



Draft Medium Density Housing Policy Stakeholder Engagement Outcomes Report

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1. INTRODUCTION

1.1 Purpose

This report provides an overview of a series of stakeholder workshops conducted in early 2021, during the public advertising of draft State Planning Policy 7.3 Vol 1 Part C - Medium Density Code (the Medium Density Housing Policy), by the Department of Planning, Lands and Heritage (the Department). The workshops compliment an earlier and broader engagement program conducted directly by the Department's Design WA team, to inform the development of the draft Policy.

This phase of engagement has included information briefings and engagement workshops to a range of stakeholder and industry groups with a high level of interest in the Policy's development and potential impacts and opportunities it presents.

A second phase of workshops are planned for after public submissions are assessed, and proposed policy amendments have been drafted. These will occur prior to WAPC endorsement. The composition of these workshops will be informed by the issues, comments and sentiment gathered through phase one of the stakeholder workshop series and public consultation period.

1.2 Context

The State Government, through the Department, has been delivering a program of reforms, which are being implemented through legislative, regulatory and policy changes. Through Design WA, a proposed new policy to guide delivery of medium density residential development in Western Australia was released for public consultation in November 2020 (the Medium Density Housing Policy).

The policy challenges traditional thinking about how medium density housing is designed and delivered to foster design excellence, drive innovation and diversity, improve liveability and deliver better social and environmental outcomes.

Stakeholder interest in the Medium Density Housing Policy:

- Anticipated changes to the way medium density product is designed and delivered under the new policy may be considered a major disruptor to the status quo.
- The Policy is expected to drive better built outcomes in medium density product, particularly with respect to matters of parking, provision of open spaces and deep root planting zones.
- The impacts of the Policy on yields, development costs, and therefore affordability for some sites.
- The scale and nature of development to which the Policy will apply can be expected to impact 'mum and dad' land-owners, and possibly self-managed superannuation funds.
- A heightened emphasis on design may suggest longer approval processes and timeframes, and it could be expected to generate interest, including in the inclusion of a deemed to comply pathway.
- Clarity of expectations, approvals, legibility and understanding of policy provisions by all stakeholders in the development process including landowners, developers, designers, approval entities and the broader community, as well as any transitional arrangements.





1.3 Design WA

Design WA is a suite of state-wide policies intended to support and facilitate more sustainable built environments and the creation of vibrant and liveable communities.



Design WA is underpinned by 10 principles:

context and character; landscape quality; built form and scale; functionality and build quality; sustainability; amenity; legibility; safety; community and aesthetics.

The Design WA principles place a strong emphasis and expectation on good design; an elevated role for design professionals; and the introduction of a performance-based approach to planning approvals.

The introduction of the first stage of Design WA in 2019 via *State Planning Policy 7.0 (Design of the Built Environment)*; *State Planning Policy 7.3 (Apartments)* and the *Design Review Guide* was a significant step towards delivery of a framework that addresses community concerns with higher density and infill developments. The subsequent release of *State Planning Policy 7.2 (Precinct Design)* offers guidance for the preparation and assessment of planning proposals in areas of focus for higher levels of density and infill, with mixed uses, and activity centre designations.

The Medium Density Housing Policy forms an important addition to the Design WA suite of policies with expectations of improved quality of medium density housing in urban infill and greenfield settings throughout Western Australia.

The Policy has been highly anticipated by industry, decision makers and the broader community and was anticipated to attract considerable interest once released for public comment. The Department therefore sought support to both inform and seek feedback from a diversity of stakeholders about the Policy through the workshop series.





2. ENGAGEMENT APPROACH

2.1 Stakeholders

To elicit quality and constructive feedback on the policy settings and implementation framework from a diversity of stakeholders, it was determined that an engagement program, comprising of a series of workshops, would be designed and delivered to cater for a broad range of stakeholders including:

- The community that buy, invest in and live in or close, to medium density housing (**occupiers**)
- Local and state government agencies guided by the policy for assessment and decision-making purposes (**regulators**), and
- The residential building industry, including architects and other designers, developers, building and planning consultants (**producers**).

During the formation of the Medium Density Housing Policy, the Department engaged with a wide range of stakeholder groups from across the planning and development sector including Industry Associations. The Department also established a Medium Density Advisory Group (MDAG) comprising representatives from the development industry, planning practitioners and local governments as well as some smaller scale developers and builders. A public design forum also provided interested community members with an opportunity to participate in shaping the Medium Density Housing Policy.

Recognising and building upon these existing engagement processes, including attracting continued participation by some of the same individuals, were important considerations in designing phase one of the stakeholder workshops. Equally, it was also important that other individuals with a high level of interest, also had an opportunity to participate in the workshops, and the methodology for recruiting workshop participants was a consideration to both.

The following objectives were identified in guiding the engagement process:

- Identify and secure participation from a diversity of stakeholders and interests
- Establish an open and transparent workshop process where **stakeholders feel comfortable** to constructively share a range of views and ideas, and respect the views of others
- Encourage and support stakeholders to be **well informed about the Policy** and its implications and opportunities, including opportunities to clarify and explain detailed elements
- Contribute to stakeholder **confidence and understanding of long-term outcomes and benefits** of the Policy
- Listen to and capture stakeholder **ideas, perspectives and opportunities for improvements**
- Build on existing relationships, and **foster Design WA champions** with community, state and local Government agencies, businesses, and industry.
- **Manage potential or perceived issues and risks** that may negatively impact on the engagement process for the draft policy, and the reputation of the Department and State government





2.2 Workshop Design

Workshops were planned and facilitated to seek constructive feedback whilst also managing stakeholder expectations about their role and level of influence at this stage of the policy development process. In designing the workshop structure and format, important considerations included:

- recognising that not all stakeholders had participated in previous and early draft policy engagement.
- delivering interactive and highly visual sessions, to keep participants engaged, as well as recognising and catering to different needs and preferences for giving feedback.
- ensuring resource materials supported focussed and clear discussion, as well as managed expectations about the purpose of the discussions.
- catering to a wide range and diversity of planning and technical knowledge across stakeholders, and creating an environment that enabled a voice to those for whom detail was important, and for those who were more comfortable with less detail, and
- breaking technical information into concise, jargon free, outcomes focused information to help some participants understand aspects of the Policy.

It was determined that workshops would be designed for specific stakeholder groups, in order to tailor presentations and engagement methods to proactively meet stakeholder needs and proactively mitigate and manage specific issues related to each stakeholder cohort.

To enable stakeholders to better understand the Policy and then share and explore ideas in an open and relaxed way, workshops were structured to provide a mix of presentations and opportunities to provide feedback.

A range of speakers including representatives from the Office of the Government Architect, the Design WA team and members of the MDAG, delivered a number of presentations, providing an overview of the Policy and setting the context for workshop discussions. This included:

- The importance of design and diversity of built form
- The policy development process
- Policy scope, vision and intent
- Policy testing, demonstrating an evidence-based approach
- Overview of the policy elements – Land, Garden, Building and Neighbourliness
- Key changes to the current policy environment
- Other aspects of the policy, including Local Government variations
- Additional guides and tools available.

To engender an inclusive participatory approach that allowed a wide range of perspectives to be shared and understood, a range of methods were used to elicit constructive stakeholder feedback. This included:

Plenary discussions enabling group dialogue - this was particularly useful in managing question and answer sessions and provided an open forum for participants to listen to different perspectives and concerns.

World Café for small group discussions – designed to take a strength-based approach to testing and validating each of the four Policy elements, and

Mentimeter – enabling individual feedback through the use of this interactive online tool. Enabling all participants to interact and vote with smartphones during sessions and facilitate discussions as well as identify the immediate sentiment in the workshop.

Importantly all the above tools could be adapted to facilitate an online workshop too.





Workshop objectives included:

- Build a collective understanding of why we need policy change
- Understand different stakeholder values/views on medium density and what matters most to stakeholders.
- Provide information about the policy, including the non-negotiables and negotiables / key changes from existing policies.
- Test and validate with stakeholders - policy challenges, issues, and opportunities for improvement.
- Provide opportunity for all participants to have input and provide feedback.

2.3 Workshop Recruitment

A number of options for recruiting workshop participants were employed, providing an opportunity for all stakeholders with a high level of interest in the Medium Density Housing Policy to participate in the workshop series. This included:

- Through the advertising of the public consultation period, promoting an EOI for all stakeholders interested in attending a workshop

Using DPLH’s online engagement portal and other social media networks

- Direct invitations to:
 - stakeholders engaged during the draft policy preparation - including webinars (via DPLH database), and
 - stakeholders involved in other aspects of Design WA (via DPLH database)
- Reaching out through stakeholder networks, including the Medium Density Advisory Group.

2.4 Workshop delivery

The workshops were delivered during the public consultation period for the draft Medium Density Housing Policy, which ran from 27th November 2020 to 16th April 2021.

Initially six, three-hour workshops were designed and delivered focusing on a different stakeholder group. Following the first round of workshops and a high level of interest from stakeholders, a further two workshops were delivered – one for Developers/Builders and another for Planners from the South West region.

Stakeholder Group	Date	Registered	Participated
Planners	16 th Feb 2021	33	25
Developers/Builders	18 th Feb 2021	52	40
Architects / Designers	18 th Feb 2021	52	35
Regional LGAs*	23 rd Feb 2021	9	5
Community	23 rd Feb 2021	40	15
Metro LGAs	2 nd Mar 2021	50	32
Developers/Builders (2)	23 rd Mar 2021	61	30
South West Planners	26 th Mar 2021	25	20
TOTAL		236	152

* Regional LGA workshop was held online and participants did not provide feedback via mentimeter





3. ENGAGEMENT OUTCOMES

3.1 Mentimeter – Individual Feedback

The information detailed below outlines the feedback captured from participants using mentimeter at different points throughout each workshop. Participation was not obligatory and therefore the number of participants answering each question fluctuated throughout each session. Two workshops were held for Developers/ Builders and their responses have been combined in the results below.

3.1.1 Initial stakeholder sentiments about the Policy

To begin each workshop, stakeholders were asked a series of questions to better understand their motivation and purpose in attending the workshop and manage both the Design WA team’s and other participants’ expectations. The graphs allow a degree of comparison across stakeholder groups about the responses to each question.

Other Feedback

Developers / Builders

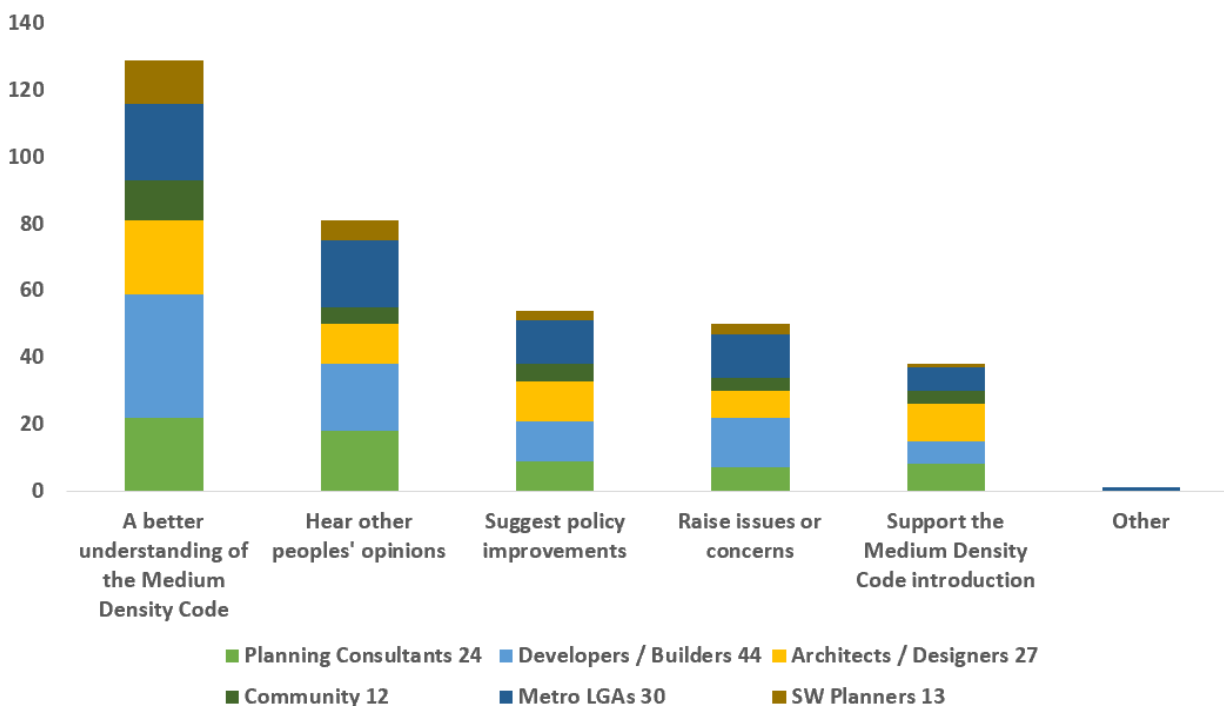
Raised concerns about:

