Statement of Expert Evidence: Urban Design
Amendment C308 to the Melbourne Planning Scheme

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Instructed by City of Melbourne
20 February 2018
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1.0 Introduction

1.1 Process and involvement

(1) This statement has been prepared by Simon Joseph McPherson, Director of Global South Pty Ltd.

(2) Global South is an independent urban design practice, currently involved in various policy, review and advisory engagements.

(3) On 2 August 2018, I was asked by City of Melbourne to review the exhibited Amendment C308 and provide preliminary opinions.

(4) On 6 September 2018 I was engaged by City of Melbourne to provide expert evidence in relation to Amendment C308, for the Planning Panel hearing scheduled for late February 2019.

(5) In preparing this Statement I have:

   o Met with City of Melbourne officers and legal advocates to be briefed on Amendment progress and updates.
   o Participated in two walking tours with City of Melbourne officers, on 3 December and 10 December 2018, to inspect relevant examples of recent development in the central city and Southbank. The photographs in this Statement are my own, except where specified.

1.1.1 Amendment documentation

(6) I have reviewed the following documentation:

   o Amendment documents for exhibition:
     - Synthesis Report (January 2018);
     - Schedule 1 to Clause 43.02 Design and Development Overlay (DDO1);
     - Explanatory Report;
     - Map 1 – Area to be deleted from a DDO;
     - Map 2 – Area to be deleted from a DDO;
     - Map 3 – Proposed DDO1.
   o Central Melbourne Design Guide: Exhibition Draft (June 2018);
   o Submissions applicable to Urban Design, provided by City of Melbourne:
     - 8, 10, 11, 13, 14, 16, 17, 18, 19, 21, 23, 24, 25, 26, 27, 28, 29, 30, 34, 35, 26, 39, 40.
   o Report to the Future Melbourne (Planning) Committee, Agenda item 6.2, 20 November 2018: Planning Scheme Amendment C308 Urban Design in the Central City and Southbank;
   o Future Melbourne Committee Unconfirmed Minutes: Meeting Number 46, Tuesday 20 November 2018;
   o Post-Exhibition Amendment documents:
1.2 Qualifications and experience to prepare this Statement

1.2.1 Qualifications and registrations

(7) My academic qualifications are as follows:
   o **Executive Masters (MSc) in Cities** (Distinction), inaugural programme (September 2016 - February 2018), London School of Economics and Political Sciences (LSE Cities), UK;
   o **Master of Science (MSc): Built Environment - Urban Design** (Distinction), The Bartlett School, University College London, 2005-06, UK;
   o **Bachelor of Architecture (BArch)** (First Class Honours), The University of Melbourne, 1996-97;
   o **Bachelor of Planning and Design (BPD) (Architecture)**, The University of Melbourne, 1992-94.

(8) My professional registrations and memberships are as follows:
   o **Registered Architect, Architects Registration Board of Victoria**: individual registration number 15838;
   o **Australian Institute of Architects**: full member.

(9) I am engaged on the following professional organisations:
   o Member, Victorian Design Review Panel;
   o Member, Design Review Panel for South Australia;
   o Global Advisor, United Nations Global Compact – Cities Programme;
   o Member, Built Environment Task Force, Smart Cities Council – Australia/New Zealand;
   o Member (AIA representative), National Urban Design Protocol Advisory Board.

1.2.2 Experience

Professional experience

(10) I hold over 15 years of professional experience in urban design, including:
   o Urban Designer, Victorian State Government (2002-2007, including study leave);
   o Director, SJB Urban (2007-2016);
   o Director, Global South (2016-present).

(11) I hold approximately 5 years of prior experience in architectural practice, in Australia and the UK.
Project experience

(12) My urban design experience includes the following projects:

- **Policy and guidelines:**
  - Contributor (State Government employee), *Design Guidelines for Higher Density Residential Development*, *Activity Centre Design Guidelines*;
  - Contributor, *SA Medium-Density Design Guidelines*;

- **Urban Design Advice:**
  - Eden/Haven/Sanctuary on the River, Abbotsford, for HAMPTON (complete), (SJB Urban, 2010). High-density, mid-rise (9-11 storeys) permeable courtyard development, winner UDIA President’s Award, High-Density Housing Award (National, Victoria), Masterplanned Development Award (Victoria);
  - Richmond Plaza redevelopment, for Coles (SJB Urban, 2014);
  - Grocon FCAD redevelopment, Footscray Station Precinct (SJB Urban, 2011).

- **Independent reviews:** Various independent review of permit applications, for Councils including Yarra, Port Phillip, Brimbank and Casey.

- **Strategic plans, structure plans and Urban Design Frameworks:**
  - 1160 Sayers Road, Tarneit, Structure Plan for Wyndham City Council (landowner) (SJB Urban 2014-15). Innovative, integrated plan for high-density, walkable precinct in greenfield setting;
  - Footscray Station Precinct Planning and Urban Design Framework (SJB Urban, 2008-09). Winner, PIA Transport Planning Award 2008);
  - Brighton Toyota Site UDF, for LEFTA Corporation;
  - Frankston Transit Interchange Precinct UDF and Master Plan, for DPCD (SJB Urban 2009-2012);
  - Wise Foundation ‘Wellness Village’ UDF, Mulgrave, for landowners (SJB Urban, 2015-16).

- **Master Plans and Concept Designs:**
  - Caulfield Village Master Plan, for Beck Property / Probuild (SJB Urban, 2012);
Experience preparing expert evidence

(13) I have presented evidence at Planning Panels Victoria and VCAT on numerous occasions.

1.3 Summary of opinions

(14) There is a strong strategic basis for this Amendment, and a clear need for improved urban design policy, guidance and advocacy, to improve public realm outcomes resulting from private sector-led development.

(15) Private development has a significant impact on the quality and experience of the public environment. I consider it appropriate, important and valuable to establish a stronger focus on these implications for the public realm, and on the quality of streets and public spaces.

(16) I support coordinated approaches to design policy, spanning multiple formats.

(17) I support best practice design outcomes as the aim for central Melbourne.

(18) I consider more stringent and bold planning controls as proposed by the Amendment for ground floor interface conditions, in particular, to be warranted and necessary.

(19) I support coordinated approaches to design policy, spanning multiple formats.

(20) The structure and content of the Amendment, comprising Design Outcomes and Design Requirements, including mandatory and discretionary, responds to its strategic foundations and objectives.

(21) The Amendment necessarily and appropriately allows for discretion (apart from the mandatory provisions) and negotiation of outcomes. It does not stipulate specific design solutions.

(22) I generally support the Design Outcomes and Design Requirements, subject to a number of specific Recommendations as set out below.

1.4 Recommendations:

(23) I have made numerous recommendations for refinement of the Amendment, throughout this statement. These are repeated in a consolidated list at Appendix A.
2.0 Review of the context and rationale for this Amendment

2.1 Rationale and basis for Amendment C308

(24) The Synthesis Report provides extensive discussion of the background and context for this Amendment. This section summarises the key assertions in this Report, and my response to them.

2.1.1 Objectives and format

(25) Amendment C308 seeks to address multiple concerns, as follows:
- Improve urban design outcomes from development activity, in response to the significant increase in development intensity;
- Strengthen the focus on the qualitative experience of the city, particularly arising from the public realm impacts of private development;
- Complement the more quantitative controls introduced through Amendment C270.

(26) To achieve this, the Amendment proposes to:
- Delete Clause 22.01 (Urban Design within the Capital City Zone), which currently encompasses the following sections:
  - 22.01-1 Building Envelope
  - 22.01-2 Building Design
  - 22.01-3 Pedestrian Permeability and Connectivity
  - 22.01-4 Facades
  - 22.01-5 City Roofs and Profiles
  - 22.01-6 Projections
  - 22.01-7 Wind and Weather Protection
  - 22.01-8 Public Spaces
  - 22.01-9 Access and Safety in Public Spaces
- Delete Schedule 4 to the Design and Development Overlay (Weather Protection – Capital City Zone)
- Replace the existing Schedule 1 to the Design and Development Overlay (Active Street Frontages) with a new DDO1 (Urban Design in the Central City and Southbank), which consolidates and replaces several existing local policies, as set out above.
- Provide additional design guidance in the form of a Central Melbourne Design Guide document;
- Consider other platforms to improve design quality, such as Design Review Panels and Competitive Design Processes.

(27) From an urban design policy and guidance perspective, the principal initiative of this Amendment is to review and consolidate policy content relating to the various ways in which buildings affect the experience of the public realm.

Discussion/Review

(28) Private development has a significant impact on the quality and experience of the public environment. As substantial and extensive redevelopment occurs in the Central City and Southbank, I consider it appropriate, important and
valuable to establish a stronger focus on these implications for the public realm, and on the quality of streets and public spaces.

(29) The consolidation and refinement of planning controls is effective in reducing the complexity of available guidance and requirements, addressing overlaps or conflicts, and improving accessibility and readability.

(30) The provision of an illustrative Design Guide which aligns with the planning policy is also supported, in that it provides additional guidance, examples and visual references to enhance understanding of the proposed controls.

2.1.2 Qualitative accompaniment to Amendment C270

Basis

(31) Amendment C308 is intended to establish a qualitative complement to the provisions of Amendment C270, ensuring that these recently implemented quantitative envelope controls are accompanied by an enhanced emphasis on the quality of how buildings interface with the public realm, as stated in the Synthesis Report.

(32) The Explanatory Report states the need to strengthen the focus on the qualitative aspects of development in the city, through a review of Clause 22.01 Urban Design in the Capital City Zone, recognising the cumulative impacts of individual developments on the quality of the public realm, in the context of extensive public realm improvements by the City over the past 20 years.

Discussion/Review

(33) Urban Design is a wide-reaching field, spanning the full range of scales in the built environment.

(34) I consider that there is a strong and clear rationale to developing qualitative guidance and controls, which address the smaller scale, experiential aspects of development, alongside the quantitative controls for built form massing at the larger scale.

2.1.3 Reinforcing the importance of good design

Basis

(35) The Synthesis Report states that:

- Good design is paramount to Central Melbourne’s ongoing success and international competitiveness during our current period of sustained growth. As we continue to densify and grow taller, the City will require increasingly well considered and innovative design solutions to maintain our high quality public environment.
- The high quality of public and private spaces is paramount to the City’s distinctiveness, vitality and renowned liveability.
- Shaping private development through regulation is essential to safeguard and promote a high quality public environment within the City.
Discussion/Review

(36) While growth and development provides an economic basis for enhancing the public realm and seeking improved design quality, the design challenge is increased in the context of more intensive development and higher demands on space in the city. Therefore greater design attention and innovation will be required.

(37) Public realm quality is key to a city’s liveability and enjoyment, for residents, workers and visitors. The public realm largely determines the experience of the city.

(38) As the city densifies, the quality and experience of the public realm increases in value and importance, and is experienced by more and more people.

(39) I accept that the regulation of private development is essential to ensuring a high quality public environment, as stated in the Synthesis Report. Because most buildings will be delivered by private developers, it is necessary to apply controls to ensure these developments interface appropriately with the public environment.

2.1.4 Acknowledging poor outcomes

Basis

(40) The Synthesis Report states that:
   o Urban design outcomes resulting from rapid recent growth have not met design quality expectations. Key areas for poor outcomes include impacts from car parking and building services, and lack of design investment in the lower levels.
   o There has been a recent proliferation of low-quality design, and there is a need for revised design policy to promote and help achieve high quality design outcomes.
   o The level of private development in the past decade has raised questions about the cumulative effect on the public realm.

Discussion/review

(41) While the Central City and Southbank demonstrate a range of outcomes in recent development of widely varying quality, the impact of car parking can significantly impact the interfaces of new development with the public realm.

(42) Building services can also create significant, detrimental impacts at the public realm interface.

(43) I accept the assertion that in recent years, low-quality design has proliferated in Melbourne, as stated in the Synthesis Report. I support the importance and value of effective design policy in promoting and shaping better outcomes.

(44) The cumulative impacts of multiple developments, including large-scale built form projects and smaller infill developments, can exacerbate the impacts on the public realm, beyond any single development. While each proposal must be addressed individually, the design and approval processes must consider the wider streetscape setting in order to manage these cumulative impacts.
2.1.5 Addressing the challenges through multiple platforms

**Basis**

(45) The Synthesis Report states that:

- There is opportunity to address these issues through a coordinated approach comprising regulatory, advocacy and process improvements.
- New planning tools should be based on best practice (from findings of review of Clause 22.01).
- Promoting a stronger focus on urban design in the Melbourne Planning Scheme through other measures such as Guidelines, Advocacy and Design Review.

