

22 August 2022

Morris Edwards
VPA
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Dear Morris

Submission to Draft Amendment GC206 – Small Lot Housing Code update

Insight Planning Consultants Pty Ltd are pleased to lodge a submission to Draft Amendment GC206 and the updated *Small Lot Housing Code June 2022* (Code).

The updated SLHC makes changes to several of the Type A and B Standards within the existing Code, including:

- Standard 2.a requiring an entry window at a door
- Standard 2.b requiring minimum material variation to facades to front street, side and rear street alignments
- Former Standard 1.1 Maximum setback deletion
- Former Standard 2.1 to broaden the definition of “recreation reserve”
- Former Standard 2.5 v) iv. which required balconies to occupy more than 80% of the frontage.
- Standard 6.1 which has been modified to require a minimum of 1 car park per dwelling on Type A lots irrespective of number of bedrooms
- Standard 12.1 Overlooking has been modified to only require windows overlooking living rooms to be screened.

Additionally, the updated Code introduces a new Type C, which is intended for lots that are part of rows that will be simultaneously designed and approved.

While we generally support the approval of Amendment GC206 and the proposed changes to the Code, including the introduction of Type C, some of the proposed changes are likely to create consequential impacts on the implementation of the Code for these dwellings. The following sections separate the issues into those relating to the proposed changes to Types A and B, and to the proposed Type C.

Types A and B

The following issues and recommendations relate to the proposed changes to the Type A and B Standards.

The proposed changes to the Type A and B Standards include the modification of the car parking requirement in Standard 6.1, as outlined below.

6.1 Provision must be made for the number of car parking space(s) specified in Table 5.

Table 5: Car parking

Designation of the allotment in the subdivision permit	Minimum number of car parking spaces
Type A <u>and B</u>	<u>1 car parking space if the building has two or less bedrooms</u> <u>2 car parking spaces if the building has 3 or more bedrooms</u>
Type B	1 car parking space

From our experience with many of the growth area Councils, sufficient car parking is often raised as a major issue in relation to medium-density townhouse developments. The removal of the requirement for two car spaces for dwellings with three or more bedrooms for Type A, has the potential to create implementation issues for applicants at the subdivision stage if Council's perceive these lots to result in car parking issues for future residents and visitors to these new communities. The Small Lot Housing Code - Design Guidance Note which is currently under preparation by the VPA, will need to provide clear guidance as to where the different Small Lot Housing Code Types can be located and which is appropriate in what circumstances, to avoid receiving pushback from Council's at the subdivision stage for implementation of these lots.

Type C

The following issues and recommendations relate to the proposed Type C, including the Standards within the updated Code and the updated Practice Note.

Proposed Standard 10.3 requires that a pedestrian entry door be provided at the laneway if the dwelling is rear loaded. We consider that this will encourage pedestrian use of laneways, which is not supported in relation to traffic and pedestrian safety. In terms of resident convenience, there is no reason why a resident of a dwelling could not enter/exit via the garage door and does not require a separate pedestrian entry door. Any visitors to an allotment should be encouraged to use the front entry, as opposed to entering/exiting the site through the rear laneway and garage. Additionally, it is not considered that the addition of a door to the garage would necessarily increase passive surveillance of the rear laneway, unless they contained windows. Habitable windows from the dwelling overlooking the laneway would be far more effective in contributing to passive surveillance of the laneway.

It is recommended that Standard 10.3 be deleted.

Proposed Standard 15.1 requires that only one car park must be provided on site unless the dwelling is rear loaded. This prevents dwellings from containing a tandem double garage or car parking spaces to the frontage, even though visually this would be no different to a single garage to the frontage when viewed from the street.

Additionally, the proposed Practice Note conflicts with this Standard by specifying that only one car park is permitted on the allotment.

It is recommended that this Standard be reworded to require that double garages that feature side-by-side car spaces be rear-loaded. This results in the same visual outcome, whilst allowing the flexibility to have a front-loaded tandem garage, or a single garage with un-covered car space in the driveway within the frontage.

Proposed Standard 15.2 requires that the [required] car park can be provided in a garage or in an un-roofed area. It is unclear how this Standard relates to carports.

Additionally, the proposed Practice Note which corresponds to Standard 15.2 conflicts with the proposed Standard, as it specifies that where a garage is proposed it must be accessible from inside the dwelling. This would not be applicable if the garage was rear-loaded, as these may not necessarily be connected to the dwelling.

It is recommended that the Practice Note as it relates to Standard 15.2 be reworded to acknowledge the exemption for rear-loaded garages being accessible from inside the dwelling. It could also offer further clarification relating to whether carports are permitted under the Code.

Proposed Standard 24.1 a) appears to contain an error. It specifies 'within 4.5 metres of a living room AND an adjoining allotment'. This should be 'within 4.5 metres of a living room ON / OF an adjoining allotment'.

Proposed Standard 27.1 requires that where no garage is provided, bin storage must be screened from view. Neither the standard nor the Practice Note offer any guidance as to where the bin storage cannot be viewed from.

It is recommended that additional guidance be provided either within the Standard or the Practice Note as to where the bin storage must be screened, in relation to whether this is as viewed from the front street, adjoining dwellings, or a rear laneway etc.

Proposed Standard 28.1 requires that an area that allows for a rainwater tank must be provided at ground level. Neither the Standard nor the Practice Note offer any guidance as to how large this area needs to be, or what size rainwater tank must be accommodated.

It is recommended that additional guidance be provided either within the Standard or the Practice Note in relation to how large an area needs to be provided for the rainwater tank.

Additionally, Figure 5 within the Practice Note appears to conflict with Standard 9.1 of Type C in the Code, and corresponding Figure 8 in the Practice Note. Figure 5 shows a front setback in excess of 5m

from the garage, whilst the Standard and Figure 8 specify a front setback to the garage of no less than 2.5m and no more than 4m.

It is recommended that this Figure be amended to correct the inconsistency.

Having reviewed the range of documents associated with Amendment GC206, we are generally supportive the approval of the Amendment and the proposed changes to the Small Lot Housing Code, subject to key changes being made to the Code and Practice Note as outlines in our submission.

We trust the above information is sufficient for the VPA's review of the submission. Please do not hesitate to contact myself on 0477 221 215 to discuss any of the above.

Sincerely,

Monica Ceckiewicz
Senior Planner
Insight Planning Consultants