

**City of Port Phillip Internal Referral Responses**  
**313-317 Kings Way, SM – CoPP Ref: PDPL/01035/2021**

<p><b>Urban Design Architect</b></p>	<p><b>21-02-2022: Urban Design Topics</b></p> <p>The subject site is a small, triangular-shaped island site, of 297sq.m on the east side of Kings Way. An additional area of 38sq.m of Crown land abuts the apex of the triangle which the applicant proposes to seek adverse possession of and incorporate within their site. The site is bound by streets including 8-lane Kings Way, Kings Place and Cobden St. The application is for construction of a nineteen storey, 64m tall office building, with rooftop terrace and four levels of basement accommodating services and car stacker for 40 vehicles.</p> <p>The site is subject to inundation, so the ground floor has been set at AHD 3m in response to Melbourne Water direction.</p> <p>The site is subject to DDO 26-2 and SBO I DDO Schedule 26 includes the following built form provisions:</p> <ul style="list-style-type: none"> <li>• <i>Development should be generally in accordance with Map 3 of this schedule.</i></li> <li>• <i>A 3 metre landscape setback should be provided to the direct frontage or abuttal to Kings Way.</i></li> <li>• <i>Development within 13 metres (inclusive of the 3 metre landscape setback) of a direct frontage or abuttal to Kings Way should not exceed a height of 40 metres.</i></li> <li>• <i>Development beyond the setbacks identified above must not exceed a height of 60 metres. A permit may not be granted to construct a building or construct or carry out works which are not in accordance with this requirement unless allowed by Clause 2.3 of this schedule.</i></li> </ul> <p>DDO26 Sub-precinct objectives relevant to this application include:</p> <p>Sub-precinct 2, Northwest Corner</p> <ul style="list-style-type: none"> <li>• <i>To improve the streetscape environment of Kings Way through high quality built form and consistent landscaped setbacks.</i></li> <li>• <i>To ensure the development in Kings Way creates a landscaped boulevard through high quality architectural design and a landscaped public realm interface.</i></li> <li>• <i>To ensure that podium design and heights create and reinforce a 'human scale' to provide visual interest and activity for the pedestrian at street level along Kings Way.</i></li> <li>• <i>To improve the streetscape environment of the Northwest Corner Sub-Precinct through high quality built form.</i></li> </ul> <p><b>Context</b></p> <ul style="list-style-type: none"> <li>• <i>Accessibility</i></li> </ul> <p>A single revolving door is shown for the main entry with a platform lift inside for access for people using mobility aids. The revolving door will not be suitable for these people so a by-pass door should be provided alongside. The driveway entry to the car stacker is located on Cobden Place immediately adjacent to the Kings Way boundary. This creates minimal queuing distance for vehicles entering the building or the one opposite in Cobden Place with the possibility of queuing occurring within Kings Way. It is not clear how cyclists are to enter the 'bike lift' shown on the ground floor plans in order to access basement end-of-trip facilities.</p> <p><b>Built Form</b></p> <ul style="list-style-type: none"> <li>• <i>Form, mass and visual impact</i></li> </ul> <p>The DDO height and setback controls appear to have been tailored for the larger, more conventionally proportioned sites within the precinct than the subject site. The DDO controls' metrics applied to the subject site are restrictive given its small size and irregular shape, as demonstrated by the analysis and diagrams within the Urban Context Report. The resultant 'allowed' floorplates, particularly above level 12, are impractical in terms of their dimensions and buildability.</p> <p>Nevertheless, the proposal seeks to maximize the potential development yield by ignoring the ground and upper level setback requirements, building beyond the mandatory maximum height at the top of the façade of 60m, and seeking to acquire by adverse possession the small parcel of Crown land on the east corner. The overall built form is considered inconsistent with the DDO26 objectives for the sub-precinct including high quality built form, consistent landscaped setbacks, a human scale to provide visual interest and activity at street level. In this case a podium level building height is considered consistent with the DDO requirements for human scale with the lower building height expected to achieve more comfortable ground level wind conditions.</p>
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- *Streetwall/setback/separation*

Proposed ground and mezzanine level setbacks are 2m to Kings Way, 700mm to Kings Place and south-east frontage to Cobden St. These incorporate 950mm high raised planters.

