# PSA Request C207 – 272-280 Normanby Rd, SM – 20 Levels Internal Referral Responses to Application (May 2022) Plans

Department	Comments
Housing	30-05-2022
Officer	the development scale is to be reduced and, hence, the amount of social housing correspondingly
Gary Spivak	is reduced.
	I note there is a reduced amount of social housing and support that.
Urban	31 May 2022
Designer	272-280 Normanby Road preliminary comments
Chaitali	Built form:
Bhanushali	Form, mass, and visual impact
	The building form, architectural expression and the podium articulation is significantly improved with the appreciation and retention of former industrial character through the materiality in the façade strategy. The earthy palette of brick work and metal strongly reflects the character of Montague precinct in Fishermans Bend. The central green spline and diverse material palette such as Bronze perforated metal screen, Terracotta metal cladding, etc. on the upper tower creates subtle separation of the towers and softens down the visual bulk.
	Materials and finishes
	The materiality and the façade strategy strongly reflects the appreciation of the former industrial character of Montague, however raises key concerns on the extensive use of perforated metal. The long term maintenance of perforated metal across the upper tower is questionable. Further information is required to understand how the maintenance of the façade is undertaken against dust and rust. This development holds a high potential to achieve a balanced design outcome with the strategic use of metal, concrete, and brickwork.
	Additionally, the widespread use of metal across the building façade affects the environmental performance of the development. Further information is required on how the thermal properties of the metal finishes enable to achieve the internal level of habitable comfort.
	Amenity and Legibility:
	Ground floor activation
	The provision of retail/commercial uses fronting Normanby Road and Johnson Street creates a strong relationship between community uses and the public realm by accentuating visual and physical connectivity. However, the internal circulation from ground level to mezzanine level highlights a concern. The location of the lifts at the immediate building corner and provision of two lifts instead of one lift operating from ground level to mezzanine level is questionable as it narrows the circulation space on mezzanine level for a smooth DDA compliant accessibility. Further information is required that demonstrates the location of the lifts in the documented elevations and renders to be able to assess the street and building interface.  • Canopy/awnings
	The provision of canopy cover does not provide enough shade and weather protection on the public realm. The narrow width of the canopy is insufficient to be able to shelter a continuous thoroughfare for pedestrians. The canopy is provided at a double height level on level 01 FFL which is considerably farther away to provide shade and shelter for pedestrians on ground plane.
Landscape	31 May 2022
Architect Peter Boyle	The landscape scheme for upper levels of the development will provide a series of different spaces and facilities for occupants within a garden setting of lush planting of trees, shrubs, ground cover and climbing plants. Planter boxes on the façade will include cascading plants to visually soften the building's form.
	The sections indicate soil depths and volumes in garden areas and containers that should be capable of supporting the proposed range of plant types and species.
	Native and indigenous plant species are proposed and are generally considered appropriate for the context and settings at elevated building levels.

Regular maintenance of the garden areas will be required to ensure the successful establishment of the landscape. Following final completion and the requisite maintenance period ongoing care would normally be managed through the Owners' Corporation arrangements which are expected to be sufficient for the project.

The tree species however, particularly Eucalyptus caesia subsp. magna and E pulverulenta 'Baby Blue' will require suitable support, such as earth anchors, for protection from wind effects.

The materials palette for hard landscape elements is considered appropriate and is supported.

The overall landscape proposal for the upper levels of the building is considered acceptable and is supported.

#### **Arborist**

#### 31/05/2022

.... mostly happy with plant selection and the soils provided for their establishment, as they are tolerant of the local environment and suitable to the proposed planting areas.

.... (is there) sufficient area that meets the Deep soil guidelines ... we would like marked up plans identifying the area which met the definitions under the scheme.

I thought we would be able to map out the canopy cover area.

.... (May) we ask for:

Marked up landscape plans identifying the surface area which met the definitions under Clause 58.03, Standard D10. The plans must identify the soil depth for the allocated surface areas.

