



## **Submission**

Response to the State Department of Environment Water Land and  
Environment (DELWP) proposals

**Facilitating Residential Aged Care Development, Proposed reforms  
to the Victoria Planning Provisions, December 2017**

February 2018

## Introduction

This submission is to the proposed changes to the Victoria Planning Provisions (VPPs) explained in Facilitating Residential Aged Care Development, Proposed reforms to the Victoria Planning Provisions, December 2017 (DELWP).

The reforms to the VPPs are broadly supported by the City of Yarra, subject to some specific changes to minimize any adverse impacts and improve the effectiveness of the proposed provisions. Support, subject to specific changes is based on the following.

- Research undertaken by Yarra City Council which indicates that the current supply of Residential Aged Care Facilities (RACF) in the municipality does not meet projected demand.
- The proposed provisions would apply to the General Residential Zone, the Neighbourhood Residential Zone and the Mixed Use Zone, which cover a substantial area of the municipality (approximately 31% of the municipality).

## Comments on the proposals

The proposed provisions need to be refined to minimise potential impacts, improve internal design and ensure that future proposals effectively respond to their local context.

### Proposed Requirements to be met

The proposal sets requirements which do not vary by zone and seem to ignore variations in the setting for RACF. The proposal would allow a 13.5m (four storey) RACF in the NRZ and GRZ and MUZ. The residential zones however, have a clear hierarchy of densities and building heights with the default 9m limit in the NRZ, an 11m default limit in the GRZ and no default limit in the MUZ. The proposed scale and form of new development should better relate to the setting, context and zone. It could discourage taller development which might be appropriate in the MUZ, where such form maybe more appropriate.

### Recommendation

Consider ways the provisions could be improved to take account of: the purpose of the relevant zone; the clear hierarchy of residential density between the zones.

### Proposed Exemption from notice and review

The new provisions exempt applications from notice and review.

The GRZ, NRZ and MUZ do not include many exemptions from notice and review. Subdivision and some small scale development under the Vic-Smart provisions are exempt. This would include, for example a ground floor extension to a dwelling or an outbuilding.

The proposed exemption for RACF is a significant departure from these limited exemptions.

There may be local impacts which arise from the height and scale of the RACF, despite the proposed provision requirements addressing height and amenity. In particular, the proposed provisions would allow development at a scale which exceeds the typical building heights and default mandatory building heights in the GRZ (11m) and the NRZ (9m). This could allow for development that is a significant departure from the established character of an area.

The proposed exemption from notice and review might also have the unintended effect of encouraging building forms which just meet the requirements, in circumstances where not meeting the requirements might result in a better development.

### **Recommendation**

Remove the proposed exemption from notice and review.

The exemption from notice and review would deny local communities from participation in processes which could have significant interface, amenity and character impacts. The exemptions are not justified and are inconsistent with the very limited exemptions in the relevant residential zones.

### **Better internal design**

The proposed Particular Provisions do not address internal design and amenity or well-being issues for residents of RACF.

The recently approved provisions for apartment development include provisions dealing with On-site Amenity and Facilities (Clause 58.05) which deal with internal access, adaptable facilities, entry and sense of identity, access to daylight and natural ventilation, the nature of private and common space and access to open space. Recent research suggests that the quality of life and mental well-being of RACF residents can be improved if the design addresses:

- (a) Connect facilities with the outdoors. For example: views, and rooms that open up to decks/gardens;
- (b) Use good levels of natural light and where possible natural ventilation;
- (c) Include spaces that support social interaction such as sitting areas which open onto corridors and allow for unplanned interactions with passers-by;
- (d) Consider locations to view activities throughout the passage of a day;
- (e) Avoid double-loaded corridors lined with bedroom doors to ensure circulation through the facility is enjoyable;
- (f) Provide different types of spaces, like themed sitting areas with an individualised character and feel;
- (g) Personalise bedrooms space and fixtures;
- (h) Provide residents with richness of experience such as access and choices offered at a café, cinema or library; and
- (i) Support community spaces that can enable all residents to gather for an event.

“Architects, aged care providers & Mental health” by Cath Muhlebach

### **Recommendation**

The proposed provisions should be modified to include provisions which are similar in scope to those in the apartment design provisions at Clause 58.05 but varied to address the needs of RACF residents and support staff. This should address internal amenity and facilities, and should include: views and access to outdoor space; natural light and ventilation; spaces to promote social interaction; and shared facilities and spaces.