- Increase in build costs
- Whether the new Code would improve quality of life and development yield

Planners

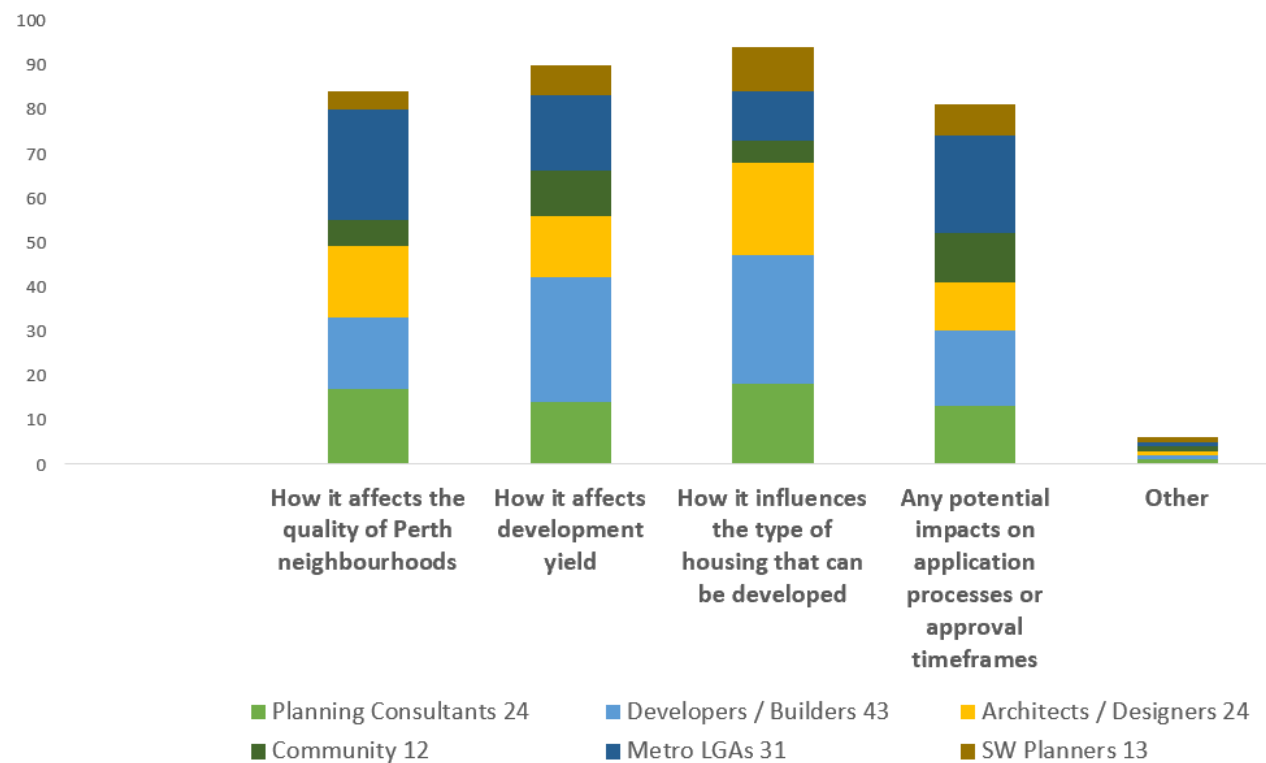
- How it improves the built environment
- How it supports a better review process rather than tick boxes
- What development yields can be achieved
- How housing typologies will be influenced
- What costs will be associated with new housing?

WHAT ARE YOU HOPING TO CONTRIBUTE OR GAIN FROM TODAY’S SESSION?





PLEASE INDICATE YOUR INTEREST IN THE NEW MEDIUM CODE?



Other Feedback

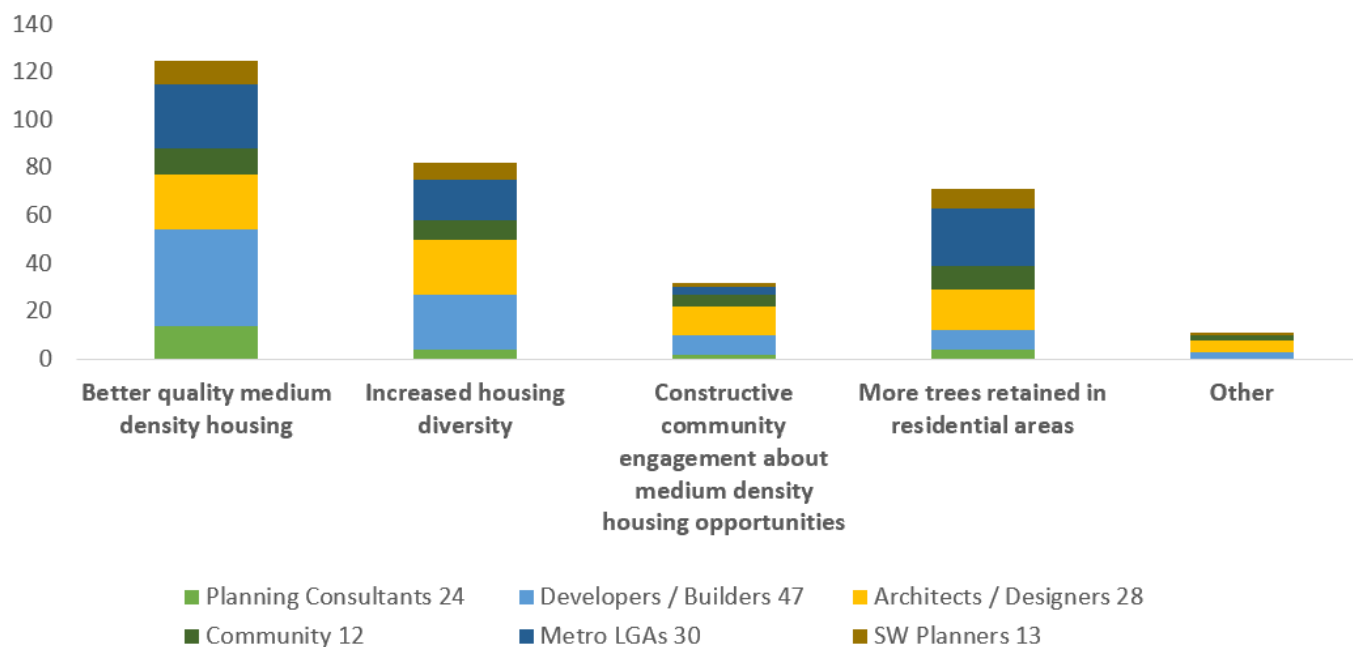
General

- Affordability
- Workability in my local government
- Heritage and tree preservation





WHAT CHANGES DO YOU HOPE WILL BE ACHIEVED BY THE NEW MEDIUM DENSITY CODE?



Other Feedback

Developers / Builders

- Easier to meet design criteria

Architects

Sustainable outcomes:

- landscaping
- higher energy efficiency
- minimising materials used

SW Planners

- Assist with aging in place and retaining older people in the community





3.1.2 Stakeholder sentiment about medium density

Following the conclusion of the policy presentation, stakeholders were asked a number of questions to better understand their sentiment towards the rationale for creating greater housing diversity and what they believed were some of the challenges that faced developing better quality medium density outcomes.

What do you think is the number one barrier to developing quality medium density housing in Perth?

Overwhelmingly across all workshops, **stakeholders highlighted the financial barriers**, the difficulty of getting feasibilities to stack up, construction costs, the difference in expectations between developer and future buyer and as a result the impact on housing affordability. This feedback was dominant across Developers/Builders as well as Planning Consultants and SW Planners.

‘Public / client’s expectations. Most people are looking for resale value. It may take time for people to realise the value of good design over square metres.’

Another strong theme that ran across both barriers to medium density development and as well as finding a place in the recommendations for rolling out the policy included a **‘perceived’ skills and resources gap across a range of industry professionals**. With a lack of competency impacting how flexible designers and assessors could be in using the Codes, to achieve pragmatic outcomes and recognising quality design.

Community resistance and understanding of medium density was also cited as an impediment, particularly by Local Government, who see themselves as responsible for handling state wide policies at the local community level.

‘The not in my backyard mentality, need real examples to change this mind set.’

A significant number of community comments focused on *‘houses being developed for money rather than people’*, with a number of stakeholder groups concerned that **Developers / Builders having little concern for quality design**. Others highlighted the ‘cookie cutter’ approach to development with a focus on pushing out poor quality homes and developing land rather than focusing on built form.

‘Developers seek maximum profit over neighbourhood amenity’,

Finally across all workshops stakeholders raised the need for an overall **shift in mind set across the property market to support consumer sentiment and behaviour change**.

‘Change is hard, people are used to developing single storey grouped dwellings, afraid something different won’t sell,’

Do you think there is a need for a greater choice in medium housing? (community only)

Overwhelming all 12 stakeholders who answered, agreed YES. A summary of feedback included:

- One size doesn’t fit all, provide choice
- Include smaller residences
- Current rules result in similar and bland suburbs – stop the cookie cutter approach
- We all have different needs not just physically but culturally too
- Greater choice to meet population increases, changing family dynamics and lifestyles





3.1.3 Defining the scope of medium density

Stakeholders were asked to reflect and provide their feedback on what they believed were the challenges facing the development of medium density housing; whether there was a need for greater choice and what diversity might look like and whether the Policy provisions enabled this.

Do you think these housing types look like medium density?



Overwhelming across all stakeholder groups, most participants agreed the housing did look like medium density, with a few saying there was a clear differentiator to higher density living.

'.....appearing to be low rise", "they are a group but look like individual areas.'

'Yes... movement away from single storey typical homes with back yards.'

'Yes, particularly terraces - low rise apartments.'

'They have variety in form and street presence.'

'Yes, because they sit somewhere between single houses and high rise apartments.'

'Yes, narrow lots, in particular, have needed change for a long time and often restricted by current codes.'

Some participants, however believed the examples didn't represent the type and range of medium density that was currently seen or was generally being built around Perth or regional areas. A few people also questioned whether single storey detached house and semi-detached was a fair representation of medium density.

'Semi-detached and below isn't...' 'everything except single detached.'

'Not the current medium density in Perth, but what you would expect in medium density areas in Melbourne/Europe etc.'





A number of participants suggested the community wouldn't see three storeys as medium density. With site and neighbourhood context playing an important role in determining whether certain type of housing was perceived as medium density.

'Yes, the perception from community depends on context though.'

'Suspect the apartments would be considered high density by the general public.'

The code encourages terrace house development. Do you support this?

(Community / Metro LGAs and SW Planners only)

From 47 responses, only 2 participants did not support terrace housing out right – with it being suggested that terrace housing should be developed in a co-ordinated manner through precinct planning and impacts on airflow, parking and verge trees were an issue. Others in support did however on a number of provisions, with Metro LGAs providing significant commentary. Common themes included:

'Would development be controlled when an LDP is due regard?'

'...with incremental development, and targeted precinct design.'

'Only if parking and neighbourhood spaces are mandated too'

'Yes in appropriate locations' " ...does it suit all suburbs?" "If well designed with POS.'

'Interface between 2 storey boundary walls and external boundaries with neighbours.'

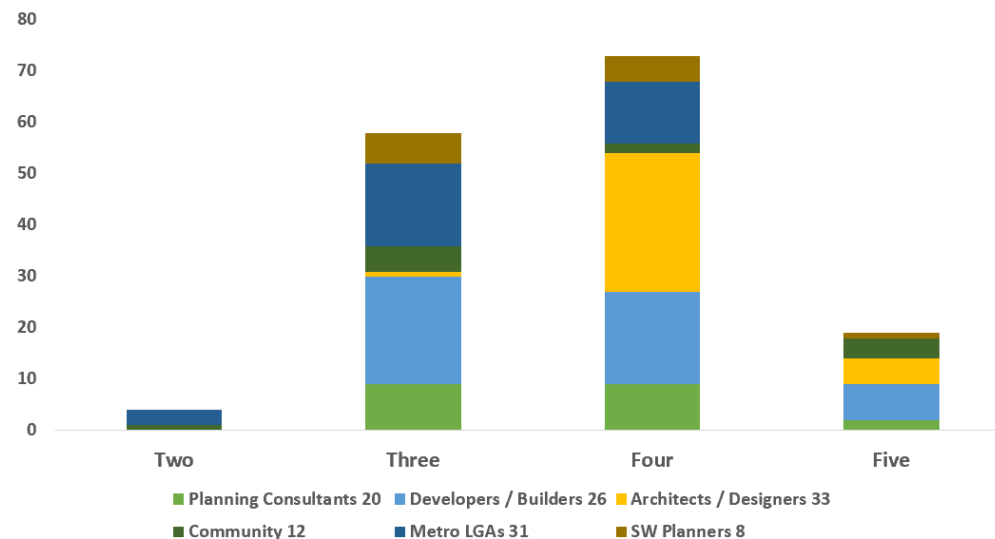
'.....need to resolve laneways' "...only if dominance of garages is minimise.'