To complete the assessment against 58.03 D10 we ask for marked up landscape plans identifying the surface area which met the definitions under Clause 58.03, Standard D10. The plans must identify the soil depth for the allocated surface areas.

Additionally we have some concerns about selections one level 3, specifically those planted under the roofed area.

## Subdivision Officer

### 31-05-2022

Sandra Stewart

I don't have any comments. It appears that all built form is within the title boundaries and clear of the way and drainage easement.

#### Waste Management Binita Shrestha

#### 01-06-2022

The bin room is located on the ground floor so would be helpful to see the plan of ground floor with the changes.

All other changes/amendments mentioned would not impact on the original WMP.

#### Development Engineer John Tran

#### 03-06-2022

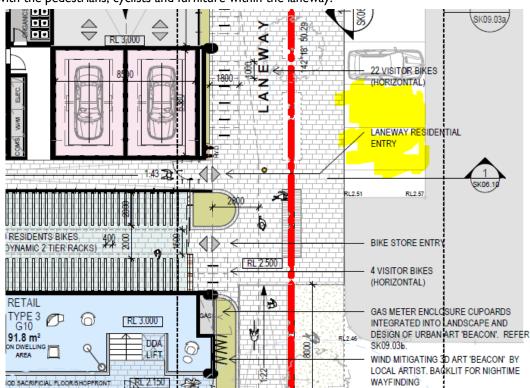
Below are my comments:

Laneways:

It is assumed the internal laneways will be privately owned.

- If bluestone pavers is opted for it needs to be in a different pattern that Council do not use so it clearly delineates the laneways are not Council assets. If the laneways are constructed in a similar pattern and material to Council standard under Common Law Principles these laneways could potentially be vested in Council. Alternative, if the laneway to be constructed is similar to Council's standard, entrances to the laneways need to be gated and have the laneways closed once a year. Attached is a doc in relation to the Common Law for your info.
- Is the applicant proposing to construct the eastern laneway past their property boundary and onto 270 Normanby Road as part of this development? If it is, I have the following questions:
  - Who will be maintaining and managing the laneway and associated assets, especially the section of laneway encroaching onto 270 Normanby Rd?
  - The future trees, seating and planter elements and laneway landscape feature as proposed to be installed by whom and when?

- Would there be some sort of agreement between the owners at 272 and 270 Normanby in relation to the laneway encroaching on 270 Normanby Rd property? Which Title will the agreement be designated to?
- There is a possibility if 270 Normanby Road is not developed within a certain period, part of the laneway, encroaching onto 270 Normanby, could potentially be incorporated into 272 Normanby Rd under the Common Law.
- With the "Future Ultimate Arrangement Laneway Landscape Feature", this area needs to be fenced so it is clearly delineated that it is not Councils to maintain.
- As the public will be using the private laneways, lighting for the laneways are required to the
  satisfaction of Council. All costs associated with the lighting aspects including design and installation
  will be bear by the developer. Costs associated to the maintenance of the lightings will be on the
  owner. A 173 agreement will need to be prepare to the satisfaction of Council and costs
  associated in preparing the agreement will be at the developer's expense. The agreement will need
  to be registered to a Title.
- All runoff from the laneways need to be captured within the site before discharging to the Legal Point of Discharge.
- I believe traffic needs to provide comments to the proposed laneway being a shared zone. From my opinion, there are safety aspects especially to the pedestrians and cyclists using the laneway. For example with cars moving out of the highlighted carpark, there is likely to be a collision occur with the pedestrians, cyclists and furniture within the laneway.



Encroachment into the public realm

- All the runoff from the proposed canopies will need to be captured within the site before discharging to the Legal Point of Discharge.
- Could we have the unhighlighted conditions (this is from the development from 187
   Williamstown Rd) incorporated into the Planning Permit conditions for this development.

