

Submission to ODASSA on the Design Guidelines - Design quality and housing choice

Purpose of the Guidelines

Our fundamental and paramount concern about the draft design guidelines relates to their purpose. We are concerned that -

1. The purpose is unclear because of different statements about the purpose (both within the document and elsewhere);
2. The document does not achieve any of the stated or potential purposes anyway;

A simple explanation?

The Minister has said (CityMag 6 July 2017) "*Those guidelines are not intended to be some sort of new age prescription that we are now applying to everybody.... They were actually intended, as far as I was concerned, to enable me to have a better conversation with other members of the public who don't spend their whole time involved in the development industry. So when I talk about design and they glaze over and go, you know, 'is he talking about dresses or something?' I can say this is an example of good design and this is an example of bad design*".

If the document is intended to enable the Planning Minister to explain to the public the difference between designing dresses and designing buildings then the document ought to be considerably rewritten (and simplified). If the conversation is at that level, then the document should not occupy more than a few pages.

Not "best practice"

The purpose of the document as expressed in the Introduction suggests that it is intended to be used in a very different manner to that envisaged by the Minister. On the second (unnumbered) page under the introduction there is a heading "*How should the design guidelines be used and who are they for*". The document goes on to assert that "*the design guidelines provide best practice guidance regarding the design quality of new developments...*"

Whatever the document aspires to, it is not "best practice". To the extent that it is intended to comprise a canon of design axioms of universal application to residential design, it falls short. It contains a curious mixture of obvious design platitudes and prescriptive, policy laden design stances.

Not part of assessment rules but sort of....

The document goes on then to say that "*this information can be used by designers in considering new residential development.... planners in*

understanding various solutions to common design challenges".

Under the heading "are the design guidelines mandatory" the document states that the guidelines "*have been established as an aspirational, best practice guide that supports high-quality design outcomes beyond the minimum statutory requirements. The guidelines are just that, a guide. They are not intended to be used as a development assessment tool, as this is the role of development plans.*"

However the document then goes on to say that "*In their current form, the design guidelines are a best practice tool to provide design guidance until the new planning system is established. As such, the design guidelines provide a wider range of design quality guidance than current development plan policies. The design guidelines will likely continue as advisory material in support of the new planning and design code, providing guidance where deemed to comply provisions of the code are not met. In addition the design guidelines present a framework for a performance-based approach to the design of residential development as a more responsive alternative to prescriptive regulation.*"

These expressions of purpose fundamentally misconstrue the role of Development Plan and the Planning and Design Code ("PDC") and show that the Guidelines will be used as an aid ("best practice tool to provide design guidance") in planning assessment.

By its very terms the document is intending to expressly apply to planners who will inevitably include planners in local government and State government undertaking assessment of development applications. The guideline is therefore expressly inviting planners to use the guidelines in assessing applications.

The contention that the guidelines are to apply until the new planning system is established again contradicts the statements elsewhere in the document that the guidelines are to play no role in the development assessment process. The guidelines should be abandoned and should not emerge from this ambiguous state as advisory material in support of the PDC.

Design policy should be in the Development Plan and PDC and should be subjected to the public policy debate that the consultation processes allow. Ambiguous satellite "guidelines" undermine the system and should be terminated promptly. It is fundamentally at odds with a coherent planning system within which the PDC provides the central policy, for additional "guidelines" to also apply (with ambiguous status).

Problems with the detail of the policy - some general comments

To the extent that the guidelines are to form the basis of future policy to be included in the PDC then, for the reasons detailed below, the policy contained within this document is fundamentally inappropriate.

The prescriptive policies embedded within this document are inconsistent, do not appear to be based on any sound principle and are written in a way which assumes that by merely cobbling together a string of design tricks that suddenly good design will result.

The property development industry supports good design and continued improvement in design standards. However design is a process which plainly takes into account a range of factors for a range of purposes. To attempt to reduce the design process to a set of cute principles is fundamentally misconstrued.

To suggest (as this document does) that design can be reduced to a series of "design solutions" reduces the process of design to a set of particular design tricks. It ignores the process and prescribes the outcome or solution.

In many ways this is little more than a fairly glib attempt at "Design 1.01". The hope that anybody involved in the design, assessment or development process could or should attempt to engage in that process merely armed with this document is misconceived. The risk that unqualified planners will (armed with this document) start to assert certain design outcomes is frankly terrifying.

If substantial developments are being designed by people who do not have a proper understanding of the design process then it is hard to see how this document will overcome that shortfall.

The planning assessment process should set clear policy requirements including the relevant design outcomes required for particular developments in particular locations. It should then leave the process of design to those qualified and experienced to do so. The assessment of such applications should then be undertaken by a range of persons qualified to assess the relevant matters that arise. That plainly is the role for the government architect.

Reducing that assessment to a glossy document that sits outside planning policy in the expectation that unqualified planning staff will suddenly be unable to assess designs is a hopeless aspiration.