**Discussion/review**

(46) I support coordinated approaches to design policy, spanning multiple formats. Design quality is a challenging area for policy and regulation, and so other forums such as design guidance and design review can lead to improved outcomes.

(47) The strong development market in Melbourne provides a foundation for achieving higher quality buildings, streets and spaces, which benefits all developments, and all residents and visitors to the central city and Southbank. However, the imperative for design quality remains regardless of market conditions.

(48) I support best practice design outcomes as the aim for central Melbourne. Effective policy and design guidance should demonstrate and clearly articulate what constitutes best practice.

(49) Explanatory documents such as Design Guidelines can be effective in clearly setting out expectations, objectives and requirements, and providing guidance for how to achieve these aims, for the benefit of proponents, designers and authorities involved in the design process, as well as the wider community.

(50) Design Review is also an effective method for assessing design quality and applying recommendations for improvements, within a rapid and intensive forum, which can be delivered in parallel to the design process.

2.1.6 Providing clearer guidance

**Basis**

(51) The Synthesis Report states that urban design provisions should be rationalised to increase clarity and reduce duplication.

**Discussion/Review**

(52) While my experience of applying Melbourne Planning Scheme urban design policies is relatively limited, I am supportive of centralised and integrated design-based policy and guidance to support effective application.

2.1.7 Confirming the strategic basis for the Amendment

(53) I therefore conclude that there is a strong strategic basis for this Amendment, and a clear need for improved urban design policy, guidance and advocacy, to
improve public realm outcomes resulting from private sector-led development, to maintain and strengthen Melbourne’s distinctiveness, liveability and attractiveness to investment, residents, businesses and workers.

(54) This Amendment comprises several important aspects which support achieving the objectives, as follows:

- Recognising and reinforcing the significant public realm impacts from private development, as a basis for requiring greater design attention to public realm interfaces;
- Drawing greater attention and design consideration to the lower building levels and ground floor interfaces of often large development proposals;
- Establishing comprehensive Design Outcomes, which clearly set out what is to be achieved, to set strong benchmarks for design proposals;
- Providing direct and clear Design Requirements, as well as Mandatory Requirements, to support achievement of the Outcomes;
- Addressing the public realm experience as affected by a range of scales and considerations, spanning urban structure and built form massing, through to design detail, while also considering internal arrangements which affect external interfaces.

(55) In this way, the structure and content of the Amendment responds to its strategic foundations and objectives.
3.0 Assessment of the Amendment purpose and effectiveness

3.1 Is Amendment C308 needed?

(56) The public realm constitutes the areas of the city which are fully open and accessible to all. It comprises a continuity of streets, lanes and public spaces, in between which built form and development occurs. It is the space where the civic and social life of the city population occurs, and it defines the experience of people moving through the city.

(57) The public realm comprises a range of elements, including street and footpath space and design, vegetation, lighting, signage and furniture, and microclimate conditions.

(58) Buildings adjoining the public realm serve to define its extent, and frame public space (fixed/permanent), as well as affecting the quality of the public realm in terms of activity, visual interest and visual and physical amenity (impermanent, changeable). These qualities can also influence outcomes such as safety and economic performance.

(59) The Central City and Southbank have experienced extensive and ongoing development activity, which substantially affects the public realm. While recent development displays a range of quality levels in public realm interfaces and impacts, it is apparent that overall urban design quality has been below expectations, as stated in the Synthesis Report.

(60) A building’s contribution to public realm quality results from a design-led integration of several inputs, including building structure, internal arrangements and tenancies, building services, transport/vehicle access, parking and waste management among others.

(61) The ground floor of buildings provides the most direct public realm impacts, but is also perhaps the part of the building most affected by technical requirements for servicing, utilities and access.

(62) I therefore consider more stringent and bold planning controls for ground floor interface conditions, in particular, to be warranted and necessary.

(63) This Amendment also fills a gap in terms of the detailed consideration of the qualitative experience of public realm, including design detail, materiality, texture and articulation. Other references such as the new Urban Design Guidelines for Victoria do not address this level of detail. The Better Apartment Design Standards are significantly detailed, but with a different subject focus.

3.2 Is the Amendment focus appropriate?

(64) The public realm experience is significantly determined by its immediate interfaces, and how pedestrians experience building edges and frontages.

(65) This Amendment recognises this impact, and appropriately places greater design value and importance on the ground floor and lower levels of buildings. It establishes design aspirations and benchmarks, to which a range of disciplines and technical inputs need to respond.
(66) The Amendment also reinforces the urban design implications of individual developments, beyond built form massing, and brings the scale of focus down to the direct, human scale. It calls for more detailed design consideration and resolution at the lower levels, which I consider important and necessary.

(67) This focus presents the streetscape as a highly sensitive and valuable condition, which each development affects, and should contribute to.

(68) The Amendment drives attention to design detail at the lower levels of buildings, rather than stipulating specific design results. I support this approach.

3.3 Is the Amendment content and structure effective?

(69) While Amendment C308 is focussed on the public realm, and the human-scale experience of the city, it provides design outcomes and requirements which span the full range of scales from Urban Structure, Site Layout and Building Massing, through to building layouts, interfaces and design detail.

(70) This approach aligns generally with other urban design guidance, such as:
   o Creating Places for People: National Urban Design Protocol (Elements of Urban Design); and
   o Urban Design Guidelines for Victoria.

(71) I consider this spanning of scales, from large to small, to be appropriate and effective, because all of these scales or themes influence and impact the experience of the public realm.

(72) The Design Outcomes describe what is to be achieved by development, individually and cumulatively, articulating what is expected, and reflecting the responsibility of individual developments to address and contribute to wider public realm outcomes. The Design Outcomes are an effective approach to providing clear direction for individual projects. They are reviewed in more detail below.

(73) The Design Requirements are expressed in clear and direct, instructive language ("ensure...", “to be...”, “provide...”), rather than as principles or guidelines ("should be...", “consider...”). I support this approach because it is bold, direct and clear, without inviting ambiguity or too much flexibility, while the actual mandatory requirements are clearly identified.

(74) The Amendment necessarily and appropriately allows for discretion and negotiation of outcomes. It does not stipulate specific design solutions. For example, it allows the potential for ground floor recesses or colonnades, which demonstrate a clear public purpose and are well-designed, as a departure from the ‘default’ preference for buildings aligned to the street at ground floor level.

(75) A design policy or guide cannot address every possibility, and the provisions need to allow for local context-responsive, site-specific and innovative design, which can be refined through the planning permit process.

(76) The Design Guide content is closely aligned to that of DDO1, and this alignment supports clarity, consistency and accessibility of the content. However, while the Guide provides a range of illustrations to explain and demonstrate the
Design Outcomes and Requirements, it does not provide significant additional content beyond that of DDO1. This is considered further below.
4.0 Review of the Amendment provisions: Urban Structure

(77) My review of the proposed controls responds to the Amendment aims to:

- Improve urban design outcomes from development activity; and
- Strengthen the focus on the qualitative experience of the city, particularly arising from the public realm impacts of private development.

(78) In the following sections I review each Theme of the proposed controls, through consideration of the content of the proposed DDO1, and the Central Melbourne Design Guide.

(79) Each Theme is considered as follows:

1. **Overview**: Summary of the thematic focus;
2. **Basis**: Why this Theme is important, in relation to the public realm;
3. **Affects**: How development and built form affects the public realm experience, in relation to the Theme;
4. **Challenges**: Constraints to achieving the potential public realm benefits;
5. Review: Are the **Design Outcomes** appropriate and effective?
6. Review: Are the **Design Requirements** appropriate and effective?

4.1 Review of the proposed controls: Urban Structure

4.1.1 Overview

(80) Urban Structure (Table 1 in DDO1) is primarily focussed on new and existing lanes and connections within and through development parcels, to reduce block size, increase pedestrian permeability, and expand movement and access options for pedestrians.

(81) The Design Outcomes and Requirements focus on new and enhanced existing connections within and through developments, to reduce block sizes and provide new connections which complement the street network.

4.1.2 Basis: Why this is important?

(82) The Urban Structure theme is focussed on promoting walkable precincts. Walkability and pedestrian activity are important because they contribute to:

- More vibrant streets and spaces;
- Local economic activity;
- Safety, through presence of people and ‘eyes on the street’;
- Reduced demand or reliance on private vehicle transport; supporting reduced congestion and traffic impacts;
- Healthier people, through incidental activity;
- Social activity between people in the public realm.

(83) The Urban Structure of streets, lanes and public spaces is a central determinant of walkability. Walkability is influenced by:

- Distances between origins and destinations;
- The quality of walking routes (safety, amenity, activity, visual interest);
- Choice of routes allowing more direct, efficient movement; and
| (84)  | A diverse range of laneways, shared streets and pedestrian links are important because this provides for choice of movement routes, including options which are separate from vehicle traffic routes. It also increases permeability through the city, allowing free and flexible movement and access for pedestrians, and avoiding forced circuitous routes around large blocks. |
| (85)  | In a densifying city, new routes can also ease pedestrian congestion, by creating increased street space which can be occupied by pedestrians and stationary activity. |
| (86)  | New linkages can expand the retail and commercial potential of urban areas, by creating more active street frontages. |
| (87)  | As with all walking routes and public spaces, the quality of pedestrian connections is a primary determinant of the pedestrian experience, usage levels, activity/activation, safety and other outcomes, as noted above. For example: |
|       | o Linkages and lanes which are straight, with visibility through to the end and to a connecting street or destination, are likely to be navigated by pedestrians more confidently, and so will be used more. By contrast, links which turn the corner and where the end is not visible, feel less certain and clear, and so discourage usage. |
|       | o Linkages which are lined by active frontages feel more vibrant and sage, and are more visually interesting and engaging, and so more enjoyable to walk along. |
|       | o Links which are open to the sky feel public, like streets and laneways, whereas arcades tend to feel private and internal, and like a part of the building, rather than a space between buildings. |
|       | o Arcades with low-height ceilings, dim lighting and doors at each end which are generally closed (such as automatic sliding doors), tend to feel enclosed, separated from the street network, internalised and private. Pedestrians will seek visual cues as to whether these links are accessible or not, whereas open laneways are generally clearly public and accessible. |
| 4.1.3 Affects: How can urban development affect the Urban Structure? | Development and built form can affect the Urban Structure as follows: |
|       | o Reinforcing the established urban structure of streets, lanes and spaces, to improve legibility and accessibility; |
|       | o Improving the quality of existing movement routes to enhance the public experience of the Urban Structure; |
|       | o Creating new movement routes to expand and enhance the Urban Structure. |
|       | The design of new and enhanced connections significantly affects their potential for usage and activation, including: |
|       | o Locations of connections, in relation to other links, destinations and identified movement routes; |
4.1.4 Challenges

The challenges to improving the Urban Structure through development include:

- Identifying the appropriate location for new connections, and on which landholding they should occur, at what point in time. New connections may be seen as a liability to development sites, which landowners/developers may seek to avoid, if there is not clear direction for where new links are required.
- The impacts of new connections on developable land, building structure and other aspects affecting development economics. For example, a new 6m wide connection may occupy a significant proportion of a relatively small site, especially if this connection is kept open to the sky.
- Coordination and alignment of new connections across multiple sites under separate ownership.
- Maintaining viable activation along new and existing links, through retail, commercial and other uses.
- Achieving appropriate scale, proportions and design quality in new/existing connections and arcades, to make them attractive, safe and vibrant.

4.1.5 Are the Design Outcomes appropriate and effective?

{T1:DO:1} Reducing block sizes and reducing walking distances is an appropriate Design Outcome, in supporting walkability by modifying the urban structure.

{T1:DO:2} Creating new links and improving existing links is an important and appropriate urban design objective, as outlined above.

{T1:DO:2} Providing new, direct and convenient connections through development is also considered appropriate, because it encourages the development process to provide necessary links, while reinforcing that these links need to be designed effectively to support pedestrian movement.

{T1:DO:3} Maintaining and improving existing connections is an important Design Outcome, because it encourages retention of the established Urban Structure, and improvements to the pedestrian experience of this structure.

[Recommendation]: I suggest consideration of an additional Design Outcome as follows:

- New and enhanced connections provide additional public realm spaces for stationary activity, and opportunities for activation and commerce. This expands the focus from just ‘connections’ to ‘places’, and reinforces the importance of public space quality of new and enhanced connections.

4.1.6 Are the Design Requirements appropriate and effective?
Location and spacing of connections

(96) [T1:DR:1, 2, 3] The Design Requirements establish a maximum distance between through-connections of approximately 70m.