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#### 2. City of Port Phillip Requirements Prior to Commencement

Before each stage of the development starts (other than demolition or works to remediate contaminated land in accordance with an Auditors direction), plans, engineering drawings and computations (as applicable) must be submitted to, approved by and be to the satisfaction of the Responsible Authority for the following matters:

- (a) All road works and associated drainage.
- (b) Independent drainage, the direction of stormwater runoff and a point of discharge for each lot.
- (c) Underground reticulated water (including dual reticulation and a connection point to connect to a potential future precinct scale alternative water supply via a third pipe network), sewerage, gas, electricity and telecommunications to each lot to the satisfaction of the Responsible Authority and the relevant servicing authority.
- (d) All works for stormwater, Water Sensitive Urban Design, drainage, street trees, and landscaping.
- (e) All bearings, distances, levels, street names, lot numbers, lot sizes, reserves and easements.
- (f) A certified plan showing the extent and depth of fill in excess of 300mm placed on any of the lots.
- (g) Payment to the City of Port Phillip of an engineering design checking fee equivalent to 0.75% of the value of documented works.

Happy to discuss further.

### **Strategic**Gareth Nevin

#### **07 JUNE 2022**

#### **CITY STRATEGY TEAM REFERRAL ADVICE**

Prepared by Gareth Nevin - Senior Precinct Planner - Fishermans Bend

#### **Application for review**

- Proposed section 20(4) Amendment to the Port Phillip Planning Scheme
- 272-280 Normanby Road, South Melbourne (with Johnson Street Park Proposal)



#### Understanding of Application Context, and Scope of Review

 The development was originally approved through Planning Scheme Amendment C177 on 04 August 2021.

- The new application seeks to amend the design scheme.
- The proposal has been designed to maintain the intent of the Incorporated Document (SCO26), including its associated conditions,
- The changes that are fairly limited from a strategic planning perspective. As such, the new application has been reviewed against the outcomes of the original approval, seeking to assess whether the new design represents an improved outcome.

#### **Built Form & Public Realm**

#### Comments:

- Visually, the updated façade strategy is significantly improved compared with the previous
  approved plan. The design makes good use of brick, metal and cladding in earth tone materials
  that align more closely with the identified industrialized character of Montague. The façade
  articulates a clear distinction between podium, tower and various internal land uses within a well
  integrated design response.
- Awnings should be lowered and extended, provided at a more human-scale and with the express purpose of achieving weather protection over footpath areas.
- Refer to Council's Preliminary Urban Design Advice for further comment on built form.
- Refer to Council's Pre-application advice for Johnson Street Park dated 13 May 2022, which
  contains initial advice on the park and public realm design. This advice will be updated to reflect
  the updated documentation, however based on preliminary review, the changes in the submitted
  plans are minor and most of the advice is likely to still stand. Updated advice will be provided as
  soon as possible.

#### Land Use Mix - Non-Residential Elements

#### What is proposed?

- The building includes a mixture of commercial/retail land uses (total 3,645 sqm)
- · Retail premises, including food and drink premises, restaurant and shops
- · Offices, including a medical centre
- · Restricted Recreation Facility, including gym and yoga studio
- Place of assembly, including a co-working/function space
- Activated ground floor frontages, a publicly accessible through-block-link integrated with the building lobby, and upper level outdoor terraces associated with commercial land uses in the podium of the building.

#### Comments:

- The land use mix and layout is generally supported. It incorporates a similar but improved layout when compared with the original approval.
- The planning scheme requires a minimum plot ratio not used for dwellings of 1.6:1.
- The development was originally approved with a minimum plot ratio not used for dwellings of I.4:I, with an adaptable floor plate that could ultimately deliver a ratio of I.6:I (Condition 4.9d of the incorporated document).
- The new application continues to achieve a minimum plot ratio not used for dwellings of 1.4:1, with an adaptable floor space that could ultimately achieve a plot ratio of 2.8:1 (a substantial increase compared with the prior approval).
- It is preferable for the development meet the minimum 1.6:1 plot ratio upfront. However, the context of the existing approval is acknowledged, and it is accepted that the new design represents an equal or marginally improved outcome that should be supported in this context.