Much of the document is written as though it contains universal truths about residential design. Plainly that is not the case and it is a patently hopeless aim.

Some of the performance outcomes expressed through the document might be re-expressed as common design aspirations rather than being expressed as universal and axiomatic truths about design in all instances. This is particularly important so that the guidelines do not purport to set out any policy (which should be left to Development Plans and the PDC).

The "design suggestions" and "design solutions" should not be expressed as "measurable criteria" which plainly invites the misuse of this regime in development assessment. They ought (at most) be simply grouped as design options associated with the particular performance outcome without numeric prescriptions. They ought to be much more clearly expressed as a range of considerations rather than expressly advocated as "suggestions" or "solutions".

When the time comes, the PDC and that the consultation process around it should be the forum for the detailed policy argument about what

design rules are to apply to different developments in different situations. There should be no other. Therefore this guideline document should be completely recast to remove from it all inherent policy contentions.

In any event we make the following submissions about the detailed policy contentions made within the document after the highlight points made above partly in the event that despite these submissions the document continues more or less in its present form.

General feedback – Design guidelines		
Chapter & subheading	Comments	Suggested Amendments
Comments applicable entirety document	<ul style="list-style-type: none"> • The introduction clarifies that it is an “aspirational, best practice guide” whereas the coming Code will set to minimum requirements, yet we believe aspects of the Guidelines are already being incorporated into Development Plan Amendments, effectively taking them beyond aspirational status to make them minimum requirements. They are becoming a de facto Code. • As a result, the approach is likely to curtail innovation. Some builders are introducing innovations including sliding walls to allow for changeable rooms. Holding these Guidelines as the paramount standard is likely to exclude such innovations, to the detriment of purchasers looking for smart solutions for higher density living. • These “aspirational” Guidelines risk creating an expectation that all will be included in every project, thus raising the cost and price. As one industry participant observed “we can’t afford to produce this level of quality because the market won’t allow it”. As such, the Guidelines completely ignore the impact on housing affordability. • Creating a de facto Code of aspirations also creates an additional cost for developers and builders, who will need additional professional advice to manage the higher risks being introduced. • The structure of the document also raises a very real risk that the creation of planning requirements (“P”) will translate into building requirements (“B”) as the project continues. This will increase compliance and building costs. 	<ul style="list-style-type: none"> • Remove all quantitative elements from the document. • Disclaimer on each page that these are Guidelines only and are not to be used as a means of approving or rejecting any development application.
Context	<p>On Page 4 under “neighbourhood analysis” suggested amendment to the reference images. The first two images (left + right) are extracted from Adelaide City Council 3D Model. The first image (left) illustrate the proposed developments within the catchment area, however this image is out of date as the Council is updating their model currently. The second image (right) illustrate the planning policy zone.</p>	Update images.

	<p>Suggest an inclusion of text relating to the importance in understanding the socio-economic profile of the neighborhood. Understanding the community profile is essential to understand the urban context of the development that is proposed to occur.</p> <p>Page 5 – neighborhood analysis – in areas that have had substantial re-zoning, context becomes less relevant as the desired character is different to the existing. A number of suburbs established in the 1950’s and 60’s may not represent character that is desired in the future, so limiting development to existing context in all circumstances would be inappropriate and limiting.</p> <p>On page 6 under “Site Analysis”, the example of South Terrace illustrates a Ground Floor Plan of a building rather than site analysis in an urban context.</p> <p>Further comments on Neighbourhood analysis (Page 5):</p> <ul style="list-style-type: none"> • This may preclude significant investments for first movers that increase the densification of a neighbourhood but are considered by some – perhaps a vocal minority – to be at odds with the broader neighbourhood. Additional work will be required to substantiate such a proposal with some confusion as to whether formal planning advice is required to overcome such objections. This raises the hurdle for investments. • The size of a development proposal needs to be acknowledged as a relevant factor as a smaller project may have little impact beyond the property boundaries or only affect two or three blocks yet be subject to such an analysis. • References to “potential heights of anticipated nearby development” are so uncertain as to be nonsensical. Such a “planning consideration” involves substantial speculation – and yet may have a material impact on a development proposal. • This section also invites emotive statements which may affect community expectations, which may not be practical. In other words, it invites additional community input into individual projects, an outcome at odds with the intention of the Act – all because of a “guidance document” with no formal standing. 	<p>Mention importance of understanding the socio-economic profile of the neighbourhood.</p> <p>Refine.</p> <p>Suggest changes the reference image.</p> <p>Introduce clarity around the demands of a site and need to appreciate its specific needs.</p> <p>Remove references to “potential heights of anticipated nearby development”.</p>
<p>Context – Site Analysis</p>	<ul style="list-style-type: none"> • Many elements are considered standard including: shape, size and orientation of the site; topography, levels and contours; easements and encumbrances; and the location and height of adjacent buildings. 	<p>Remove guideline pertaining to solar access to site.</p>