Upper levels 1-19 have zero setbacks with a curved radius facade at each corner. Artist renders show a canopy along the Kings Place frontage, but this is not included in the architectural plans or elevations. The 2m ground level setback at Kings Way is inconsistent with the endorsed plans for the adjacent site at 1-13 Cobden Place and the latest Kings Place/Cobden St Plaza Concept plan. (See image below) The proposed setbacks do not accord with the DDO and are, therefore, not supported.



- *Character*

The drawings and renders show a sheer glass curtain wall, teal silver colour with teal silver opaque spandrels. The renders and plans depict the corners with perfectly curved, fully glazed faces as a critical component of the building's formal and material expression. We are not convinced that this effect will be translated within the built outcome but is more likely to end up with faceted flat planes of glass, an entirely different visual result. We recommend a requirement that the expression depicted in the renders must be realised in the ultimate building.

The Cobden St facade presents a pre-cast concrete facing to lift core incorporating bronze metal inlay and integrated art. The top of the building incorporates a shared rooftop terrace behind the curtain wall facade incorporating a digital LED video screen. Further detail should be provided regarding the integrated art elements of the proposal for Council approval.

- *Overshadowing and wind effects*

We recommend wind tunnel testing of the proposed development given its height form and facade strategy. The letter from Mel Consultants incorrectly assumes that sitting areas would not be present around the foot of the building when this is clearly planned through the streetscape upgrade and shown in the numerous renders in the application. The deletion of the canopy from the Kings Place frontage is expected to alter the ground level wind effects.

- *Fenestration and Façade Strategy*

Fully glazed curtain wall shown with smooth curved corners. It is anticipated that the corners will be delivered as faceted, flat planes of glass rather than as illustrated with smooth 'radiused' glazing. This is

	<p>expected to present a less refined or successful façade expression than promised by the illustrations and supporting text.</p> <ul style="list-style-type: none"> <li>• <i>Materials and finishes</i> The palette is relatively simple, dominated by teal coloured glass curtain wall with a bronze tinted pre-cast concrete wall to the lift and fire stair core. The plans show an integrated art work within the lower levels of the lift core wall. A concrete plinth surrounds the building with bluestone paving abutting nominated on the architectural plans. The proposed palette is considered appropriate.</li> </ul> <p><b>Amenity &amp; Legibility</b></p> <ul style="list-style-type: none"> <li>• <i>Canopy/awnings</i> Refer comments above regarding Overshadowing and Wind Effects</li> <li>• <i>Building entries</i> Access to the ground floor and DDA lift is only provided via a revolving door which may not be appropriate for all persons with a disability.</li> <li>• <i>Ground floor activation/transparency</i> Activation of the ground floor is minimal confined to the Kings Place frontage with the entry and lift lobby and a bookable meeting room. The Kings Way frontage is effectively blank with a slatted screen concealing the driveway and car lift as is Cobden Place with the garage entry and service booster cupboards. Ground floor activation is challenging on such a small site with a significant amount of upper level floor space and the necessary servicing and access requirements. The previously proposed café in the lobby is not included in the current set of plans. The proposed planting around the base of the building may also obscure internal activity from the public realm.</li> <li>• <i>Landscaping</i> Refer separate review comments regarding landscape</li> </ul> <p><b>Referral Overview</b> From an urban design perspective, the proposal is not supported</p> <p><b>Summary of Recommendations:</b> From an urban design perspective, the proposal is generally not supported. To gain full support the proposal should:</p> <ul style="list-style-type: none"> <li>• Amend the overall height and form of the building including ground and upper level setbacks to better respond to the requirements of the DDO</li> <li>• Confirm that the curved expression as shown will be delivered in the final building</li> <li>• Confirm the extent of and commitment to public realm works</li> <li>• Improve access to the ground floor for people using mobility aids</li> <li>• Review access for vehicles to avoid queuing into Kings Way</li> <li>• Wind tunnel modelling is required to demonstrate that sitting conditions can be achieved adjacent to the building at ground level</li> <li>• Confirm the parameters of the proposal should the application for adverse possession of the adjacent Crown land be unsuccessful</li> </ul>
<p><b>Landscape Architect</b></p>	<p><b>21-02-2022:</b> The Ratio Planning Report, August 2021, p.14, states, <i>“The proposal seeks to undertake significant public upgrade works generally in accordance with the CoPP ‘Domain Precinct Public Realm Masterplan’.</i> Plans indicate any works outside the title boundary are subject to future discussion with Council. We question the likelihood that the applicant would be willing or able to take responsibility for implementation of works shown in the landscape submission due to their extent and likely cost. We understand that timing of the implementation of Kings Place improvements is yet to be determined making moot this application’s aspiration for the public realm.</p> <p>The plans show vehicle access with a turning circle extending into the Cobden St public realm improvements which is unlikely to be encouraged as an outcome.</p> <p>The landscape submission shows a large area of speculative works within the surrounding streets reflective of the planned Kings Place plaza. The footprint of the building occupies the entire site leaving very little space for landscape. Actual landscape works are restricted to planting in a plinth around the base of the building- 700mm wide to Kings Place and Cobden St frontages and 2m wide undercroft on Kings Way frontage, and to the roof-top shared space. DDO 26-2 seeks a 3m landscape setback to Kings Way which the application fails to deliver.</p>

