heritage assessment required to support an application for interim and permanent heritage controls is not scheduled for some time with Council's current focus on the strategic review of heritage overlay precincts HO7 and HO8.

Planning Policy considerations:

This advice responds to a proposal for the development of the above site referred to City Strategy on 9 November 2021. The advice provides comments in relation to the specific issues raised in the referral request. It does not assess detailed design and amenity issues, nor comprehensive and broad compliance with the planning scheme.

This advice focuses on the following issues, as requested by the Statutory Planning Referral:

Please advise on any Strategic Planning issues relevant to the proposal, including if there is any change to previous advice to residents and Councillors relating to the potential heritage significance.

There are no current Planning Scheme Amendments relevant to this site.

o Amendment C203port is currently on exhibition. This amendment is a review of local context in the planning scheme to improve its usability and enable better decision making. All policies in the current Local Planning Policy Framework of the Port Phillip Planning Scheme have been reviewed and translated into the new format to simplify and improve its structure, function and operation and remove unnecessary regulation. Most of this translation is 'policy neutral' and does not alter the meaning of the policy. Further details on this amendment can be found here.

- Amendment C161port makes a series of updates and technical corrections to the Port Phillip Planning Scheme. It was split for form amendment C161port Part 1 and C161port Part 2. Part 1 has been approved by the Minister for Planning. Part 2 was adopted by Council on 16 June 2021 and has been submitted to the Minister for Planning for approval. The subject site, or sites within close proximity are not affected by this amendment.
- Summary of Heritage advice for this site to be provided separately to this advice (see above Potential Heritage Significance and Interim Heritage Controls)

Please specifically comment on side / rear setbacks to 490 and 492 St Kilda Road. I would like to ensure my interpretation is correct - the built form must be setback 4.5m or constructed to the boundary, there is no scope to propose a variation to this setback unless it meets the exemptions set out at Section 2.3 of DDO26 i.e. within 4.5m of the side boundary any built form must be no greater than the current built form envelope.

- I concur with the above assessment outlined in the referral. The same setback requirements for the proposed development are to be applied consistently to the site's boundary with 490 and 492 St Kilda Road.
 - o As noted above, DDO26 specifies for sub precinct 5a for properties in Sub-Precincts 5 and 6 without a primary frontage to St Kilda Road or Queens Road: Development must be setback at least 4.5 metres from common side boundaries; or Development may be constructed to a side boundary (0 metre setback) where... etc (We note this point refers to construction on the boundary rather than a varied setback). It further states A permit may not be granted to construct a building or construct or carry out works which are not in accordance with this requirement unless allowed by Clause 2.3 of this schedule.
 - The built form must be setback 4.5m or constructed to the boundary, there is no scope to propose a variation to this setback unless it meets the exemptions set out at Section 2.3 of DDO26.
 - The first part of this requirement requires that: Development must be setback at least 4.5 metres from <u>common side boundaries</u>.
 The subject site adjoins a common side boundary with both 490 and 492 St Kilda Road.



Addendum to above referral: 20/01/22

After the above Strategic Planning Comments were provided to statutory planning on 18 November 2021, the Applicant provided legal advice (Minter Ellison) to Council's statutory planning team: whether the boundary that the Subject Site shares with the land at 492 St Kilda Road, Melbourne is a "common side boundar[y]" for the purposes of the above requirement. This legal advice was dated and provided to Council on 1 December 2021.

In sum, the legal advice contained within this letter is, we consider that the Subject Site's boundary to 492 St Kilda Road is not a "common side boundar[y]" for the purposes of the requirement referred to at paragraph 5.

This legal advice surpasses the above strategic planning referral comments provided on 18/11/21 regarding the common side boundary setback requirements in DDO26.

Heritage Advisor

In relation to the significance of the building, please refer to the Strategic Planning Referral, which addresses this issue. As this site is not included within the HO it is not appropriate for me to comment on the proposed demolition, as a planning permit is not required for this.

In terms of the proposed new development the key issue is the potential impacts upon the heritage significance of the surrounding heritage places, which include:

- Landene (former), 490 St Kilda Road, Citation 2117, Individual HO331. Two storey. Queen Anne style villa later used as a Post Office.
- Brookwood, 32 Queens Road, Citation 2129, Individual HO335. Three storey flats in the Interwar Jazz Moderne style diagonally opposite the subject site.
- Lenhurst, 33 Queens Road, Citation 2225 Individual HO346. Three storey Old English style flats to the west on the opposite side of Queens Lane

• Stanhill, 33-34 Queens Road, Citation 2149, Individual HO346, VHR H1875, Multi-level Modernist flats.