(97) [T1:DR:1, 2, 3] I support the approximately equal spacing of connections within street blocks, to balance accessibility and permeability. I support the approximate maximum frontage length of 70m between streets or through-connections. This equates to approximately 1 minute’s walk, and would require a connection between, for example, Collins Street and Little Collins Street, which are approximately 100m apart.

(98) [T1:DR:1] I question the use of the term ‘average’ block length, because it is unclear, and the actual length of the particular block under consideration is sufficient to apply the proposed controls.

(99) [Recommendation]: I consider that these provisions would provide for clearer implementation if supported by a map or framework plan indicating which street blocks may require new connections, so that landowners have an indication of where connections will be expected.

(100) I am advised that City of Melbourne is preparing a map for the Planning Panel, which will highlight street block edges which are deemed to require additional linkages to achieve the above criteria.

Quality of connections

(101) [T1:DR:4] The Requirements encourage connections which are open to the sky.

(102) [T1:DR:4] I support the initiative to make new connections open to the sky as a priority. Connections which are open to the sky look and feel more ‘public’ and accessible, and are likely to be read as part of the public network of streets and lanes.

(103) [T1:DR:4] By contrast, covered arcades, especially with doors at the entries, generally appear as internal spaces within buildings, and are therefore less accessible and less welcoming to pedestrians.

(104) The distinctions between different formats of linkages reflects the importance and influence of design details in how the city is experienced and used by the public.

(105) [T1:DR:5] The Requirements allow for consideration of connections in the form of high quality arcades in the Central City only.

(106) [T1:DR:5] I support the potential for arcades in the Central City, where open to sky connections are not possible. Arcades are a traditional and recognised part of the fabric of the central city area.

(107) [T1:DR:5] I support the prioritisation of open-to-sky linkages, in preference to arcades, because open connections tend to be perceived as part of the public realm network, whereas arcades tend to read as internalised, private spaces. However, well-designed arcades can contribute to and enhance the pedestrian experience of the city.

(108) [T1:DR:5] I support the provision for arcades in the Central City only. While there may be sites and conditions in Southbank where open-to-sky linkages are
difficult to achieve, this discretionary provision provides clear direction for open links in Southbank, which is generally characterised by larger parcels and a coarser grain street network. [Recommendation]: I consider that more information should be provided to articulate what conditions may mean that open to sky connections are not possible. This could be provided in the Central Melbourne Design Guide.

(109) [T1:DR:5] This requirement calls for high quality arcades, which is expanded upon in the subsequent Requirement [T1:DR:6], with an outline of what constitutes high quality in arcades. [Recommendation]: I consider that it would be useful for the Design Guide to expand on this by providing more detail on what constitutes high quality in arcades, with examples, as noted below.

(110) [Recommendation]: It would be beneficial to clarify or define whether a connection which is not open to the sky, is an arcade. That is, could a covered laneway be provided in Southbank, or would that constitute an arcade? For example, in the image on page 19 of the Design Guide, this covered open space is identified as a laneway. I am advised that Council’s definition is that an open-to-sky linkage is considered a laneway, and a covered linkage is considered an arcade. However, there are hybrid examples such as Goldsborough Lane, which is covered with transparent material at a high level, but would be considered a laneway rather than an arcade.

Figure 1: Goldsborough Lane, viewed from Little Bourke Street, part of the CBW development, corner of Bourke and William Streets in the CBD. Although it is covered for weather protection, I would consider this a laneway rather than an arcade.

Figure 2: Goldsborough Lane, looking towards Bourke Street, part of the CBW development, corner of Bourke and William Streets in the CBD.
Figure 3 (left): Contemporary arcade spaces can combine weather protection with an open feel and natural light access. However, this roof makes the space feel less like part of the street network, and more like part of a development. Rialto development, Collins Street.

(111) [T1:DR:6.1 – 6.5] The Requirements seek to ensure connections are safe, direct, attractive and visible, publicly accessible, at least 6m wide and lined by active frontages.

(112) [T1:DR:6.1] It is important that new connections are straight and direct, and afford views along their length to the other end, to assist pedestrian navigations, support legibility, and encourage passive surveillance and a sense of safety. These parameters make connections more visible and ‘readable’ by pedestrians, and makes them appear more ‘public’ and accessible, thereby encouraging usage.

(113) [T1:DR:6.1] By contrast, indirect connections tend to appear more private, disconnected, and create uncertainty in pedestrians who are not familiar with these routes.

(114) [T1:DR:6.3] I question the minimum 6m width for linkages, which seems quite wide for a pedestrian connection, although I note that Hardware Lane is approximately 6m wide, and is a good example of an active, vibrant pedestrian-focused connection. I am not aware of the rationale for this dimension, but assume it may be intended to allow for vehicle access when required. Other examples include:

- The Causeway: approximately 3m wide (Google maps measure)
- Caledonian Lane: approximately 4m wide (Wikipedia)
- Bank Place: approximately 7m wide (Google maps measure)
- Custom House Lane: approximately 12m wide (Google maps measure)

(115) [T1:DR:6.3] In some cases, a narrower dimension may support a more intimate feel, and could be achievable in terms of access, servicing (deliveries) and pedestrian movement. The appropriate width will also be affected by the length...
of the connection, and other design aspects, such as height, orientation, and frontage conditions.

(116) [T1:DR:6.3] This is a discretionary provision, and so I accept the minimum 6m dimension for new connections of a generous urban quality, with potential for variation in specific cases.

(117) [T1:DR:6.5] The requirement for connections to be lined by active frontages is also supported, to ensure these connections are active and vibrant, visually interesting, safe and attractive. This provision will be explored further below.

(118) [T1:DR:8] The Requirements seek to ensure pedestrian connections do not result in entrapment spaces or limit passive surveillance opportunities.

(119) [T1:DR:8] This reflects a core principle for safety in built form design.

(120) [T1:DR:8] I recognise that the intent of this Requirement is not to encourage completely smooth, flat frontages with no depth, thickness or variation, but rather to avoid poorly designed, deep, concealed spaces along public realm interfaces.

(121) Public realm interfaces which encourage more activity, more people, more eyes on the street, together with effective lighting and configuration of internal uses, should be the primary strategy for supporting safety in the public realm. These may be achieved through interesting, engaging frontage designs, active internal uses which engage with the outside, and building edges which invite use and stationary activity, and visual interaction between inside and outside.

(122) [T1:DR:10] I support the provision of routes which are positioned and aligned for convenient access to destinations and efficient, direct movement through the street network, like the example below.


(123) This section considers the content of the Design Guide, as supporting content for the Urban Structure provisions in DDO1, in the context of the above review of the proposed controls.

(124) The guidance in the Design Guide largely aligns with the Outcomes and Requirement in DDO1. I support this approach, which provides for consistency and accessibility of information.

(125) Requirement 5 seeks to ensure pedestrian connections are of a high quality. I support the provisions for high quality connections, but consider that these could be expanded upon to provide further context and guidance.

(126) [Recommendation]: I consider that further guidance and explanation to ensure pedestrian connections are of a high quality would be useful and effective, including:

- Explanation of the rationale for the 6m minimum width;
- Explanation of outcomes described by ‘lined by active frontages’, noting that the quality of frontages is addressed later in the Design Guide. However it is relevant here to further explain what is intended and the importance of ‘lined by active frontages’ in the context of pedestrian connections.
(127)  **[Recommendation]**: As noted above, I consider that more information should be provided to articulate what constitutes *high quality arcades*. Further design guidance for high quality arcades may include:
  
  - Generous vertical proportions to create a sense of space and volume, and avoiding low-slung spatial proportions;
  - Effective lighting to create a sense of space and light;
  - Entrance doors or gates which are highly visually permeable, and preferably open throughout the day;
  - Design which creates an ‘outdoor’ environment or character.

(128) Photographs of examples of high quality contemporary arcades, along with description of some parameters which support this outcome, would be beneficial in the Design Guide.

(129) The illustrated diagrams effectively demonstrate the intent of the requirements and the benefits of new connections for pedestrian accessibility. I understand these diagrams, such as Figure 3, to be hypothetical rather than real places, although Figure 3 reflects a block structure like the Central City.

(130) As noted above, I consider that a Framework Plan which indicates the localities or street blocks where new connections may be beneficial, would assist in clarifying requirements.
5.0 Review of the Amendment provisions: Site Layout

5.1 Review of the proposed controls

5.1.1 Overview
(131) Site Layout (Table 2 in DDO1) focusses on the arrangement and configuration of the ground floor, in relation to adjoining streets and spaces in the public realm.

(132) The Design Outcomes and Requirements address building access and entries, ground floor facades, frontage alignment and public spaces on development sites. These are intended to optimise the quality of the public realm experience, in line with the objectives of the Amendment.

5.1.2 Basis: Why this is important?
(133) The way buildings meet the ground and interface with the streetscape significantly affects the quality and experience of the public realm.

(134) The quality of the public realm is substantially determined by buildings, which create the edges to streetscapes and public spaces.

(135) The organisation of building elements, particularly at ground floor level, is a primary consideration in relation to optimising the public realm experience.

5.1.3 Affects: How can Site Layout influence the public realm experience?
(136) The siting and configuration of buildings in relation to adjoining streets and spaces has a significant influence on the nature of public realm interfaces, which affects the experience of the public realm, and the potential for the development to contribute to an attractive public realm.

(137) Buildings can effectively define, frame and contribute to the public realm through activation and visual interest, creating a sense of enclosure and human scale, and demarcating public spaces.

(138) The internal configuration of ground floor levels also shapes public realm outcomes, such as activation, visual interaction, safety, visual interest and impacts from building services.

5.1.4 Challenges
(139) Challenges to achieving best practice design outcomes for Site Layout include:
   - Vehicle access technical requirements, which may affect the width, design and alignment of service areas;
   - Site limitations, such as single frontage sites which require vehicle access (and so must provide vehicle access on the same frontage as pedestrian entries);
   - Retention of existing publicly accessible spaces on sites when they undergo redevelopment, given the economic value of developable land.
   - Responding to potential future changes to the function and character of adjoining streets and laneways, as the city evolves.

5.1.5 Are the Design Outcomes appropriate and effective?
(140) [T2:DO:1] Configuring the site layout in response to adjoining streets and lanes is an appropriate and desirable outcome.

(141) [T2:DO:2] Maintaining a consistent building alignment to the street edge is also appropriate, as a foundation principle, although there will be circumstances where varying the building alignment in response to the context may be appropriate.

(142) [T2:DO:3] Providing opportunities for stationary activity in well-designed exterior spaces is an important outcome. [Recommendation]: The wording of this Outcome should clarify that the ‘publically accessible exterior spaces’ include streets and lanes (on-site and adjoining the site), not just on-site plaza spaces, as the wording currently implies.

(143) [T2:DO:4] Retaining existing exterior spaces which perform an important function in the city is also supported. [Recommendation]: This Outcome should also address the improvement and activation of retained spaces.

(144) [T2:DO:5] Responding to anticipated pedestrian volumes is a complicated outcome for development to manage, as it will be affected by adjacent public realm conditions and other nearby developments, and land uses in those developments, which will change over time.

(145) [T2:DO:5] Further, high anticipated pedestrian volumes may encourage design outcomes which conflict with other design provisions, such as consistent building alignment and frontage activation.

(146) [T2:DO:5] I consider pedestrian capacity and congestion issues to be primarily a public realm concern, relating to streetscape design, footpath width and street infrastructure, rather than a matter for individual developments to seek to address. [Recommendation]: I therefore recommend removing or revising this Design Outcome.

5.1.6 Are the Design Requirements appropriate and effective?

Entries

(147) The Design Requirements recommend, in summary:
   o Positioning entries in response to adjoining streets;
   o Avoiding vehicle access and loading on main street frontages;
   o Positioning entries away from points of congestion.

(148) These are appropriate considerations for Site Layout, noting that Building Program (internal arrangements) is addressed in the subsequent Theme.

(149) [Recommendation]: An additional Design Requirement should be provided, as follows:
   o Position building entries to contribute to and enhance adjoining streets and laneways, through activation, pedestrian movement and passive surveillance opportunities.

(150) [T2:DR:1] This suggestion intends to build on the requirements to respond to existing streets and laneways, because entries can also contribute or add to streets and lanes, to help enhance their role and function.
This recommendation aligns with the leading prompt for Site Layout in the Central Melbourne Design Guide: Does the configuration of ground level spaces and entrances contribute to the use and character of the streets and laneways?

Avoiding vehicle and service entries on main street frontages is appropriate and supported, acknowledging that some sites may only have a main street frontage, in which case discretion would be required.

The discretionary provisions allow for an appropriate, site-responsive outcome which balances the development’s functional and technical requirements (access, servicing, loading) with the site’s particular street interfaces.