	<p>The proposed planting comprises a variety of small trees, tufting, cascading and climbing plants that are all native species, some indigenous. These are considered generally appropriate for the context, but further detail should be provided to ensure that they do not overly screen the transparency of the ground floor from the public realm. Indicated soil depths and irrigation appear adequate for the successful plant growth.</p> <p>The landscape submission shows a fixed canopy over the Kings Place frontage, but this has been deleted from the most recent architectural drawings. The wind report indicates that wind effects are projected to increase from those current to all footpaths surrounding the site. Deletion of the canopy is expected to decrease shelter to this side of the building. We recommend that the building itself should mitigate wind effects at ground level to accommodate gathering, sitting and relaxing, particularly within Kings Place. These should not rely upon tree planting or ground level installations to moderate wind effects.</p> <p>The plans suggest that proposed materials and finishes within the public realm are to be to CoPP approval, yet these are not specified.</p> <p><b>Recommendation</b></p> <p>The landscaping proposal is not supported. To gain full support it should:</p> <ul style="list-style-type: none"> <li>• Increase the landscape setback on Kings Way to 3 metres.</li> <li>• Clarify and confirm the extent of works, including hard and soft materials and finishes, to be undertaken within the public realm</li> <li>• Incorporate measures within the building to moderate wind effects at ground level to meet sitting criteria. Any wind mitigation measures should not be within the public realm.</li> </ul>
<p><b>City Strategy</b></p>	<p><b>17 March 2022:</b> This advice responds to a proposal for the development of the above site (advertised plans) referred to City Strategy. The advice provides high level comments in relation to the strategic context of the site and the intents of DDO26. It does not assess detailed design and amenity issues, nor compliance with other existing planning policy.</p> <p>Specific comments are sought on the following:</p> <ul style="list-style-type: none"> <li>- Comments in response to DDO26-2 including building height, landscaping and all building setbacks, ability and response to Cobden Street park.</li> </ul> <p><b>Proposal:</b></p> <p>The application is for a permit to:</p> <ul style="list-style-type: none"> <li>- Construct a building or construct and carry out works for a use in Section 2 of Clause 32.04- 2 (mixed Use Zone) and use land for Office exceeding 250sqm leasable floor area in the Mixed Use Zone (construct a 19 level building with four (4) basement levels and a rooftop terrace).</li> <li>- Construct a building or construct or carry out works in the Design and Development Overlay and Special Building Overlay (including exceeding the preferred maximum building height and reducing the preferred building setbacks)</li> <li>- Reduce the number of car parking spaces required under Clause 52.06-5 (for the Office Use).</li> </ul> <p><b>The site:</b></p> <p>The subject site roughly a triangle shape and is located on an 'island site' bound by Kings Way, Kings Place and Cobden Street, with an overall site area of 336sqm.</p> <p>The site is within the Mixed Use Zone, and is directly to the east of Kings Way which is within the Road Zone 1. The site is also within DDO26-2, SBO1, SCO-15 (Major Promotions Signs- Permit Provisions 2008)</p> <p>The proposal is to demolish the existing building on-site and construct a new 18 storey mixed-use building comprising "office" and "retail" and a four level basement.</p> <p><b>Planning Assessment:</b></p> <ul style="list-style-type: none"> <li>- The planning controls generally identify this location as an area where the built form character will develop and evolve to a vibrant mixed use precinct. It has been identified as an area that will likely undergo change and has the potential to accommodate significant amounts of development.</li> </ul> <p><u>Use</u></p> <ul style="list-style-type: none"> <li>- The proposal is for the construction of an 18-storey mixed-use retail/office building within the St Kilda Road North Precinct. The use of the site for the purpose of "office" and "retail" are both 'section 2' permit required. Given the recent development trends across the precinct, it is considered that the proposed uses will assist in creating a vibrant residential and mixed use environment, through an increased scale and density of development</li> </ul> <p><b>Building height and setback</b></p>