The above buildings are all examples of individually significant heritage places that are significant 'independent of their context'. That is, apart from the immediate setting within the title boundaries the surrounding context does not contribute to the significance of the place. On the contrary, the surrounding context is very diverse, and all the buildings are in varying degrees viewed in the context of surrounding mid to high rise office developments, which include 480, 484 and 492 St Kilda Road.

Because of this, and the strategic importance of the St Kilda and Queens Road corridor for higher density development, DDO26 sets out development controls that, amongst other things, include in relation to heritage:

To ensure development does not compromise the identified heritage value of adjoining or nearby properties. (specific objective under 'City Beautiful')

And

New development should respect the form, massing and siting of heritage buildings on the development site or adjoining sites. ('Heritage' in section 2.1)

To achieve the above heritage objective and strategy, DDO26 sets out detailed design strategies, guidelines and controls that apply either across DDO26 or within specific subprecincts (the subject site is within sub-precinct 5A).

Because of this, the proposed construction of a mid/high rise building in close proximity to a heritage place is permitted within the St Kilda/Queens Road corridor and there are several examples where this has occurred on the same site (for example, 452, 478 & 572 St Kilda Road, and 23-25, 54 and 83 Queens Road).

In conclusion, a mid rise development on the subject site that complies with the relevant aspects of DDO26 will not adversely impact upon the heritage significance of the surrounding heritage places listed above.

For specific comments in relation to the proposed design and its response to DDO26, please refer to the Urban Design referral.

Arborist

I have reviewed the Tree Management Report and Protection Plan by Arbor Survey, dated 18 October 2021. There are several issues that should have been addressed via an Arboricultural Impact Assessment report. The submitted report is to be updated with the impact assessment and findings from further investigation as outlined below. Architectural Plans, Landscape Plans and Utility/services plans are to be reviewed.

The proposed inground water tank will require excavation within the Tree Protection Zone (TPZ) and Structural Root Zone (SRZ) of tree 40 (group). Although the TPZ/SRZ area within the subject site is currently paved, that is not a guarantee that roots will not be under the existing surface. The updated report is to provide details of a non-destructive root investigation, along the line of proposed excavation within the TPZ of tree 40 (group). The report and plan also require updating to provide ground protection to any exposed areas of

the TPZ that are to be retained, once the current surface is removed. Alternatively, the plans can be redesigned to move the inground water tank away from the TPZ of these trees.

Any changes to the path over the nature strip (between trees 3 and 4) are to be included in the impact assessment. The location of utilities at the front of the site (opposite tree 5) must also be assessed in the impact assessment. Any works required for utilities must be designed to occur outside the TPZ of the street trees, as Council will not support an application to remove the trees, if alternative alignments exist.

The report must follow the <u>guidelines</u> from Council Arboriculture Victoria and comply with the Australian Standard *4970:2009 Protection of Trees on Development Sites*.

Should the report find that any works encroach into 10% or more of the Tree Protection Zone, or into the Structural Root Zone of any tree, and the design cannot be modified to reduce the incursion, then a non-destructive root investigation (NDRI) must be conducted and documented, with a root map to show the location, depth and diameter of all roots found along the line of the proposed works. The findings, photographs and recommendations should be presented in the impact assessment report.

Development Engineer

- No council's stormwater assets or easement within the development.
- It is advised to the applicant to get a consent from Sewer Authority reason being sewer asset within the easement and the sewer easement may also service the neighbouring property (490 St Kilda Rd) as well.
- As the proposed development have the construction of basement, the sewer boundary trap for the property will need to be reviewed. Council do not permit the sewer boundary trap to be installed in the public realm. The sewer trap must be located within the property boundary.

Environmenta Ily Sustainable Development

Outcome: The application has yet to meet Council's expectations for a development of this size.

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. Please re-refer to Sustainable Design Advisor:

- Issues in various categories to be addressed.

Full Assessment Comments by Category:

BESS Assessment: A development of this size needs to meet the minimum 70% overall score and minimums in Energy (50%), Water (50%), IEQ (50%) and

Stormwater (100%) categories in BESS. Considering your response to the points below, should any category fall short of the minimum targets, adjustments will need to be made to demonstrate that the project meets the BESS minimums.

