



**Submission to Dept. Environment, Land, Water and Planning
re Proposed Central City Planning Provisions Melbourne Amendment C270**

The Australian Institute of Architects provides in principle support for the further central city reforms announced under the proposed Melbourne Amendment C270.

These reforms go hand in hand with the Government's current initiative developing apartment design guidelines, and we welcome them both as tools to ensure certainty and consistency of built form outcomes in the central city and the first step in delivering a Melbourne that is both able to support expected population growth of approx. 100,000 people a year, while maintaining its reputation of the most liveable city in world.

The Institute agrees with the introduction of the proposed controls as a mechanism to ensure that development outcomes and public realm amenity impacts are effectively managed into the future. While we understand the reason behind the timing of the release and minimal industry consultation around the introduction of the interim controls in September 2015, and the short time frame for initial responses with this iteration of the controls, we are encouraged by the Government's commitment to engaging more closely with all stakeholders as we develop this further.

While providing our in principle support for these changes there are a number of areas that we believe require further interrogation and development before the final controls are put in place. These include (but not necessarily limited to):

- Floor Area Ratio: definition of Gross Floor Area requires further clarification;
- Public Benefits to enable Floor Area Uplift: the current list of Public Benefits is very narrow – we believe there is scope to increase this list to include activities that may deliver health and/or educational benefits, and also provide benefit across demographic groups (e.g. aged care and child care opportunities). We would also like to see further research in to the potential to provide public benefit through the contribution to abutting or proximate public realm, and abutting street or footpath upgrades;
- Public Benefit Competitive Design option: we absolutely support this as an option, but would like further discussion around the incentives needed for both the developer and the architect to encourage this as an attractive Public Benefit option for Floor Area uplift, particularly if this is being seen as the key motivator for delivering design excellence. The current proposed provisions provide little incentive for a developer to undertake a competitive design process, and little or no incentive for architectural practices to engage in increasing numbers of such competitions. We believe there needs to be further work on this option that takes in to account the following parameters of any competition process: payment; deliverables; timeframe and overall number of competitions. This is a key area of the proposed changes that we would wish to discuss with the Government in greater detail;

- Role of other mechanisms to encourage design excellence: we would welcome a further conversation with the Dept. and the Minister about other opportunities that could be introduced to these planning controls that would encourage design excellence;

- Role of City of Melbourne as Recommended Referral Authority: while not expressly stated anywhere in the documentation relating to the C270 amendment, we are assuming that the announcement made by the Minister in September 2015 which strengthened the role of the City in determining the built form of Melbourne will be retained under these revised provisions. Clarity on this would be appreciated.

As a profession we look forward to working alongside the Government, community and industry to ensure that Melbourne's built form controls are world class and on track to delivering improved public amenity and ensuring growth enhances Melbourne's long-term liveability.

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30/05/2016