	<ul style="list-style-type: none"> <li>- This site is unique in that it is an 'island' site and the DDO allows discretion to accommodate specific site characteristics. The C107 Panel Report noted:             <ul style="list-style-type: none"> <li>o Sub-precinct 2 is characterised by a fine-grain and irregular lot pattern with varied lot sizes that include many small and/or narrow lots, island sites...and ...requirements should be discretionary so the individual aspects of each site and the design response can be assessed on a site-by-site bases at the permit stage. (7.4.2)</li> <li>o The Panel notes that there is no clear pattern of podium height and tower setbacks in the sub-precinct and that it is not likely that a uniformed pattern can be achieved given the nature and pattern of existing development and the varied lot size and allotment patterns in Sub-Precinct 2. The Panel is not convinced that this is the best and only outcome for Sub-precinct 2. Discretionary setbacks would allow future developments to respond to an integrated building form throughout sub-precinct 2. (7.4.2).</li> <li>o The Panel concludes that podium height and tower setbacks, side and rear setbacks and front setback to Kings Way should be discretionary so that future developments can respond to an integrated building form throughout Sub-precinct 2. (7.4.3)</li> </ul> </li> <li>- Nevertheless, it is also a highly constrained site. The size of a site may constrain the ability to achieve the specified height.</li> <li>- Given the proposal for the public realm upgrades immediately surrounding the site, it may be that a tower of this scale requires a podium/setback form to ensure that the wind, and other potentially adverse amenity impacts on the adjoining public space are mitigated. - When considering variations from setback requirements, the impact on the public realm, specifically the proposed new public open space around Kings Place will be critical, along with the internal amenity and functionality of the building.</li> <li>- Importantly, any variation from the setback/podium requirements will need to carefully consider the impact of the proposal's shadows, per the DDO26 requirement that Development should not overshadow the adjoining dwellings in residential areas to the south west of Kings Way and comply with the objectives of Clause 55.04-5 – Overshadowing.</li> </ul> <p><u>Landscaped setback</u></p> <ul style="list-style-type: none"> <li>- DDO26 requires a 3m landscape setback from Kings Way. The intent of this requirement is to contribute to the transformation of Kings Way to a boulevard. - For Sub-precinct 2, DDO26 seeks:             <ul style="list-style-type: none"> <li>o To improve the streetscape environment of Kings Way through high quality built form and consistent landscaped setbacks.</li> <li>o To ensure the development in Kings Way creates a landscaped boulevard through high quality architectural design and a landscaped public realm interface.</li> <li>o To ensure that podium design and heights create and reinforce a 'human scale' to provide visual interest and activity for the pedestrian at street level along Kings Way.</li> </ul> </li> <li>- The proposal will need to ensure the sub-precinct objectives are met, particularly where requirements are varied that allow an integrated design that is responsive to the site's specific circumstances.</li> <li>- It is suggested that advice be sought from Council's landscape architects/urban designers as to whether the proposal meets the requirement that development of this site contribute to a landscaped boulevard through high quality design and landscaped public realm interface.</li> </ul> <p><b>SUMMARY</b></p> <ul style="list-style-type: none"> <li>- DDO26 applies discretionary setback controls. Specifically, Panel noted The Panel concludes that podium height and tower setbacks, side and rear setbacks and front setback to Kings Way should be discretionary so that future developments can respond to an integrated building form throughout Sub-precinct 2. (7.4.3)</li> <li>- the proposal will need to ensure the sub-precinct objectives are met, particularly where requirements are varied that allow an integrated design that is responsive to the site's specific circumstances.</li> <li>- This is a highly constrained site. A careful assessment of the amenity impacts of the proposal, particularly on the proposed adjoining new public realm, will be required.</li> </ul>
<p><b>Sustainable Design</b></p>	<p><b>09/02/2022:</b> The plans and supporting documents listed in the referral above have been reviewed against the WSUD (LPP 22.12), and ESD (LPP 22.13) policies. See detailed comments below. Kind regards, Imm Chew</p> <p><b>Outcome:</b> The application has yet to demonstrate an acceptable outcome for ESD</p> <p><b>Suggested Action:</b> ESD improvements required prior to decision &gt; Re-Refer to Sustainable Design</p> <p><b>ESD improvements required prior to decision:</b></p> <p><b>BESS Assessment</b></p>