Building alignment

The Design Outcomes and Design Requirements recommend:

- Aligning buildings to the street at ground level;
- Avoiding alcoves and recesses which lack a clear purpose;
- Avoiding deeply recessed ground floor facades or low-height colonnades.

I consider these appropriate provisions for building alignment at the ground floor level, noting that the discretionary provisions allow for localised departures from these requirements where the context supports different outcomes.

While aligning buildings to the street is the default preference, the provisions allow for well-designed recessed spaces or colonnades at ground floor, where there is a clear purpose.

Publicly accessible plazas

The Design Outcomes and Design Requirements recommend retaining a minimum of 50% of any existing plaza that demonstrates public value or potential for repurposing as a high quality space.

I support the imperative to retain, at least partially, existing spaces of public value on private land. While the 50% requirement appears arbitrary, it acknowledges the reality that redevelopment will in some cases result in reduction or loss of publicly accessible space.

This Requirement is aimed at spaces which perform certain functions: reducing pedestrian congestion, or opportunities for stationary activity. It is presumed that the proponent is required to demonstrate whether a particular space has these attributes, which may require negotiation with Council, given the proponent’s interest may be to reduce or remove the space through redevelopment (and therefore demonstrate that it does not provide significant public value).

[Recommendation]: It would be beneficial, in my view, to provide a Framework Plan or to identify particular spaces in the Amendment area, which currently provide an effective public realm benefit, and/or present opportunity through retrofit to enhance the public realm experience.

[Recommendation]: I would recommend inclusion of a requirement that the design response should demonstrate how a reduced plaza area can perform a
useful and effective public function, in relation to the function of the existing space. This provision should also apply to proposed new publicly accessible spaces, to ensure they are useful and effective.

5.2 Review of the Central Melbourne Design Guide: Site Layout

(162) As noted above, further information or guidance pertaining to the public benefit of plaza spaces would be beneficial, including potentially a map identifying particular spaces of identified public value or benefit. However I recognise that each site and space will present unique circumstances, requiring individual consideration.

(163) I support the provision of explanatory notes with photographs in the Design Guide, which allows the reader to clearly understand which aspect of the image is considered a good or poor example.

(164) I would suggest the full-page photographs also be given a Figure number, as part of the full package of illustrative guidance.

(165) Utilising case studies and built examples to demonstrate particular points through photographic images can be problematic and somewhat misleading. I support the Design Guide’s use of captions to explain what aspects of the image are being put forward as good (or poor) examples. However, some aspects of these images remain questionable in relation to the outcomes they are showing, and what they are seeking to demonstrate. Examples as follows:

- The image on page 25 of the EY Centre (Sydney) requires review. The caption discusses minimising disruption to the main street frontage (not shown) and balancing activation and servicing to the rear lane. However the image appears to show a complete lack of ground-level activation, quite dominant vehicular access, accessibility challenges caused by stairs in the arcade, and narrow (or non-existent) footpaths.

- The image on page 29 (500 Bourke Street) focuses on the plaza space (as captioned), but the dark-tinted glass and limited activation appears to restrict passive surveillance or visual interaction opportunities. However I acknowledge that the caption specifies the aspect of this image being put forward as a case study.
6.0 Review of the Amendment provisions: Building Mass

6.1 Review of the proposed controls: Building Mass

6.1.1 Overview

(166) Building Mass (Table 3 in DDO1) focusses on the composition of building forms in response to the urban context and streetscape considerations.

(167) The Design Outcomes and Requirements address formal diversity and variation, response to streetscape contexts, and skyline effects.

(168) The proposed provisions are distinct from those established through Amendment C270, which establish building heights, street wall heights, upper level setbacks and floor area ratios for General Development Areas and Special Character Areas.

6.1.2 Basis: Why this is important?

(169) The massing of built form significantly influences the public realm.

(170) Urban environments which are visually rich, complex and varied support visual interest and a sense of place and character. These characteristics also reinforce the ‘public’ qualities of the city, as they reflect an environment which has evolved over time through many individual projects and interventions.

(171) The considered and effective integration of new built form with existing and heritage fabric can both reinforce and emphasise valued existing built form, while accommodating new interventions, contributing to the overall diversity and richness of streetscapes.

(172) Establishing and reinforcing fine-grain streetscape rhythm makes the streetscape experience more varied, interesting and engaging, when compared to broader frontages and coarser grain, which in turn supports walking and public realm activity. By contrast, long expanses of a single edge condition tend to discourage walking and pedestrian activity, and can make distances look and feel longer.
6.1.3 Affects: How can Building Mass influence the public realm experience?

(173) Building Mass affects the visual richness of public realm, and determines the contextual fit of new development within established streetscapes, and heritage settings or particular character locations.

(174) Building Mass also affects the perceived scale of built form in relation to the public realm, shaping the proportional relationships of streetscapes, and therefore the urban character of streets and spaces.

(175) Building Mass affects the pedestrian movement experience by establishing the regularity of articulation or break-up in frontages, and therefore the ‘rhythm’ of the streetscape. This rhythm can be compact, fine-grain, regular and human-scaled (smaller, compact modules), or expansive, lengthy and coarse-grained.
Figures 8 and 9: A diversity of forms and design expressions, with varying street wall height, creates visual interest and a sense of complexity and texture. Crossley Street, Melbourne.

6.1.4 Challenges

(176) Challenges to achieving best practice design urban design outcomes through Building Mass include:

- Large development sites and large buildings which reflect a singular or consistent form and appearance.
- The spatial requirements of car parking and large retail tenancies at the lower floor levels.
- Excessive formal and aesthetic variation and decorative treatments which are detrimental to a sense of refinement and integrity of forms and elements.

6.1.5 Are the Design Outcomes appropriate and effective?

(177) [T3:DO:1] Establishing visual distinction between components and buildings within larger developments is an appropriate outcome, but this requires balance to ensure a degree of integration and cohesion in design, as opposed to excessive, deliberate variation.

(178) [T3:DO:2] It is clearly appropriate and desirable that new interventions respect the existing scale and proportions of heritage places and the Special Character Areas. I suggest reviewing the term ‘adjoining’, as the interface to heritage buildings or Special Character Areas may be across a street or lane, for example. [Recommendation]: Change wording to ‘adjacent’ or ‘proximate’ rather than ‘adjoining’, to encompass immediate built relationships which are not directly adjoining.
Adopting a variety of street wall heights to reinforce the fine grain rhythm of streetscapes is also supported. However, street wall height variations should be integral with frontage designs and defined façade elements, rather than simply a stepped front wall. The appropriate degree of variation will be informed by the local streetscape context.

Designing tall buildings to support a diverse and interesting skyline, and in relation to other tall buildings, is a valid direction. [Recommendation]: However, I recommend removing this Design Outcome, because:

- I understand skyline effects are predominantly addressed through Amendment C270 (building heights, floor area ratios, setbacks);
- The skyline affects more distant, remote views, rather than direct public realm outcomes, which this Amendment is focussed on;
- Tall buildings will generally achieve a varied skyline naturally, through individual design initiative for each project, and varied site sizes and shapes, and the complexity of existing tall buildings in the Central City and Southbank.
- There are no specific Design Requirements associated with this Design Outcome.

6.1.6 Are the Design Requirements appropriate and effective?

It is appropriate to incorporate a diversity of forms, typologies and architectural languages on large sites comprising multiple buildings. However this needs to be balanced with a sense of design cohesion, and avoidance of ‘pastiche’ application of varied surface treatments which may lead to a sense of visual clutter or excessive variety. [Recommendation]: I suggest revising this Requirement as follows:

- Ensure development adopts a diversity of forms typologies and architectural language, within a cohesive design framework, on large sites comprising multiple buildings.

I support the principle of multiple architectural firms contributing to the development of large, multi-building sites, to achieve more diverse, varied and visually rich development, as demonstrated by existing projects such as the QV development (former Queen Victoria Hospital site), CBW (corner Bourke and William Streets), and RMIT’s city campus and New Academic Street. I consider that this approach will:

- Support preparation of comprehensive master plans for large sites, to guide development of multiple buildings;
- Achieve more complex, varied built form environments, which look and feel more city-like or ‘urban’ in character, and work to reduce the visual distinction of large sites from the surrounding context.
- Support the application of specialised architectural skills for particular land uses.

While I recognise that single architectural firms can deliver diverse buildings balanced with design cohesion, I consider that in the Central City and Southbank, combining the work of multiple forms, within a strong urban design framework, is an appropriate approach.

I defer to others on the matter of whether this is an appropriate provision in a Design and Development Overlay.
[T3:DR:3, T3:DR:4] Establishing street wall heights in relation to the width of streets and lanes, and to adjacent heritage buildings, is supported.

[T3:DR:5] I also support the reinforcement of the street wall as the dominant component within the Special Character Area, because the street wall forms the human scale element and directly affects the pedestrian experience. **[Recommendation]:** However, I would recommend clarification of this Requirement, which I understand to relate to the street wall in relation to upper level forms or towers. The street wall should not necessarily be the dominant component over the ground floor frontage, for example.

[T3:DR:6] The Requirement to step down the street wall and overall building height to respond to lower built form in the Special Character Area warrants further consideration, in terms of how this provision would be applied. I recognise that requirements to ‘transition’ built form can create confused or inappropriate outcomes. For example, the depth of the ‘transition zone’, and so which sites are affected and expected to be lower in scale, is unclear. However I recognise that this is quite an open provision, which may be negotiated through the permit application process.

[T3:DR:7] The break-up of wide street frontages into smaller vertical segments is an appropriate approach to responding to fine-grain streetscapes and enhancing the human scale public realm experience. I also support the provision of rebates of sufficient depth to provide modulation in the façade, to avoid excessively flat facades which do not contribute to the streetscape experience.

[T3:DR:7] I understand the intent of this provision is to encourage façades with perceivable thickness and depth, which creates light/shade effects and encompass a three-dimensional profile when perceived from below.

[T3:DR:10] I support the avoidance of excessive surface or decorative effects, and the focus on integrated façade designs which relate to the internal configurations and the adjacent streetscape.

[T3:DR:10] **[Recommendation]:** However, the final Design Requirement: ‘Avoid the excessive use of surface or decorative architectural effects...’ is unclear in its wording and requires revision, in relation to how façade surface treatments relate to transition in building mass. I would suggest revised wording such as:

- Where a transition in height or scale to an adjacent heritage place or precinct is required, establish this within the building form, not just through surface treatments or decorative effects.

[Recommendation]: I consider that there is opportunity for further Design Requirements and/or design guidance for street walls, noting that these are perhaps more appropriate in the Design Detail chapter, but should address:

- Ensure the street wall holds and defines the street edge;
- Ensure that the street wall extends to the ground, and is not seen as ‘floating’ above a glazed ground floor frontage;
- Balance openness/transparency/glazing with solidity and surface in street walls, and avoid excessive glazing;
- Integrate balconies and balustrades within the street wall design composition.
(193) [Recommendation]: The Requirements should also reinforce that the street wall should be visually distinct from the upper levels or tower, and encourage the building base (street wall) to be more solid, articulated and refined.


(194) The explanatory diagrams are generally effective and useful, such as at Figures 19, 23, 24, 24, 25.

(195) The Figure numbers are apparently out of sequence. For example, Figures 20, 21 and 22 are missing.

(196) I consider the case study images at pages 35 and 37 to be effective and useful in communicating good practice outcomes in relation to the Design Requirements for design coherence and complexity on large sites, and relationships between heritage and contemporary buildings.

(197) I consider the image on page 41 to be less effective in demonstrating the breakdown of building mass. While this Brisbane building has a clear vertical division between two distinct components, it still appears quite bulky and appears to 'stand out' above its 'mid-rise, fine grain context', as noted in the image caption, including the adjacent building to the left.

(198) In Figure 24, page 38, it is unclear which is the new development mentioned in the caption. A streetscape elevation drawing is somewhat ineffective in communicating recessive upper levels. A 3-dimensional perspective sketch (such as at Figure 55, page 64) or streetscape photograph would potentially communicate the required outcomes more effectively.

(199) I support the messaging of the images at Figures 28-31. [Recommendation]: I suggest making these images bigger and squarer in proportion so that more of the case study is visible, especially for Figures 29 and 31. I also consider that a good example would assist alongside the four bad examples.

(200) The image at page 44 refers to the Building Program chapter, but it raises the question of the relationship between contemporary and older built form. The buildings shown are within a Heritage Overlay, but I am not aware if the older buildings have identified heritage value, and this location is not within a Special Character Area.
7.0 Review of the Amendment provisions: Building Program

7.1 Review of the proposed controls: Building Program

7.1.1 Overview

(201) Building Program focusses on the internal configuration of uses within buildings, as it relates to the public realm.

