Re: Apartment Design Guidelines for Victoria

The Victorian Chapter of the Australian Institute of Landscape Architects (AILA) is pleased to have the opportunity to review and provide feedback on the Better Apartments in Neighbourhoods March 2020 Final Consultation Draft.

AILA anticipates and develops, with its members, a leading position on issues of concern within the landscape architectural discourse. With more than 3,500 members in Australia and overseas, AILA champions quality design for public open spaces, stronger communities and greater environmental stewardship. Alongside government and allied professions, AILA works to improve the design, planning and management of the natural and built environment.

Following on from AILA’s feedback from 27 September 2019, we have again, drawn upon the expertise of our members to provide further comments for consideration.

GENERAL COMMENTS

AILA supports the move to strengthen landscaping standards for apartments as demonstrated in the current draft document’s developed guidelines around the landscape scope. Provision of pictorial examples of high quality, integrated landscape solutions to support the policy wording and diagrams is strongly supported.

As noted in the September 2019 submission, AILA suggests the development of guidelines specific to small-scale infill development, given its potential cumulative impact to the amenity, performance and character of the city’s middle-density suburbs. The Infill Opportunities Design Research Report, prepared by Monash Architecture Studio (MAS) for the OVGA in 2011, is a suggested starting point for developing these infill-specific guidelines.

Provided below are comments on the seven sections outlined in the final draft guidelines.

0.0 LANSCAPING (INTRODUCTION)

While the discussion introducing the importance of this scope is framed well, AILA would suggest the following amendments:

- Suggest referring to landscape scope of projects as ‘landscape scope’ vs. ‘landscaping’.
- Focus in discussion of the landscape scope’s value falls on character, with reference to amenity and performance. AILA would suggest that focus instead be more directed towards amenity and performance (what the landscape does) with character (how it looks) being secondary.
- Reference to involvement by a ‘qualified professional’ in the selection and design of this scope should be further qualified, i.e. required involvement by a registered landscape architect.
- AILA would suggest a reordering of objectives for this scope as follows:
  - To provide landscaping that supports biodiversity, wellbeing and amenity.
  - To preserve existing canopy tree cover and support the provision of new canopy cover.
To ensure landscaping is climate responsive.
- To provide landscaping that reduces urban heat.
- To provide landscaping that supports the existing or preferred landscape character of the area.
- To ensure landscaping reduces the visual impact of buildings on the streetscape.

1.0 CANOPY TREES

AILA supports the developed standards around required soil volumes and depths, solar access and head room to support the retention and establishment of canopy trees. AILA supports the inclusion of a permit condition requiring information on the proposed landscape maintenance. AILA also supports the additional guidance around suitability of plant palettes and pavement colour.

The following refinements are proposed to the Decision Guidelines:
- As advised in our September 2019 submission, refinements to guidelines around the health of any trees to be removed is recommended as advised by a suitably qualified arborist and cognisant of the expected lifespan of the tree.
- As advised in our September 2019 submission, refinements to guidelines around retention of mature trees are suggested, with setbacks from the trees to built form should be based on the actual Tree Protection Zone (TPZ) as determined by a suitably qualified arborist.
- As advised in our September 2019 submission, while we agree that arbours and vegetation on facades positively contributes to urban amenity, and a sense of health and wellbeing, we note that vertical greening opportunities should not be considered a replacement for on-ground or on-structure landscaping which typically provides greater open space and ecological benefits. Therefore, suggest removing note suggesting arbours as substitutes for canopy cover ‘if canopy trees cannot be provided’ (Principle 5, p.9)

2.0 COMMUNAL SPACE

AILA supports the requirement for all apartment development to include a landscape communal open space and the developed guidelines around this scope. We support the required size of the communal space be proportionate the overall size of the development as well as the number of units.

AILA supports additional development in the latest document draft detailing the definition of ‘communal open space’ (as distinct from ‘common areas’ and ‘indoor communal open space’) and the exclusion of car parking space from ‘communal open space’ calculations. AILA also supports additional guidance provided around colocation of indoor/outdoor communal spaces, requirement that communal open space be all-access and the increase in minimum required area of communal open space from 25m² to 30m².

The following refinements are proposed to the Decision Guidelines:
- As advised in our September 2019 submission, refinements to guidelines around minimum solar access for communal open space are recommended, with a minimum of six hours recommended, to allow for a diverse planting palette.
- While AILA supports design of landscape scope to support ‘passive surveillance’, recommend that CPTED principles be adopted as best practice standards for design for safety.
3.0 EXTERNAL WALLS AND MATERIALS
AILA supports the requirement that external wall design facilitate safe and convenient access for maintenance.

4.0 WIND IMPACTS
AILA supports guidance that trees should not be used as primary means to mitigate wind (and that some trees will struggle in strong wind conditions) but they can and should be used as supplement to built form.

5.0 INTEGRATION
The following refinements are proposed to the Decision Guidelines:
● As advised in our September 2019 submission, refinements to guidelines around integration of building services/service cabinets into landscape scope of building façade recommended.
● AILA suggests including additional principle to provide guidance around bike parking.

6.0 ACCESS
The following refinements are proposed to the Decision Guidelines:
● Consider providing a minimum width to landscaping along driveways to ensure plantings thrive. Ideally the width allows for some variation in planting types and forms. For example, in Principle 2, the width of the in-ground garden bed is very thin—Are there any parameters around the heights of fencing along these boundaries? Might be valuable to consider this.
● Principle 2 - Subtle grade separation (single steps/kerbs) are not preferred as they constrain pedestrians to a limited width. Shared zones and/or flush kerbs to defining the edge is preferred.
● Suggest that the material of the vehicle crossover should be consistent with the footpath pavement where possible.

7.0 SITE SERVICES
AILA supports guidance notes around visual impact of site services.

Thank you again for the opportunity to provide further comment on the consultation draft. Should you require additional input from AILA, please contact AILA Victoria Chapter Manager, Martha Delfas at vic@aila.org.au.

Sincerely,

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