	<p>For a development of this size, it should meet a 70% overall sco and minimums in Energy (50%), Water (50%), IEQ (50%) and Stormwater (100%) categories in BESS to demonstrate excellence in sustainable design. Considering your response to the points below, should any category fall short of the minimum targets, improvements will need to be made.</p> <p><b>Management</b> no issues</p> <p><b>Water</b></p> <p><u>Water 1.1 Water Efficient Fixtures</u> There are no urinals on plans, it should be scoped out.</p> <p><u>Water 3.1 Water Efficient Landscaping</u></p> <p>To claim this credit, indicate in report and drawings water efficient irrigation, connection of irrigation system to rainwater tank or water efficient plant selection on landscape plans. <b>Energy</b></p> <p><u>Energy 1.1 Thermal Performance Rating - Non-Residential</u></p> <p>The heating, cooling, hot water and lighting loads entered in BESS are different to the JV3 results in Appendix B. Please amend to reflect modelling results. JV3 results are also showing that proposed building fabric is of a poor performance that the building design is reliant on the solar PV system meet NCC energy efficiency minimum requirements. Energy efficiency commitments need to be improved.</p> <p><b>Stormwater Management</b></p> <p>Local Policy 22.12: Stormwater Management applies to this application size. Refer to <a href="https://www.portphillip.vic.gov.au/media/mxmfgs/1s/sustainable-design-compliance-guidelines-stormwater-management-2.pdf">https://www.portphillip.vic.gov.au/media/mxmfgs/1s/sustainable-design-compliance-guidelines-stormwater-management-2.pdf</a> on how to provide an appropriate response. This includes addressing the following:</p> <ul style="list-style-type: none"> <li>• Application floor plans – The size and location of rainwater tanks must be provided on the proposed floor plans with a notation to indicate tank connection to toilets, include connection to bin wash taps.</li> <li>• Maintenance manual – Provide a maintenance manual for water sensitive urban design initiatives. These must set out future operational and maintenance arrangements for all WSUD measures appropriate to a complex project of this scale, including inspection frequency, cleanout procedures and as installed design details/diagrams including a sketch of how the system operates. This manual needs to be incorporated into any Building Maintenance Guide.</li> <li>• Construction Site Management Plan – Current statement needs more detail. Refer to Council's guide mentioned above and example in Appendix C.</li> </ul> <p><b>IEQ</b></p> <p><u>External Shading</u></p> <p>Concerned about the extent of exposed North, East and West facing glazing (i.e. not shaded by overhanging balconies or shading devices). Provide external shading to prevent glare and overheating, this could be in the form of external operable awnings, louvers, sliding shutters, venetian or roller blinds. Top floor outdoor areas appear to have minimal protection from the elements. Consider shading elements to make it useable space in cold and hot weather.</p> <p><b>Transport</b> no issues</p> <p><b>Waste</b></p> <p><u>Construction &amp; Demolition Waste</u></p> <p>Include a commitment to a minimum of 70% of construction and demolition waste diverted from landfill.</p> <p><u>Urban Ecology</u></p> <p><u>Green Factor:</u></p> <p>This application is suitable for a Green Factor assessment, as part of Port Phillip's free trial. Green Factor is an online tool that assesses the extent of vegetation proposed. It provides a score based on the multiple benefits of urban greening, such as aesthetic benefits, urban heat regulation, providing biodiversity, social benefits, stormwater management and food supply.</p> <p>The tool is free to use and is there is no mandatory score. Submission of a Green Factor scorecard will not delay the planning application outcome. The trial is open to all applicants to enable the consideration of the benefits of urban greening.</p> <p>For more information:</p> <ul style="list-style-type: none"> <li>- Refer to the Green Factor tool online <a href="https://www.greenfactor.com.au/">https://www.greenfactor.com.au/</a></li> <li>- Refer to the Sustainable Design section of our website <a href="#">Sustainable design - The City of Port Phillip</a></li> </ul>
