

Summary of Responses

The following table provides an overview of the themes from written submissions on each standard and provides the Department's response.

Green space

PROPOSAL	SUBMISSION THEMES	RESPONSE
Clarify the current landscaping standard to prioritise canopy trees and encourage landscaping in the street frontage.	Most respondents supported more green space in apartment developments and suggested strengthening the landscape standard.	Agree. The Department has strengthened the existing standard to encourage tree retention, increase the minimum communal open space size and promote longevity of green spaces through irrigation.
Require all apartment developments to include landscaped communal open space.	Several respondents were concerned with the costs of landscape maintenance and the overall impact on apartment affordability.	Comments noted. The proposed standard will offer higher levels of amenity for apartment dwellers and improve the microclimate and pleasantness of the public realm for the community. While there may be a marginal increase in maintenance costs, there is expected to be a net community benefit as a result of the new standards.
	Some respondents suggested that apartment developments should be able to provide less communal open space if public open space is nearby.	Agree. The decision guideline requires the responsible authority to consider 'the availability of and access to public open space' in determining the appropriate level of communal open space. Additionally, apartment developments of less than 10 dwellings will not be required to provide communal open space. Apartment

		developments of 10 dwellings or less often have garden front setbacks and public open space nearby reducing the need for communal open space.
	Some councils suggested that a greater number of trees should be required for apartment developments in outer suburbs.	Agree. The new standard supports this approach; the decision guideline requires consideration of any relevant local plan or policy for landscape and/or environmental sustainability to encourage a greater number of trees.
	Some respondents suggested that communal open space areas should be of a size and width that makes them functional and can fit a tree.	Agree. The new standard requires that communal open space is of a functional size, shape and dimension and the minimum communal open space area has been increased from 25sqm to 30sqm, to fit a tree.
	Respondents asked for advice on how much vegetation to provide if trees cannot be provided in the communal open space.	Agree. The standard has been changed to provide advice on how much vegetation to provide if trees cannot be provided.

Appearance of the building

PROPOSAL	SUBMISSION THEMES	RESPONSE
Apartment developments are attractive and built from durable materials, so they stand the test of time.	Many respondents expressed support for lifting the standards for external building quality.	Agree. The Department will proceed with changes to require all apartment developments to have durable external materials, and ease of access for façade maintenance.
	Several respondents agreed that the words in the standard were too generic, subjective and open to interpretation.	Agree. The words in the standard have been updated to describe external design and material quality more clearly.
	Some respondents thought that consideration of maintenance to facades was appropriate.	Agree. The new standard will include requirements to use materials that are resilient and weather well over time and that buildings are designed for ease of access for routine maintenance.
	One respondent suggested that council planners need access to architects to assess building design.	Comments noted. DELWP will explore how to deliver design skills to council planners.

Wind Impacts

PROPOSAL	SUBMISSION THEMES	RESPONSE
Apartment developments do not exacerbate windy conditions to public and private open spaces	Some respondents suggested that the building height threshold in the standard of five storeys, should be different: higher or lower, or apply to all buildings.	Comments noted. The standard will proceed with the threshold of five storeys so that wind impacts can be minimised in suburban areas. Generally, when a building is double the height of the surrounding buildings, it will create wind impacts. This means that in a suburban setting, of one or two storey dwellings, wind

		impacts will typically be triggered by an apartment building at five storeys or more.
	Some respondents requested clarity on what is expected to be provided with the planning application; desktop assessment, wind tunnel assessment or both?	<p>Agree. The decision guidelines will request that applicants seek advice from wind engineers to determine when a desktop assessment or wind tunnel analysis will be required. A Practice Note will be provided that outlines the process for complying with the wind impacts standard. Content will include:</p> <ul style="list-style-type: none"> • technical guidance for industry on the process of making a permit application for an apartment development • guidance for regulators on the process for assessing a permit application for an apartment development. • guidance on when it is appropriate to use a desktop assessment, or wind tunnel assessment.
	Some feedback suggested that the standard was too technical and the words and figures difficult to interpret.	Comments noted. Due to the nature of wind engineering, this standard requires technical terminology. In order to guide councils and industry, the Department will provide information in the Apartment Design Guidelines, a Practice Note and training to build capacity to use the standard.

Street Interface

PROPOSAL	SUBMISSION THEMES	RESPONSE
Apartment developments are attractive at street level and contribute to the life of the neighbourhood.	Some respondents wanted clarity on what 'active frontages' mean.	Agree. The standard will be reworded to clarify that the Department is seeking to avoid blank walls and high fencing along street frontages. The Apartment Design Guidelines will provide clear illustrations of types of active frontages appropriate for urban and suburban contexts.
	Several respondents suggested that more thought be given to safe design principles.	Agree. The standard will be updated to encourage safety measures such as visually permeable fencing and passive surveillance.
	Some respondents suggested that the wording in the standard gave too much priority to vehicles and there should be more on pedestrian and cycling safety.	Agree. The standard will require pedestrian and cyclists' access to be safe and clearly delineated from vehicle access.
	Respondents recommended that the design and location of services and fencing should consider suburban contexts.	Agree. The standard will require that high front fencing be avoided, unless it fits in with the existing urban context and to ensure services are integrated with the building design and the urban context.

Construction Impacts

PROPOSAL	SUBMISSION THEMES	RESPONSE
The impacts of apartment building construction are	Some feedback expressed confusion about when a Construction Management Plan (CMP) is required.	Agree. The drafted standard was not intended to require a CMP to be submitted at the planning stage, but rather at the permit condition phase.

<p>consistently managed with less disturbance on existing neighbourhoods.</p>	<p>Many respondents did not support this as an apartment standard, but as a permit condition instead.</p>	<p>Agree. The Department will not proceed with the introduction of a new construction impacts standard. The Department has prepared a model permit condition in the Apartment Design Guidelines. Permits are a more appropriate mechanism to manage construction impacts than apartment design standards which are focused more on the design process. To support the state's new environment protection laws, the Environment Protection Authority has also recently released new guidance which will assist the civil construction, building and demolition industries to eliminate or reduce the risk of harm to human health and the environment.</p>
	<p>Some respondents provided suggestions for additional amenity impacts such as pedestrian and cyclist safety around building sites and noise and dust, that should be included for consideration in a model CMP.</p>	<p>Comments noted. The Department has included a model permit condition in the Apartment Design Guidelines which specifies that details of measures to manage pedestrian and cycling safety and noise and dust pollution mitigation be provided.</p>