#### Land Use Mix - Residential Elements

#### What is proposed?

- A total of 213 dwellings, 13 of which are nominated as affordable housing.
- Diverse dwelling mix, with 64 (30%) 1-bedroom, 98 (46%) 2-bedroom and 51 (24%) 3-bedroom apartments, with several typologies across each size of dwelling.
- Residential Communal Open Space on the rooftop (624sqm).

Comments on dwelling density and affordable housing requirements:

- Clause 22.15 (Fishermans Bend Urban Renewal Area Policy) and at Clause 37.04 (Capital City Zone) requires:
  - o 6% of all dwellings be provided as Affordable housing
  - o Dwelling Density requirement of 450dw/ha (Montague Precinct Core Area),
  - Allowance to exceed the Dwelling Density requirement only if 12.5% (1 in 8) of the additional dwellings are provided as social housing
- The new application's 213 dwellings should incorporate 13 affordable housing and 12 social housing units to meet planning scheme requirements.
- However, Item 14-b-ii of the Fishermans Bend Standing Advisory Committee Terms of Reference (May 2020) does not require development to meet dwelling density requirements. This methodology was applied to the original approval which allowed for the dwelling density requirement to be exceeded and required a 6% affordable housing contribution only (Condition 4.13 to 4.17 of the incorporated document).
- While the social housing uplift continues to be a preferred requirement for Council, the site's approval history and decision-making methodology is acknowledged.
- Aligning with the decision and methodology applied in the original approval, it is acceptable for the new application to provide 213 dwellings including 13 affordable housing units as proposed.

#### Comments on dwelling diversity:

- Clause 22.15 (Fishermans Bend Urban Renewal Area Policy) encourages a diversity of dwelling typologies and sizes, and includes criteria that proposals of more than 100 dwellings should provide 25% as 3-bedroom dwellings.
- The proposal provides 64 (30%) 1-bedroom, 98 (46%) 2-bedroom and 51 (24%) 3-bedroom apartments, with several typologies across each size of dwelling.
- The applicant notes that side-by-side apartments 10 and 11 on levels 6 and above have been designed to allow for potential conversion into a 3-bedroom apartment to increase the 3-bedroom percentage. This is not preferred. Instead, the design should be updated prior to approval (or as a condition of approval) to meet the 25% 3-bedroom criteria at minimum. Otherwise, the diversity of apartments in the design is supported.

#### Comments on Communal Open Space:

- Clause 58.03-2 (Apartment Development Communal Open Space Objective) Standard D7 requires a minimum 220 sqm of communal open space. This is the most that can be required within the standards.
- The original approval provided 1,171 sqm. The new application seeks a reduced size of 628 sqm.
  While it is acknowledged that the reduced size exceeds minimum requirements, it is not
  preferable. Recommend exploring options to increase the size where practical within the
  confinements of the rooftop.
- The updated space has been designed with a multitude of uses on the rooftop level, described as
  including plunge pools, a fire pit, boardwalks, a dining pod, food preparation and BBQ area, deep
  planting areas and vegetable gardens. The layout is generally considered acceptable, subject to
  meeting wind comfort requirements.

#### Traffic Engineer Arian Menxhiqi

#### 08-Jun-2022

#### Proposal:

- Construction of a multi-level mixed use development comprising of:
  - 64 x one-bedroom dwellings. 98 x two-bedroom dwellings. 51 x three-bedroom dwellings.
  - 1,491m2 (gross floor area) commercial space on the ground level and mezzanine level.
  - 647m2 (gross floor area) commercial space on Level 1.
  - 647m2 (gross floor area) commercial space on Level 2.
  - 574m2 (gross floor area) commercial space on Level 3.
  - 202m2 (gross floor area) commercial space on Level 4.
- The proposal includes a 4-level carpark (x1 basement level and x3 levels above ground) comprising of 156 parking spaces.