	<ul style="list-style-type: none"> • The inclusion of a guidelines pertaining to “solar access to the site and adjacent sites” introduces additional uncertainty and requirements. This is not presently a requirement under Regulations or Building Code Australia. It demands an appreciation of what an entire street will look like and overshadowing. The current treatment of overshadowing is significantly clearer and should be retained. • An analysis of “potential noise sources” requires an additional cost and therefore a price burden to assess current sources. However, an assessment of “potential” sources is unclear and should be curtailed or removed. This is the responsibility of the EPA and not planning. 	Remove guideline pertaining to potential noise sources.
Movement – Access and Entrances	<ul style="list-style-type: none"> • There are significant cost and price implications relating to the integration of access and egress points. • Design work relating to this requirement must be done prior to entering the site and will require additional work and costs to be brought forward. This will therefore contribute to questioning the viability of each project. 	
Movement – Cars and Bicycles	<p>Page 13 - Design suggestions - additional guidance for apartments - last dot point reference to adequate floor to floor heights and car parking structures to enable future adaptation to alternative uses will clearly depend on the nature of the development and the intended life cycle of the structure. It is not universally appropriate to build and design such structures for a wide variety of future uses. Whether it is appropriate to design and build something for future conversion may depend on a range of factors. It is a huge policy “call” to prescribe now that all residential buildings ought to be designed and built in this manner.</p> <p>Further thoughts on this section raised by our members includes;</p> <ul style="list-style-type: none"> • “Minimise the number and width of vehicular cross-overs” – this could be expressed as maximizing on-street parking • “Avoid large extents of consolidated at-grade parking...screened from view” -view from where – street, public /private open space? This is at odds with CPTED principles. • “Provide secure and accessible communal parking areas” - does this mean gates? • “Prioritise basement location when car parking is provided within building” - needs to warrant additional cost 	<p>Delete.</p> <p>Reword to delete some aspects and provide clarity on others,</p>

	<ul style="list-style-type: none"> • Charging points, car wash bays and dedicated parking for motorcycles and scooters may be desirable in some developments, but relates to target market rather than design • Limit the protrusion of semi- basement car parking to 1.2m above finished ground level - this is at odds with current and proposed DPs • Provision of secure bicycle parks should be removed as it may not be required • Where above ground car parking is proposed, floor heights should be suitable for latter conversion to commercial or residential use and street frontages provided with active uses such as residential or commercial offices – this has substantial cost implications • Much work has been put into separating movement of cars and bicycles in the interests of safety. Care should therefore be taken not to conflate traffic lanes for both within this document. • The requirement that vehicular crossovers be located on secondary streets or lanes is likely to be honoured in the breach. There needs to be a consideration of the site itself, as this is not always possible. • There also appears to be an inconsistency between this element and the requirement of individual access to street frontages (Access & Entrances, 11). • A planning requirement that the garage width be limited to “no more than 50% of the dwelling frontage” will be a significant restraint on design. In Lightview, for example, street frontages are limited to 4.2m. This requirement would therefore curtail garage facilities, pushing more vehicles onto the street. Additionally, there is no acknowledgment of Building Code requirements relating to open air requirements for garage facilities to allow appropriate ventilation. • A requirement to incorporate charging points and wash bays adds to the shared ongoing cost of a development (strata costs, etc) for a facility that may not be used, or used only infrequently. Additionally, it is likely that residents will treat such as space as being for parking so it will be unused for its intended purpose. • These Guidelines require bicycle access to be at the same level as the car park. This introduces a new danger for cyclists. • Requiring floor heights to allow for future conversion between commercial, residential and car parking will have a significant cost bearing on any projects including its viability. Apartments are currently required to have a floor height of 3.2m, whereas car parks must be a minimum 2m. Adding 1m removes the ability to 	<p>Remove requirement relating to location of vehicle crossovers.</p> <p>Provide additional clarity regarding working with Access & Entrances.</p> <p>Remove restraint on garage width as percentage of frontage.</p> <p>Remove guideline requiring charging points, wash bays, etc.</p> <p>Remove guideline relating to uniform ceiling height for car park and accommodation to allow for change of use.</p>
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	<p>create the most efficient layout, a spiral, and therefore increases the cost of a project.</p> <ul style="list-style-type: none"> The provision of secure and accessible communal parking creates a development and an operational cost, raising the questions about who will own and pay for the communal space and whether sufficient land is available. <p>Page 13 Design solutions reference to a maximum garage width of no more than 50% of the dwelling frontage is an arbitrary figure of very limited utility.</p> <p>This section includes discussion on ‘cars and bicycles’ and ‘access and entrance.’ Given that bicycles in South Australia are allowed on the footpath, it might be useful to have an ‘active transport’ section which includes pedestrians and cyclists together.</p>	<p>Delete</p> <p>Including ‘active transport’ section that captures pedestrians and cyclists, rather than including cyclists exclusively with car transport.</p>
Building Form - Orientation	<p>Page 15 – photo not an example of good design as it doesn’t relate to the street.</p> <ul style="list-style-type: none"> “Orientating buildings perpendicular to boundary” <ul style="list-style-type: none"> needs explanation/ visuals may not minimise overshadowing (depending of lot dimensions and orientation) The principle of good orientation is desirable in enhancing the appearance and performance of sites of a size and shape where it can be accommodated What level of public open space is intended here? Design solutions not needed - remove “adequate” separation is too subjective – delete as there is a section on separation If diagrams are to be included, they need to demonstrate a concept and must not be regarded as prescriptive – the diagram on P17 is not descriptive. 	<p>Delete Better diagram needed for orientation.</p> <p>Delete design solutions.</p>
Building Form - Building Height	<p>Page 18 - Building height - last paragraph reference to "particular care needs to be taken with tall buildings in established areas..." This ignores the circumstances where the relevant <u>policy</u> under the development plan or PDC calls for an increase in height and/or density of development and therefore a change in the height envisaged even at the "interface". This is an example of how the “guidelines” inherently contain policy which should be the domain of the PDC.</p>	<p>Delete</p>