Are there other housing types that should be considered under the new code?

In general, stakeholders anecdotally agreed that the policy allowed for a wide range of typologies. Only a few additional suggestions were made:

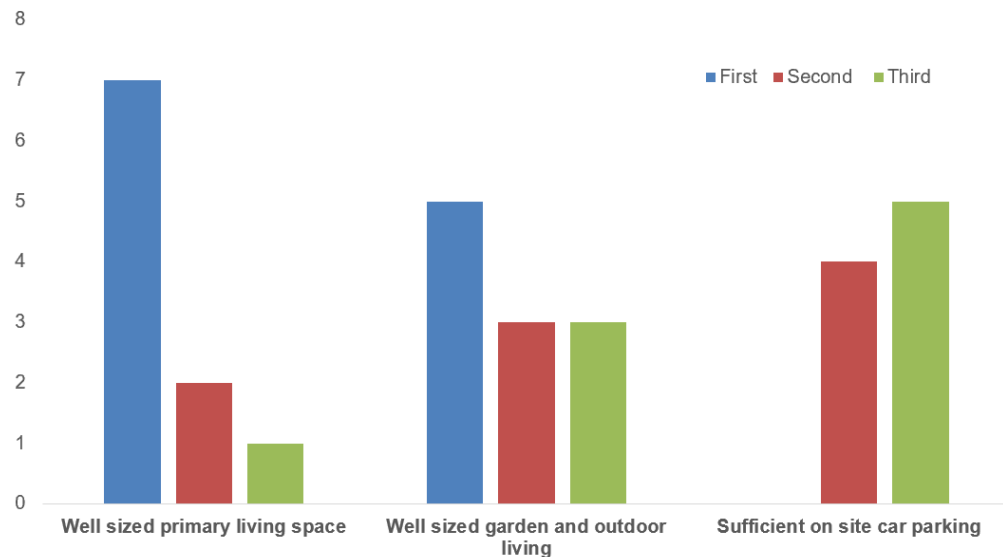
- Shop top housing
- Mixed use ground level, up to three storey apartments
- Mews, loft and mansard typologies
- Tiny houses.

WHAT DO YOU THINK THE BUILDING HEIGHT LIMIT FOR THE MEDIUM DENSITY CODE SHOULD BE?





WHEN SPACE IS AT A PREMIUM, WHICH SPACE IS MORE IMPORTANT TO YOU? PLEASE RANK. (COMMUNITY ONLY)



Do you support the use of site area categories and yield incentives to support diverse housing? *(Community not asked this question)*

Developers / Builders – generally were overwhelmingly supportive:

- Reward good design and outcomes
- Ensure consistency among local councils
- More support needed to enable 1-2 beds and different typologies
- Additional yield will allow profitable development to occur and support diverse housing
- Support different typologies within same project
- Provide more options in site selection

- Allows variations from standard 3 X 2
- Only one no – demand should be the driver

SW Planners – all eight respondents were positive:

- Benefits for liveability, health and well being
- Should also include heritage bonus / flexibility and small lots below the minimum
- Needs to be a shift in the market to encourage change
- Customers pushed out of areas when housing choice isn't available.
- Yes but don't pay POS or DCP costs

Metro LGAs – the majority were supportive:

- Ensure diverse housing not just diverse lot sizes
- Don't exploit incentives and ensure benefits are realised
- Developers need to move beyond BAU
- More community consultation required to avoid perception of density by stealth
- Favours NDIS housing and precinct planning

Architects / Designers – generally were overwhelmingly supportive:

- Quality management is key
- Include for keeping trees and character homes and long term maintenance of amenities
- It will incentivise developers and builders to enhance design quality, diversity of housing typology and affordability – seek greater innovation
- Demonstrate community benefits

Planning Consultants – all eight respondents were supportive, with one comment questioning how difficult this would be to regulate.





3.1.4 Closing stakeholder sentiments about the Policy

At the end of each workshop, from 152 participants, only 3 stakeholders suggested they were not supportive of the draft Policy. Stakeholders were also asked whether they had any recommendations for how the Department could connect with stakeholders or provide additional support in regards to the new code. Common themes included:

Requests for more specific examples of test cases including:

- application of the code’s requirements against good medium density examples
- running feasibilities against a number of real sites

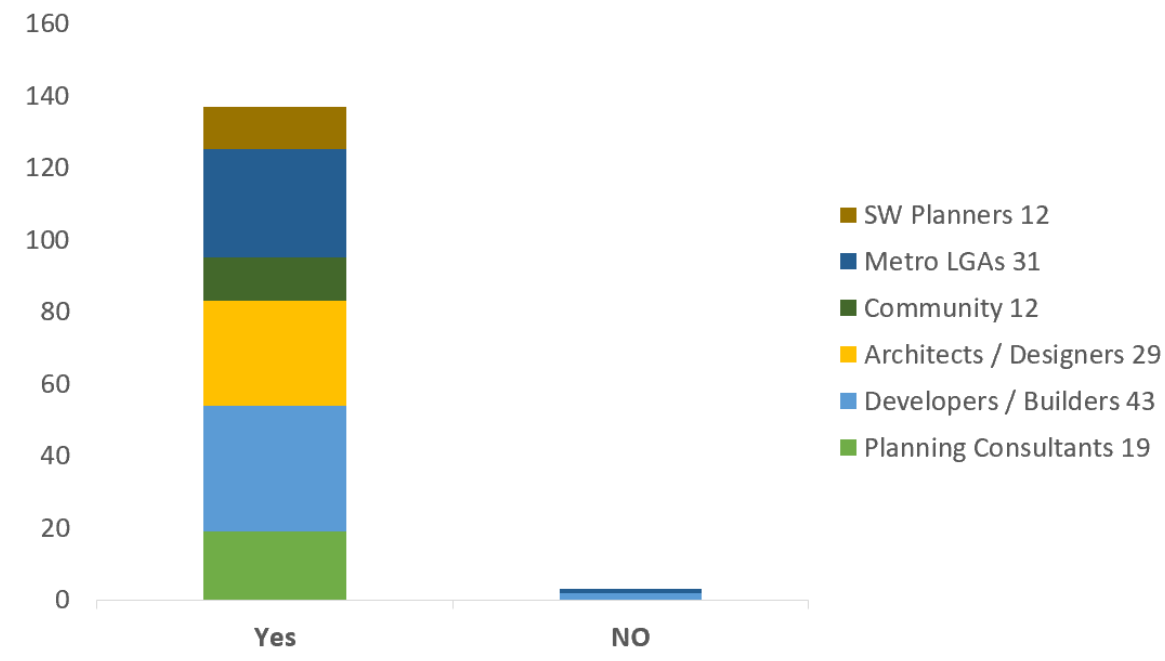
Further engagement:

- across industry including smaller developers and builders, to ensure they understand the Policy requirements.
- with approval authorities to support consistency of decision making.

Education campaign for:

- the community so they improve their understanding of the need and improved outcomes of the Policy and can distinguish medium density from higher density development.
- smaller developers and builders so they understand the need for greater diversity and explore more innovative approaches and deliver higher quality outcomes
- real estate agents, valuers and bankers to support a change management program for funding options and drive a change in the market of both developers and purchasers

DO YOU SUPPORT THE INTENT OF THE DRAFT MEDIUM DENSITY CODE?





Transitional arrangements, and then support and guidance as the final Policy is rolled out:

- Dedicated building prototype project examples and implementation exercises, to support the sector in effectively learning and adapting to the new Code.
- Identifying advocates that work with Local Government and community to educate.
- Long term education and communication commitment including a broad reaching promotional campaign targeted at the community on explaining the outcomes and benefits the Policy is aiming to achieve – using illustrative means.
- Work exclusively with Developers/Builders inc. smaller companies to help them understand the Policy benefits and opportunities for them.
- Take the Policy on a road show across WA to inform and educate all stakeholders on the new Code as well as the principles and context for it. Using more presentations and webinars to engage.
- Bring back the R Codes Forum!
- Design a digital tool to test designs and concepts against the Code.
- Head out to Local Governments and meet with the Planners – support them through the transition period.



Clearer and simpler explanatory guidelines

- Provide a greater number of visuals and less technical 'jargon' to support practitioners and the community in understanding the change.





3.2 World Café, small group discussions

A considerable portion of each workshop was dedicated to small group discussions using a World Café style of facilitation. Each participant was given an opportunity to work in detail on two of the four policy elements - Land, Garden, Building and Neighbourliness – during the workshop with an opportunity to summarise discussions to the larger group at the end. The Regional Online Workshop was an exception due to attendance numbers and session format.

The detailed comments captured from small group discussions have been brought together as a series of tables and represent a summary of the notes made on working paper during the sessions. These are contained in **Appendix A** and capture this information by policy element and by stakeholder group, allowing a reflection on the similarities and differences in sentiment across the stakeholder groups to various policy details. Comments vary from broad support through to detailed suggestions for areas of amendment or improvement.

A snapshot of the comments and sentiment from small group discussions is also provided in this section.





3.2.1 Land

Provisions and aspects of the Policy

- There was overall support for site area categories across all stakeholder groups.
- Detailed suggestions about the requirements for, and application of Categories 2 and 3 have been provided in **Appendix A, table 1**. In particular the suitability of proposed site area minimums for Category 3; the onerous nature of other Category 3 criteria; and the role and importance of context analysis and streetscapes in determining the application of Categories 2 and 3.
- Local government stakeholders suggested that precinct plans or structure plans should be used to identify where Category 3 can be applied rather than location criteria. Developers and builders also suggested that, while site areas categories should not be varied by local planning instruments, they could be used to augment criteria for the application of site area categories.
- The definition of Location A was raised by almost all groups. Suggestions included varying Location A criteria to reflect a broader range of conditions and amenities in both metropolitan and regional locations, beyond transport considerations.
- The requirements for Local Development Plans raised a number of comments, particularly around procedural clarity and implications on processing and decision timeframes.
- The application of site categories to split-coded sites was raised by both metropolitan and regional local government stakeholders, and noted to require clarification, and alignment with the strategic purpose of spit-coded sites.
- With respect to multiple dwellings, the use of average site area over plot ratio was discussed by all stakeholders. Generally, there was



acknowledgement this could result in larger dwellings, which can both contribute to, and negatively affect, housing diversity depending upon local market conditions and site values.

- Provisions associated with ancillary and small dwellings were broadly supported across the workshops. Although, a number of suggestions were made to increase the size of small dwellings. Also the potential to cap the number of small dwellings in a scheme or street block to avoid proliferation.
- With respect to lots under 100sqm, while generally supported, views were mixed about the level of regulation required for this product type. While comments from most stakeholder groups including planning consultants; architects and designers; and local government, reflected the importance of careful controls – developers and builders felt there was a value in relaxing restrictions in high amenity locations.

Market and dwelling diversity

- Developers and builders in particular, felt that the market continues to seek larger homes and smaller gardens. Further, that retirees seek single level homes and double garages, and this may not be catered for under the Policy.
- The value of setting diversity requirements to remove likelihood of homogenous outcomes was also raised in a number of workshops.

Transitional arrangements, support and guidance

- A number of sentiments were captured around the importance of clear transitional arrangements, and providing adequate support for Policy introduction.
- This included supporting local government, both with communicating policy changes and in managing the interface with existing policies and planning instruments.
- There were comments about the importance of procedural clarity for the review and update of intersecting State policies, particularly DC2.2 and R-Codes Vol 1 Part C (low density).





- The importance of resourcing arrangements for monitoring and review processes to assess if the Policy is performing as intended was also raised.

Impacts and unintended consequences

- Comments regarding the impacts of the policy provisions included the impacts of yield increases arising from incentives on existing residents, as well as the potential to compromise other standards and policy objectives.
- Comments were also raised regarding the challenges of achieving amalgamation, as well as bank finance on larger lots.
- Also, the potential for the Policy provisions to disincentivise infill and result in more urban sprawl.

