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Western Australian Planning Commission
Level 2
140 William Street
PERTH WA 6000



Australian Institute of Architects

To whom it may concern

DRAFT POSITION STATEMENT FOR HOUSING ON LOTS LESS THAN 100m²

The Australian Institute of Architects (Institute) is the peak body for the architecture profession in Australia, working to improve our built environment by promoting quality, responsible, sustainable design. The Institute also aims to enhance the cultural, environmental and economic well-being of the community by advancing contemporary practice and the professional capability of architects and advocating the value of architecture. We take this opportunity to comment on the State Government's Draft Position Statement for Housing on Lots less than 100m², which touches on several of the Institute's key areas of advocacy, including Affordable Housing, The Benefits of Good Design, and The Cost of Urban Sprawl.

According to the Urbis study commissioned by the Department of Planning, Lands and Heritage and Landcorp, terrace-style houses on "small lots provided the opportunity for innovative and design-led housing solutions [that] respond to contemporary living needs and choices through well-considered dwellings that contribute to their surroundings".

We believe the key message from that report is that these new house and land types on less than 100m² must be "innovative and design-led". Assuming that is the case, such housing will be beneficial for the following reasons:

- As an alternative to infill housing and new apartments, houses on small lots increase density and housing diversity in locations that offer good access to amenities and services, health, education, employment and public transport options. Therefore, they reduce the need for the city to continue to sprawl at its fringes, and demonstrate the benefits of good design in providing new housing solutions.
- Houses on small lots are more energy efficient and offer performance and comfort advantages when they are well designed. The use of environmental design techniques such as the combination of thermal mass and cross ventilation; and passive solar provisions that exclude summer sun while allowing winter sun in, helps to reduce the need for air conditioning in summer and heating in winter. These are all essential objectives if Australia is to achieve its Paris climate change targets to reduce greenhouse gas emissions to 26-28 per cent on 2005 levels by 2030, because households account for approximately 20% of all greenhouse gas emissions in Australia.
- Houses on small lots tackle one part of the affordable housing puzzle, by providing an alternative choice for people who don't want to live in larger houses or strata-titled apartment buildings. According to the Department and Landcorp's Urbis study, new small

house lots in other states sell at 70 to 80 per cent of the median house price in the surrounding locality, thereby providing an affordable alternative to nearby housing stock. The Institute's Affordable Housing Policy (attached) calls for a good housing supply that is diverse, affordable, sustainable, and supported by the community.

We note that in several other states there are new 'Small lot homes' developments already underway, and we are watching with interest the development of the Ellenbrook small-lot houses here in Perth, by Landcorp. We are interested to see whether ongoing WAPC monitoring and review of that implementation will result in this housing type being included in the R-Codes.

If it is, and for these kinds of developments to succeed and provide housing that will remain attractive to homeowners and investors in future, it is essential that they are innovative and design-led. We therefore urge the Department to consider the following points:

- The selection of appropriate sites is paramount – in addition to the Siting and Configuration points within the Draft, they must be close to existing amenities and open space, and oriented to maximise northern elevations to the living areas and outdoor spaces of the proposed dwellings. The dwellings in Figure C in the draft will require different design solutions to take into account that the houses occupy four different axes – N-S, S-N, E-W and W-E. In such a scenario, house design that takes into consideration the various northern aspects is of critical importance. Especially in the case of the row of housing on the lower edge, the S-N elevation, which could be developed as Small House Lots with living spaces such as front courtyards facing the street, to take advantage of the northern aspect and encourage community engagement. Alternatively, it could be developed as another housing type – such as apartments – that can more readily take advantage of that particular orientation.
- Housing on small lots must capitalize on its ideal orientation and other site and local characteristics in its design, because the importance of good design is amplified on small sites. Many competing concerns – including privacy, overshadowing, access to natural light, thermal mass, thermal comfort, cross ventilation, engagement with the street, homeowner and visitor parking, etc – vie for the designers' and developers' attention, and careful management of these issues by a skilled designer is vital. The Institute is concerned that in Appendix 2 of the Draft Positioning Statement, there is 'No maximum overshadowing' and that 'No Privacy Provisions Apply', which we believe is problematic. Our first recommendation below addresses this issue.
- We acknowledge that there is some resistance and opposition in the general community to increased densification in Perth, but we believe there is an important place for Houses on Small Lots in the city's overall growth strategy. We believe government has an important role to play in informing and educating the public about these broad issues and these specific proposed initiatives and solutions, versus the cost of maintaining the current status quo. Our second recommendation below addresses this issue.