(202) The Design Outcomes and Requirements focus on ground floor and lower levels uses, and how these can contribute to the public realm.

(203) This Theme contains Mandatory Requirements for the proportion of ground floor occupation by building services.

7.1.2 Basis: Why this is important?

(204) A strong visual and spatial relationship between inside and outside is essential to achieving a high-quality, engaging, safe public realm. It is therefore important that internal uses which support this interaction are positioned at the public realm interfaces.

(205) Inappropriate or ineffective positioning of land uses, car parking and infrastructure within buildings can have a significant detrimental impact on the streetscape experience.

7.1.3 Affects: How can Building Program influence the public realm experience?

(206) The types of activities within buildings, and how these are positioned and configured, affects how the building relates to the public realm.

(207) The ground floor interface is a primary determinant of the experience of adjoining public realm, but the ground floor also needs to accommodate access/entrances, services/infrastructure, and potentially car parking.

Figures 10 and 11: The arrangement and configuration of internal uses, along with visible interiors and well-placed entrances, allows them to contribute to the public realm outside. Riverside Quay, Southbank.
The lower building levels above ground floor also play a significant role in activating and interacting with the public realm.

Building Program works in conjunction with frontage design to support an effective public realm interface, which is visually engaging, interactive and invites passive or stationary activity.

**7.1.4 Challenges**

Challenges to achieving best practice design urban design outcomes through Building Program include:

- Impacts of car parking and vehicle access on ground and lower building levels;
- Impacts from building services: utilities, emergency infrastructure, lift cores, storage;
- Sustaining suitable commercial operations (potentially, in some locations) which facilitate interaction between inside and outside;
- Creating activation outside of core retail areas.

**7.1.5 Are the Design Outcomes appropriate and effective?**

The arrangement of internal uses to maximise activation and support a safe, high-quality public realm is an appropriate outcome.

Minimising the impact of parking and services is also appropriate and supported.

Supporting wellbeing and comfort for building occupants is a valid and important design imperative, but internal access to natural light, ventilation and outlook and thermal comfort are not directly relevant to public realm outcomes, and so are less applicable here. However, high-amenity internal spaces may support vibrant, active uses in ground floor spaces and lower-levels, which in turn supports activation. **[Recommendation]:** I suggest rewording this Outcome to address the Amendment’s public realm focus, such as:

- **The internal configuration of development ensures comfort, wellbeing and enjoyment for building occupants, which supports active uses, habitation of internal spaces and therefore activation of the public realm.**

Spatial adaptability and accommodating a range of tenancy sizes are key to providing for varied activities and changes in use over time.

I am supportive of the Design Outcomes relating to publicly-accessible parts of the building’s internal common areas contributing to activation and passive surveillance. However, these appear repetitive with the preceding overarching Design Outcomes relating to the public realm interface, activation and safety. I also note that these outcomes are largely repeated in the Design Requirements, which I consider to be adequate.

**7.1.6 Are the Design Requirements appropriate and effective?**

Positioning active uses at frontages, and locating services away from street frontages, is logical and essential.
(217) Minimising impacts from car park entries is also supported, as these can have a significant, detrimental impact on the public realm, through wide, blank/inactive, often recessed frontages, vehicle movements across the public realm.

(218) As noted above, I support the Requirements for location of publicly-accessible internal spaces to contribute to the public realm.

(219) I support the premise of increased numbers of entrances to provide for interaction and flexibility, although the term ‘maximise’ is potentially misleading, and ‘optimise’ may be preferable.

(220) While avoiding large expanses of frontage with limited entries is supported, I consider this relevant to Public Interfaces (below) rather than Building Program.

(221) I support sleeving of large tenancies with smaller, fine grain uses/spaces at ground floor, to avoid the negative impacts of elongated frontages which are potentially inactive.

(222) As noted above, I question the appropriateness of guidance in this DDO relating to internal amenity within buildings (privacy, daylight, outlook), because it is not directly relevant to public realm outcomes.

(223) Also as above, I recognise the preferred 3.5m floor to floor heights to allow for commercial office space, or other uses such as residential. I support this flexibility of use, but defer to others on the specific requirement.

(224) It is clear that ramped or graded floorplates which can accommodate parked cars, cannot be adapted for habitable uses, and so should be avoided.

(225) The requirement to configure tenancies to not rely on queueing in the public realm is difficult to assess, because it would depend on the nature and popularity of the tenancy. Providing space before the entrance for queueing outside of the public realm, is likely to impact on the frontage and activation conditions of the tenancy and building. [Recommendation]: The uncertainty of this Requirement and how it would be assessed leads me to suggest it be reviewed or removed.

7.1.7 Are the Mandatory Requirements appropriate?

(226) The proposed controls prevent above-ground car parking in the Central City. I support this initiative, because:

- Parking floor plates are typically large, and when sleeved with active uses, become even larger – restricting the potential for fine-grain, human scale development forms.
- Occupying extensive above-ground space for storage of cars in the Central City, in the context of significant growth and demand for housing in particular, is inefficient.
- The context for car ownership is expected to change dramatically, and while this future is uncertain and beyond my expertise, it is informing new thinking, and approaches to, car parking in development internationally.
- While sleeving can conceal the visual impact of above-ground car parking, it will still be perceptible as a large mass which separates the public realm from the upper levels;
- Car parking effectively pushes more building mass upwards;
- The space occupied by cars is better occupied by habitable space. For deep floorplate spaces which are less amenable to habitable use, the mass can be broken up by new connections, with further opportunities for activation through habitation of the lower floor levels.

(227) [T4:MR:2] In Southbank, I recognise that above-ground parking is allowed, because of ground water conditions and the expense of constructing basements. I cannot comment on these technical or financial considerations.

(228) [T4:MR:2.2] I support the requirement to sleeve car parking to main streets and streets in Southbank, and consider this an essential outcome. I accept that laneways can accommodate inactive edges to parking from first floor, in the context of other requirements for active frontages at ground floor level to laneways.

(229) [T4:MR:3] Building on my comments above, I consider the adaptability of car parking to other uses an essential provision, and support its mandatory nature. I understand the proposed 3.5m floor height to reflect a minimum height for commercial office space, but I defer to others on this technical matter.

(230) [T4:MR:3] A challenge for future adaptation of car parking is the potentially deep floor plates and limited access to natural light for internal spaces, for future habitable uses. In this context, I support the requirement for designers to demonstrate how car parking can be appropriately adapted.

(231) [T4:MR:4] I support the limitation of the ground floor area occupied by services, in order to reduce their impact and maximise active frontages, and I am advised by City of Melbourne officers that the specified 40% maximum is informed by analysis of proposals and completed projects in Melbourne. Services design is beyond my area of expertise, so I cannot provide further confirmation as to the appropriateness of this 40% figure.

7.2 Review of the Central Melbourne Design Guide: Building Program

(232) The diagram at Figure 33 is very small and so the intent is not clearly visible. A photographic example may be more effective, instead of or in addition to a larger diagram, such as below:
Figure 12: The exposed services connection on this Russell Street building (QT Hotel) avoid the use of cabinets, to maximise the active frontage.

Figure 13: This example in the Adelaide CBD is less effective at using the exposed services to facilitate more active frontage.

(233) [Recommendation]: The diagrams at Figures 36 and 37 are also quite small, and so the distinction between them is not immediately apparent. I recommend review of these diagrams.

(234) I note that the image on page 51 showing a positive example of sleeved podium parking is in the Melbourne Central City, and so would not be allowable under the proposed controls. However, I accept this case study as an example of a positive outcome, which would be applicable to Southbank.

(235) [Recommendation]: The image captions on page 53 could be clarified to confirm that these are ‘before’ and ‘after’ images of a converted car park.

(236) [Recommendation]: As discussed above, I question Requirement 27 which addresses internal amenity, with a diagram showing light courts on both side boundaries. As internal amenity is not a public realm issue, I consider it to be superfluous in this context. Boundary light courts are generally considered a compromised design outcome, especially for taller buildings, and this sketch (Figure 46) is scale-less, and so of little benefit.

(237) [Recommendation]: I suggest revising the image at Figure 47, as this shows an access ramp, rather than a ramped parking floorplate on which cars would be parked.

(238) [Recommendation]: I suggest revising the image at Figure 48, as it appears to show a ground floor parking entrance, rather than an upper level interface to the public realm.
8.0 Review of the Amendment provisions: Public Interfaces

8.1 Review of the proposed controls: Public Interfaces

8.1.1 Overview

Public Interfaces addresses the physical boundary or frontage between a building’s internal uses, and the public realm or streetscape.

The Design Outcomes and Requirements address the design of building frontages, services access and weather protection.

This Theme contains Mandatory Requirements for active frontages, which applies to Special Character Areas, but not to General Development Areas.

8.1.2 Basis: Why this is important?

Outcomes such as visual interaction, visibility of activity inside, passive surveillance, safety (through ‘eyes on the street’), visual interest and human scale, are substantially determined by the design of the public interface where buildings meet the public realm.

These outcomes can contribute to continuous streetscapes which are active and interesting, and encourage walking and pedestrian activity, or contribute to large ‘gaps’ in active streetscapes, which reduce the quality of the public realm experience and discourage walking.

Figure 14: Considered design at the ground floor interface, even for back-of-house areas and screening, contributes to the public realm experience. Riverside Quay, Southbank.

Figure 15: Back of house areas which lack design consideration and reflect poor quality materials and detail, detrimentally affect the public realm experience. Literature Lane, Melbourne.
8.1.3 Affects: How can Public Interfaces influence the public realm experience?

(244) The design, materiality, transparency and texture of the building frontage is key to achieving a desirable extent of activation, passive surveillance, visual interest and activity in the public realm.

(245) The Public Interfaces of buildings affect public realm outcomes as follows:

- Visibility of activity inside buildings:
  - Contributes to a sense of activity in the public realm;
  - Supports public realm safety through the visible presence of people and a sense of ‘eyes on the street’;
  - Permits visual interaction between inside and outside,

- Frontage design, lighting, signage and artwork or displays:
- Enhance the visual interest and enjoyment of the streetscape experience;
- Support public realm amenity such as through façade-integrated seating, shelter over the footpath;
- Invite people to pause, wait, meet and interact at the building frontage.
  - Entrances:
    - Support movement of people between buildings and public realm;
    - Increase public realm activity through people movements

8.1.4 Challenges
(246) Challenges to achieving best practice in the design of Public Interfaces include:
  - Unknown tenants at the design and construction stage;
  - Balancing privacy and security for ground floor non-retail uses, with activation and visual interaction imperatives;
  - Balancing solar control through tinted glass, with visual transparency at frontages;
  - Achieving active interfaces in non-retail areas, such as through residential frontages or commercial uses.

8.1.5 Are the Design Outcomes appropriate and effective?

Active frontages
(247) [T5A:DO:1] Active frontages which contribute to public realm outcomes is an appropriate direction.

(248) [T5A:DO:2] Continuity of ground floor activity in Special Character Areas is also appropriate. [Recommendation]: I suggest this Outcome should also apply in General Development Areas, given that the corresponding Design Requirement is the same (although only mandatory in Special Character Areas). That is, the Special Character Area should not be mentioned in the Design Outcome.

(249) [T5A:DO:3] Views from the public realm into buildings is an appropriate outcome, but the wording of this Design Outcome may warrant review, such as:
  - **Internal habitable spaces at ground floor are highly visible from the public realm.** This is less specifically relating to ‘openings’ and potential ‘obstructions’. 
Services, waste and loading

(250) [T5B:DO:1] I support the promotion of innovative design of services to maximise public realm quality, because this demands particular design attention to an aspect which is often neglected from a design perspective, and requires integration of services within the overall design composition.

(251) [T5B:DO:2, T5B:DO:3] Design integration of services, and avoiding services which dominate the pedestrian experience, are also supported outcomes. Services infrastructure and enclosures can be a very prominent component of the ground floor frontage to buildings. It is essential that their impact is minimised, and their positioning and design is integral with the frontage overall.
Public realm projections and weather protection

(252) [T5C:DO:1] It is appropriate that development contributes to pedestrian comfort through weather protection in the public realm.

(253) [T5C:DO:2] I consider that weather protection will necessarily affect daylight and views to the sky. [Recommendation]: This Outcomes should be removed or revised as follows (suggested): Ensure projections maintain reasonable daylight access and views to the sky from the public realm.