IEQ: No Issues
Energy: No Issues
Water: No Issues

Stormwater: Local Policy 22.12: Stormwater Management applies to this

application size. Refer to

https://www.portphillip.vic.gov.au/media/mxmfgs1s/sustainable-design-compliance-guidelines-stormewatermanagement-2.pdf on how to provide an appropriate response.

This includes addressing the following:

- Proposed 20,000L tank connected to all toilets is not shown on plans. Please clarify/amend.
- Construction Site Management Plan Current statement does not provide sufficient details for a development of this size. Refer to Council's guide mentioned above and example in Appendix C.

Transport: Transport 2.1 Electric Vehicle Infrastructure To claim this credit, there must be an annotation on plans indicating electrical provisions for electric vehicle charging.

Waste: No issues
Urban Ecology:

<u>Urban Ecology 2.4 Private Open Space - Balcony / Courtyard Ecology</u> To claim this credit, provide additional notes on the drawings and in the report which shows that each dwelling's private open space area either a balcony or courtyard will be provided with an external tap and floor waste.

<u>Urban Cooling</u> For the non-visible flat roofs and concrete driveway, specify light-coloured or reflective finishes to help mitigate the urban heat island effect.

Building Management & Construction: No issues

Materials: Insufficient response provided, refer to https://www.portphillip.vic.gov.au/planning-and-building/where-do-istart/sustainable-design "The 10 Sustainable Building Categories" section for requirements under this category.

Innovation: No issues

Green Factor: This application is suitable for a Green Factor assessment, as part of Port Phillip's free trial. Green Factor is an online tool that assesses the extent of vegetation proposed. It provides a score based on the multiple benefits of urban greening, such as aesthetic benefits, urban heat regulation, providing biodiversity, social benefits, stormwater management and food supply.

The tool is free to use and is there is no mandatory score. Submission of a Green Factor scorecard will not delay the planning application outcome. The trial is open to all applicants to enable the consideration of the benefits of urban greening.

For more information:

- Refer to the Green Factor tool online https://www.greenfactor.com.au/ - Refer to the Sustainable Design section of our website Sustainable design - The City of Port Phillip - Contact the Sustainable Design team $\underline{sustainable design@portphillip.vic.gov.au}$ Commercial and Residential bin storage room should be separate and Waste clearly identified. Management Waste and recycling bin for commercial tenements is not suffice, they will need to either increase the number of bins or collection frequency. Waste calculation is estimated as below: Retail (non-food), 50L/100m3 floor area/week (waste and recycling, Takeaway, 150L/100m2 floor area/day (Waste and recycling), for Takeaway we use 7 days per week. Please note in the WMP, how residents would access the organic bins as they are asked not to use the Chute for organic waste. Highly recommend bin space for glass recycling due to State Government's four waste stream policy. Highly recommend space for Charity bin to encourage re-use and recycle within the development. It is important that the space for bins underneath the chute outlet is suffice and secure so that the items from each stream don't contaminate each other. Access to the bin room (for Retailers) is only through the stairs, accessibility needs to be considered. Page #12 (5.3), Polystyrene and plastic wrap can't be recycled through normal recycling bin therefore these items should not go into the recycling bin. Page #9, (4.2.3), please note that there might be cost to dispose of hard waste at the transfer station or please refer to our link https://www.portphillip.vic.gov.au/council-services/waste-recycling-andcleaning/resource-recovery-centre-and-depot Please note collection time on the WMP which should be in line with our Local laws requirements. Rest all looks good. Key Issues: **Traffic** Engineer Inadequate bicycle parking access, as discussed below. Applicant is to confirm the functionality of the design by providing B85 swept path diagrams to all critical spaces (i.e. spaces at blind aisles, corner spaces, spaces abutting walls/obstructions). Applicant to provide further assessment of traffic generation impact as discussed below. Car Park Layout: Access ways: Access to the basement carpark is proposed via a modified vehicle crossing on Queens Lane.

Access way dimensions are in accordance with Clause 52.06 of the

planning Scheme.

- The Transport Impact Assessment (TIA) undertaken by Onemilegrid notes that a sight triangle is provided to the north by the double width accessway. A sight triangle is not provided to the south due the boundary wall. The TIA argues that the design is acceptable due to the low level of traffic generated by the development and low speed of vehicles exiting the site. The anticipated peak hour traffic generation of 39 vehicles movements is considered substantial and that appropriate sight lines are required. Given the design of the accessway cannot cater for a formal sight triangle to the south, the applicant is to install a convex mirror within the property boundary to provide exiting vehicles with appropriate sight lines. Sightlines are important as exiting motorists are legally required to give way to any pedestrians on the footpath or vehicles on the road.
- The plans show a passing area is proposed and is approximately 6.049m wide by 9.486m long. Swept path diagrams provided in the TIA demonstrates that a B85 and B99 vehicle can simultaneously pass each other. This is acceptable.