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	<p>- Contact the Sustainable Design team <a href="mailto:sustainabledesign@portphillip.vic.gov.au">sustainabledesign@portphillip.vic.gov.au</a></p> <p><u>Urban Ecology 2.1 Vegetation</u></p> <p>Provide a landscape plan that reflects vegetation covers the % of site area claimed in this credit.</p> <p><b>Innovation</b> no issues</p>
<b>Building</b>	<p><b>23-03-2022:</b> I have reviewed the proposed architectural drawings and the fire engineering report provided and note the following:</p> <ol style="list-style-type: none"> <li>1. There are several “deemed-to-satisfy” non compliances in relation to fire resistance, services and equipment, and emergency egress. These issues have been highlighted in the Fire Engineering Report and will be dealt with under the performance provisions of the Regulations, and provided Fire Rescue Victoria agree to the variations, they will likely not impede the building approval process.</li> <li>2. The development is likely to undergo minor design development.</li> <li>3. It is likely that a building permit could be issued for construction based on the drawings provided without significant design alteration.</li> </ol>
<b>Waste Management</b>	<p><b>22-03-2022:</b> I've reviewed the docs and have following comments;</p> <ul style="list-style-type: none"> <li>• Please specify the bin collection times as per Council Local Law No.1</li> <li>• Need to specify who is responsible for all hard/e-waste that are stored in the storage and how that will be collected and disposed of.</li> </ul> <p>Collection of bins outside the building might be problematic in future due to other new developments in the area. The road could get busier and may not be ideal to have the truck to turn around too. I've asked for Traffic engineering department's opinion to that and am happy with what they come back with.</p>
<b>Traffic/Parking</b>	<p>The below comments are only in response to major areas of concern. Once the below matters have been confirmed or addressed, detailed comments can be provided.</p> <p>It appears the development proposed is too intense for the size of the site, resulting in poor design outcomes.</p> <p><b>Key Issues:</b></p> <ul style="list-style-type: none"> <li>- <b>Vehicle crossing location</b></li> <li>- <b>Queueing</b></li> <li>- <b>Sight triangles</b></li> <li>- <b>Loading and Waste collection</b></li> <li>- <b>Bicycle visitor parking provision</b></li> </ul> <p><b>Access ways:</b></p> <ul style="list-style-type: none"> <li>• Access to the car stackers is proposed via a new crossover on Cobden Street. The existing crossover on Cobden Street is proposed to be removed.</li> <li>• The proposed vehicle crossing is located within 5m from the intersection of Kings Way. This does not meet the requirements of Access Driveway Locations in AS2890.1 and is not considered an appropriate design considering the nature of the site, queueing expected and location off a Primary State Arterial road.