Recommendation 1

For the reasons outlined above, specifically related to the Overshadowing and Privacy Provisions to be adopted in the R-Codes as per the Draft Positioning Policy, we recommend that threshold-based regulations be introduced to mandate the use of architects on Lots of less than 100m², to ensure the provision of innovative and design-led housing.

Architects are able to negotiate competing design interests on a case-by-case basis, taking into account individual characteristics such as site, aspect, views, overshadowing, privacy, local climate, seasonal variations etc, and are particularly skilled at designing for maximum amenity and liveability on small and challenging lots. We believe that minimum standards of Overshadowing and Privacy can be incorporated into Small Lots of Less than 100m², but the innovative and creative talents of architects are necessary to achieve them. This is a crucial issue because the quality, liveability and future appeal of Small Lots Housing could easily be marred by inappropriate design responses that don't sufficiently take into account Overshadowing and Privacy issues.

Architects and building designers may appear to offer similar skills and services, but the key distinction between the two lies in the ongoing education, training and registration process they are subject to. Architects travel a more rigorous path from the outset, completing an accredited 5-year degree followed by a minimum of two years of work experience, before going through an onerous registration process with a statutory authority in order to legally be called an architect. After that, they are obliged to complete Compulsory Professional Development each year, and they are subject to random annual auditing.

Architects have the requisite training and skills to design complex buildings and developments that meet high standards and community expectations. They also understand the importance of contextual fit and the contribution a building makes to the quality of a neighbourhood. Architects are problem solvers and their designed outcomes prioritise functionality and performance, rather than focusing unduly on a building's appearance.

Recommendation 2

At the Institute, we refer to the Department of Planning's definition of what constitutes 'good design', taking into account the following criteria: Context and character; Landscape quality; Sustainability; Functionality and build quality; Community; Amenity; Legibility; Built form and scale; Safety and Aesthetics, and we refer to the government's Better Places and Spaces policy as the benchmark for new developments.

We would like to see government undertake a strategic public relations campaign to explain the benefits and allay any community fears about the introduction of Houses on Small Lots, as part of a broader initiative to engage with the community on housing, urban sprawl and design issues, which are of great importance not just to the architectural profession but to the community more broadly.

In closing, we at the Australian Institute of Architects would like to thank the Department for the opportunity to provide feedback on this great initiative, and we look forward to hearing about the results of this process. We are particularly keen to learn more about how the people of Perth respond to the Draft Position Statement for Housing on Lots less than 100m². Please keep us informed of any future developments.

Any queries about this submission in the first instance may be directed to the Institute's Executive Director Michael Woodhams at michael.woodhams@architecture.com.au or 08 6324 3100.

Yours sincerely



SUZANNE HUNT FRAIA
PRESIDENT WESTERN AUSTRALIA

Affordable Housing Policy

CONTEXT

Housing is a basic human need and universal human right, and in the rapidly expanding cities and towns of the twenty-first century, there is a critical need for more flexible and diverse housing solutions. New housing stock needs to be integrated with transport and social infrastructure and much greater diversity beyond simple models of homogenous suburban boxes or regimented apartments. In the face of social and demographic change, growing economic inequality and global issues such as climate change, the architectural profession offers the design and problem solving skills to deliver more affordable, dignified and accessible housing, reducing both upfront and ongoing costs. All financial levers to make housing more affordable for owners and renters need to be regularly examined for their effectiveness

THE POLICY

The Australian Institute of Architects endorses the following:

- The design and problem solving skills of architects are crucial to the provision of affordable and accessible housing in Australia
- Mandated targets for social and affordable housing and incentives for flexible and diverse housing types
- Housing that is affordable, sustainable, and of high amenity achieved through clever design strategies, including smaller, energy-efficient dwellings; cost-effective, space-efficient and quality controlled mass housing; and the adaptation of existing housing stock to accommodate multi-generational families, and support ageing-in-place
- A focus on multi-residential developments and urban consolidation as the sustainable and affordable solution to the increasing demand for housing in dense urban environments
- Investment in design quality and mandated use of architects for medium and high density housing projects nationally
- Moving Australia towards net zero carbon emissions for the housing sector by 2050