Matters beyond the policy

- A number of matters were raised which are considered beyond the scope of the Medium Density Policy, including:
 - The importance of clearly targeting locations for density
 - The need for strategies to open up laneways, including widening and upgrades, and
 - Consideration of larger scale aged persons accommodation, and clarity about their role and position in planning instruments to make these developments better and less socially isolating.





3.2.2 The Garden

Provisions and aspects of the policy

- There was overall support and positive sentiments across stakeholder groups about standardising the requirements for quality outdoor living spaces. This includes establishing a relationship between indoor and outdoor living spaces, and consolidation of outdoor space as a primary garden area.
- Nuances such as upside down living, and irregular shaped lots may, however required further consideration.
- There were comments across most stakeholder groups regarding garden area requirements and dimensions, and several queries about the value of more scalable dimensions relative to lot and building size. Detailed comments are in **Appendix A, table 2**.
- The requirement for a northern orientation to the primary garden area was also discussed across stakeholders. While supported in principle, there would be circumstances where lot orientation and site conditions would likely to result in less than desirable outcomes. This includes overshadowing from adjoining properties. Additional flexibility for garden orientation via deemed to comply pathways was sought by stakeholders.
- With respect to private open space in multiple dwellings, discussion and comments focused on screening requirements. Again, while generally supported, it was felt that there was a need in the deemed to comply provisions for greater account for local context, such as coastal and windy locations.
- The specification of a deep soil area, and associated provisions regarding impervious surface encroachment were largely supported, with some differing opinion regarding the suitability of a 20% minimum.



- The objectives of the Policy to improve outcomes around trees was universally supported. It did however, generate considerable comment. This included inconsistencies with local government requirements in some instances; the need to simplify tree requirements; and the overwhelming benefits of a retained or larger tree over several smaller trees.
- It was felt that more incentives for tree retention were required. Suggestions in this regard, are as per **Appendix A, table 2**.
- Considerable discussion also regarding tree species choice, and the importance of good decisions and local guidance to achieve desired outcomes.
- Post occupancy and compliance issues associated with paving, trees and landscaping in private spaces were a considerable area of discussion across most stakeholder groups. This included discussions about the role and extent of planning, and the role and relevance of compliance.

Transitional arrangements, support and guidance

- As per the discussion associated with the Land element, stakeholders recognised the importance of supporting the Policy's introduction.
- This included supporting local government, both with communicating policy requirements and in direct training opportunities.
- The importance of resourcing and development of good graphics, examples and design guidance, was also raised, noting the complexity of the policy and the ability to interpret the cumulative impact of the provisions.

Impacts and unintended consequences

- Comments about unintended consequences included the impacts of garden area requirements on dwelling size (number of bedrooms) which will challenge financing while not resulting in overall build cost savings.





3.2.3 The Building

Provisions and aspects of the Policy

- Stakeholders supported the requirements of a primary living space, including a connection to an outdoor space.
- There was however, mixed opinion about appropriate minimum room dimensions, and the ability to achieve these across a range of circumstances. Detailed comments are in **Appendix A table 3**.
- Provisions and requirements associated with solar access and natural ventilation were considered positive overall. Stakeholders across a number of groups, particularly Architects and Designers; Developers and Builders; and Local Government did offer a range of detailed commentary on the workability of the draft provisions related to solar access and natural ventilation. These may warrant closer consideration in finalising the Policy.
- With respect to dwelling size and layout provisions, stakeholders expressed mixed views on the provisions as proposed. While generally supported, views about the level and nature of prescription are mixed, both within and across, stakeholder groups.
- This includes the proposed use of a minimum dimension for the primary living space, and the potential need to factor in a minimum area also, to apply to a greater range of circumstances.
- The role of planning (as opposed to the Building Codes) in prescribing indoor areas, and in particular, for matters such as limiting circulation spaces was queried, as was the ability to effectively assess these provisions during the approval process.
- Parking provisions generated considerable commentary. A number of themes are summarised in the comments below, with further detail in **Appendix A table 3**.



- Generally, there was support for reduced minimum parking requirements. Planning Consultants queried why minimum parking was still required. Stakeholders in the SW Region considered street parking should be able to be credited. Other groups, including Architects and Designers; Developers and Builders; and metropolitan Local Governments, felt that a reliance on verge parking and street parking while garages were used for storage were problematic and to be avoided.
- Provisions providing flexibility for carports were generally supported, although security issues were raised.
- Both Planning Consultants and Local Government queried the need for a car bay for ancillary dwellings, and considered this could be problematic.
- Other comments with respect to parking were that the provisions did not account for a different future. This would likely include the uptake of EV's and requirements for charging stations. Also, the role of shared-vehicles in the community.
- Bicycle requirements were queried. Considered unnecessary by some, and difficult or unclear to assess by other groups.
- Architects and Designers sought greater flexibility with respect to storage. Developers and Builders felt storage requirements were excessive and may impact affordability.
- Provisions that support housing diversity outcomes - represented in the Policy via universal design requirements; ancillary dwellings; small dwellings; aged and dependant persons dwellings, and lots under 100sqm – were broadly supported and considered to make a contribution to changing community needs.
- With respect to universal design, comments included: suggestions about incentivises and exclusions (for example from open space and circulation requirements); the impacts on dwelling affordability; and the ability to achieve consistent assessment.
- Ancillary dwellings were supported, although it was felt that ancillary dwellings should be larger. As long as they remain ancillary to the primary dwelling and on the same title.





- Equally, there was support for small dwelling provisions to replace single bedroom dwellings. As with ancillary dwellings, it was suggested that these were too small to meet community need, with 80sqm – 90sqm proposed across stakeholder groups.
- Aged persons dwellings were supported by Developers and Builders; and Community stakeholders. Stakeholders from the SW Region however, felt these were no longer required, and subject to abuse.

Market and dwelling diversity

- Discussion about market preference with respect to housing diversity and parking came across in a number of stakeholder workshops. Planning Consultants, Developers and Builders and the Community expressed views that the market should be able to decide without over prescription.

Transitional arrangements, support and guidance

- The complexity of the Policy was raised by stakeholders.
- It would be important that implementation was supported – both to support local government, and to communicate directly with the community about the changes and their value and implications.
- There was also interest in additional guidance on typologies and design options, without pigeonholing types.

Impacts and unintended consequences

- Financing of developments was again raised in the discussions regarding the building element, particularly with respect to the impact of dwelling size and parking on achieving bank finance.





3.2.4 Neighbourliness

Provisions and aspects of the policy

- The intent and objectives of the neighbourliness provisions were supported by stakeholders.
- Architects and Designers suggested more information and guidance on the application of typologies together in one area would be useful to avoid things getting 'messy'.
- Perspectives on site cover requirements were mixed. Architects and Designers; Developers and Builders; and metropolitan Local Government stakeholders suggested site cover may be unnecessary, given deep soil area and primary garden area requirements under the Garden element of the Policy.
- The use of storeys for measurement of building height was generally supported. However, Planning Consultants and metropolitan Local Government stakeholders felt the community generally prefer metres. It was suggested that storeys may be 'fudged' and that unintended height consequences could result.
- While Architects and Designers supported 3 storeys for R40 sites, both Planning Consultants and metropolitan Local Government stakeholders noted the likely opposition to 3 storeys (and above) amongst the community, and therefore issues with the passage of approvals.
- Provisions regarding lot boundary setbacks generated a number of detailed comments. Local Government stakeholders suggested alternatives and/or circumstances where the provisions in their current form may be difficult to implement, as per **Appendix A table 4**. Other stakeholders including Planning Consultants, Architect and Designers, and Developers and Builders recognised the lot boundary



- setback provisions as simpler, and easier to interpret, and will enable terraces and two storey products on the boundary. The Community felt stepping the setbacks were a positive, to reduce bulk and scale.
- The majority of comments pertaining to the character sub-element were related to streetscape, street setbacks, and vehicle and pedestrian access provisions.
- The tension between current market demand and vehicle ownership patterns, with considering and providing for a different vehicle ownership future came through across the workshops. The ability to achieve good outcomes on narrow lots was also reflected in workshop comments.
- Flexible use car spaces were broadly supported, and Developers and Builders felt there was an opportunity to 'go hard on promoting carports over garages.'
- The importance of avoiding cars parking on streets and driveways was broadly agreed by most stakeholder groups.
- Reduced setback provisions, and the degree of flexibility to enable carports, balconies, porches and patios forward of the setback line were supported. The Community were particularly supportive of active street frontages.
- There was support from Planning Consultants and Architects and Designers for communal street provisions, with suggestions that this should be an area of incentive, and include tree requirements. Architects and Designers and Developers and Builders supported permeable fencing provisions.
- Developers and Builders felt the provisions were insufficient to encourage dwelling retention.
- There was general support for solar access provisions for adjoining sites, although felt that further tools and support would be required. Identified issues included delivering terrace typologies in infill sites with good solar access, and managing overshadowing for single storey neighbouring properties with solar PV.
- The approach for visual privacy assessments were broadly supported, with agreement that overuse of highlight windows was a poor





outcome, and that while provisions did need to respect the privacy of existing lots, some flexibility was good.

- Community stakeholders made a number of comments about the importance of neighbourhood security and community isolation as a consequence of overregulation.
- The assessment of visual privacy provisions was raised by a number of stakeholder groups. Planning Consultants felt it would be easier to explain to neighbours, and with #D drawings, assessment would be easier. Conversely, Developers and Builders and metropolitan Local Governments felt that assessment, certainty and community discussions may be more challenging.

Transitional arrangements, support and guidance

- Architects and Designers, Developers and Builders, and the Community, commented in context of the Neighbourliness provisions that the Policy was complicated / technical and hard to understand.
- The importance of supporting local government with training, and providing overall support for the community to understand and accept changes was referred to by both Developers and Builders and the Community stakeholders.
- Local Government stakeholders recognised the challenge of readjusting local planning policies, and addressing elements that may have previously been able to be varied.

Local government variations

- Planning Consultants supported the tighter controls around local government variations, however Local Government and SW region stakeholders felt location specific considerations warrant options to vary, particularly with respect to the Character sub-element as well as regional demand for vehicle and recreational equipment resulting in higher demand for storage and sheds.

Impacts and unintended consequences

- Affordability and costs were again raised. Planning Consultants felt the Policy would drive two storey construction which could create feasibility issues, unless alternative building materials and methods were adopted. The SW Region stakeholders suggested additional costings to be done.
- Planning Consultants, Architects and Designers, Developers and Builders, and metropolitan Local Government referred to the timing of infill activity in a location, however drew different conclusions. Most felt the first development would be disadvantaged by aspects of the Policy, particularly screening and setback requirements, while Developers and Builders felt it would be a 'first in' advantage.





4. CONCLUSION

4.1 Observations

The intensive workshop series has successfully enabled stakeholders to be both informed and engaged, with ample opportunity for detailed discussion.

The engagement approach has also provided valuable feedback for the Department, and the Design WA team in identifying areas of the Policy, which may warrant further refinement prior to adoption, as well as areas where additional guidance, support or communication may deliver benefits and outcomes.

Our observations were, that stakeholders on the whole were highly engaged, and expressed considerable interest in the medium density housing policy. This was backed up by participant feedback received both verbally to team members and through emails after the workshops, which indicate that the sessions were informative and well received.

'I wanted to thank you again for organising the event on Tuesday. I've had a number of participants mention that they were very impressed with how you presented the information and the genuine efforts you are making to seek feedback.' Developer / Builder participant.

'Terrific workshop yesterday and probably the best I've ever been to. Good information, excellent handling of audience going off track and for once I really enjoyed the poster work! Congratulations.' Community participant

'Just wanted to thank you for inviting me along this evening. I was so pleased to be listening into the conversations. You've all been doing a great job on this engagement - I've heard that from a few architects and developers too.' Architect / Designer participant

'I found the session very informative,' Developer/Builder participant

4.2 Next Steps

4.2.1 Phase 2 workshops – closing the loop

A second phase of workshops will be delivered in June 2021, once the Design WA team has assessed public submissions and presented policy amendments to the WAPC prior to endorsement.

The composition of each of these workshops will be informed by the issues, comments and sentiment received during the public consultation period with the following purpose:

- Report on feedback received during stakeholder engagement process.
- Inform how this feedback is proposed to be addressed in the final policy, and
- Identify any potential 'red flags' resulting from proposed changes to the policy.

Importantly and as discussed at the beginning of the phase one workshop series, phase two will provide a good opportunity for stakeholders to listen and better understand perspectives and considerations, from outside of their co-hort. Therefore, workshops will be open for stakeholders to attend from any group. Only consideration to maximum numbers and ongoing COVID-19 restrictions will need to be accommodated for.

Recognising and building upon these existing engagement processes, including attracting continued participation by some of the same individuals, will be relevant in Phase Two. This will help maintain interest and a sense of being heard by those involved.