- Access is proposed via Munro Street.
- I x loading area / waste area is proposed on-site.
- 261 bicycle parking spaces are proposed on-site.

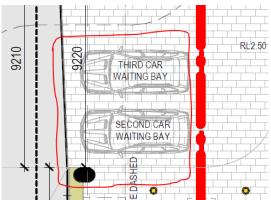
The below comments in relation to the development are only in response to areas of concern. Once the below matters have been confirmed or addressed, detailed comments can be provided.

#### Car Park Layout:

#### Access ways:

- Access to the site is proposed via a modified vehicle crossing on Munro Street. The width of the access point at the property boundary is dimensioned as 6.4m.
- It is noted that the property boundary line runs down the middle of the double width accessway.

  Applicant is to confirm the entire width of the accessway is protected by the easement and cannot be reduced or built on by the adjoining property. This is critical.
- The proposal has queueing area for vehicles waiting to enter the car lift while it is in use. The plans are not clear, however line marking is to be implemented to highlight the queueing bays for entering vehicles and a warning light system to be implemented before the 'bend' to advise vehicles whether to stop or proceed.

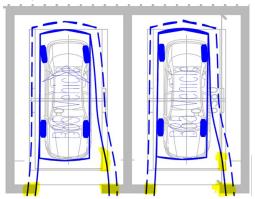


#### Car Lift:

- The usable area of the car lift is unclear. The car lift must adequately cater for a B99 vehicle.
- As part of the queueing assessment, a 10 second vehicle entry and departure has been assumed. To improve safety and ensure timely ingress/egress from the lift, the lift is to be fitted with sensors / digital displays to guide motorists as available by the manufacturer.
- Car lift access concerns in Swept Path Analysis below is to be addressed.

#### Swept path analysis:

• Swept paths show a B85 vehicle entering and exiting the car lift. The lift access points need to be adequately widened to not encroach into the 300mm clearance area. As currently proposed, the vehicle will hit the lift entry point. Further, the applicant is to confirm the suitability of the vehicle envelope when driving on the lift platform. An easy to access lift is important based on the assumption of a 10 second entry and exit time.



Parking aisle walls at dead-end spaces have not been adequately designed. See below.



#### Car parking spaces:

☐ It is unclear if clearances at blind aisles (dead-end spaces) have been provided in accordance with
the standards. The swept path diagram shown in Swept Path Analysis indicates that the parking aisle
wall offset is not adequate, and the 300mm vehicle clearance encroaches over the parking aisle wall.

☐ One accessible parking space is proposed for the development. The development comprises of
various commercial uses and has not detailed the requirements of the BCA for each use where
parking is provided. An analysis of the BCA for accessible parking spaces is to be provided to ensure
the amount of accessible parking spaces proposed are in-line with the requirements of the BCA.

☐ The development is required to provide 4 motorbike spaces onsite. The architectural plans show provision of 4 motorbike spaces within each parking level.

#### Carshare:

☐ It is proposed to provide 4 dedicated carshare spaces for the exclusive use by residents of the development. The viability of carshare spaces may be compromised for the exclusive use for residents of the development. Comments must be sought from Council's Strategic Transport team regarding the number of carshare spaces proposed and how they are accessed: carshare@portphillip.vic.gov.au

#### Headroom:

- $\Box$  The TIA notes that the minimum headroom clearance within the parking levels meet the requirements of the Planning Scheme.
- $\Box$  Applicant is to ensure headroom clearance for commercial trucks (MRV and waste vehicles) is available within the ground level.

