Australian Institute of Landscape Architects

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Team Leader - Planning Policy
City of Melbourne
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RE: Submission regarding Amendment C308 - Urban design in the central city and Southbank

The Australian Institute of Landscape Architects (AILA) *is the peak body representing over 3,500 active and engaged members. Committed to designing and creating a better Australia, landscape architects shape the world around us. They conceive, reimagine and transform the outside world, from streetscapes to parks, transport solutions to tourism strategies, and new suburbs to cities. aila.org.au*

The AILA Victorian Chapter provides the following submission in response to Amendment C308. Our members include both landscape architects and urban designers who are experienced in the planning and design of the city at large, as well as at the detailed scale of streetscapes, building interfaces and other interstitial spaces. We value the opportunity to provide feedback on this important body of work to improve urban design outcomes in the Central City and Southbank.

We applaud the City of Melbourne for recognising the need for this amendment, building upon other recent improvements including Amendment C270 (in collaboration with the State Government). The relaxation of planning laws over the last decade or so has eroded Melbourne's much prized urbanity. We believe the evolving nature of cities is intrinsic to their attraction, but good design principles never go out of fashion. Fine-grained blocks, carefully modulated building massing, detailed lower floors and purposefully designed plazas are but some of the elements that combine to form a successful cityscape.

AILA broadly endorses Amendment C308 and views it as essential reform to leave a positive legacy for Melbourne.

The consolidation of a number of planning scheme provisions into DD01 and the Central Melbourne Design Guide will assist built design professionals, developers and the general public to more easily understand and assess urban design outcomes. We do not believe the content of DD01 or the Design Guide will erode design diversity; rather it sets basic principles from which innovative outcomes should spring forth.

For ease of reference we have structured our comments to reflect the numbered headings in the Design Guide. As this mirrors the content of DD01, our comments apply to that document also. For clarity, where we have no specific comments we have clustered sub-headings and noted our support.

Urban Structure

1. Retain existing connections

2. Provide direct and convenient connections

AILA strongly supports protecting the city's pedestrian permeability and remaining fine-grained character. In recent years a number of public laneways been subsumed into large development sites (eg. Elliot Lane) and important privately-owned connections are at risk through redevelopment (eg. the Walk Arcade between Little Collins and Bourke Streets).

We agree that RMIT's New Academic Street is an exemplar project for demonstrating how a large building mass can become more permeable, but feel that another example would better illustrate the intent of retaining *existing* connections.

Renovated or new connections should be designed to improve public accessibility by remaining open 24/7 and avoiding stepped level changes where possible.

3. Create new arcades where appropriate

We agree that new connections open to the sky are generally preferred over arcades. It follows that arcades that provide strong connections to the outside (as in the 19 James Street example) are invariably more successful than fully-enclosed spaces (eg. The Tivoli Arcade, Melbourne).

4. Reduce the Urban Block Size
5. Improve walking distances

Supported

6. Provide safe and attractive pedestrian connections

This could be combined with Requirement *2.*

7. Avoid covered pedestrian connections in Southbank

We agree there is an urgent need for more pedestrian connections that are open to the sky in Southbank.

8. Avoid entrapment spaces within pedestrian connections

We support these design requirements in line with best practice Crime Prevention Through Environmental Design (CPTED) principles.

Site Layout

9. Respond to the hierarchy of streets and laneways

10. Align buildings to the street

11. Provide purposeful setbacks where appropriate

Supported

12. Retain existing plazas

We support the intent of this design requirement. Consideration should be given to removing the reference to retaining a minimum of 50% of plaza area as this appears to be arbitrary. Given that most, if not all, existing

plazas are the result of historic plot ratio bonuses, their retention or modification should be carefully assessed site by site.

13. Carefully position building entries and spaces

14. Avoid undercrofts and setbacks that disrupt street continuity

15. Avoid service areas on main streets

We agree that vehicle access, loading and service areas should generally be avoided on main streets. For example, the car park entry and traffic signaling to service the QV Car Park off Russell Street is particularly disruptive to pedestrian flow. Similarly, the inclusion of pedestrian signals at the intersection of Caledonian Lane and Lonsdale Street to manage delivery vehicles that service Emporium is a substandard outcome. On the other hand, the concentration of *all* service areas on Caledonian Lane has obliterated 50% of a fine-grained laneway that had a thriving local economy. In the case of the illustrated example of 108 Flinders Street, the location of the car park entry on the main, car-dominated street frontage protects ACDC Lane and Duckboard Place.

We therefore think that there are select sites with boundaries to little streets and lanes that have equal or greater importance to the pedestrian experience. Ultimately it would be most desirable to prevent new car parks altogether on sites that have multiple sensitive interfaces. We do not believe this to be unreasonable given the generous provision of public transport in the central city.

Building Mass

16. Respond to the context

17. Break up the mass of the building

Supported

18. Minimise impacts on public and private amenity

We strongly support these design requirements to protect the human scale and enhance climatic conditions at street level.

19. Maximise outlook and daylight

20. Avoid long, horizontal expanses of facade without modulation.

21. Avoid the appearance of a wall of towers

22. Avoid an abrupt massing relationship to heritage buildings

Supported

Building Program

23. Maximise activity along streets and laneways

24. Limit ground floor services

25. Integrate services to minimise impacts on the public realm

We strongly support these design requirements to break up continuous sections of services and improve the pedestrian experience. We do not feel the example image on page 46 with the planter integrated above the service cabinet best illustrates the intent as it appears to take up most of the façade.