Car parking spaces:

- Proposed parking spaces are generally 2.6m wide, 4.9m long and accessed from an aisle at least 6.4m wide.
- The TIA states that the carpark has been designed in accordance with Diagram 1 of Clause 52.06. A review of the basement carparks indicate that columns have been appropriately placed. The applicant is to dimension the placement of the columns on the revised plans to confirm the placement of the columns are in accordance with Clause 52.06.
- Clearances in accordance with Clause 52.06 have not been strictly
 applied to parking spaces abutting walls/obstructions. Therefore, the
 applicant is to confirm the functionality of the design by providing B85
 swept path diagrams to all critical spaces (i.e. spaces at blind aisles,
 corner spaces, spaces abutting walls/obstructions).
- Over-bonnet storage is proposed above each standard parking space. A 1.2m clearance below the over-bonnet storage cages are proposed. The TIA notes that studies undertaken by consultants indicate that the 85th percentile height of a vehicle approximately 1m from the front of the vehicle is 1.13m. While this is acknowledged, there is still a concern that a 1.2m vertical clearance is not sufficient and may impact the usability for some residents, especially those with SUV's/larger vehicles. We generally accept over-bonnet stores that are proposed at least 1.5m above ground level. The applicant is to consider revising the design of the over-bonnet storage to be 1.5m above finished floor level.
- Over-bonnet stores are not considered acceptable for parking spaces that require a reverse-in parking manoeuvre.

Headroom and ramp grades:

- The TIA notes that the minimum headroom clearance within the basement garage is 2.6m. This is acceptable. The applicant is to ensure a minimum headroom clearance of 2.1m beneath the carpark doors/ within basement ramps are available, calculated for a vehicle with a wheelbase of 2.8m.
- Proposed ramp grades have been checked and have been provided in accordance with the Planning Scheme. However, the length of the ramp grades are not dimensioned in some sections. As some grade changes are less than 3m apart, the applicant is to provide a vertical clearance assessment to confirm the suitability of the design.

Bicycles

- Clause 52.34 of the planning scheme requires 32 bicycle parking spaces to be provided for the proposed development, comprising of:
 - o 21 resident spaces;
 - o 10 visitor spaces; and
 - o 1 employee space.
- It is proposed to provide a total of 86 bicycle spaces onsite, which
 exceeds the requirements of the Planning Scheme and is considered
 acceptable. The proposal allocates 4 spaces at the site frontage for
 general visitors and 82 spaces within the basement levels for residents,
 their visitors and staff to use. This is acceptable.
- However, the bicycle parking areas <u>are not</u> satisfactorily accessible as they are 'blocked in' by parking spaces. Access to the bicycle parking areas cannot be achieved when the parking spaces are occupied. This is a serious design issue and needs to be addressed. An example of the issue is shown below:



- All bicycle spaces must be installed in accordance with the Australian standards, ensuring each space has a clear 1.5m access aisle.
- Horizontal rail spaces are to be 1.8m long with 1m centres.
- Vertical rails are to be installed in a staggered arrangement as per Figure B7 – AS2890.3.

Loading and Waste Collection

- A loading area is proposed on-site which connects to the waste room at ground level. The loading area allows for a 6.4m mini-loader to reverse in, propping partially within the loading area and partially across the basement access way. While the mini-loader partially obstructs the accessway, swept path diagrams provided demonstrate that a B99 vehicle can drive around the parked truck when entering the development. This can be considered reasonable considering the low usage of the loading area. However, consideration should be made for adequate sight distance for opposing traffic as vehicles travelling up the ramp may not see approaching traffic travelling around the mini-loader.
- Furthermore, there is on-street loading facilities available on Queens
 Lane which can cater for any additional loading requirements. The
 Loading Zone parking restriction operates from 8am to 6pm Monday to
 Friday.
- Waste Management plan to be referred to Council's Waste Management department for assessment.

Traffic Generation and Impact:

 The TIA has adopted a traffic generation rate of 5 vehicle movements per dwelling, with peak hour rates being 10% of daily volumes. This rate has been applied to all dwellings.