	<p>Page 19 - Street wall height to width ratios greater than 1:1 are generally appropriate for urban contexts, while ratios around 1:2 are more typical of suburban settings. Ratios should not be mandated.</p> <p>P19 Design Solution – “Locate taller buildings with sufficient separation to avoid unreasonable amounts of overlooking” is problematic, in locations where greater building height is envisaged/encouraged, the potential for overlooking should not be a limiting factor. Rather, alternatives to increase privacy should also be considered.</p> <p>The diagrams on page 19 should be deleted. They attempt to reduce the concept of design to a series of diagrams which are overly prescriptive and do not take into account a variety of different circumstances. They are too simplistic to have any real utility.</p> <p>Further, the setbacks displayed in the diagrams would require lifts to be located at the rear of the property to avoid “tailing out”. However, this solution is seemingly at odds with providing ready access at the front of a project. Further, it will increase the amount of public space that all residents must pay for. Mandating such a design therefore has a significant cost impact on residents.</p> <p>The tailing back also reduces developable space, increasing the per unit cost of a development and introducing additional inefficiencies. As one members explained: “It’s going to add costs and cut the yield – things won’t stack up financially.”</p> <p>Street wall height-to-width ratios should be removed. Infill projects within suburban spaces are often 1:1, for example.</p> <p>Further points that our members believe need clarification include;</p> <ul style="list-style-type: none"> • Buildings should allow “daylight to all developments and public realm” – what is the rationale for this and does it preclude shading which can provide equally important protection? • Wind protection – intention unclear, avoidance of creating wind tunnels (refer Separation), impact of balconies? • Transition of building heights – “needs to be considered in context with other buildings/streetscape”, this has potential to preclude any change in building height. • Varying heights may provide better amenity, but also may not. 	<p>Do not mandate street wall height ratios.</p> <p>Suggest privacy treatments where direct/close views may be obtained.</p> <p>Delete.</p> <p>Delete.</p> <p>Delete.</p> <p>Provide clarity and rationale. Remove wall height to width ratios.</p>
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	<ul style="list-style-type: none"> • Stepped effect does not support policy for high and medium density. • Limiting location of higher buildings would not provide any overshadowing solutions to locations such as Churchill Rd or north/south corridors 	
Building Form - Building Depth	<p>The reference to 15m depth provides a requirement that is likely to be in conflict with each additional site. It should therefore be removed as each site should be assessed on its merits.</p> <p>Page 20- our member's feedback is as follows;</p> <ul style="list-style-type: none"> • "May provide acceptable amenity" – very subjective with no definition of good residential amenity to provide a benchmark • up to 15m is an arbitrary distance – relevance? Is the intention that no building is greater than 15m in depth? • Shallow apartment building depths are idealistic and commercially naïve given construction cost dynamics. 	<p>Delete.</p> <p>Reword to reflect comments</p>
Building Form - Building Separation	<p>Page 23 - the diagram ought to be deleted. The diagram suggests a simplistic solution that again has no regard to the infinite variety of circumstances. This is the sort of detail that is best dealt with in each development plan or PDC relating to particular zones and developments.</p> <p>The apartment Guidance suggesting separation of buildings should be deleted as it will significantly ratchet up prices and costs.</p> <p>The requirement relating to sufficient separation is in conflict with current laws that allow building on the boundary.</p> <p>In some cases, boundary to boundary building is to be preferred as the best use of space and site. The Guidelines prohibit this and therefore do no account for the vagaries of each site.</p>	<p>Delete.</p> <p>Delete requirements relating to building separation.</p>
Building Form - Street Setback	<p>Page 25 under the heading design suggestions appropriate street setback should be a matter of <u>policy</u> for the relevant zone and development not something the subject of a universal design principles.</p>	<p>Delete.</p>

