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To whom it may concern

Draft Position Statement: Housing on Lots less than 100m²

Thank you for the opportunity to provide feedback in relation to the above draft Position Statement. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in Western Australia. UDIA is a membership organisation with members drawn from the residential, commercial and industrial property development sectors. UDIA members include both private and public sector organisations. Our industry represents approximately 12.3% of Western Australia's Gross State Product, contributing \$30.45 billion annually to the Western Australian economy and \$251.7 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 228,500 Western Australians and over 2 million Australians across the country.

UDIA welcomes the release of the draft position statement and supports attempts to provide greater housing diversity and increase the availability of more affordable housing options. UDIA commends the Department for the preparation of the position paper, which recognises the successful delivery of housing on lots smaller than 80m² in the eastern states, and offers a good starting point to achieving the same in Western Australia.

Whilst welcoming the position statement, the Institute does wish to raise a number of concerns regarding its content which should be improved to enhance and ensure the delivery of the outcomes that the position statement is seeking to achieve.

Limited Flexibility Restricting Policy Application

The Institute's primary concern is that the position statement is overly prescriptive and too inflexible. The requirements relating to the location, design, configuration and number of lots will severely restrict the implementation of lots under 100m² and prevent the realisation of the intent of the statement. As a 'position statement' the Institute suggests the inclusion clear aims and objectives identifying the outcomes sought, may be a more practicable solution to achieving the statements intent rather than the setting out strict development requirements.

Whilst the Institute congratulates the WAPC for supporting the delivery of this innovative form of development, the strict requirements that the position statement sets out is likely to restrict further

innovation, improvement and refinement in the design of this housing product. Until housing on lots less than 100m² become more widely established, with the issues, challenges and opportunities regarding this housing typology more accurately understood, the Institute recommends that the position paper requirements should be more flexible. This would allow for greater innovation with regards to housing design and the more practical application of this housing typology to the full range of locations that it is suitable to.

Specific Comments

Location Criteria

UDIA acknowledges the importance of ensuring that the location of housing on lots of less than 100m² is carefully considered and skilfully designed to provide appropriate amenity. However, the location criteria set out in the statement is overly prescriptive and will prevent the provision of this form of housing in many areas where it is highly appropriate. UDIA suggests that in addition to areas where structure plans are in operation, housing on lots less than 100m² should also be enabled by Local Development Plans (LDP). This would allow for the provision of such housing in appropriate infill areas and other areas with appropriate residential density coding.

The Institute queries the requirement for an R80 density code as this pre-requisite will severely limit the opportunities to develop this form of housing and thereby increase housing diversity and improve affordability. Furthermore, recognition also needs to be given to the fact that single dwellings on small lots are unlikely to be the highest and best use of land with a R80 density coding. The position statement's locational criteria state that this development form may be used to integrate and transition between high density (urban) and low density (suburban) residential areas. However, if this housing typology is to be used to manage the integration and transition between high density (urban) and low density (suburban) residential areas, then lower density coding should be considered.

The distance requirements from activity centres are also overly restrictive and requires review. Historically, activity centre boundaries aligned with the cadastral boundaries of shopping centres. However, contemporary policy, in support of the shift towards supporting mixed use development, has resulted in an expansion of the boundaries of activity centres which now include a range of mixes and built-forms. It is notable that Figures A and B appear to show the area within which lots of less than 100m² are appropriate as being from the centre of the activity centre rather than the from the boundary of the centre. The Institute suggests that a more practicable criteria would be to support lots less than 100m² within activity centres and within 800m² of activity centres, including local, secondary or strategic Metropolitan Centres (which are not identified by the statement). In addition to activity centres, this type of housing should also be considered in locations surrounding train stations and high frequency bus routes that are well served by public open space.

Similarly, the requirement for lots to be limited to street block ends and of a minimum number of four lots is too inflexible and prohibits the application of this form of housing in other situations where it may be highly suitable. For example, this form of housing may be appropriate at the interface or corner of primary and secondary streets.

Single House standards

Given the nature and the size of the lots involved, the 1.5m rear setback requirement is excessive, particularly when consideration is also given to the 1m front setback requirement. In addition, as this form of housing is required to be located on street-block ends, the rear setback is effectively a side setback for adjacent properties. The Institute suggests that a zero rear setback would be more appropriate and consistent with side setback requirements.

Given the consistencies and similarities with this form of housing product and that of apartments, the Institute queries the appropriateness of the requirement for 70% of outdoor living areas (OLA) to be uncovered as multiple dwellings are not required to have any portion of OLA uncovered. Whilst these requirements are well intended, the provision of relatively large proportions of space for OLA will limit the usability of ground floor habitable rooms. Furthermore, the statements other OLA requirements ensure that this space is appropriately sized and useable, whilst the requirement to be located in close proximity to public open space provides good access to uncovered open space. Rather than the requirements for being uncovered, consideration should be given to ensuring that an appropriate area is accessible from habitable rooms other than bedrooms. Clarification should also be given as to whether setback areas constitute OLA.

The Institute appreciates the Department's efforts in engaging with the development industry on this issue and looks forward to continue working with the Department to increase housing diversity and affordability. Should the Department require any assistance or further information regarding this matter, the UDIA would be delighted to assist. Please do not hesitate to contact Chris Green, Director Policy and Research at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely



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