(254) I support the following Outcomes:
   o [T5C:DO:3] Weather protection which is functional, high design quality and contributes to human scale, noting that ‘human scale’ should be defined, as noted below (section 10.1).
   o [T5C:DO:5] Minor building projections contributing to facade depth and visual interest. This creates relief and variation, as perceived from below, and avoids excessively flat facades.

(255) [T5C:DO:6] Projections should be discreet rather than ‘discrete’.

(256) [T5C:DO:7] The balance of addition and subtraction is a valid design suggestion, but I do not consider it an important Outcome, alongside other guidance for discreet projections and provision of thickness and relief in facades. I consider that this Outcome should be removed or revised, such as: Projections contribute to facade depth and relief, and visual interest in streetscapes.

(257) [T5C:DO:8] While maintaining clearance for service functions is essential, I am not sure that this Outcome is required in a DDO.

8.1.6 Are the Design Requirements appropriate and effective?

Active frontages

(258) [T5A:DR:1.1] I support the provision of at least 80% active frontage to main streets, streets and laneways, on the basis that:
   o The 80% provision is carried forward from the existing DDO1, with new exemptions (see next paragraph);
   o This is an aggregate measurement across all frontages, allowing for design flexibility (rather than 80% activity frontage to each frontage);
   o 80% reflects a clear majority of the frontage being active, which is an important outcome, while allowing for a reasonable proportion of non-active frontage, to accommodate building structure, services and vehicle access.
   o I recognise that for sites with small frontages and single street frontages, 80% may be difficult to achieve along with vehicle access. For example, if vehicle access and limited services occupy say, 8m in length, the overall frontage would need to be 40m for the 8m to comply, and some sites will have shorter total frontages.
   o However the discretionary controls for General Development Areas allow flexibility, while maintaining a clear objective to minimise the extent of non-active frontage. I support this direction.
I have not carried out individual design testing or measurement to assess how achievable the 80% minimum is, but I accept Council’s assessment of this potential as achievable.

(259) The current DDO1 requires at least 5 metres or 80% of the street frontage (whichever is the greater) as an entry or display window to a shop and/or a food and drink premises in Area 1 (Retail Core) and Area 2 (Major Pedestrian Areas and Key Pedestrian Routes Within CCZ1). For Area 3, the current DDO1 requires at least 5 metres or 80% of the street frontage (whichever is the greater) as an entry or window which allows occupants to engage with the street.

(260) Amendment C308 builds on and simplifies these provisions, by:

- Nominating 80% of the length of the frontage, rather than 80% of the frontage (area);
- Allowing for solid elements within the 80% active frontage, to encourage more varied materiality, texture and depth, and to avoid full glazing to frontages.

(261) [T5A:DR:1.1] I find the wording of this Requirement somewhat unclear and confusing, in terms of the exclusions. The Design Requirement states that ‘This measurement (80%) excludes stall-risers... in addition to pilasters, window and door frames’. This may be understood as the 80% excluding these elements, so they are therefore part of the 20% inactive frontage.

(262) However I understand from Council officers that the intention is to allow exemptions (stall risers, materiality, window frames and doors) to enable a reduced percentage of glass within an ‘active frontage’. That is, stall risers, pilasters and frames are included in the active frontage measure, rather than excluded.

(263) [T5A:DR:1.1] [Recommendation]: I therefore suggest revisions to the wording, such as the following:

- At least 80% of the ground floor frontage as an entry or window... which provide pedestrian interest and interaction.
- Stall risers may be included within active frontages, to a maximum height of 700mm (noting that the 80% refers to the length, not area, of ground floor frontages, so stall risers do not affect the calculation);
- The 80% measurement includes pilasters and window and door frames, which are part of the active component of the façade.

(264) I support the other Requirements for General Development Areas as follows:

- [T5A:DR:1.5] Provision of thickness, depth and articulation of frontages, which creates visual interest [Recommendation]: I suggest this should apply to all frontages, not just shopfronts.
- [T5A:DR:2] Avoiding long expanses of glass which tends to reduce visual interest and activity, even if the glass is transparent.
- [T5A:DR:3] Avoiding tinted, opaque or highly reflective glass. Tinting and reflectivity of glass reduces visual interaction potential.
- [T5A:DR:4] Ensuring security installations are transparent for visibility at night. This is valid in that it avoids obscure roller-shutters or similar, which are detrimental to streetscapes, even when the tenancy is closed.
(265) [T5A:DR:5] The requirements for flood prone areas to avoid external stairs and ramps and provide useable space at street level, reflects the challenges of maintaining activation and visual interaction, with a potentially significant level change inside the building. The Requirement specifies ‘useable space’ at grade, but this comprises a risk that a narrow space which lacks activity separates the streetscape from the main internal activity on the raised floor level. The level change may also reduce the potential for ground floor tenancies to be occupied.

(266) [T5A:DR:5] I agree that in principle, it is preferable to have some internal activity at grade, to provide for direct visual interaction with the streetscape.

(267) [T5A:DR:5] These discretionary requirements allow for the particular site design response to demonstrate the optimal balance of tenancy activation, visual interaction and flood mitigation. These types of Requirements are highly dependent on particular site conditions. I therefore support the Requirements relating to flood prone areas.

Services, waste and loading

(268) [T5B:DR:1] I support the location of service access doors within 500mm of the street edge, assuming this also applies to main streets and laneways, and avoidance of large setback undercroft spaces. Recessed service spaces and entries significantly detract from the public realm and create safety risks.

(269) [T5B:DR:2] I question whether reference to the Waste Management Guidelines is required in this DDO.

(270) [T5A:DR:4] I support the sleeving of internal waste collection areas, and the design integration and quality for service cabinets.

Public realm projections and weather protection

(271) [T5C:DR:1] The provision of continuous weather protection except where heritage intervenes, is appropriate and supported.

(272) [T5C:DR:2] The suggested parameters for canopies are appropriate. [Recommendation]: I would suggest the depth also be defined as providing adequate protection from rain and wind where appropriate, as some streetscapes will not receive sunlight at all.

(273) [T5C:DR:6] I question the Requirements for upper level balconies to main streets, which appears overly prescriptive or suggestive, and also conflicting, although I support the provision for deeper projections to main streets, and smaller projections to streets and laneways:

- First floor balconies up to 1.6m deep conflicts with lightweight balconies or other features projecting up to 600mm.
- This Requirement appears to recommend projecting balconies. In some cases, recessed or no balconies may be appropriate. [Recommendation]: Therefore, rewording may be appropriate, such as: For main streets, balconies up to 1.6m depth may be considered...

(274) [T5C:DR:7 - 11] I support the Requirements for ensuring that projections are not excessively large, dominant or continuous, and which allow for street trees.
8.1.7 Are the Mandatory Requirements appropriate and effective?

(275) [T5A:MR:1.1] In Special Character Areas, the mandatory 80% minimum active frontage does not include laneways, providing for flexibility in accommodating vehicle access and services on laneways, while providing for at least 80% activation to main streets and streets.

(276) [T5C:DR:1.4] [Recommendation]: I recommend rewording this Requirement regarding heritage places, to clarify that the extent of existing active frontage cannot be reduced.

8.2 Review of the Central Melbourne Design Guide: Public Interfaces

(277) As discussed above, the caption text at Figure 56 states that the 80% minimum active frontage excludes key architectural elements which create thickness. However, I understand the 80% component (active component of the frontage) to include these elements. This requires clarification. This caption could also clarify that it means ‘at least 80% openings or windows’ by length (not by area).

(278) The points at Requirements 32 and 33 relating to clear glazing are unclear in their wording, and are different in parenthesis. I suggest these should read as follows:

- Clear glazing (security grilles or mesh are to be transparent and mounted internal to the glazing or shopfront).

(279) The diagram at Figure 63 appropriately advises against deep recesses which can create entrapment spaces. However, this suggests review of Figure 58, which appears to show quite a deeply recessed entrance (noting it is generally open and visible).

(280) The diagram at Figure 67 appears to show discontinuous weather protection, with gaps between canopy elements, in contrast to the Design Requirement.
9.0 Review of the Amendment provisions: Design Detail

9.1 Review of the proposed controls: Design Detail

9.1.1 Overview
(281)  Design Detail addresses both the architectural expression of buildings, including articulation, materiality and finishes, as well as the smaller, more detailed aspects of design.

9.1.2 Basis: Why this is important?
(282)  Design Detail addresses the immediate, direct, close-up experience of buildings, which determines how the interfaces are perceived and experienced within the public realm.

9.1.3 Affects: How can Design Detail influence the public realm experience?
(283)  Design Detail can provide for visual interest and quality, richness, depth and variation in building frontages. It can shape the pedestrian experience as interesting, varied and engaging, or uninteresting and bland.
(284)  Design Detail can also encompass physical experience opportunities, such as integrated seating in frontages, standing/leaning spaces, sheltered areas and gathering spaces.
(285)  Design Detail frames the experience of entering and exiting buildings, by addressing the threshold experience, which mediates the public/private interface, while also shaping the commercial aspects of ground floor tenancies.

9.1.4 Challenges
(286)  Challenges to achieving best practice in Design Detail include:
- Insufficient detail or design consideration for lower building levels at the Planning Permit Application stage;
- Balancing visual and textural quality of materials and details, with robustness in the public realm, and durability over time.

9.1.5 Are the Design Outcomes appropriate and effective?
(287)  [T6:DO:1] I support the establishment of clear relationships to context, but this Outcome (or the associated Design Guide) should expand on this to encourage contemporary interpretation and design innovation, rather than design ‘matching’ or replication.
(288)  [T6:DO:3] I support responding to viewing distance, but this Outcome should consider the range of distances from which a development is likely to be viewed, requiring a response to the immediate, close-range experience, as well as more distant views. This approach would align with the requirement for more detailed, larger-scale design drawings for the lower levels.
(289)  [T6:DO:4] I support the Outcome for sufficient design detail, but consider the terminology for a high quality City to be unclear, and would suggest a focus on a rich, engaging pedestrian experience.
(290) [T6:DO:5] I also support the Outcome that all sides of a building are designed to a high standard, and would suggest that this also include the roof, as buildings may well be viewed from above in the Central City and Southbank.

9.1.6 Are the Design Requirements appropriate and effective?

(291) [T6:DR:6] I strongly support the provision of depth, light and shadow in facades, through integrated design, as this supports visual interest and a sense of design attention and craft in construction.

(292) [T6:DR:7] I support the integration of blank walls, such as boundary walls, through three-dimensional design. Boundary walls may remain highly visible in the public realm for a long period or permanently, if potential redevelopment on adjoining sites does not take place.

(293) [T6:DR:8] I support the use of durable, robust, low maintenance materials at upper levels, and avoidance of deteriorating materials, to ensure the building does not fall into disrepair and appear run-down or damaged. [Recommendation]: However, this Requirement should be balanced with the need for materials and details which are considered, textured and visually interesting.

(294) [T6:DR:9] I consider that tactile, visually interesting materials can also be employed at upper levels, as well as lower levels.

(295) [T6:DR:11] I support the avoidance of materials and finishes which undermine or detract from the visually rich laneway environments, but consider that this applies to streets and spaces also (not just laneways).

(296) [T6:DR:12] I support the avoidance of materials which create excessive glare in the public realm, as this affects pedestrian comfort and amenity.

9.2 Review of the Central Melbourne Design Guide: Design Detail

(297) At Figure 83, while I support the principle of providing greater detail in parts of the building that will be viewed from a closer distance, the actual dimensions indicated are not referenced in the Design Requirements, and not explained in terms of what these suggest. [Recommendation]: I suggest removing these dimensions to avoid confusion.

(298) The image caption on page 87 is unclear in relation to the ‘exaggerated brass finish’. This may refer to the window frames, and/or the reveals to the side wall.

(299) Requirement 49 is unclear in terms of ‘visually exposed towers’ as most towers will be visually prominent by their nature. [Recommendation]: This Requirement should focus on ensuring high façade design quality in towers.
10.0 Review of the Amendment drafting

10.1 Definitions

(300) The Design objectives contain the term *human scaled*. [Recommendation]: In my opinion this term should be referenced in the Definitions in DDO1, because its meaning is unclear and open to interpretation. I suggest a definition such as: *Built form or public realm interface elements of a size and scale which is legible to people in the public realm, and not over-scaled or overwhelming in the streetscape.*

10.2 Application requirements

(301) These include a requirement for detailed plan, elevation and section drawings (1:50 or 1:20) for the lower levels. This builds upon the CCZ1 requirement for an urban context report which addresses ground floor street frontages, but increases the demand on designers to address the lower levels in more detail, at the planning permit application stage. I support this initiative.