26. Locate car parking underground

27. In Southbank, sleeve all podium parking with active uses

AILA believes this is one of the more important design requirements in the DDO. We agree the best streets and lanes are ones not marred by podium parking and understand that there is a surplus of off-street space in the central city, given the convenient access to public transport and mode shift to share cars and other rapidly-evolving services. We therefore do not believe it to be an unreasonable expectation that any new parking in the Central City be located in a basement, or omitted altogether.

We understand the intent to sleeve parking above ground in Southbank is due to difficulty with building basements in Coode Island silt. However, there is the potential to mount an argument for sleeving parking above ground in the Central City too, as the effect on the street would be the same as if it were located underground. We believe Council should remain steadfast on this mandatory requirement as it will have the effect of discouraging parking in the Central City altogether and thus limit harm to streets and lanes from additional obtrusive entries. The image shown of 35 Spring Street should therefore be changed so that sleeving in the Central City is not seen as an option.

28. Design for future adaption

This is highly supported as there is a growing understanding that private car ownership (at least in the Central City) may become redundant well before the buildings that house them.

29. Activate the public realm

30. Maximise the number of building entries

31. Maximise opportunities for visual interaction

Supported

32. Maximise internal amenity

33. Avoid parking structures that impact on the public realm

We do not believe the images provided illustrate the design intent as a ramp is always required for entry/exit and access between levels. A better image would show a multi-storey structure where the parking bays and ramps are integrated and thus preclude adaption to other uses. The avoidance of car parking on small sites is fully supported; see above response to *15. Avoid service areas on main streets*.

34. Avoid broad tenancy frontages with limited entries.

In addition to this requirement, signage and product display should allow proper views in and out.

35. Avoid reliance on queueing within the public realm

We are not convinced that this can always reasonably be planned for, as the success of some tenancies and the potential length of queuing can be unpredictable. Furthermore, some congestion on main street footpaths can be considered desirable where it contributes to a sense of liveliness, and small-scale 'hole in the wall' food and beverage outlets are some of the city's most popular institutions. AILA supports the widening of footpaths where possible to accommodate a variety of short and long staying activities as well as peak flows.

Public Interfaces

36. Active street frontages in Special Character Areas

37. Active street frontages in General Development Areas

Supported

38. Provide active frontages in flood prone areas

We agree that all steps, ramps and wheelchair lifts should be accommodated within the private allotment. We do not believe stairs always need to be internal to the building, as well-designed exterior stairs can provide interesting seating opportunities facing the public realm.

39. Provide seating

We support the general intent to activate the street and provide depth and tactility to the facade. However, notwithstanding this and the previous point on potential 'desirable congestion' on wide footpaths (see response to Requirement 35), the example image on Page 60 shows a very narrow footpath made almost impassable by those dwelling on the seat. This is especially problematic for those in wheelchairs or with vision impairment that rely on running canes along the building edge. For this reason window seats should be set back to allow all furniture and legs to be tucked in.

40. Position access doors to align with street edge

41. Respond to waste management guidelines

42. Sleeve internal waste collection areas

Supported

43. Provide weather protection to footpaths

44. Allow for upward views to facades

45. Ensure canopies are positioned appropriately

46. Ensure the width of canopies maintains daylight

Ensuring that canopies do not enclose more than one third of the width of a laneway will work for relatively wide laneways, however there may be issues if buildings on both sides of a narrow laneway wish to install canopies. We suggest Council revise this design requirement to set two or more rules to suit a variety of laneway/walkway cross sections.

47. Design canopies of high quality

48. Position and design canopies in response to the context

49. Allow for street trees

Council should stipulate a minimum horizontal setback from the kerb to allow for mature tree canopy growth.

50. Ensure projections are discrete or lightweight

51. Avoid treatment that obscures views into the building

52. Avoid long expanses of floor to ceiling glass

53. Avoid unsafe undercrofts or alcoves

54. Avoid poorly integrated and designed service cabinets

55. Avoid projections that impact negatively the public realm.

Supported

Design Quality

56. Use competitive design processes where appropriate

AILA supports using a competitive design process for the development of large sites with multiple buildings or sites of strategic significance. We understand the City of Melbourne has researched similar processes in other municipalities, including the City of Sydney, and that further investigation would need to be undertaken into the required modifications to the Melbourne Planning Scheme. AILA highlights the importance of adequate remuneration for design professionals involved in such schemes and welcomes further consultation regarding competitive processes generally.

57. Use multiple design practices where appropriate

58. Create depth within the facade

59. Ensure all visible elevations are designed to a high standard

60. Integrates sustainable systems and technologies

61. Select high quality materials

Supported

62. Avoid visually exposed towers with low facade quality

The lower image of Casselden Place does not clearly illustrate what should be avoided with regard to addressing vistas.

Other Matters

AILA understands that Council may investigate developing permit conditions for flexible delivery of high quality shop fronts where tenants are not known at the time of application, such as allowing temporary high-quality hoardings. We would support this to reduce wastage and impacts to the footpath from demolition works not long after a building is completed. We also encourage Council to develop mechanisms that encourage high quality hoardings on major development sites for the entire duration of construction.

Please contact AILA Victoria for more information

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