	<p>The Guidelines fail to highlight the importance of the site itself. Street frontage may be extremely limited and therefore unable to offer street frontage or side frontage for all residents. This will continue to be a problem with deep city blocks as they are outbuilt. Alternatively, a U-shaped building would be required, which might create a significant cost imposition solely as a result of these Guidelines.</p> <p>The contention that in established areas new development should be consistent with the existing streetscape is a particularly simplistic design suggestion that ignores the relevant policy for the zone and the particular circumstances of any development. It may be a common policy, but it is not a universal design principle.</p> <p>The suggestion under the heading Design Solutions that standards for setbacks are described in policy requirements as set dimensions is again an attempt to make a universal prescription when in some instances setbacks may be relative rather than a set dimension.</p> <p>The diagrams on page 25 should be deleted as a very simplistic approach to merging setback distances while ignoring a whole range of different factors that may be relevant to that consideration.</p> <p>Our members further thoughts include:</p> <ul style="list-style-type: none"> • Maintaining historic setbacks likely to be at odds with increase in density • Front yards tend to be not as useful as backyards unless counted as private open space • Effect of rear loading? – often requires minimal front setback • Integration of street trees – implied required retention is undesirable 	<p>Delete</p> <p>Delete the diagrams</p>
<p>Building Form - Street Interface</p>	<p>Page 27 - design suggestion of limiting the height extent of solid walls or fences facing streets is somewhat impossible and a strange universal design proposition. The purpose of fences and walls is to form a barrier.</p> <p>The suggestion under the design solutions (second dot point) to limit solid walls to 1.2 m high above footpath level and to not exceed 50% of the building frontage is an arbitrary and inappropriate prescription. This also does not account for sloping blocks or minor deviations.</p>	<p>Delete</p> <p>Delete</p>

	<p>A requirement to integrate gas and other service lines with garden fencing introduces a new cost for relocation. The Guidelines do not account for this relocation or consider the impost on purchasers.</p> <p>Additionally, the location and treatment of services is governed by other Acts and Regulations. Parliament would need to expressly alter those Acts and Regulations or provide an alternative.</p> <p>The diagrams on page 27 should be deleted.</p> <p>Our members further thoughts include:</p> <ul style="list-style-type: none"> • Addressing the street – garage provisions? • Integration of services and fencing must recognise the need to be able to find services, meters etc • Raising floor levels generally not practical (uneconomic) except for some ground floor apartments or undercroft parking (ventilation) - steps up to front door do not meet current standards. • Visitor parking – numbers often take precedence over interface • Relationship between private, semi-private (eg community) and public spaces needs to be described – diagram required 	<p>Delete new requirement to relocate essential services.</p> <p>Delete</p> <p>Reconsider visitor parking requirements</p> <p>Diagram needed for private, semi-private and public spaces</p>
<p>Building Form - Visual Privacy</p>	<p>The design suggestion under the heading on page 29 referring to minimising overlooking should refer instead to minimising "inappropriate" overlooking.</p> <p>Our members further thoughts include:</p> <ul style="list-style-type: none"> • “Habitable room or balcony 6m” - use diagram to show extent (arc + distance) • CPTED v privacy - what is a reasonable balance? • “Avoid adverse affect on others” – often difficult to define • Avoiding direct line of sight may be difficult – may be desirable for CPTED etc • Generally solid balustrades have more negative than positive connotations and definitely should not be mandated • P29 diagram 2 doesn’t make sense, as it restricts light access to building and the other diagrams are not helpful 	<p>Insert “inappropriate”.</p> <p>Provide diagram to demonstrate line of sight.</p> <p>Reconsider diagrams on P29.</p> <p>Review regarding comments.</p> <p>Do not mandate balustrades.</p>

	<ul style="list-style-type: none"> • Overlooking from rear balconies – may be needed to get views of private open space to support CPTED • Louvres – preventing looking down stops passive surveillance • The table is at odds with a lot of DPs – conflict 	
Building Form – Safety	<p>By referring to the principles of Crime Prevention through Environmental Design, the Guidelines are effectively incorporating yet another set of documents into building requirements.</p> <ul style="list-style-type: none"> • Direct access to street from ground level apartments will be dictated by relative number and other design considerations rather than being expressed as a design requirement • Last 3 dot points should be encouraged, but not mandated • Unacceptably high levels of lighting in public spaces may be needed for CPTED (facial recognition requirement) • Intercom systems—add “where appropriate” 	<p>Delete reference to CPTED.</p> <p>Last 3 dot points should be encouraged, but not mandated</p>
Open Space and Landscape - Landscape	<p>Page 34 - the fourth performance outcome refers to providing deep soil zones to enable large plant specimens. This is overly prescriptive given that the landscape solution to a particular development in the particular circumstances may not require or be appropriate for planting of large specimens for a variety of other reasons.</p> <p>The provision of deep soils as outlined in this document would require costly engineered solutions.</p> <p>Page 35 heading design suggestions the first suggestion refers only to the use of "trees". A better word would be "vegetation" in the event that groundcovers, bushes or shrubs are the appropriate form of vegetation.</p> <p>An unreasonable amount of land on allotments that are generally shallow in depth along road corridors is expected to be dedicated to vegetation which is simply not always practical or financially viable for developments, impacting the feasibility of development, counter to the intent of the rezoning.</p>	<p>Reword or delete</p> <p>Replace “trees” with “vegetation”.</p>