It will however also be important that other individuals with a high level of interest, but yet to participate in any face-to-face engagement, also have an opportunity to participate in the workshop series, and the methodology for recruiting workshop participants should give consideration to both.





APPENDIX A: World Café discussions

Table 1: Land

Table 2: The Garden

Table 3: The Building

Table 4: Neighbourliness



Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
SITE AREA CATEGORIES	site area categories	Support site area categories and yield incentives. Incentivises sites more suited to development.	Support site area categories and yield incentives. Will encourage flexibility, diversity, site responsive design.	Support site area categories and yield incentives. Encourages greater diversity, promotes larger development sites, better streetscapes.	Support site area categories and yield incentives. More street frontage development, dwelling diversity. However, incentives for density will negatively impact residents.	Support site area categories. Will support better land assembly and improved dwelling diversity.	Support for site area categories.
			Suggestion for mandated context analysis to unlock Site Categories 2 and 3. Further consideration warranted of how to deliver consistent streetscape character with appropriate built form typology – ongoing monitoring required of impact of new Code on streetscapes/ neighbourhood character and quality.	Consider impact on narrow frontage lots, where orientation not ideal (NCC/Bush fire risk)	More focus needed on importance of place character and reference to community in policy and explanatory guidelines. Cat. 2 and 3 must be responsive to streetscape considerations.		
			Support street frontage criteria for Cat B and C (2 and 3)	Consider linking Cat 1 & 2 to frontage instead of lot size. Consider if corner bonus will create crossover/access issues.	Support requirement for Cat 2 and 3 dwellings to front primary street – better streetscapes. Site Cats. 2 and 3 good for corner lots – will achieve better street frontage development (reduce fencing and potential for antisocial behaviour)		
		Category 3 criteria should apply to larger min. sites than 1500m ² .		Consider restricting Category 2 to R30-R40 Category 3 for R50+ Query if 1500sqm site area is enough for Category 3.		Consider reducing to two site categories where Category 3 equivalent can only be introduced through structure or precinct planning.	
				Site area categories and associated area requirements should not be varied through local planning instruments; however, ability should exist for local planning instruments to augment criteria attached to these categories. Current issues with LG not allowing multiple dwellings in R40 coded areas.			

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
				Consider reducing max. site requirements for Cats 2 and 3 (retain other criteria) or reduce Cat 3 min. lot size from 1,500m ² to 1200m ² . This would extend yield flexibility to more lots.			Consider incentives being linked to dwelling retention, increase floor to ceiling heights and universal access.
			Cat 3 criteria may be too much - too many matters to meet to achieve outcomes (e.g., min. floor to ceiling heights, universal access requirements)	For cat. 3, consider a plate height condition in lieu of LDP. This requirement is used for greenfield development.		Consider requiring Category 3 referral to design review panel where panel exists.	Consider provisions regarding minimum floor to ceiling heights.
				5% site area variation should remain.		Need to consider if there's greater capacity to require development approval prior to subdivision (a subdivision condition has been agreed to for some projects within Armadale)	
	Location A criteria	Consider varying Loc. A criteria – factor in high amenity locations near POS, schools, activity centres etc. Location criteria shouldn't just be about transport. Consider connecting yield bonus to community benefit as well as amenity within site and its context. Clearer definition needed for Loc. A	Support categories for well-located sites. Expand location criteria, e.g. include proximity to activity centres.	Reconsider Loc. A criterion- must related to good cycling and walkability, footpaths etc. Location A and B too blunt to be used for parking standards and category 1-3 system (Joondalup Loc. A very different to Highgate)	Location A should not just be about transport – district centres and higher. Review Loc. A criteria – does not apply to many LG areas (e.g., Kalamunda). Consider using Precinct or Standard structure plans or other criteria (infrastructure, amenity) to identify Category 2 and 3 areas instead of Loc A criteria. Potential Loc A will lead to arguments / create confusion about what land does/does not qualify.	Location criteria not regional appropriate.	

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
	LDPs	LDPs will support better design outcomes, however need more clarity on whether they will require advertising and whether they can be used to vary other provisions of the code.		LDP requirement for a 2-3 lot development could be excessive.		Support use of LDPs to coordinate development, as this allows LGs to work with developers to achieve desired outcomes.	
		Include manner and form template for LDPs as appendices.		Guidance needed for form/content of LDP, which should not be unnecessarily onerous.		LDP will not coordinate all design considerations including primary garden areas – examples needed.	
				Can LDPs allow more R-Code variations and be used to achieve vision in greenfield given developers have greater control over outcome (e.g Stockland Canopy project, Glendalough)		Site categories might be difficult to determine in the absence of a DA. LDP may not be sufficient (perhaps require either a DA or LDP for site categories 2 and 3.	
				LG determination timeframes can be >12 months.		Need assurance that no WAPC approval for LDPs	
				Consider making performance based LDP mandatory for larger development projects.			
	retained dwellings	Recommend additional provisions for retained dwellings.					
	parking, access and traffic			Clarify mixing of allocated and visitor parking in a townhouse/multiple dwelling arrangement.		Cat 2 and 3 warrants engagement with servicing agencies and consideration of traffic impact	Reduce onsite parking requirements and use the street.
	screening and overlooking				Overlooking provisions need to be tempered so that there is still opportunity for social interaction / neighbourly connection.		

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
	application to split coding					Greater clarity needed how Cat. 2 and 3 apply to split coded lots. Consider if Cat 2 and 3 will discourage councils using dual codes and higher codes.	
MULTIPLE DWELLINGS	multiple dwellings	Averaging of site areas could result in overdevelopment of the site and reduced diversity due to developers aiming for larger dwellings.	Support for average site area instead of plot ratio provided garden areas /tree planting not compromised – allows simplified calculations and greater mixes of apartment sizes.	Support for multitis (ave site area) – allows mixed schemes, and easier for feasibility and calculations.	Support for average site area – may encourage some larger, family apartments.	Support for ave. site area approach to multitis: simpler approach for community / LG understanding, will discourage large scale multitis cramming units for max. Yield; allows for mixed schemes; encourages greater apartment diversity.	Unsure about the benefit of average site area instead of plot ratio. Suggestion for different average dwelling site requirements relative to height to incentivise; or approach used for Montario Quarter Project, (Development WA) where plot ratio was linked to density bonus.
			Need to consider impact of average site area for different contexts – e.g., high income such as South Perth may see proliferation of large apartments.	Not convinced about site area req. for multitis – does plot ratio provide for more flexibility and diversity? May discourage smaller apartments.		Plot ratio offers degree of flexibility whereas average site area requirement is fixed – further explanation needed how average site area will support flexibility.	
			Can current limit preventing development of apartments on survey strata lots be addressed?	Consider yield bonus for smaller apartments.		Encourages greater apartment diversity.	

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
VARIATIONS	variations		<p>Strong support for small dwelling and ancillary dwelling provisions. Small dwellings may require larger areas (85m2 suggested by one group, 80m2 by another – measured internally?) for universal access. Small dwellings could become a cookie cutter (maybe offer 35% site concession for 2 bedroom and 50% for single bedroom).</p>	<p>Support small dwellings and ancillary dwellings. Small dwellings should not be restricted by number of rooms.</p> <p>Consider a cap on number of small dwellings in a scheme/street block – avoid a monoculture of small dwelling developments.</p> <p>Consider increasing size of small dwellings – needs to appeal to downsizers (80m2 suggested to allow 2brm and study, 75m2 also suggested).</p> <p>Also queried if a cap on dwelling size is needed.</p>	<p>Strong support for small dwelling – critical this shift underpins better affordability (good design should be affordable!). Hopefully state led policy will see shift in current lending practices.</p>	<p>Support for small dwelling incentives – still very limited number of small dwellings being provided. Should DA be required for small dwellings?</p>	<p>Support ancillary and small dwellings. Airbnb an issue.</p>
				<p>Support removal of minimum 450m2 for ancillary. Support for new ancillary dwelling provisions and removing minimum land area requirement.</p>	<p>Ancillary dwelling provisions supported (great international examples e.g., Netherlands) – important typology for fulfilling housing needs / addressing affordability crisis. Ensure effective design controls in place for both the ancillary and principal dwelling to achieve - garden areas, privacy, overshadowing etc. Consider introducing requirement for development approval for ancillary dwellings on lots less than 350m2 to ensure ancillary dwellings can be accommodated without compromising design.</p>	<p>Support removal of min. site area for ancillary accommodation – requires ongoing monitoring (not for Airbnb)</p>	<p>Expand guidelines to identify different occupants of ancillary e.g. Carer accommodation, Young people, aging parents.</p>
				<p>Suggest remove 5 dwelling min. for aged and dependent persons dwellings and allow for wider user group (people with disabilities – not just over 55s.</p> <p>Consider removing min dwelling size for aged person, or increase to 130sqm.</p>		<p>Supports housing typologies for ageing in place. Review aged and dependent persons dwelling is enough being done for ageing in place?</p>	

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
				Consider allowing dual key ancillary dwellings on a proportion of survey strata (grouped dwelling) lots – should not however be permissible as an addition to existing grouped dwelling developments. Suggest allowing this on street frontage grouped dwellings only.		Dual key limit of 1 per apartment development supported (Armadale in SAT hearing re: overdevelopment of site with dual keys)	
Lots less than 100sqm	lots <100sqm	Support inclusion of lots less than 100m2 in medium density code, however need to ensure good outcomes via effective checks and balances.	100m2 lots and less – good controls needed to avoid delivering a new monoculture (e.g., an estate of 100sqm lots)	Supported. Consider relaxing criteria for micro lots – high amenity locations.		Close monitoring over lots under 100m2 – could be used excessively and poorly – particularly in outer areas (Averley example)	
MARKET AND DWELLING	diversity of dwelling outcomes; market preferences		Suggest setting minimum requirement for diversity – similar to Vol 2 (20% single bedroom and 20% 2-bedroom) – resale monopolises typology outcomes.	Buyers still want a larger home with smaller gardens. Retirees want single level homes with double garages; and this is not catered for via smaller dwellings.	Consider if cap is needed to ensure diversity in a development scheme – do not want homogenised outcomes of all small dwellings or all 3x2s.		
LG VARIATIONS	LG variations						
TRANSITION, SUPPORT AND GUIDANCE	transitional arrangements and support for policy introduction		Suggest removal of DC 2.2	Consider transitional arrangements – particularly needed for apartment applications in the system. Transition is needed for ‘the herd’ to change direction – buyers, valuers, real estate.		What happens with DC 2.2? – ideally it should be consolidated into the R-Codes, but only following low density review? Clear transition arrangements needed for new policy.	

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
				LGs need lots of support to help them transition to new provisions – importance of this cannot be overstated. Local planning instruments reference earlier R-Code provisions.		LGs need advice on when R-Codes Vol 1 Part C (Low Density) will be reviewed – budget, team, and resource commitment (should be min review every five years)	
	communication and examples	Stronger communication of objectives of category approach.		Further testing needed of provision in greenfield contexts – Site categories don't really speak to greenfield medium density. Can current product mix be delivered under new Code?		Site area category approach may discourage triplex developments, and WAPC needs to be active in communicating this.	
	monitoring, review and alignment of the policy		Continue to monitor / review incentive uptakes to assess if approach is market responsive (e.g., five yearly) – policy should be evidence based and market responsive. Monitoring and review process of bonuses and incentives – 5 yearly?			WAPC needs to resource ongoing monitoring and review to establish if policy is performing as intended. .	
IMPACTS AND UNINTENDED CONSEQUENCES	impact on existing community	Consider how yield uplifts can affect POS contributions.			Density increases (incentives) might impact residents.		
	cumulative impact/ interrelationship of provisions		Requires appropriate checks to ensure other standards not compromised in push to maximise yield			Need to ensure Categories 2 and 3 will not compromise other design standards being achieve – garden areas, DSA etc.	
	affordability / Cost			Cat 2 & 3 will increase land values. Market expectations don't always meet developer costs. Concerns about affordably and ability to build single storey under the code.	Support changes as will improve housing affordability – diversity will provide affordable options.		

Table 1: LAND

		Planning Consultants	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
	infill			Amalgamations difficult to achieve, and incentives not big enough to. Challenges with achieving bank finance on larger lots > 4 dwellings needs commercial finance and that's difficult to get.			
				Could provisions inadvertently encourage more people to move to fringe locations (contrary to Perth & Peel). Consistency with Directions 2051 (?) – could cause more sprawl.			
BEYOND THE POLICY	establishing densities	Better coding of residential areas – State Government intervention to focus density in higher amenity areas – give an as of right density for ped-shed areas					
	staging of infill	More guidance needed regarding staging of infill so that future opportunities are not compromised.					
	laneways		Strategies needed for laneways – widening, upgrades.				
	developer contributions			More certainty is needed on developer contributions.			
	larger aged person developments				Provisions for aged persons housing requires review – consider also larger scale aged persons accommodation. developments – where do these fit in current planning system and how can we make these developments better / less socially isolating? Many developments are using loopholes to achieve greater density – amenities are for general public.		

