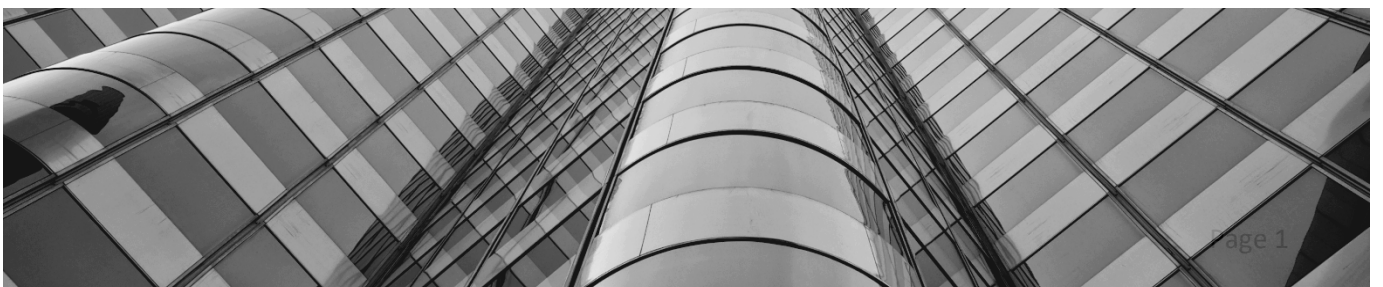Australian
Institute of
Architects

Draft amendments to State Planning Policy 7.3 – Residential Design Codes: Volume 1 (R-Codes)

Submission to

designwa@dplh.wa.gov.au

Submission issued
2020

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PURPOSE

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1. This submission is made by the Australian Institute of Architects WA Chapter (the Institute) to the West Australian Planning Commission (WAPC) and Department of Planning, Lands and Heritage (DPLH) to provide comments on the *R-Codes Interim COVID-19 Review.*

2. At the time of this submission, the Chapter President of the Institute is Peter Hobbs.

3. At the time of this submission, the Chair of the Urban Design committee is Sam Klopper.

4. The State Manager is Beata Davey.

INFORMATION

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The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand   and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

CONTEXT

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The Institute acknowledges that the proposed R-Code amendments are aimed to streamline the planning process for single residential dwelling in Western Australia. Please refer to the appended Feedback Table for specific comments.

Schedule of proposed modifications R-Codes Volume 1 interim review 2020

Feedback Table

Note: For clarity, please do not modify the general formatting of the table and indicate the specific clause to which the comment relates. Additional rows can be inserted to accommodate comments.

Respondent: Australian Institute of Architects – WA Chapter

Part/Clause	Comment	Solution	Relates to… *A = Advertised version* *C = Current R-Codes*
Part 1 – Preliminary	There is overlap between the densities covered by different planning codes: R-Codes, Medium Density and Apartment Codes. This is not best practice and we recommend streamlined demarcation between the densities covered.	Clear demarcation between the densities covered by the different codes. We recommend: R-code houses - R25 and below R-Medium Density – R30-R50 R-code Apartment - R60 and above.	A, C
Part 2 – R-Codes Volume 1 approval process	2.1.2 and 2.5.2 If no application is required, how can the authority know or ensure projects that "claim to be DTS projects" meet all DTS criteria – will there be a checking procedure? 2.4.2 Clause 67 can be used to refuse any application	2.1.2 and 2.5.2 For DTM design, an authorised person such as a Registered Architect or Designer (with PI Insurance) should provide a letter confirming compliance to all DTS and submitted for local authority record.	A
Part 3 – Accompanying information			
Part 4 – Consultation			
Part 5 – Design elements for all single house(s) and grouped dwellings; and multiple dwellings in areas coded less that R40			
5.1.1 – Site area	No comment		
5.1.2 – Street setback	No comment		
5.1.3 – Lot boundary setback	Sites on steep slope are hugely disadvantaged; not practical for site drops greater than 2m. The clause encourages long flat walls with no articulation It is unclear when Figure 4 series apply.	Wall height should be measured as the average of every 10m intervals length-wise for steep sites. Wall recess and wall articulations should be introduced at every 10-15m	A