	<p>The quantitative requirements offer limited flexibility despite the importance of site specific context such as existing deep soil landscaping on adjoining land, climate, topography, built form and land use of adjoining allotments;</p> <p>Page 35, the design solutions table of soil zones is highly prescriptive and do not align with the intent of a performance based planning system. The rate of deep soil zones seems excessive and in any event arbitrary. The quantitative deep soil requirements could be misinterpreted by the public as ‘best practice’ and cause unnecessary and avoidable tension during the public notification phase The table ought to be deleted.</p> <p>Page 36 under “communal space” consider adding Christie Walk in Adelaide as an example of urban ecology and communal space.</p> <p>Industry practitioners observed that very few people take responsibility for communal landscapes. Their inclusion in this document therefore increases the cost imposition on residents and potential residents through mandating a need for gardening services.</p> <p>Additionally, new planting requires an up-front investment for tending and establishing plants. This is an additional cost burden for developers.</p> <p>There is a clear tension within the document between demands for landscaping and car parking. However, there is no resolution.</p> <p>The document overlooks or ignores the impact that trees and deep soil have on buildings. Buildings are likely to fail or be damaged as a result of these requirements, with additional costs being imposed on residents. The document fails to account for the implications of its principles and quantitative requirements.</p>	<p>Delete the solution and the table.</p> <p>Include better example.</p> <p>Remove sections imposing quantitative requirements.</p>
<p>Open Space and Landscape Communal Space</p>	<p>Page 37 - the second design suggestion dealing with publicly accessible open space - fails to acknowledge the fact that it may not be necessary to provide accessible open space within each development if there is sufficient existing public open space.</p> <p>The guideline overlooks the difficulty about deciding not only who will develop open space but who will manage and maintain it over the longer term.</p>	<p>Reword or delete</p>

	<p>Under the heading of design solutions -additional guidance for apartments - the 5m per dwelling and up to 12.5% of the site 4m dimension, 50%/2 hours etc seem arbitrary numbers among all the others in that section. They fail to account for facilities available in the surrounding areas or the limitations of the site itself. These are matters of policy.</p> <p>It might also be worth mentioning street lighting as a part of landscape.</p> <p>Further comments include;</p> <ul style="list-style-type: none"> • Delete “range of facilities” – suggested amenities are OK • Open space specifications criteria seems rather dubious at best and rather pointless • Communal space needs to relate to number of people accommodated in building • Access to sunlight while providing shelter from adverse weather • Apartment guidance has no clear basis , is too prescriptive, may not be deliverable and should be deleted • The rates provided need to have regard to the context; i.e. a building next to, or in close proximity, to a park should not need to provide communal open space. • Communal space in smaller medium density terrace projects is idealistic and is not responsive to what the market actually wants or needs. Land titling, shared ownership, maintenance responsibility and the practical use are often issues that have no acceptable commercial solutions, other than a philosophical social engineering planning goal. • The Guidelines also impose a new demand on industry to prove the benefits of any aberration to these Guidelines. This is additional red tape upon businesses attempting to develop innovative solutions that the market will embrace. • Industry participants have noted that communal space is often wasted as it imposes additional costs through lost yield and ongoing operational costs passed through to owners, and the areas are rarely used. 	<p>Delete</p> <p>Consider adding street lighting as an element of landscape.</p>
<p>Open Space Stormwater Management</p>	<p>Our comments include:</p> <ul style="list-style-type: none"> • This Guideline injects additional cost, design and operational demands into the development process. 	<p>Delete roof garden section.</p> <p>Delete additional stormwater management requirements.</p>

	<ul style="list-style-type: none"> • Each Council currently has its own stormwater requirements. Adding another layer – including biofiltration, sediment filters, etc – will add costs and reduce affordability, especially as rainwater falling onto sites is already clean. • The introduction of a requirement for roof gardens fails to account for the additional structural requirements relating to concrete mass, waterproofing and filtration of fertilisers from water used. • “Reduce the volume of stormwater entering the stormwater system” – how will we do this, and where? • “Minimise impervious areas and use permeable surface treatments” <ul style="list-style-type: none"> ○ Keep water away from buildings – pervious surfaces and on-site infiltration can be expensive and impact on building integrity – should not be encouraged (allowed) on reactive soils • “Improve the quality of stormwater through the use of raingardens and biofiltration systems, sediment filters and litter traps” - This is costly to install and creates maintenance obligations which Councils have been reticent to undertake • Catchment management plans should include WSUD at a district level • Mandated 1000 litre tanks don’t do much in terms of managing stormwater and are inefficient as a water supply source in summer • Roof gardens are costly and not suited to all apartments 	<p>Review in context of significant construction and maintenance costs.</p> <p>Consider in terms of wider catchment management plan.</p>
<p>Open Space – Green Infrastructure</p>	<p>Page 41-</p> <ul style="list-style-type: none"> • Use of plant species that support native fauna needs to balance potential contrast with landscape • Needs to be sustainable • Existing trees need to be assessed for suitability for and value of integration, with priority given to regulated or significant trees • Selected plant species need to complement general landscaping principles to avoid conflict 	<p>Review regarding comments</p>
<p>Open Space – Public Art</p>	<p>Page 43</p> <p>While industry participants agreed that public art was beneficial, there was universal agreement that it should not be mandated in planning requirements.</p>	<p>Delete public art requirements.</p>