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
GENERAL	overall	Support state policy that standardises requirements for outdoor spaces.	Generally positive to mandate quality outdoor living spaces/gardens.		Garden space is valued.	Support the layering of requirements: open space; deep soil area; impervious area; root protection zone. Will work on big sites, and support a coordinated approach.	
	PRIMARY GARDEN	primary garden area, linking indoor and outdoor living / consolidation	Support a relationship between indoor and outdoor living spaces. Support consolidated garden area rather than 'bits', which will lead to better habitat and ecological outcomes.	Support overall for a relationship between indoor and outdoor living spaces, and connection to primary living area.	Support for consolidation of outdoor space.	Support for a primary garden area.	Agree with garden area linked to living area. Consolidated garden supported.
			However primary garden area link to primary living area does not support upside down living.	Challenges in working with irregular shaped lots in infill settings. (e.g., providing consolidated open space area).			
primary garden area, dimensions, requirements, orientation		Specification of minimum dimensions generally supported, although some consideration that a sliding scale may be needed to respond to site and context. May be conflicts between the size of garden and primary living spaces.	More scaled primary garden area requirements across either lot size or zoning. Minimum area requirements need further consideration (for example, 40sqm is excessive for R40). Small sites that have been raised with retaining walls or on sloping sites could be potentially inaccessible and may not meet minimum outdoor space requirements due to ramps taking up space.	For group dwellings and multiple dwellings, over emphasis of open space will result in not enough internal space. Mixed views about the amount of open space proportionate to other outcomes. Number of comments that the garden area requirement is not proportionate to lot size. Suggestion for percentage requirement for primary garden area needed.	Query if there is enough room for development, given outdoor space requirements, eg 150sqm site, less 40sqm for garden.	Minimum areas are workable.	Allow primary garden area in setbacks area. As services are not included in private open space, air conditioner units will require additional space.
		Orientation of primary garden area to the north not always suitable, or will deliver the best outcome. More opportunity to control orientation through deemed to comply pathway would be preferred.	Location and orientation of primary garden area is generally supported, however doesn't consider south facing lots; northern neighbour building to boundary (potential overshadowing); impact on street scape; relationship to	Further consideration of north orientation is required to enable consideration of site context, climatic elements, street scape conflicts and passive surveillance (safety). Policy should talk about solar access rather than focus on north	Broad support for primary garden to be located in northern portion of site – can be hard to do though.	Northern orientation may be difficult to achieve with overshadowing occurring. Some flexibility in approvals/assessment for deemed to comply pathway if it does not make sense. Two storey boundary walls will overshadow gardens.	Primary garden area facing north and requirement for fencing will create inconsistent streetscape, and provisions will result in shading structures in front setback areas. Preference to orientate

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
			built form; wind, neighbours and views. To constraining for some sites and circumstance.	orientation, and provide greater flexibility. Could result in poor dwelling design and street outcomes.			the building rather than garden.
							Suggestion to merge private open space calculation with primary living space.
			Clarify treatment of roof gardens with respect to primary garden areas.				
PRIVATE OPEN SPACE	private open space requirements					Private open space minimums are different to Volume 2, and some terminology needs clarification.	
	private open space, screening	Requirements of screening types and flexibility of types depending on preference/design outcomes.	Support for less screening. Difficult to achieve neighbour privacy if screening is limited on the other hand why set balconies so far back, they provide security surveillance.	Support for screening limits, requirements at 75%, however some sites (e.g., Coastal) should be able to have louvered/sliding screens on balcony. Suggest more apportionments for privacy of open space.	Clarification of screening on private open spaces, tint on bottom, clear above. Need to consider wind.	Screening supported but recognised overlooking issues remain with 25% unscreened. Promote diversity of screening materials and solutions.	support screening provisions.
DEEP SOIL AREAS	deep soil area	Support for inclusion of a deep soil area, and a point of change from 'traditional infill'	Deep soil area supported, allows for diverse planting opportunities and water management on site. Differing opinions about whether 20% is too much or too little. Some felt it was too much "particularly at R60".	Deep soil areas broadly supported; however some suggested 20% deep soil area is too large. Alternative was to allow for 15% with reduction to 10% if retaining a tree.	Encroachment of essential service utilities within the deep soil area should not be permitted.		Support for deep soil area provisions.
				Prioritisation of landscaping design is important to achieve good outcomes.		Mandatory requirement for a landscape plan for over 3 dwellings (supported by arborist).	

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
	deep soil areas, impervious surface encroachment	Greater definition of encroachment into deep soil including permeable impervious definitions.	Support allowance for impervious surface encroachment	Make deep soil area provisions clearer in regard to impervious surfaces (e.g., wooden decking above deep soil area).			
				Limiting paved surfaces is good. Benefits with impervious surface allowances.			
	deep soil area, grouped and multiple dwellings			Sharing of deep soil across parent lot, who maintains it? Calculations for deep soil area shouldn't depend on shared spaces/access ways.			
TREES	trees, requirements	There are some inconsistencies with LG requirements	Need for explicit articulation to help passage of approvals.	Positive that more trees are being encouraged, however requirements need further consideration. Simplify. Reduce number of trees required for multi lot subdivision and development.	Medium to large trees will achieve a better canopy cover than several small trees.		
				Difficult to comply with trees in front setback area on narrow lots		Small trees are too small.	Difficult to enforce tree requirements, therefore suggest tree to be provided on verge, or cede land for street tree.
				Support tree requirement over canopy cover.		Prefer canopy cover over tree requirements, although also support for multiple trees.	
				If unable to provide a tree you can donate a tree to Local government.			
				Allow planting on structures (Vertical gardens) as incentive bonus to reduce setbacks.			

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
LANDSCAPING	trees, root protection area		Min. 1.5m x 1.5m root protection area is too small for a serious tree.	Enhance outcomes from tree requirements by insuring soil quality in the root protection zone is maximise. Benefit and outcomes from requirements (tree to close to retaining build). Structural issues planting trees near footings.		Dimensions of root protection zone differ to Volume 2 and terminology is different. In addition, felt 1.5m root protection area is too small. Damage to footings and retaining walls with trees being too large for the 1.5m deep soil area.	
	trees, grouped and multiple dwellings			Clearer direction as to whether at grade parking requires trees for consolidation of parking, or all parking greater than 4 bays.			
	trees, retention	More Incentives for tree retention required. Flexibility of parking access to retain trees.	Tree retention incentive are weak. The value of 1 big tree is equivalent to 10 small trees.	Support for tree retention, use of incentives promotes mature canopy. If tree retained allow a reduction to minimum lot size.	Tree retention policy provisions require further consideration. Consider how this is managed in other jurisdictions, eg NSW, which proves it's not enough incentive to get the outcome – look at further incentives for tree retention. What are we giving developers back, is there enough incentive?	Incentives for existing tree retention not enough to achieve outcomes, noting this is an area of significant community concern and expectations.	
		Tree retention impacts redevelopment potential.	Tree retention incentivises development potential. (site category 3 for tree retention)	Retaining of tree has the potential to damage a new building (e.g. plumbing).	How about moving an existing tree, or adapting for art/furniture?	Require an arborist report/attention to tree protection during and after construction.	
			For irregular lots, WAPC requirements (under DC2.2) undoes ability to retain existing tree.			Table 2.3a/2.3b missing large trees and definition of large tree.	
	additional guidance - trees and landscaping	Provide additional design guidance on suitable landscape outcomes between a driveway and fence line, and set the ingredients for successful plant growth. The quality of tree is more	LG tree species list is required to ensure the right trees are planted as a result of the policy. Difficult to make the right choice - deciduous; limited native options; important solar benefits; maintenance issues.	Education piece and LG incentives to support post occupancy behaviours around trees and paving/deep soil area retention.	Tree success will depend on soil type and species choice, need guidance.	Species dependant for tree size.	

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
		relevant that tree count. Require guidance on local tree choice and suitability (by LG)					
COMMUNAL OPEN SPACE	communal open space	Threshold of 10 group dwellings may be too low.	Communal open space is tokenistic, increases strata fees.	10 dwelling thresholds for communal open space is supported. Potentially reduce number of dwellings for communal areas. (currently no requirement for less than 10 dwellings).		Omit grouped dwellings from communal open space, perhaps better landscaping of common areas instead.	Communal open space is not often used. Suggest a higher threshold (50+). Threshold of 10 grouped dwellings is too low. Design guidance is required for useable communal open space.
		POS requirements need to be considered in the allocation and requirements for communal open space, particularly in greenfield master planned areas.					POS Consideration. Communal open space trade off. (particularly in greenfield master plan areas.)
		Shared amenity of communal open space allows for equality for affordable units.	Deep soil areas within communal open space. (50% of communal area needs to be vegetated)				Shared amenity of communal open space allows for equality for affordable units.
WATER MANAGEMENT	water management		Support for promotion of more site responsive and environmentally responsive design outcomes. More incentives required for onsite water harvesting, and reflect biophilic design more explicitly in the policy, by adopting the terminology through the policy and provide incentives.	Some local governments have onerous drainage requirements that are inconsistent with other LGs, R codes to provide better guidance. Consider water safe urban design (similar manner to precinct policy) and biodiversity (tree choice and LG requirements).		Need to improve elements of sustainable principles (Rainwater tanks/useability practices).	Water management seems like an afterthought.

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
POST OCCUPANCY	post occupancy issues, paving, trees, landscaping	Query enforceability and process of checking that trees are retained post development.	Post occupancy issues, tree maintenance leaf litter and water management on site – allow removal of gutters.	Post occupancy and compliance issues with extension of paving beyond policy requirements. Onus on the developer to provide trees, however can't control what occupants do. Using common property to achieve tree outcomes would be easier to manage and retain intent.	Maintenance of garden area, how do you ensure it? Difficult to enforce and maintain tree requirements.	Difficult to retain trees - either die or will not thrive. How do we monitor tree spaces in private area? Tree retention post occupancy requires a response from LG compliance teams.	
			Canopy is vital to the success of trees. Needs monitoring, if it dies you must replant.		Incentivise tree maintenance through reduced land rates.	Tree retention incentive will be abused (e.g. cut down after development), suggest placing a memorial on title. There are many factors against keeping trees such as water, insurance etc.	
						Small sheds that do not require a building permeant do they require a variation/development approval for reduced open space.	
MARKET AND DWELLING DIVERSITY	diversity of dwelling outcomes; market preferences				Development of 3/4 bedroom houses not needed, more mix.		

Table 2: THE GARDEN

Table 2: THE GARDEN							
		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
TRANSITION, SUPPORT AND GUIDANCE	support for policy introduction	Implementation, administration, support and training needed. (pressure of many DA's).				Pressure on Local Government to explain and build understanding of what will be possible to existing landowners and developers.	Implementation, administration, support and training needed. (pressure of many DA's).
	clarity, complexity and interpretation	Potentially complex assessment and pathways.			Confusing to determine what outcomes can be expected from combination of provisions (consolidated outdoor space, deep soil area, amount of space). How the provisions are used together will be interpreted at approval stage.	Document flow within this element difficult for assessment/workability (Clause 2.1= Single and grouped, 2.2= Multis, then back to grouped).	Potentially complex assessment and pathways.
	communication and examples	More examples, and graphics and design guidance would be helpful			More examples of good development.	Graphics and supporting images could be improved via full lot inclusion to see how they work (e.g. screening elevations).	
IMPACTS AND UNINTENDED CONSEQUENCES	affordability / cost		Affordability is a critical consideration, flow on impact on the whole market.	Garden area will reduce the number of beds/dwelling size and will impact valuations to the point that it will impact finance approval and affordability.	Will the code work in middle suburbs? Area requirements may force two storey development outcomes, which are not feasible in lower socio-economic areas.		
					Losing a bedroom does not reduce build cost, expensive areas are the kitchen and bathroom.		
	opportunity cost			Loss of opportunity for other outdoor amenity (E.g., swimming pool)			
	noise from outdoor spaces			Noise impacts from outdoor areas, not currently addressed and should be.			