</li> <li>• Sight triangles are not provided for exiting motorists. This is not considered as an acceptable design response for a new development. Safety for vulnerable road users (i.e. pedestrians) is critical. There are existing pedestrian facilities abutting the site on Cobden Street and the Domain Precinct Public Real Master Plan proposes to convert Cobden Street into a Shared Zone. As noted in the traffic report, the key outcomes of the masterplan are coped in below: <ul style="list-style-type: none"> <li>○ A new safe shared space, public plaza and improved pedestrian connections with the reduction of roadway;</li> <li>○ Prioritise short-term and servicing parking where appropriate;</li> <li>○ A gathering place for pedestrians with landscaping, bike parking, seating and drinking fountains;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Opportunities for community events such as markets and festivals; and</li> <li>○ Enhanced pedestrian amenity and connectivity between trams and trains.</li> </ul> <ul style="list-style-type: none"> <li>• The development's lack of pedestrian sight lines is not in-line with objectives of providing a safe shared space / pedestrian connection with opportunities for community events (i.e., increased pedestrian movements in the area).</li> </ul> <p><b>Car parking spaces:</b></p> <ul style="list-style-type: none"> <li>• Detailed mechanical parking information has not been provided. Notwithstanding, it is understood the stackers can cater for a vehicle with a maximum height of 1.8m which meets the vehicle height requirement in the Planning Scheme.</li> <li>• Further, it is understood that the mechanical parking facility will be fully automatic and therefore parked vehicles can be independently accessed.</li> <li>• However, it appears that B99 vehicles cannot be accommodated by the parking system. While the swept path analysis demonstrated B99 vehicles can access the site, B99 vehicles will not be able to park within the site, limiting the usability of the parking spaces. This is a poor design outcome, and it is highly recommended the site can cater for B99 vehicles.</li> </ul> <p><b>Bicycles</b></p> <ul style="list-style-type: none"> <li>• Clause 52.34 of the planning scheme requires 24 bicycle parking spaces to be provided for the proposed development, comprising of:             <ul style="list-style-type: none"> <li>○ 18 employee spaces; and</li> <li>○ 6 visitor spaces.</li> </ul> </li> <li>• It is proposed to provide a total of 25 secure bicycle spaces onsite for employees, comprising of:             <ul style="list-style-type: none"> <li>○ X14 spaces within two tier bicycle parking systems in Basement 2.</li> <li>○ X11 spaces within vertically hung rails in Basement 2.</li> </ul> </li> <li>• The traffic report indicates that all on-site bicycle facilities will be allocated to employees. Allocating all 25 spaces to employees results in a 100% reduction for visitor spaces. This needs to be addressed.</li> <li>• In addition to the lack of visitor spaces, with the application seeking a car parking reduction of 110 spaces, we would like to see a larger provision in bicycle facilities to assist in offsetting the car parking loss.</li> </ul> <p><b>Loading and Waste Collection</b></p> <ul style="list-style-type: none"> <li>• Waste and loading activities are proposed to be catered on-street abutting the subject site.</li> <li>• It is noted in the traffic report that Council advised during a pre-application meeting that we would not support the use of an on-street Loading Zone.</li> <li>• On-street parking is a public resource and is not intended to cater for any one use only. Removing a public resource from the community is not considered appropriate especially in response to a lack of appropriate facilities on-site. Furthermore, the installation of parking restrictions requires a consultation process and the consideration of a Loading Zone cannot be guaranteed.</li> <li>• With Kings Way providing a pedestrian barrier between local on-street parking opportunities, short-term parking surrounding the subject site is needed for visitors to the area.</li> <li>• The on-street Loading Zone would also likely require the removal of paid on-street parking opportunities to not obstruct access to the development's accessway. The removal of on-street paid parking spaces is not supported.</li> <li>• Removal of paid parking for user restricted parking is not in-line with Council's Parking Management Policy.</li> </ul> <p><b>Traffic Generation and Impact:</b></p>