- Application of these rates to the 78 dwellings that are allocated parking spaces equates to 390 movements per day. The morning and afternoon peak is expected to generate 39 vehicle movements.
- Concerns have been raised with regard to the number of traffic movements the site will generate with respect to the number of existing access points in the subject section of Queens Lane. The TIA argues that Queens Lane is suitably designed to comfortably accommodate the additional increase in traffic due to the one-way traffic management in place. All movements to all sites are restricted to single direction entry and exit movements. Further, the TIA notes that due to the short length of Queens Lane, vehicles will be travelling at a low speed reducing the risk of conflict. Based on the assessment that the development is expected to generate less than 2 vehicles every 3 minutes during the peak periods, this can be considered reasonable.
- Notwithstanding, an assessment of the existing traffic volumes of Louise Street is required to ensure the suitability of the expected 390 additional vehicle movements per day. The assessment is to consider the expected traffic volumes compared to the acceptable limit for the road function. Furthermore, the assessment is to consider traffic impacts to the intersections of Louise Street/Queens Road and Louise Street/St Kilda Road.

On Street Parking:

- The existing on-street parking is a mixture of 1-hour, 2-hour, Permit Zone and Loading Zone parking.
- Residents/visitors of the development will not be eligible for resident parking permits and will need to abide by on-street restrictions.
- Staff/visitors to the commercial use will not be eligible for resident parking permits and will need to abide by on-street restrictions.

Parking overlay and parking provisions:

- Clause 52.06 of the planning scheme requires 132 off-street parking spaces to be provided for the proposed land uses, comprising of:
 - o 6 spaces for the retail use; and
 - o 126 resident spaces.
- It is proposed to provide 89 off-street car parking spaces within a basement carpark, comprising of:
 - o 0 retail spaces for staff; and
 - 89 residential spaces.
- The proposal results in a net shortfall of 43 parking spaces.
- The TIA anticipates that the majority of the retail trade is expected to be from dwellings above and other nearby developments. Therefore, it is anticipated that most of the parking demands are expected to be attributed to staff. The TIA anticipates that the retail use will generate a staff demand of 2 parking spaces.
- The proposal does not allocate any parking for staff. The TIA argues that staff will need to seek alternative transportation arrangements given no provision of on-site parking and the lack of on-street parking facilities on the surrounding network. Employees that need to drive to work can park in paid parking garages within the surrounding area. This is considered acceptable. Commercial use is generally accepted to be the easiest use to accept modal change away from vehicles where parking is not available for free.
- A total of 89 parking spaces are allocated to residents of the development. The allocation of parking spaces is:
 - 53 spaces to the 2-bedroom dwellings;
 - 24 spaces to the 3-bedroom dwellings; and

- o 12 spaces to the 4-bedroom dwellings.
- The proposal results in a parking shortfall of 37 spaces purely for the residential component.
- The TIA argues that the proposed parking provision is appropriate based on the following:
 - The site has a parking credit of 9 parking spaces.
 - The proposed development provides bicycle spaces in excess of the requirements of the Planning Scheme.
 - The development is located within easy walking distance of amenities including shops, education, entertainment and recreational facilities.
 - o The site has excellent access to public transport.
 - The site is located near a number of car share spaces, including one in Louise Street.
 - Reduced parking provision assists with the desired reduction in private vehicle usage/ownership.
- Given residents will not be exempt from surrounding parking restrictions, the parking shortfall will not have an impact to on-street parking.
- It is anticipated that prospective buyers/renters will be aware of the fact
 that certain dwellings will not have a parking space allocated to them. As
 such, dwellings that are not allocated a parking space will be occupied by
 residents that do not own/require a vehicle.
- Noting that the assessment for the appropriate rate for car parking
 provision lies with Statutory Planning. Reference should be made to
 CoPP's Sustainable Parking Policy. We also suggest comparing previous
 approved parking provision rates of adjacent developments as part of the
 Planning team's assessment / determination.

Other:

- It appears a brick fence is proposed at the north-west property corner of
 the site. The height of the proposed fence is unclear. It is highly
 recommended that the height of the brick fence be restricted to 900mm in
 height 2m along each side of the corner. This is important as pedestrians
 require appropriate sight lines at changes of direction to minimise conflict.
- It is recommended that electric vehicle parking spaces be incorporated into the design of the development.
- Any redundant crossovers must be reinstated to Council satisfaction.
- Any proposed crossovers must be installed to Council satisfaction.

The Applicant is responsible for all costs, including those incurred by Council for associated on-street parking signage, line-marking changes and/or infrastructure changes.