(302) [Recommendation]: I suggest including a requirement for a detailed streetscape/interfaces study, at scale 1:50 or 1:20, as part of the urban context report, focusing on the lower building levels and ground floor frontages. This would encourage designers to consider the context and implications of public realm interfaces in more detail, and would lead into the requirement for detailed drawings for the lower building levels as proposed.
11.0 Conclusion

11.1 Will Amendment C308 be effective in achieving its objectives?

(303) Amendment C308 encompasses a highly considered, comprehensive set of
guidance for the design of buildings in relation to the public realm.

(304) The Design Outcomes and Requirements are aspirational and reflect best
practice, yet are achievable and realistic, and attuned to commercial
development

(305) While the Amendment content is wide-ranging and spans the scales from
Urban Structure to Design Detail, I consider the content of the Amendment to
be highly targeted, specific, clear and applicable to commercial development.

(306) On this basis, I consider that the Amendment will achieve its objectives, as set
out at 2.1.1 above, as follows:

- Improve urban design outcomes from development activity, in response
to the significant increase in development intensity:
  - The breadth of specific Design Requirements, particularly focussing on
the lower levels of buildings, and supported by the illustrative Central
Melbourne Design Guide, will provide a new frame of reference and
comprehensive set of guidance for future development.
  - The Amendment’s focus and emphasis on the lower-level
configuration and design of buildings will directly contribute to
improved urban design outcomes in the public realm.
  - I expect that this guidance will also, appropriately, inform design and
design assessment in other areas beyond the Central City and
Southbank.

- Strengthen the focus on the qualitative experience of the city, particularly
arising from the public realm impacts of private development:
  - The Amendment’s focus on the way that buildings interface with, and
contribute to, the public realm, reflects a new emphasis on the
qualitative experience of the city.
  - Pedestrians experience ground floor frontages, entrances, materials,
streetscape interfaces, windows and internal ground floor uses, more
directly than other aspects of buildings. The Amendment’s emphasis
on these aspects therefore strengthens the policy and design focus on
the pedestrian’s experience of the city.

- Complement the more quantitative controls introduced through
Amendment C270.
  - In its focus on qualitative, experiential aspects of urban design, this
Amendment is an effective complement to the qualitative focus of
C270.

(307) There is opportunity to refine and enhance the clarity and application of the
Design Requirements, as I have identified above.

(308) I therefore consider that Amendment C308 should be supported, subject to
the Recommendations I have made in this Statement.
Declaration

(309) I have made all the inquiries that I believe are desirable and appropriate and no matters of significance that I regard as relevant have to my knowledge been withheld from the Panel.

Simon Joseph McPherson

Director, Global South Pty Ltd
12.0 Appendix A: Consolidated list of recommendations

The recommendations made throughout this Statement are consolidated in the following list.

12.1 Urban Structure

12.1.1 Design and Development Overlay 1

I suggest consideration of an additional Design Outcome as follows:

- New and enhanced connections provide additional public realm spaces for stationary activity, and opportunities for activation and commerce. This expands the focus from just ‘connections’ to ‘places’, and reinforces the importance of public space quality of new and enhanced connections.

I consider that these provisions would provide for clearer implementation if supported by a map or framework plan indicating which street blocks may require new connections, so that landowners have an indication of where connections will be expected.

I am advised that City of Melbourne is preparing a map for the Planning Panel, which will highlight street block edges which are deemed to require additional linkages to achieve the above criteria.

[T1:DR:5] I consider that more information should be provided to articulate what conditions may mean that open to sky connections are not possible. This could be provided in the Central Melbourne Design Guide.

[T1:DR:5] I consider that it would be useful for the Design Guide to provide more detail on what constitutes high quality in arcades, with examples. Further design guidance for high quality arcades may include:

- Generous vertical proportions to create a sense of space and volume, and avoiding low-slung spatial proportions;
- Effective lighting to create a sense of space and light;
- Entrance doors or gates which are highly visually permeable, and preferably open throughout the day;
- Design which creates an ‘outdoor’ environment or character.

It would be beneficial to clarify or define whether a connection which is not open to the sky, is an arcade.

12.1.2 Central Melbourne Design Guide

I consider that further guidance to ensure pedestrian connections are of a high quality would be useful and effective, including:

- Explanation of the rationale for the 6m minimum width;
- Explanation of outcomes described by ‘lined by active frontages’.

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12.2 Site Layout

12.2.1 Design and Development Overlay 1

(318) [T2:DO:3] This Outcome should clarify that the exterior spaces include streets and lanes, not just on-site plaza spaces.

(319) [T2:DO:4] This Outcome should also address the improvement and activation of retained spaces.

(320) [T2:DO:5] I recommend removing or revising this Design Outcome.

(321) An additional Design Requirement should be provided, as follows:
  o Positon building entries to contribute to and enhance adjoining streets and laneways, through activation, pedestrian movement and passive surveillance opportunities.

(322) It would be beneficial to provide a Framework Plan or to identify particular spaces in the Amendment area, which currently provide an effective public realm benefit, and/or present opportunity through retrofit to enhance the public realm experience.

(323) I recommend inclusion of a requirement that the design response should demonstrate how a reduced plaza area can perform a useful and effective public function, in relation to the function of the existing space. This provision should also apply to proposed new publicly accessible spaces, to ensure they are useful and effective.

12.3 Building Mass

12.3.1 Design and Development Overlay 1

(324) [T3:DO:2] Change wording to ‘adjacent’ or ‘proximate’ rather than ‘adjoining’, to encompass immediate built relationships which are not directly adjoining.

(325) [T3:DO:5] I recommend removing this Design Outcome, because:
  o I understand skyline effects are predominantly addressed through Amendment C270 (building heights, floor area ratios, setbacks);
  o The skyline affects more distant, remote views, rather than direct public realm outcomes, which this Amendment is focussed on;
  o Tall buildings will generally achieve a varied skyline naturally, through individual design initiative for each project, and varied site sizes and shapes, and the complexity of existing tall buildings in the Central City and Southbank.
  o There are no specific Design Requirements associated with this Design Outcome.

(326) [T3:DR:1] I suggest revising this Requirement as follows:
  o Ensure development adopts a diversity of forms typologies and architectural language, within a cohesive design framework, on large sites comprising multiple buildings.
(327) [T3:DR:5] I recommend clarification of this Requirement, which I understand to relate to the street wall in relation to upper level forms or towers. The street wall should not necessarily be the dominant component over the ground floor frontage, for example.

(328) [T3:DR:10] The final Design Requirement: ‘Avoid the excessive use of surface or decorative architectural effects...’ is unclear in its wording and requires revision, in relation to how façade surface treatments relate to transition in building mass.

(329) I consider that there is opportunity for further Design Requirements and/or design guidance for street walls, noting that these are perhaps more appropriate in the Design Detail chapter, but should address:
  - Ensure the street wall holds and defines the street edge;
  - Ensure that the street wall extends to the ground, and is not seen as ‘floating’ above a glazed ground floor frontage;
  - Balance openness/transparency/glazing with solidity and surface in street walls, and avoid excessive glazing;
  - Integrate balconies and balustrades within the street wall design composition.

(330) The Requirements should also reinforce that the street wall should be visually distinct from the upper levels or tower, and encourage the building base (street wall) to be more solid, articulated and refined.

12.3.2 Central Melbourne Design Guide

(331) [Figures 28-31] I suggest making these images bigger and squarer in proportion so that more of the case study is visible, especially for Figures 29 and 31. I also consider that a good example would assist alongside the four bad examples.

12.4 Building program

12.4.1 Design and Development Overlay 1

(332) [T4:DO:4] I suggest rewording this Outcome to address the Amendment’s public realm focus, such as:
  - The internal configuration of development ensures comfort, wellbeing and enjoyment for building occupants, which supports active uses, habitation of internal spaces and therefore activation of the public realm.

(333) [T4:DR:14] The uncertainty of this Requirement and how it would be assessed leads me to suggest it be reviewed or removed.

12.4.2 Central Melbourne Design Guide

(334) The diagrams at Figures 36 and 37 are also quite small, and so the distinction between them is not immediately apparent. I recommend review of these diagrams.

(335) The image captions on page 53 could be clarified to conform that these are ‘before’ and ‘after’ images of a converted car park.
12.5 Public Interfaces

12.5.1 Design and Development Overlay 1

12.6 Design Detail

12.6.1 Design and Development Overlay 1

12.6.2 Central Melbourne Design Guide

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(347) At Figure 83, I suggest removing the dimensions to avoid confusion.
(348) Requirement 49 should focus on ensuring high façade design quality in towers.

12.7 Amendment Drafting

(349) The term *human-scaled* should be referenced in the Definitions in DDO1, because its meaning is unclear and open to interpretation. I suggest a definition such as: *Built form or public realm interface elements of a size and scale which is legible to people in the public realm, and not over-scaled or overwhelming in the streetscape.*

(350) I suggest including an Application Requirement for a detailed streetscape/interfaces study, at scale 1:50 or 1:20, as part of the urban context report, focusing on the lower building levels and ground floor frontages. This would encourage designers to consider the context and implications of public realm interfaces in more detail, and would lead into the requirement for detailed drawings for the lower building levels as proposed.
Appendix B: Case studies - Pedestrian linkages and laneways

This section considers several existing arcades, laneways and pedestrian links in the Central City. It provides an outline assessment of each, how it might be improved, and whether Amendment C308 is likely to result in improved urban design outcomes.

13.1 Mill Place and Victoria University Arcade

13.1.1 Assessment

Victoria University Arcade, off Flinders Street, aligns with Mill Place to the north. The arcade has low-slung proportions and feels very enclosed/internalised, even though the opposite end is visible.

The northern entrance comprises glass doors. The arcade comprises reasonable activation, presumably supported by the immediate student population and foot traffic. This activation contributes to a sense of public accessibility.

Mill Place lacks active frontage but the adjoining buildings appear to present potential for future activation by opening through existing windows.

Mill Place, off Flinders Lane near Elizabeth Street, is approximately 4m wide and with deep proportions, but is open to the sky. Laneways which are open to the sky look and feel more ‘public’ and accessible. I consider the width acceptable and comfortable for a pedestrian-only lane, even though it contravenes the DDO1 Design Requirement for 6m minimum width.

13.1.2 Potential improvements

The arcade would be improved through higher ceilings, more open ends/entrances without closed glass sliding doors, and materials and finished which reflect an outdoor quality.

The Victoria University linkage would also be better as an outdoor, open-to-sky continuation of Mill Pace, to create an urban laneway rather than an enclosed arcade.

Mill Place would be improved by greater activation from adjoining buildings, and enhanced materials and furniture. Its significant gradient may limit this potential.

13.1.3 Would Amendment C308 guide better design outcomes?

DDO1 would prioritise open-to-sky linkage rather than an arcade, but if that was not possible, DDO1 required high quality arcades. I have recommended above that this should be further explained, but I do not consider the existing arcade to be of high quality.

DDO1 would also require a greater extent of active frontages to Mill Place, to guide future development or tenancy work in the adjoining buildings which edge Mill Place.
13.2 Coromandel Place and 137 Bourke Street

13.2.1 Assessment

(361) This location comprises an established laneway with vehicle access off Little Collins Street, with a recently developed pedestrian connection through to Bourke Street within a development.

(362) The new connection creates a linkage from an existing lane. I am not aware of whether there was a pedestrian linkage previously, connecting Coromandel Place with Bourke Street.

(363) Coromandel Place reflects a range of positive attributes for a laneway. While direct activation such as through retail frontages is relatively limited, there are many doors and windows, varied built form styles and materials, and a sense of texture and ‘grit’, as well as multiple vehicle entries. The lane is approximately
6m wide. But the footpath space is very limited or non-existent in some places, but I consider this acceptable in a low-speed, non-through route for vehicles.

(364) The new linkage within 137 Bourke Street draws in natural light and air through a single overhead opening near the ‘corner’ link to Coromandel Place, and incorporates public art and outdoor-style materials. However, it is quite narrow, and is not direct/straight in its connection to Coromandel Place, with a corner at the end, creating visual uncertainty for pedestrians who don’t already know the route through. This reflects the importance of direct links, which are open to the sky, but also the design attention required to deliver high quality arcades.

13.2.2 Potential improvements

(365) While a straight connection all the way through would be most legible, this appears to be not possible given the two 2-storey buildings fronting Bourke Street on alignment with Coromandel Place behind.

(366) The new connection may have achieved a better outcome through a wider connection, with greater activation along its length, and a greater extent of openness to sky, so that the link feels more like a public lane, and less like an internal corridor.

(367) However, the artworks, brickwork, and opening to sky contribute positively to this linkage currently.