	<ul style="list-style-type: none"> • Public art should be visible for both residents and the wider community to enjoy • Cost sharing mechanism needed. (Wider community should contribute) • Shouldn't be a cost burden on development • Should relate to scale of development • Shouldn't be prescriptive 	Consider offset against open space provision or levy
Building Design-Universal Design	<p>This section seems to attempt to trample upon the disability access requirements of the building code of Australia and is unnecessary.</p> <p>Further comments include;</p> <ul style="list-style-type: none"> • "...Alternatively, all new residential developments should adopt a universal housing"- not an appropriate solution and would be cost prohibitive • Ageing in place is different to universal design, but there is no real reference to seniors' living • "Avoid changes in levels or surfaces and provide a safe, step-free path of travel from street to the dwelling door" - this is at odds with other elements 	<p>Delete</p> <p>Remove from the document – more a building rules matter rather than planning.</p> <p>Provide clarification around the "note" – what does that mean?</p>
Building Design - Size and Layout	<p>Page 49 - design solutions - additional guidance for apartments - prescribes that habitable room depths should not exceed 2.5 times the ceiling height. This is a strange and arbitrary figure. It should be deleted - so too should the diagram on that page.</p> <p>Page 49 - design suggestion – "Avoid direct access and visibility from living areas to bathrooms and laundries, where possible" this is very unclear and unnecessary.</p> <p>In fact, all the design solutions are far too prescriptive. For example, the design solutions stating that "master bedrooms should have an area of not less than 10m2 and other bedrooms 9m2, excluding storage" is far too prescriptive and unnecessary and does not align with the intent of a performance based planning system.</p> <p>The mandating of room sizes and heights beyond Building Code requirements creates a new set of rules in competition with existing regulations. At no point is it made clear within the Guidelines that innovative solutions are encouraged that address the underlying concerns the Guidelines are addressing. It appears that the de facto response has been to create quantitative requirements rather than qualitative goals.</p>	<p>Delete</p> <p>Delete</p> <p>Delete</p> <p>Remove sections imposing quantitative requirements.</p>

	<p>Further comments include;</p> <ul style="list-style-type: none"> • Comments re kitchens, bathrooms and especially laundries are pointless • If bedrooms must be a minimum of 9m², at least 3m must be achieved in one direction if room has regular shape. Otherwise, not relevant. 8m² for 2nd bedroom is fine and works well in many places. • Light penetration diagram is incorrect • Precludes single aspect apartments. • Metrics are inconsistent with text • Current award winning developments won't comply. • There are well-received and flexible designs that have bedrooms with dimensions sub 3m (UDIA award winning). • Sub 3m are often popular for children's rooms, flexible/multi-purpose rooms such as studies converted to spare bedrooms for children, grandchildren, grandparents. • The market generally demands larger bedrooms, however there are examples of dwellings across SA where builders/developers have delivered smaller dwellings and bedroom sizes at affordable price points that have a place in the market. 	<p>Correct light penetration diagram</p> <p>Delete metrics – inconsistent with text</p>
<p>Building Design- Private Open Space</p>	<p>The minimum requirements within this section fail to account for the specific site and, like comments relating to size and layout, appear to reach for quantitative requirements instead of qualitative goals that would encourage innovation.</p> <p>Amendments were made to city buildings to address concerns about people committing suicide from private open spaces. We question whether this consideration was carried forward to this document.</p> <p>The table on page 51 should be deleted as having no particular logic or basis and being better left to policy in the PDC.</p> <p>Further comments include;</p> <ul style="list-style-type: none"> • Specification of range of minimum dimensions unnecessary 	<p>Remove sections imposing quantitative requirements.</p> <p>Reconsider how open space requirements are framed with reference to high-density developments.</p> <p>Delete</p>