Table 2: THE GARDEN

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
BEYOND THE POLICY	cultural change	Ongoing culture change required, e.g. regarding the value of trees					
	staging of infill					Need supporting subdivision provisions to reduce lots with limited northern aspect.	
	tree retention strategies					More strategic approach to tree retention needed (Tree retention strategy).	
	compatibility with other DC Policies					Update DC 2.3 POS to provide cash in lieu for built strata if trees retained (incentive).	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
INDOOR AMENITY	primary living space, requirement and linking indoor and outdoor living	Requirement for primary living space is a positive.	Support for setting minimum requirements for non- architect designed developments. When site orientation is favourable to the settings, one good room is easy.	Minimum dimension for primary living space to be scalable to dwelling size.	Minimum dimension of primary living space is important to ensure living spaces that are not just oversize corridors.	Support for the primary living space.	Support one good room
		Support for greater focus on amenity, usability and flow, and connection to outdoor areas.	Will provide for good outcomes if related functionally to well oriented open space. One 'good room' connected to the garden or balcony with solar access is strongly supported.	Support idea of one good room connected to outdoor space.		Support indoor/outdoor connectivity.	Include provisions on floor to ceiling height. Increase floor to ceiling height ratio to improve liveability.
			Suggest need to consider how adjacency of living and garden works for north facing dwellings – could be nuanced to allow terraces - a more flexible option.	Consider other aspects such as noise, views and adjacent built form		Strong support for raising indoor amenity standards.	
			How does the requirement for a good room + garden space suit 'co-housing' where equal and private access to areas is sought?				
	solar access and natural ventilation	Solar access requirements are a positive, although suggestion that addition options for solar orientation are also required.	Consider northern garden location for just group dwellings.	Solar access provisions are broadly supported, in contrast to some BAU outcomes. However, will be difficult to achieve orientation on some sites.	Support for solar access and natural ventilation, however it can be hard to achieve on certain sites.	Push back from applicants on demonstrating solar access and ventilation. needs to be a level of certainty required in deemed to comply.	Support solar access provisions.
		Advocate for an efficiency rating perhaps? 7/8star?	Passive solar design supports diverse living arrangements for affordable housing, and reduces operation costs.	Mental health and wellbeing supported by minimum dimensions and natural ventilation.		When considering solar access implications beyond the lot boundary a design principal pathway should be required, more guidance required to assist.	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
			2m minimum dimension does not necessarily improve cross ventilation.	Orientation requirements are not flexible enough, and might be challenging depending on site layout and orientation – potential conflict with passive surveillance and views. North orientation could be the front, might not want everything fronting the public domain.		More guidance required for assessing ventilation often ventilation is achieved through the use of internal corridors and fire doors.	
			Natural ventilation requirements conflict with NCC - will not be able to meet outcomes against COAG Agreement.	Energy efficiency is mandated under NCC, and should not be in the R-codes.		Definition of single aspect living space is vague/unclear to Joe Blogs.	
			Can there be a component of provision of solar panels to assist / offset lack of passive solar design where difficult?			Setback to windows for habitable rooms requires thought.	
			Can the location of garden be nuanced to be about hours of solar access?			C3.2.6- Exclude walls fronting the street.	
				Light wells are limiting, don't resonate with customers and are expensive to build.		Support the inclusion of eave requirements.	
				Horizontal shading - 600mm eaves not a good provision. 450 or 500 eaves provides a 25degree pitch which is what covenants require.		Minimum 10% glazing needs to be a consolidated window area.	
				Ventilation hard to achieve for apartments with double loading.			

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
dwelling size and layout			Mixed views on the suitability of 4m internal dimension for the primary living space. Suggestion to factor both width and length, and provide a min. area or more nuanced requirement for narrower/denser typologies (3.6m or 3.2m suggested). Also, suggestion that options and performance solutions can be considered for flexibility for category 3 sites.	Min. 4m internal dimension for the primary living space is good, provided it relates to one room only.		Consider minimum area for primary living space otherwise this area is reduced down in favour of providing 3x2.	
		Is there a need for room size provision, and is the extra detail of areas for larger dwellings required? Consider min. dimensions for 1bed, however don't mandate others.	Suggested to use a combination of min. dimension and area for living and bedrooms, enabling flexibility for narrow lots or more dense typologies.	Suggest use of sqm approach vs number of bedrooms and minimum dimension for room sizes. Undersized bedrooms could be labelled as a study.	Support internal amenity controls.	Support for minimum dwelling and room size requirements.	Support room sizes. Ensure 'one good room' is accessible to all people.
		Query role of planning (as opposed to Building Codes) with respect to indoor areas. Inclusion of circulation spaces (10% max) is too much for planning.	Consider min. ceiling heights for the primary living area (2.7m suggested). Also, bedrooms.	Clarification as to whether kitchen attached to living space is subject to depth to height ratio.	Flexibility and adaptability in the size and layout of dwellings for different household needs. E.g., teenagers, elderly bedrooms need to be better.	Sizing layouts of dwelling is a good tool to minimize site cover and assess internal amenity for residents.	
		Provide flexibility for different new room types and curved walls.	Provisions for kitchen/living/dining upstairs are not clear.	Minimum dimensions for rooms might limit innovation.			
			Min. dimension for bedrooms doesn't include robes, should are also exclude from minimum area.	Mandating some bedroom requirements is supported, and sizes broadly supported. However, should not mandate all bedroom sizes.	Support for min. bedroom sizes, as larger bedrooms are required than what is being produced.	2.7 to 3m Bathroom width.	Define exclusions from minimum building size (same as plot ratio).
				Max. 10% allocation for circulation spaces might be too restrictive/prescriptive.		How to assess circulation space?	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
FUNCTION	parking	Support for separation for garage vs non-garage; and location A/B detail.	Proximity (Location A or B) should include regional centres and precincts and commercial. Also, 800m walking distance to train stations could be increased. I.e., stations in the middle of the freeway may not be 800m to very many houses.	Location A covers a lot - public transport can be under used, and insufficient. Location A & B should also factor in walkability. Supportive, however we need to improve public and alternative transports modes, and the market is not yet there for carparks and reduced parking.	Strong support for reduced minimums and maximums, however reduced parking could be an issue where there isn't sufficient amenity in close proximity.	Support reduced minimum and maximum provisions- however need to consider the Stirling experience with poorly located density pushing for no bays. Location A/B - Consider how far the walk is / Distance to amenities like shops and POS. An either/or situation might be beneficial. Also need to consider the size of the local centre. Modify location A trigger for buses (Perhaps a reduced frequency e.g., 5/10mins). Stirling parking study show bus routes do not affect car use – R20 and R40 car ownership and use the same.	
		Support for car space v car bay.	Strong support for reduced min. parking requirements.	Support flexibility of carparks, although note security issues. Good trade-off for increased outdoor living area.	Support flexibility for car parking space. Support for garages to be multi use. Room for 2 cars is needed- Some families have 4 cars.	Remove carparks and uncovered bays from having no maximum.	Maximum parking provisions okay but note garages are not used to park cars in (storage and workshop)
		Query about why minimum parking still required, and seem high. Suggest further flexibility is required, including shared parking.	Avoid parking over spill onto verges.	Further consideration of verge parking.		Cars on the street are an issue- People put cars on the street and use the garage for storage. Concern about reliance on on-street parking – couple with terraces (crossovers) – reduced setback and car parking	Consider crediting street parking.
			Query max. garage requirements, which does reflect lifestyle and role as storage. Min. should be 1	Support reduced car parking minimums.		Max garage parking is supported	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
			across all dwellings except studio/ 1 Bed.				
		Query if ancillary dwellings need a car bay. Parking requirement will be problematic.		Consumers are resistant to tandem parking. These need to be incentivised, e.g. reduce PGA or include 2 nd car space in calculations for PGA.		No parking needed for ancillary dwellings	
		Round parking up or down. Not always Up		5.4m Garage setback is excessive.			
		Provide incentives for underground		Size of cars getting bigger and longer.			
		Decouple parking requirements from the dwelling, and enable in consolidated location	Require allowance for future car-less living e.g., shared electric cars within the neighbourhood.	Consideration of EV charging trends, including shared provision for visitors.	Electric vehicle charging is an important consideration. Electrical vehicle requirements need more consideration - talk to energy policy WA.		
			LGA's will mandate Australian standard for bikes, suggest removal of occupant bike provisions.	Concerns with how LG will interpret a bike space.	Bicycle parking not required for individual houses.	Bicycle parking is supported. Should define what bicycle parking looks like for single dwelling.	
	storage		More flexible storage options – could it be in the roof space / loft or garage? Why only outside? May not be suitable for higher end developments.	Does storage size need to be mandated? It affects affordability. Large 728sqm lot in R40, still 10sqm shed? People are using garage for storage. Storage located at the end of a garage includes passage / circulation requirements that are excessive.			Allow larger storage space in garage, doesn't have to be enclosed.
	waste management		Waste management needs greater detail as is often forgotten.			Large developments need waste management plans to address how/ where waste is collected.	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
	external fixtures						External fixtures to be designed into building supported. Support for out buildings and air conditioners to be hidden.
	outbuildings						Building greater than 3 storeys require fire suppression equipment (BCA), has major design limitation.
HOUSING DIVERSITY	housing diversity, general	These provisions collectively support community building, and intergenerational developments	Provisions are good for ageing population but needs to be less prescriptive. Also, consider mixed uses as this could be very useful for aged/diverse occupant groups to be able to engage with community.		Consider allowing ancillary/small/aged in grouped dwelling sites.	Consider carers accommodation and residential use change. Also, if small, ancillary and 100m2 lot policy provisions can be consolidated.	Support housing diversity provisions.
	universal design - grouped and multiple dwellings	Suggestion to round universal design to the nearest whole number (not up).	Universal designs threshold mitigates against consolidation of lots. Are we going to have only 4-unit developments?	Suggest open space reductions for liveable housing standards.	Support universal design requirements.	Code currently refers to a third-party document (Universal design) might need to reconsider having a UD Assessment section to the codes.	Exclude universal accessible homes from circulation provision.
		Could be difficult to assess at DA stage.	Table 3.9A- Minimum should be LHA Gold.	Universal design easy to achieve, and socially responsible, but impacts affordability.		How to assess liveable housing? Consistent approach and training?	Universal access should as a minimum include all primary living areas.
			Universal design is a NCC outcome. Support incentives to include but not mandate.	need to align with R-Coding and other restrictions. Needs to be single storey development.			Consider extending universal access to all dwellings.
	ancillary dwellings - single and multiple dwellings	Support for removal of 350sqm requirement for ancillary dwellings.	Support of ancillary dwellings, provisions needed regarding flexibility of use.	Ancillary dwellings supported. Need to consider NCC fire separation requirements.	Support ancillary dwelling requirements. Consider approval for ancillary on lots less than 350m2 – low density code.	Support for ancillary dwellings, but need to be bigger / size can be flexible as long as its ancillary to main dwelling.	
		Ancillary dwellings e.g., Fonzie flats, can activate laneways, and add diversity.	Why not survey strata ancillary dwellings, if min lot size can be achieved?	Consider allowing dual-key/ancillary on portion of survey strata lots –		Ancillary – open space, outdoor areas, landscaping should still apply.	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
				maybe just for street frontage only.			
				Suggest 90sqm for ancillary dwellings. Remove min sqm for ancillary dwelling – provided it is on same title.			
small dwellings		Support for small dwelling instead of single bedroom dwelling, and the intent for 2bed is good.	Support for small dwelling allowance for two bed, instead of single bedroom.	Replacing single bed dwellings with small dwellings is a great change- provides flexibility.	Support for small dwellings.	Support for small dwellings.	
			R60 and R80 small dwellings are sub 100sqm.			Relationship between small dwellings and housing on lots less than 100sqm needs clarification.	
		Suggestion that 70sqm is too small for small dwellings (75sqm?)	Suggestion that 70sqm is not large enough for small dwellings. Could this be tested? It is difficult to have two storeys with two WCs under 72sqm.	Small dwellings should be 80sqm	Small dwellings should be 85sqm		
			How to incentivise two storeys more compact? 45m2 on ground and 45m2 on first floor	Promotion of small dwellings especially in inner city – LG needs to support.			
			Site area concessions for small dwellings are appropriate for R60/R80 down to 80m2 lots – why limit to over 100m2 lots?				
			Small dwellings, provision 3.11 (i) needs to allow for proximity to institution/support spaces (e.g., mental health, schools etc)				
		Query if the dwelling size provision and small dwelling concession have been tested together.	Small dwellings are not special purpose-no s70a. R-codes now subsidiary legislation. Aged and				

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
			dependent need s70a to restrict occupants.				
	aged or dependent person's dwellings			Preference to keep aged and dependent person dwellings however reduce the minimum dwelling requirement (remove 5 dwellings) but retain bonus. Department of Communities still use this a lot.	Support for aged and dependent person dwellings. Remove notification on title (aged).		Aged or dependant persons dwelling not required, currently being abused.
	housing on lots less than 100sqm				Support for housing on lots less than 100sqm.		
MARKET AND DWELLING DIVERSITY	diversity of dwelling outcomes; market preferences	Need further consideration of consumer demand, especially with respect to parking. Do not set mins. or max., rather leave it to demand.		Provision of car bays is market-led, and the market changes depending on suburb, locality and demographics. There has not been an uptake for 0 and 1 car bay developments yet. Consumers still want double garages for security and storage. A double garage can add \$20 - \$50k to the sale price depending on location.	Needs to be diversity at the micro level not the macro level, currently we are only getting the latter. Let the market decide about housing diversity. How does the Australian dream link to medium density? Design for people not for development.		
TRANSITION, SUPPORT AND	support for policy introduction	Regional considerations and resources to help regional variations.		Very complex for product home market - Keep it simple (i.e., DAs for bedroom size variations)	More work required regarding how to implement and monitor these provisions. Also, the management of competing priorities between provisions and elements. What is most important?	Concern about 10-day timeframe for building permits – assessing amenity provisions – skills/knowledge training.	

