

Small Lot Housing Code

Public Consultation – June 2022

Master Builders Victoria - Feedback

Master Builders Victoria (MBV) represents approximately 6500 stakeholders from across the building and construction industry. These include large and small builders, tradespeople across the domestic and commercial sector, apprentices, suppliers, and manufacturers. MBV is a Public Company Limited by Guarantee, a Registered Training Organisation, and a Registered Organisation (RO). As an RO, our member elections are conducted by the Australian Electoral Commission, which ensures legitimate representation from the diverse sectors within our industry.

With more than 145 years of experience, MBV continues to deliver meaningful industry representation through effective engagement and feedback from our Board and Council of Management, committees, and members more broadly. MBV has clearly demonstrated its commitment to the delivery of improved practices across the building and construction industry to promote a better-built environment for all Victorians.

The building and construction industry is one of the most important sectors of the Victorian economy, being the largest full-time employer in the state and enabling the government to deliver on important infrastructure and transport commitments. Our sector delivers housing, parks, infrastructure, schools, hospitals and other important amenities for the livability of all Victorians, critical to our community's wellbeing and the future prosperity of the state.

MBV recognises the intent of the proposed changes to the Small Lot Housing Code (SLHC) and thanks the Victorian Planning Authority for its collaboration with the industry.

We offer the following feedback to the SLHC June 2022 Consultation which incorporates amendments to the requirements for Type A and B allotments, plus new provisions for Type C allotments.

MBV supports codification of siting controls for lots less than 300 square metres negating the need to obtain planning permits using the SLHC. We continue to advocate for similar prescriptive tools that can prove beneficial for the infill development of pre-existing allotments to improve and negate unnecessary delays through the planning approval system.

As discussed with Morris Edwards (Senior Planner, Planning Services - VPA) we offer the following feedback:

- 1. Page 6, definition**

Consider leaving the current definition for a front wall.
The proposed change offers no value as a definition.

- 2. Page 10, Standard 2.b**

Appreciate the intent for an improved streetscape, however, we question the need to have façade material requirements for rear street alignments.

- 3. Page 12, Standard 6.4**

This standard should be omitted given there is no mandatory prerequisite requirement for 2 car parking spaces

4. Page 12, Standard 6.6

This standard should be omitted given there is no mandatory prerequisite requirement for 2 car parking spaces

5. Page 14, Standard 12.1

Consider rewording as follows:

If a habitable room is in a room with a floor level more than 2.5m above natural ground level and incorporates a window that faces (at an angle less than 45°) a living room window of an existing dwelling within a horizontal distance of 4.5 metres, the window must –

- a) have a sill height at least 1.7 metres above floor level; or
- b) have fixed obscure glazing in any part of the window below 1.7 metres above floor level.

6. Page 14, Standard 12.1

The following standard doesn't read well with the proposed change highlighted yellow above.

In this Standard, a window facing a habitable room window means a window within 1.5 m from the edge of the other habitable room window on the existing building.

7. Page 19, Table 1 (3rd column, 2nd row)

Amend to read

Refer Column 4, Table 2 of Standard 7.2

Minimum setback from the side street alignment on a corner allotment

8. Page 19, Table 1 (3rd column, 3rd third row)

Minimum setback from front street alignment for Type C2 Lots will not allow for step free access path and landings. It will also not allow for the swing of a screen door for the front entry

9. Page 20, Table 2

Each column should be numbered so it easier to read with in conjunction with the requirements of Tale 1 in Standard 5.

10. Page 20, Standard 8.1

There is no consideration for garden sheds.

It should be clear whether the reference to a side boundary refers to a rear boundary.

11. Page 21, Standard 9.1

Why limit the Garage setback to no greater than 4.0m, where a greater setback may support off street parking? Consider deleting subclause b)

12. Page 21, Standard 10.3

Consider rewording this standard to improve clarity of the requirement.

If a dwelling is rear loaded, an entry door at the laneway must be provided. This must be separate from a garage door that provides access for a motor vehicle.

13. Page 21, Standard 13

Consider providing additional clarity that offers a combination of different discontinued elements to make up the 25% articulation for a façade. i.e., pergolas, sunshades, sunhoods, etc.

14. Page 23, Standard 20

Can deep soil zones be part of the lots private open space?



15. Page 23, Standard 21

The success to achieve compliance weighs heavily on the layout and orientation of the allotment to the north. (Noting this also impacts energy efficiency design/ compliance with the National Construction Code)

There could be benefits of including building envelope plans as a restriction on title that prescribe building height and location to eliminate the need to do overshadow diagrams.

16. Page 24, Standard 24.1

Consider re wording

This standard refers to a relationship between a proposed habitable room window and that of the adjoining neighbours **living room window**. Consider redrafting:

In this Standard, a window facing a living room window means a window within a 1.5 metre **offset** from the closest point of other habitable room window on an adjoining allotment.

17. Page 25, Standard 28

This standard is not prescriptive, you cannot restrict an area as part of private open space if there is no minimum size of the rainwater tank.

18. Page 27, Standard 37.1

Concerns that the Light Reflective Value needs to be greater than 50, which may challenge the intent of reducing greenhouse gases and support for building homes that are energy efficient.

Additional feedback

1. Mixed documents from VPA state different minimum lot sizes for Type C (i.e., 60, 70, 75 sq m)
2. There are concerns with the width of the allotments that were shared in the presentation and how such size and formats would not be able to comply with other Standards of the provisions. Even more so with the new ABCB Livable Housing Design Standards proposed for the National Construction Code.
3. Consider changing the numbering of each table so they are in numerical sequence throughout (not amend clause referencing)

MBV's vision is to create a future-ready industry that contributes to a better-built environment for all Victorians. We will continue to advocate and support improved standards for our industry that are pragmatic and deliverable that support practitioners and consumers alike.

MBV welcomes the opportunity to continue our discussions with you and your team. Should you wish to discuss our feedback further, don't hesitate to contact Tony Bugeja.

Contact Details

Tony Bugeja, Senior Advisor -Technical
M 0413 237 466
E tbugeja@mbav.com.au