	<ul style="list-style-type: none"> • “Design Solutions planning consideration: Minimum private open space - 4m” – we nominate 2m as a standard minimum, which has been included in Development Plans previously. • Current terrace house land widths are trending down to 3.75m minimum (The St Clair examples photographed on page 25 of the Guidelines are an example of these widths) making the proposed 4.0m minimum widths for private open space physically unachievable. 	
Building Design- Common Circulation Areas	<p>Page 53 - second and third design solutions - there does not seem to be any basis for the minimum ceiling height (which exceeds the BCA minimum) or the number of dwellings accessed from any circulation core. These are arbitrary and unnecessarily restrictive to a range of appropriate designs. These requirements should be deleted.</p> <p>There is no clarification within the Guidelines that recognizes that the site itself is a key driver of design. This is apparent on this point where Building Code requirements – which serve as a minimum – have been overruled by new Guidelines requirements.</p> <p>Further comments include;</p> <ul style="list-style-type: none"> • “Provide a minimum ceiling height of 2.7 m” – this is above the market accepted standard of 2550mm incurring up to \$10,000.00 extra construction cost of a typical Rivergum Homes 3 level apartment building. • “The maximum number of dwellings accessed from a circulation core of any level of a building to not exceed 8”, which seems an arbitrary number <ul style="list-style-type: none"> ○ a maximum number of 8 dwellings is excessively restrictive and the provision of additional service cores would result in significant and unnecessary cost increases. ○ Why not try to maximise social interaction? ○ Student Housing and Aged Care Apartments are often up to 15 – 25 residential floor plates that still achieve all the design performance outcomes. • “Design Solutions guidance: Provide a minimum ceiling height of 2.7m to common circulation areas”. This is excessive. 	<p>Delete</p> <p>Review regarding comments</p>

	<p>Further comments;</p> <ul style="list-style-type: none"> • Borrowed light to bedrooms is not a desirable outcome, but it is allowed and acceptable. It can assist in the delivery of affordable outcomes. • Every habitable room including bedrooms should have a window in an external wall may not be achievable • Access to sunlight provisions are either inconsistent or inappropriate • A maximum of 15% of the dwellings receive no direct light – 20% more appropriate, if required at all 	
Building Design- Natural Ventilati	<p>Page 61 - design solutions - first point refers to ensuring the area of unobstructed windows is not less than 5% of the floor area served. This is overly prescriptive.</p> <p>Under the heading additional guidance for apartments the second dot point refers to "exemption from meeting the criteria on these grounds". If this is in fact a "design solution" within what are merely "guidelines" then there should be no such concept of exemptions from criteria. This should be deleted.</p> <p>Further comments include;</p> <ul style="list-style-type: none"> • Natural cross ventilation for any residence is always better, but at what point does this design philosophy effect market acceptance and who is the adjudicator of that acceptability, surely the market place has the ultimate decision. This requirement has a major influence on cost effective building construction and hence final residential market pricing. • % of cross ventilated apartments, not possible in city • Ensure at least 60% of apartments are naturally cross ventilated – real problem. 	<p>Delete</p> <p>Delete</p>
Building Design Energy Efficiency	<p>The Guidelines propose space be allowed for future battery storage units. The National Construction Code is currently being revised and is under consultation regarding this requirement. The Guidelines would be better informed by referring to that process.</p> <p>The energy efficiency section page 62 to 63 is pointless given the requirements of the BCA. It should not add to or in any way trample on the same ground as the BCA.</p>	Delete

	The BCA already has a minimum energy efficiency performance that requires all or some of the design solutions subject to the specific residence.	
Building Design Acoustic performance	<p>Page 65 - third design solution refers to an assessment process. Design guidelines should not refer to an assessment process. This point should be deleted.</p> <p>The Guidelines require early assessment of acoustic performance, yet the assessment cannot be completed until the build has finished.</p> <p>Further comments include;</p> <ul style="list-style-type: none"> • The BCA already has a minimum acoustic performance that requires all or some of the design solutions subject to the specific residence. In addition 3m separation between bedroom windows and noise sources is arbitrary and irrelevant. • Already in NCC 	<p>Delete</p> <p>Remove requirements for acoustic performance assessment.</p>
Building Design Waste	<p>Page 67 - additional guidance for apartments - second suggestion refers to “larger developments with centralised storage areas should be supported by appropriate property management systems such as a caretaker”. It is not the role of a “design guideline” document such as this to purport to prescribe how a property might be <u>managed</u>. This should be deleted.</p> <p>The creation of a Waste Management Plan creates an additional requirement that will inundate new residents with information and yet be unlikely to be referenced in future.</p>	<p>Delete</p> <p>Delete need for waste management plan.</p>
Appearance-Facade	<p>Page 71</p> <ul style="list-style-type: none"> • “Where development is located”... except where character is expected to change • Careful integration should not preclude change • Minimal variety in facades of repetitive building types can be advantageous, e.g. Bath, The Circle 	
Appearance-Materials	Page 74 and 75 dealing with materials contains a policy position that materials ought to be locally sourced. While it is a noble policy in its own right, a document such as this should not contain such loaded policy contentions.	Delete second performance outcome and 6 th design solution.

	<p>Further comments;</p> <ul style="list-style-type: none"> • Should contribute to desired design outcome • Durable natural paints not readily available 	
Appearance-Services	Note; Don't locate meters too discreetly – authorities need to be able to find them	