#### **Bicycles**

- Schedule I to Clause 37.04 of the planning scheme requires 257 bicycle parking spaces.
- It is proposed to provide a total of 261 bicycle spaces onsite, which exceeds the statutory requirements. The allocation of proposed bicycle facilities is shown below:
  - o 213 resident spaces.
  - o 34 visitor spaces.
  - o 22 employee spaces.
- The TIA states that 2 shower / change room facilities are required for the development. The plans are unclear and do not annotate an end of trip facility. As such, end of trip facilities in accordance with the Planning Scheme is to be provided, or the applicant is to provide an alternative changeroom/shower facility for cyclists (i.e., have access to changerooms/showers in the gym).
- Recommendation made in the TIA for a 2m wide access aisle for employee spaces to be in accordance with AS2890.3 is to be adopted.
- The TIA states that 87% of total spaces are provided in a horizontal arrangement. This exceeds the 20% minimum requirement.
- Horizontal rails 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 which require 500mm centres between rails.
- Where 400mm spacing is proposed, the applicant is to install the bike racks in accordance with Clause 3.3 of AS289023:2015.

#### **Loading and Waste Collection**

- A loading/waste area is proposed on the ground level to cater for the site's waste/loading needs. It
  is recommended that a Carpark Management Plan be prepared to formalise the use of the waste /
  loading area outside of peak hour times as the commercial vehicles require the full width of the
  accessway to enter/exit the development which will conflict with vehicles queueing for the car lift.
- Waste Management plan to be referred to Council's Waste Management department for assessment.

#### **Traffic Generation and Impact:**

- The TIA has estimated a total traffic generation of 444 vehicles per day with 50 vehicles in each peak hour.
- The TIA estimates the 98th percentile queue for the vehicle lift will be two vehicles external to the vehicle lift for an average time period of 15 seconds. This 98th percentile queue can be considered reasonable considering all traffic can be catered for within the development.

However, all concerns above relating to the car lift and waiting bays are to be addressed.

#### On Street 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.
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- The TIA states that 87% of total spaces are provided in a horizontal arrangement. This exceeds the 20% minimum requirement.
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#### Other

- Recommendations in the TIA are to be adopted in conjunction with the above (noting recommendations made by Transport Safety supersede recommendations made in the TIA).
- It appears a new footpath is proposed on Munro Street. If this is not proposed, a footpath is to be provided and a street lighting assessment to be conducted.
- Any redundant crossovers must be reinstated to Council satisfaction.
- Crossover must be modified to Council satisfaction, noting that the footpath along Munro Street is to be clearly delineated over the vehicle crossing to make it clear pedestrians have right of way

when walking along the footpath. We do not want the vehicle crossing on Munro Street to look like a laneway intersection creating confusion.

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

#### Sustainable Design Advisor

#### 16/06/2022

The plans and supporting documents listed in the referral above have been reviewed against condition 4.62, 4.63 and 4.65 requirements.

Overall the current proposal is a better outcome. There are just a few condition and stormwater management requirements that need to be met.

There is also insufficient sustainable transport facilities, it does not meet FBURA framework requirements. I've included it below but not sure if you want to include it as it's not part of the incorporated document. The previous proposal met the requirements and there was no condition included.

#### **Outcome:**

The application almost demonstrates an acceptable outcome for ESD

#### **Suggested Action:**

ESD improvements required prior to decision > Re-Refer to Sustainable Design

#### ESD improvements required prior to decision:

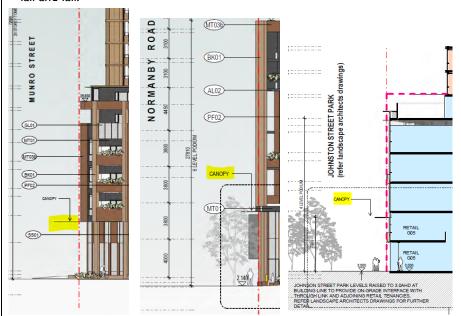
The following key ESD matters must be improved/addressed prior to approval. Please re-refer to Sustainable Design Advisor:

- The current proposed size of 35kL rainwater tank does not meet the 4.62 a) requirements of 0.5m3 per 10m² of catchment.
  - o The water balance calculation to justify the smaller tank does not include rainwater reuse for all non-potable demand (i.e. laundry use is missing), it is therefore not valid. Please provide the tank size that meets 4.62 a) requirements and clearly indicate rainwater tank location, size, third-pipe connection and re-use connections on plans.
  - o Rainwater must be reused for all non-potable uses, i.e. toilet-flushing, irrigation, laundry taps and bin wash.
  - o STORM has been used to calculate the water quality outcome for WSUD / stormwater management.
    - STORM is not acceptable for a development of this scale, as stated in the previous referral advice. The SMP must include MUSIC modelling to demonstrate the stormwater management outcome.
  - o Appendix C is missing a Construction Site Management Plan Refer to Council's guide <a href="https://www.portphillip.vic.gov.au/media/mxmfgsls/sustainable-design-compliance-guidelines-stormewater-management-2.pdf">https://www.portphillip.vic.gov.au/media/mxmfgsls/sustainable-design-compliance-guidelines-stormewater-management-2.pdf</a>. Appendix C example for the level of detail required for a development of this size.
- Appendix J in the SMP is missing and the materials legend on elevations does not provide specifications that show 4.62 e) requirements have been met.
- As the project is not showing up on <a href="https://www.gbca.org.au/project-directory.asp">https://www.gbca.org.au/project-directory.asp</a>, please provide evidence of project registration with the Green Building Council of Australia to indicate it is on track to meeting condition 4.65 in future.
- Table 2 in Schedule 1 to the Capital City Zone requires the following bicycle parking rates:
  - o I bicycle space per dwelling = 213 spaces required and provided
  - o I visitor bicycle space per ten dwellings = 21 visitor spaces required. 34 provided
  - o I motorcycle space per 50 dwellings = 4 motorcycle spaces required. 4 proposed.
  - o 2 car share spaces + 1 per each 25 car spaces = 2 car share spaces required and 4 provided.
  - o I bicycle space per 50m2 net non-res floor area = 72 spaces required, 22 provided = shortfall of 50 bicycle spaces
  - o I visitor bicycle space per 1000m2 net non-res floor area = 3 spaces required, 34 provided

#### Development Engineer Response John Tran

#### 21 Jun 2022

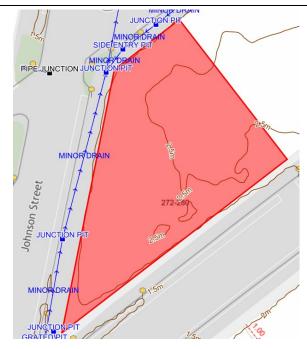
- From a drainage perspective, as the water falling on the proposed canopy below (MTO2) can drip on the pedestrians which can cause a nuisance, hence, water falling on these features need to be captured and conveyed to the legal point of discharge.
- In addition to above, from a safety perspective, these features need to be designed to withstand the various dynamic load acting on canopy and its connection to the building or wall so that it doesn't fail and fall.



• The wall projection highlighted below should not encroach onto the public realm and be constructed within the property boundary.



- Any proposed on-ground facilities (seating arrangement, arbour etc) not to obstruct the existing stormwater pits along Johnson Street. Pits to be made accessible for future maintenance and replacement of pipe/pits.
- Recommend considering the permeable paving/ passive irrigation strategy on the proposed Johnson St Park. Open Space, Arborist and Urban Design to comment further.



- Access doors to the services as clouded in purple below. These doors are required to be:
  - o Self-closing and can be held fully open against the building wall for the time personnel are occupying the facility;
  - o In the fully open position do not encroach more than 100mm into the Road Reserve;
  - o Have a minimum clearance of 150mm from the footpath surface;
  - o Open onto a footpath with a minimum width of 1500mm.
  - o The doors must be kept locked when not in use with the keys made available to approved personnel only