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	<ul style="list-style-type: none"> <li>• The traffic report has adopted a traffic generation rate of 0.38 parking spaces in the AM peak period and 0.43 parking spaces in the PM peak period. Application of these rates equates to 11 movements and 12 movements in the AM / PM peak respectively.</li> <li>• The split between inbound and outbound movements for the AM peak is 90% in and 10% out. The split between inbound and outbound movements for the PM peak is 10% in and 90% out.</li> <li>• The service rate for the car lift / parking stackers has been assumed at 157 seconds accounting for the 1 outbound movement in the AM peak.</li> <li>• The site is estimated to produce a 98<sup>th</sup> percentile queue of 2 vehicles external to the site. <b>This is not considered acceptable and does not accord with the requirements of the Australian Standard as noted in the traffic report. It is not acceptable to rely on the public road network for queueing to the development and will result in traffic issues / illegal parking / complaints from the community.</b></li> <li>• There are further concerns raised with respect to queueing. The traffic generation rate of 0.38 movements per parking space in the AM peak period is considered low. Even with a low rate adopted, it is anticipated that two vehicles will queue external to the site. A higher traffic generation rate needs to be considered for the development and this will only increase the amount of vehicles queueing on the public road network which is again not considered acceptable.</li> <li>• With Cobden Street proposed to be closed, all traffic will enter exit the street via Kings Way. The property on the opposite side of the road proposes to have access from Cobden Street and is expected to generate 67 vehicle movements per peak hour. Queueing associated with the subject site would conflict with the traffic generation anticipated for the development on the opposite side of the road.</li> </ul> <p><b>Parking overlay and parking provisions:</b></p> <ul style="list-style-type: none"> <li>• Clause 52.06 of the planning scheme requires 138 off-street parking spaces to be provided for the proposed development.</li> <li>• It is proposed to provide 28 off-street car parking spaces for employees within a stacker system throughout four basement levels.</li> <li>• The proposal therefore results in a net shortfall of 110 parking spaces.</li> <li>• The application has not detailed the requirements of the BCA for provision of accessible parking spaces for the development. An analysis of the BCA for accessible parking spaces is required.</li> <li>• The site is located well with a number of alternative transport options available. Further, the creation of Anzac Station will provide an additional sustainable transport option for commuting to / from the subject site.</li> <li>• Notwithstanding, a parking shortfall of 110 parking spaces appears excessive and we would like additional considerations to offset the shortfall to be implemented (i.e. revise design to provide additional bicycle facilities or provide car share spaces onsite that can be accessed by all carshare members).</li> <li>• Commercial use is generally accepted to be the easiest use to accept modal change away from vehicles where parking is not available or free.</li> <li>• Noting that the assessment for the appropriate rate for car parking provision lies with Statutory Planning. Reference should be made to CoPP's sustainable parking objectives. We also suggest comparing previous approved parking provision rates of adjacent developments as part of the Planning team's assessment / determination.</li> </ul>
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