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Respondent: Australian Institute of Architects – WA Chapter

Part/Clause	Comment	Solution	Relates to… A = Advertised version C = Current R-Codes
		intervals to break the long visual impact.	
5.1.4 – Open space	Supported. However, the areas are contradictory with minimum outdoor living space.		A
5.1.5 – Communal open space			
5.1.6 – Building height	The approach to all categories is not consistent.	Category A & C should also have 1m additional height to provide better amenity for houses.	A
5.2.1 – Setback of garages and carports	Not necessary for improving the design outcome.	The width of garages has more impact on the design than the setback.	
5.2.2 – Garage width	This has not been considered for narrow lots. It encourages parking on the street or driveway. A maximum of 6m width shall apply. This change permits a 10m wide garage on a 20m wide frontage site.	A maximum of 6m garage width shall apply. Add a clause to encourage ROW garages (allow full width).	
5.2.3 – Street surveillance			
5.2.4 – Street walls and fences	No comment		
5.2.5 – Sightlines	No comment		
5.2.6 – Appearance of retained dwelling			
5.3.1 – Outdoor living area	Not supported. The 32sqm requirement for higher density area (R40-80) is not practical. As outdoor living area also refers to balcony, it is disproportional for	Table 1 in the current scheme should remain. It should allow flexibility for developers to reduce outdoor living area if additional open space area/s is	

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Respondent: Australian Institute of Architects – WA Chapter

Part/Clause	Comment	Solution	Relates to… *A = Advertised version* *C = Current R-Codes*
	a 1-bed apartment in the R30 zone to have a 32sqm balcony. It contradicts with the Open Space requirement.	provided to compensate the reduction. The additional open space should double the amount of reduction in outdoor living area.	
5.3.2 – Landscaping	1 tree per dwelling may not be practical for higher density sites. "trees more than 3m should be retained" may not be practical in all situations.	Require scenario testing to proof this requirement work and not jeopardising yield. If a 3m tree is removed, a same size tree is to be planted within the site.	
5.3.3 – Parking	1:4 visitor bay ratio is high, especially for higher densities.	1:8 ratio Visitors bays to be capped to 5 bays. Visitor bays can be reduced if additional residential bays are provided. Residents can let their visitors park in their residential bays, if a surplus is provided.	
5.3.4 – Design of car parking spaces			
5.3.5 – Vehicle access			
5.3.6 – Pedestrian access	Principally supported.	Require scenario testing	A
5.3.7 – Site works	The setback zone will be wasted land	Require scenario testing	A
5.3.8 – Retaining walls	The setback zone will be wasted land Not practical for steep sites	Retaining wall should be allowed along boundaries	A
5.3.9 – Stormwater management	No comment		
5.4.1 – Visual privacy	No comment		
5.4.2 – Solar access for adjoining sites	No comment		

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Part/Clause	Comment	Solution	Relates to… *A = Advertised version* *C = Current R-Codes*
5.4.3 – Outbuildings	No comment		
5.4.4 – External fixtures, utilities and facilities			
5.5.1 – Ancillary dwellings	No comment		
5.5.2 – Aged or dependent persons dwellings			
5.5.3 – Single bedroom dwellings			
Part 7 – Local planning framework			
Other			
Scenario testing		Engage several architects and planners to undertake scenario testing making sure the proposed changes are practical for densities of R20 to R80.	
Separate "Part 1 and Part 2" from "Part 5 changes"		As many of the "Part 5 changes" require scenario testing and subject to further debate, it is recommended to separate Part 5 from "Part 1 and Part 2". Part 1 and Part 2 can be implemented first.	
Omissions		Passive Solar Design principles are not addressed. An aim to increase housing amenity and utilise orientation, shading and solar access to manage the house life-cycle costs could be incorporated. An example of strategy which could be implemented is the orientation of primary living spaces and	

Schedule of proposed modifications R-Codes Volume 1 interim review 2020

Feedback Table

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Respondent: Australian Institute of Architects – WA Chapter

Part/Clause	Comment	Solution	Relates to… *A = Advertised version* *C = Current R-Codes*
		outdoor living spaces with appropriate shading	