(368) Further, greater design attention to the glazing along the linkage and at the end where the linkage turns the corner, may have achieved a more engaging, visually interesting experience, and stronger ‘invitation’ for pedestrians to move through the linkage. Public art at the end of the linkage, for example, which is visible from the entry off Bourke Street, would help to draw people in and through to Coromandel Place.

13.2.3 Would Amendment C308 guide better design outcomes?

(369) The DDO1 guidance for laneways may have achieved an outcome here which had a greater extent of openness to the sky and activation along the new linkage, as well as potentially greater width, to create a more visually open condition. This would reflect a better urban design outcome.
Figure 28: View towards Bourke Street along the recently established pedestrian link at 137 Bourke Street (Citadines building / VicProp Real Estate tenancy at ground floor), has limited visual links to the sky but a generally enclosed feel, with limited activation along its length.

Figure 29: View towards the corner linkage to Coromandel Place. Large-scale artworks, stone flooring and exposed brickwork contribute to an ‘outdoor’ character in this linkage.

Figure 30: Opening to the sky above the new linkage at 137 Bourke Street.

Figure 31: Connection between the new linkage and Coromandel Place, which extends to the left in this image.
13.3 Guests Lane and Goldsborough Lane

13.3.1 Assessment

(370) Goldsborough Lane (within the CBW development) is positioned to align with the pre-existing Guests Lane to the north, across Little Bourke Street. This creates a highly visible and legible route for pedestrians between Bourke Street and Lonsdale Street.

(371) Goldsborough Place is generous in width and open to the sky (but with transparent high-level canopy), and is lined by active frontages.

13.3.2 Potential improvements
I consider Goldsborough Lane to reflect a good urban design outcome, in the context of the provisions of Amendment C308.

**13.3.3 Would Amendment C308 guide better design outcomes?**

I consider that Goldsborough Lane reflects the type of outcome sought for laneways by Amendment C308.

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**Figure 36**: Goldsborough Lane (CBW) is positioned to align with the pre-existing Guests Lane to the north, across Little Bourke Street (image source: Google).

**Figure 37**: Guests Lane, near Lonsdale Street, looking South, with view to Goldsborough Lane in distance.

**Figure 38**: Guests Lane mid-point, with view to Goldsborough Lane in distance.

**Figure 39**: Courtyard space, looking west from Guests Lane.

**Figure 40**: Exiting Guests Lane, on alignment with Goldsborough Lane.

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**13.4 Fulton Lane, 155 Franklin Street**

**13.4.1 Assessment**

This linkage comprises two parallel lanes. A low-level glazed building faces east onto a covered way, while turning its back to a narrow laneway. The covered way is wider but discontinuous, and has a less 'public' feel, while also being quite dark and shaded. Because of the central retail building, the continuous laneway is very narrow and inactive.
13.4.2 Potential improvements

(375) A single laneway, directly linking between Franklin Street and A’Beckett Street, with retail units facing onto it, would reflect a better urban design outcome, than what is a relatively confused and illegible arrangement currently.

13.4.3 Would Amendment C308 guide better design outcomes?

(376) The proposed DDO1 includes Design Requirements for new linkages to be:

- Open to the sky;
- 6m wide;
- Lined by active frontages.

(377) These Requirements would, in this case, lead to a wider, single public laneway which is open to the sky (rather than covered) and activated, at least on the Fulton Lane side, which would reflect an improved design outcome.

Figure 41: Fulton Lane, with dual laneway entries to Franklin Street

Figure 42: Covered pedestrian linkage with retail activation at right, leading to a termination point (with links through to the rear narrow laneway.)
13.5 Atira Student Housing, 50 Latrobe Street

13.5.1 Assessment

This new linkage connects with an apparently pre-existing laneway off Mackenzie Street to the north. It is accessed through a heritage building façade on Latrobe Street. I am not aware of whether this link is open 24 hours, or closed off at night.
While the entrance is somewhat concealed in the Latrobe Street streetscape, it opens out into a high-quality laneway/public space, which feels public, outdoor and is open to the sky, but also quiet and serene.

This central space is activated by an entrance to a lounge/library space and other glazing and entrances. Although it is not highly activated by retail or café uses, the space feels adequately connected and safe, in my experience, and provides a peaceful space to sit or meet.

This area is not accessible for vehicles, but the connection through to Mackenzie Street does provide vehicle access. The connection is well-handled and provides good through-visibility, and therefore legibility, from both directions.

13.5.2 Potential improvements

Positioning the pedestrian link immediately west of the white heritage building, creating a visible space between new and existing buildings, may have made it more visible and legible from Latrobe Street. This may have allowed the link from Latrobe Street to be open to the sky, and more direct in its connection through to the north.

Greater activation may attract greater usage, but I am supportive of the more quiet and serene character, which is supported by the materials used, including brick and timber.

13.5.3 Would Amendment C308 guide better design outcomes?

DDO1 prioritises open to sky and direct linkages, so this may have informed alternative design potentials for this development, although I recognise that other considerations and requirements play a part in the ground floor layout and integration with a heritage building.

However, I consider this outcome to reflect positive urban design attributes, which are in line with the intent of Amendment C308.

Figure 47: The laneway connection at 50 Latrobe Street is accessed through the white heritage building, but this is not highly visible or legible in the streetscape, so limits its function as part of the urban structure.

Figure 48: View through to the laneway connection from Latrobe Street, with natural light visible bend the heritage façade.
Figure 49: Pedestrian space beyond the heritage building, which forms a laneway/plaza space hybrid, but is a comfortable place for pedestrians. The connection to the north is visible beyond.

Figure 50: Looking north to Mackenzie Street, via a vehicle-access lane.

Figure 51: View south from new Mackenzie Street, with new linkage space and access to Latrobe street visible in the distance.

Figure 52: View south into pedestrian space and connection to Latrobe Street.
13.6 333 Collins Street

13.6.1 Assessment

(386) The arcade at 333 Collins Street provides a direct, straight link between Collins Street and Flinders Lane, so is quite long as an arcade. It is designed to have an ‘outdoor’ character, through street lights and stone pavement, and generous width and height (but is less than 6m wide). While the glazed frontages to the arcade are not currently active, the visibility to each end, with openings to street, supports its publically accessible character. Gates at each end, rather than glass doors for example, assist this outcome.

(387) I would consider this arcade to be acceptable in a Central City context under C308, because it is straight and direct, and contributes to the permeability of the urban structure, even though it:

- Is not open to the sky;
- Is only activated (potentially) along one side;
- Is less than 6m wide (approx. 4m);
- Is closed at night (I am advised).

(388) The entrance from Collins Street to this arcade is somewhat concealed within the building façade. A distinct, open-to-sky linkage would be more visible, as a ‘break’ between buildings.

13.6.2 Potential improvements

(389) This linkage would provide a greater contribution to the urban structure and the pedestrian experience if it was open to the sky.

(390) A greater extent of activation along its length, even if on one side only, would enhance this connection. I recognise that it may not provide optimal retail conditions (but these may be improved with an open-to-sky linkage).

(391) As shown below, which much of the arcade is lined by glazed shopfronts, these are predominantly obscured and inactive. This presents a challenge for demonstrating active frontages at the design stage, because it is also dependent on the tenancies over time.
13.6.3 Would Amendment C308 guide better design outcomes?

(392) DDO1 would seek a wider, open-to-sky linkage, where possible. 333 Collins Street is a relatively large site, and while I am not aware of the site and design conditions, it is assumed that an open-to-sky linkage may have been possible.

(393) This would reflect a better urban design outcome.

Figure 54: Arcade at 333 Collins Street, looking north towards the Collins Street entrance, from near the Flinders Lane entrance.

Figure 55: Security gates are set-in from the entrances and are not visually prominent.

Figure 56: Glazed frontages along the arcade are obscured by glazing film, and there is very little activation despite extensive glazing.

Figure 57: The arcade entrance off Collins Street is concealed within the building façade.
14.0 Appendix C: Response to Submissions

The following table summarises my responses to the key points raised in the Submissions that I have received and reviewed, as listed above.

The responses below align with my opinions as set out throughout this Statement.

<table>
<thead>
<tr>
<th>Item</th>
<th>Submissions</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Urban Structure</strong></td>
<td>8, 11, 13, 16, 19, 23, 24, 25, 28 (supportive), 29</td>
<td>Open-to-sky is preferable, supporting links that look and feel public and accessible. Examples such as Goldsborough Lane, CBW, demonstrate potential for effective weather protection with open character. I support further clarification of when open-to-sky is not possible (16).</td>
</tr>
<tr>
<td>Covered pedestrian connections (rather than open to sky)</td>
<td>8, 11, 13, 16, 19, 23, 24, 25, 28 (supportive), 29</td>
<td>Open-to-sky is preferable, supporting links that look and feel public and accessible. Examples such as Goldsborough Lane, CBW, demonstrate potential for effective weather protection with open character. I support further clarification of when open-to-sky is not possible (16).</td>
</tr>
<tr>
<td>Active frontages</td>
<td>16, 17</td>
<td>Active frontages can be achieved without retail or other uses which require high foot traffic.</td>
</tr>
<tr>
<td>Locations where new mid-block connections are required</td>
<td>21, 26, 36,</td>
<td>I understand City of Melbourne is preparing an indicative framework plan indicating street block lengths where new connections are required, and support this level of specification.</td>
</tr>
<tr>
<td>Pedestrian connections 6m wide</td>
<td>23, 24, 25, 26,</td>
<td>I acknowledge some high quality lanes may be narrower, but support this discretionary provision.</td>
</tr>
<tr>
<td><strong>2. Site layout</strong></td>
<td></td>
<td></td>
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<tr>
<td>Retention of minimum 50% existing public plazas</td>
<td>10, 11, 16, 25 (prefers 100% retention), 28 (considers removing 50% requirement), 36,</td>
<td>I support the imperative to retain, at least partially, existing spaces of public value on private land. While the 50% requirement appears arbitrary, it acknowledges the reality that redevelopment will in some cases result in reduction or loss of publicly accessible space. I have recommended a Framework Plan to identify particular spaces in the Amendment area, which currently provide an effective public realm benefit; and inclusion of a requirement that the</td>
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<tr>
<td>3. Building Mass</td>
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<tr>
<td><strong>design response should demonstrate how a reduced plaza area can perform a useful and effective public function, in relation to the function of the existing space.</strong></td>
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<tr>
<th>4. Building program</th>
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</thead>
<tbody>
<tr>
<td><strong>No above ground parking in Central City</strong></td>
<td>8, 17, 18, 28 (all supportive); 10, 11, 13, 16, 19, 23, 24, 29, 30</td>
</tr>
<tr>
<td>I support the prevention of above-ground parking in the Central City, and the sleeving of parking in Southbank.</td>
<td></td>
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</tbody>
</table>

| Avoidance of ramped parking structures | 13, 16, 17 (supportive), |
| Supported, recognising that access ramps in parking are needed, but the floors should be flat, to support future conversion. |  |

| Maximum 40% ground floor area for services | 17, 19, 23, 24, 26, 29, 30, 40 |
| I defer to other experts on the feasibility aspects, but support the mandatory maximum provision |  |

| Minimum 3.5m floor height for parking | 29 (re: basement heights), 30, 40 |
| This Requirement [T4:DR:3] only applies to car parking above ground level. |  |

<table>
<thead>
<tr>
<th>5. Public interfaces</th>
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<tbody>
<tr>
<td><strong>Street frontages dominated by services/vehicle access</strong></td>
<td>8, 16</td>
</tr>
<tr>
<td>I support the initiative to balance frontages with activation and functional requirements, but to minimise impacts, and defer to other experts on technical parameters. I support the avoidance of vehicle entries on main streets</td>
<td></td>
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</tbody>
</table>

| 80% minimum active frontage in Special Character Areas | 13, 18, 19, 23, 24, 26, 29 |
| I support this Requirement given the added importance of interfaces in Special Character Areas. |  |

<table>
<thead>
<tr>
<th>6. Design Detail</th>
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<tbody>
<tr>
<td><strong>DDO takes creative control, restricts architectural freedom</strong></td>
<td>11</td>
</tr>
<tr>
<td>I do not agree with this assertion. The DDO provides strong guidance and clear requirements/expectations, but encourages design creatively, complexity and quality.</td>
<td></td>
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<tr>
<td>Multiple architects for large sites.</td>
<td>11, 13, 25, 29, 30</td>
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<tr>
<td>Drafting language and clarity, using design guide-type objectives.</td>
<td>10, 17, 23, 24, 30,</td>
</tr>
<tr>
<td>Mandatory controls</td>
<td>16, 17 (mainly supportive), 29, 30</td>
</tr>
</tbody>
</table>