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
		Consider how changes in parking provisions will be explained to the community.		More focus on the process required to deliver under these provisions is required.		Planning approval not required for carports/outbuildings.	
		Recognise a gap between designers and assessors.		Need joined up thinking with LG – e.g., parking on street.			
	communication and examples	Provide guidance on typologies and design options, without pigeonholing types.			Solar access is not valued generally in the community, and this needs lots of education.		
	demonstration / testing			Do more market research about what buyers want.			
IMPACTS AND UNINTENDED CONSEQUENCES	access to finance	Finance is challenging for small dwellings.		Resale considerations are relevant - won't achieve 0 bays in current market, as the bank finance won't fund. Also need to consider overall dwelling size for valuation purposes. Financing is always a challenge, diversity changes.			
	existing dwelling retention						Provisions needed to incentivise retention of existing dwellings. Need to retain/ incentivise retention of existing house (orientation, front door and minimum 1 good room to be addressed).
BEYOND THE POLICY	sustainability	Incentivise active sustainability initiatives with the goal of encouraging net zero carbon developments (e.g., power generation, water harvesting).					

Table 3: THE BUILDING

		Planners	Architects and Designers	Developers and builders	Community	Metro LG	SW Region
	ROW's		Further thought about the impact on ROW's which are now primary streets for many people. ROW's could have their own separate controls to improve quality of outcomes.				

Table 4: NEIGHBOURLINESS

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
	overall	Objective 4D may benefit from addition of parking and traffic note.	Support general intent. More information on how/where typologies are placed – mess to have all different type next to each other – support housing diversity guide to address.	General support for all neighbourliness provisions.	General support for policy intent		Intent supported, however more focus on context appropriate development is needed.
BUILT FORM	site cover		Might not need site cover provisions – DSA does the job better.	Mixed views on site cover. May help deliver good 2 storey-built form, however also queries about whether it was required. Balance between DSA, PGA and site cover – site cover not required.	Make it clear that changing the ground level cover does not permit the height limit to be increased.	Site cover may not be required. Needs further testing around its removal.	Support consolidation of open space and check of site cover.
				Allow increased site cover if greater landscaping provided on common property		Good to prevent incremental increases on site cover.	
				Consider inclusion of common property. Support car ports not counting as site cover.			
	building height	General agreement that additional building height would support diversity in built form, interest and variety. It is important that the bulk, scale and articulation are considered when increasing height.	Support for building height measured in storeys. Suggest some flexibility with heights depending on location on the lot – respectful of neighbours – site responsive.	Height in storeys is supported. Support more height on merit - Building height incentive for tree retention	How does additional height fit in a single storey dominant context?	Maximum heights are a good approach. Some LG use storeys. Aligns with Vol2. Note community wants metres, however planner support storeys. Building height in storeys may be fudged.	Builders and developers may deliver an unintended consequence re building height.
		LGs and residents don't want 3 storey - there may be additional objections and community oppositions (coastal, western suburbs contexts, 'views of significance'). There may be a need to influence LGs that height is not an issue.	Are the wall/building height limits too low? Support 3 storey in R40.		Overshadowing impacts may need to be addressed due to height increase.	Consider 3 storeys too high, context is important. Suggest 2 storeys as DTC, can still consider 3 storeys under DP. Community expectations also need consideration - 4 storeys perceived as high rise.	
	Suggest more provision around roof terraces.						

Table 4: NEIGHBOURLINESS

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
lot boundary setbacks		Lot boundary setbacks - simplification is easy to interpret and may allow for greater community acceptance to additional heights (R40). More surety of what the setback will be.	Support terrace typology and two storeys on boundary, although not sure about impact of 2 storey boundary walls – potential bulk and scale impact on neighbours. Should there be different set back provisions for each built form typology.	Internal 2 storey lot boundaries restricted by some councils under LPPs	Step setbacks seen as positive. 3m set back to the upper storey reduces bulk and scale.	Simple is good. Support for simplified assessment (Currently complicated-No consistency)	There are challenges to solar access, ventilation and overshadowing for boundary-to-boundary construction
			Upper stories set back challenging for narrow sites.	Support boundary walls that allow terraces		Meeting DTC for simple setbacks and building heights may cause issue for inner city/constrained sites.	
				Building to boundaries on infill sites poses construction challenges.		Meltham example - 3 storeys with poor interface between existing and new development. Rely on DRP to meet DGs supported through compliance.	
				Is wall height measured from finish floor level or natural floor level and average or maximum.		New development has better outcomes than triplexes.	
						Simplification may impact articulation may push terrace development. May push blank walls?	
						Walls 14m May be too long, design testing required.	
						Boundary wall provisions to complicated. Figures and tables not clear and to simplistic.	
						Better to encourage stepping back upper floors or shorter section of wall.	
						Coordinate boundary walls is important- LDP/ Precinct Plan. How to implement? Can be encourage but currently not mandatory. Implementation important.	
						Two storey boundary wall impact on PGA	

Table 4: NEIGHBOURLINESS

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
CHARACTER	streetscape	Support for single garages, noting attitudes may change over time. Currently double garages are the norm.	Support flexible use car space.	Consider if providing flexible parking spaces could reduce outdoor living area. Go harder on promoting carports over garages – market would be positive to this – potential DSA concession	Streetscapes need to contribute to community	Support requirement for weather covered space at dwelling entry – helps with building articulation.	Car ports etc provision promotes activation. Support for flexible use car spaces.
		Need to balance design outcomes of garage door with current need for 2 car garages.	Need to make streetscape character clearer – needs context response.		General support that driveways and crossovers should be limited. Supported the reduction of impact of garages on street – Good outcome. Developers need to stop designing for cars, although recognise car ownership still in issue.	Garage widths with frontages supported.	
		Restrictions on double garages for narrow lot product will affect affordability (10.5metre width with no lane way.)	Challenges for streetscape for small lots and crossovers.	Concerned about restriction on garage width on narrow lots – don't restrict, use design-based approach with examples. Tandem parking reduces flexibility	Foster the change - car sharing (option to have/ don't have a car).	Support DSA in front of dwellings	
		Avoid cars parking on street and driveways.	Northern orientation may impact on streetscape / overlooking and character.	Reduced parking on lots will result in parking on verges- needs consideration.			
			Landscape is critical to character too.		Should car ports be included in impervious encroachment?		
			Support covered space at dwelling entry.	People won't use front porches.			
	street setbacks	Averaging setbacks may be a benefit and provide flexibility.	Support carports in front setback area.	The carport, balcony, porch, provisions are good and will support better street scapes. Setback calibrated to density are supported.	Reduced street set back is good. Promotes street interaction. "What is too close?"	Support carports, balconies, porches, patios, verandaed forward of setback line – helps with building articulation.	
			Not sure that ground floor active frontage is sufficient.	Support for flexible and open car parking – other uses e.g., Recreation. Some concern for open car spaces, including security, can get 'scruffy'.	Support for active street frontages	Issues with security for carports – might need 1.8m fencing.	

Table 4: NEIGHBOURLINESS

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
COMMUNIT			Interface considerations needs attention.	Wide verges don't need large front setbacks.	Setbacks contribute to community in sense of privacy, what are we protecting? Balance with need for community and social interaction.	Setbacks different for medium density to low density and Vol2.	
						Need larger front setbacks on major roads – usually subject to proposed density bonuses.	
	vehicle and pedestrian access	Support for requirement for 20 units before separate pedestrian access is required.		Consider site incentives for provision of public access way.		Parking max may cause issue depending on location (outer suburban or major road).	
		Driveways, sightlines, and crossovers may not be to Australian Standards, and require further consideration.		1m ped access leg is enough.		Location A provisions too blunt- not as connected as implied.	
		6 metre offsets from corner too large for low-speed streets.		Can we do something about shared driveways for neighbouring lots (local government support required).		Need coordinated crossovers where encouraging side by side development.	
	communal streets	It is acceptable to use shared street for lower dwelling numbers.	Support for communal street provisions. Suggest offering incentives for communal street provisions. Need trees for communal street.				
	street fences		Support for permeable fencing	Support flexible options for street fences. Consider allowing 1.8m high permeable fences.			
	retaining existing dwellings		Suggest incentives for retaining existing dwellings.	Insufficient provisions to encourage dwelling retention.			More incentive to retain dwellings and trees is required.
	solar access for adjoining sites	How do we manage negative impacts (overshadowing) on to a neighbouring single-story house with solar PV?		Concerns that terrace typology difficult to deliver with good solar access. Maintaining solar access is challenging for infill sites.		General support justification important. Solar access for adjoining sites – Need support and tools for this.	

Table 4: NEIGHBOURLINESS

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
TRANSITION, SUPPORT AND GUIDANCE	visual privacy	General support for new assessment. Will be easier to explain to neighbours why a development complies. Provide a provision for outlook?	Support for general intent - common sense approach.	Support for general intent. Support reduced requirements and more options for privacy e.g. planters. Acceptable in medium density – like Europe which has more interaction and connection with neighbours	No need to overregulate may be isolating for occupants. To talk and look at your own neighbours is okay. Eyes on streets is a positive and supports community (Can always drop blinds. Provision needs to respect the visual privacy of existing adjacent lots but can be flexible for occupants. Reduced visual privacy is culturally appropriately in Europe and is accepted when buying into the development.	Support the more nuanced approach – diagrams helpful. Provide more examples of design solutions and photos see Vol2.	Support design solution.
		Agreement that highlight windows are a poor outcome. Suggest remove highlight windows from deemed to comply provisions, or require 2 highlight windows (better light and ventilation)	Support reduction in highlight window use	Could result in fins facing onto fins on adjacent lots – not a good outcome	May affect the feasibility of neighbouring lots.	Remove highlight windows from DTC. Issue with 2nd storey and do not want to advertise- overuse of highlight windows.	Suggest looking at adjustments to account for built in furniture. (View position away from window for a Kitchen for example)
		1.5m offset to windows is supported- Impact to visual privacy can be addressed actively with blinds.				Good chance offsets currently not working.	
		Assessment easier with 3D drawings from applicant.		Certainty might be a challenge.		Difficult to assess and more pushback from community.	
	support for policy introduction	LG training may be necessary and more guidance around what can varied when approval is required.	Complicated. Need to consult with local LG's.	Too complicated. Community acceptance of changes is critical.	Policy is too technical and hard to understand. Feels like there is a lack of transparency and the community has no voice. Communities feel unsupported. Communities are able to comment only, but are not engaged.	Readjusting LPPs is a headache- Will need to re-review. Apply new code and approval through WAPC based on elements that may have previously been able to be varied without approval. This may have impact on consistent local character and identity.	

Table 4: NEIGHBOURLINESS

		Planners	Architects and Designers	Developers and Builders	Community	Metro LG	SW Region
	communication and examples					Provide more examples of design solutions.	An example of a medium density development where a communal and commercial storage facility was incorporated into subdivision.
LG VARIATIONS	LG variation	Tighter control or regulations on LG variation is supported.				Neighbourliness Character sub element should be able to be varied as is location specific (incontinency in street setbacks). i.e. street setback and street fencing (height). LG should be able to vary to coordinate local character.	Regional demands for vehicle and recreational equipment are higher and need more storage/sheds.
	affordability / cost	Appears the policy is driving 2 story construction. Industry may need to move away from double brick, but the market may not want light weight construction. There may be a feasibility issue here that may require generational/ economic change.					Suggest that quantifying the cost of medium density development under this code is done for comparison.
IMPACTS AND UNINTENDED CONSEQUENCES	infill coordination	First development is penalised with additional setbacks required to undeveloped sites.	Challenges for development that happens incrementally. First development is disadvantaged.	Results in a first-in best dressed approach – worse off if later.		May be seen as onerous for vacant adjoining. First development – what is appropriate for screening?	