

7th October 2016

Planning Manager – Urban Policy
Department of Planning
Locked Bag 2506
Perth WA 6001

ATTN: Planning Manager – Urban Policy,

Re: State Planning Policy 3.1 – Residential Design Codes

Shelter WA welcomes the opportunity to provide a submission on the proposed minor amendments to State Planning Policy 3.1 – Residential Design Codes. Shelter WA is the peak body for social and affordable housing in Western Australia. Shelter WA is committed to ensuring accessible, affordable, appropriate and secure housing for low to moderate income earners, and those disadvantaged in the housing market. Shelter WA also promotes programs and policy changes that can improve the lives of those at risk of and experiencing homelessness.

Access to social and affordable housing is critical to enable individuals and families to actively participate in their community. Western Australia has an ageing population, and with this comes many challenges, including how to house the increasing number of aged and dependant households.

Overall, Shelter WA is supportive of the proposed changes in the amendment, as these improve consistency with other legislation, wording clarity, and are likely to lead to better development outcomes. Shelter WA is particularly pleased to see the consideration of aged and dependent persons in the proposed amendment. Shelter WA is strongly supportive of amendment number No. 24, relating to 'Aged and Dependent' dwellings, detailing a modification of clause 5.5.2 C2.1ii. This change reduces the minimum dwellings required to use this provision of the R Codes for grouped and multiple aged and dependent dwellings in areas coded under R40. This will encourage the development of aged and dependent dwellings that:

- Reduce car dependency
- Have due regard to access and mobility
- Have closely located community facilities and open space
- Respond to the demand for aged and dependent persons' accommodation in the area

Shelter WA is also supportive of modification No. 31. to Table 2b: 'Boundary setbacks – Walls with major openings', reducing the boundary setback for wall heights of 3.5m or less from 1.5 to 1.2m. This change will allow for more efficient use of space in a development.



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PROMOTING AFFORDABLE HOUSING

The proposed amendments align with recent LPS regulation changes, ensuring consistency in legislation for developers, thus improving ease of which development applications can be undertaken. Improved clarity can reduce planning delays, having potential positive flow on effects for housing affordability.

Shelter WA also suggests that the R Codes could further support the provision of affordable housing in WA by:

- Supporting the provision of 'tiny houses' in areas of high amenity. This could result in an increased housing stock, greater urban infill, and reduced spatial and environmental footprints.
- Reducing vehicle parking requirements for developments close to transport hubs, i.e. within 80m from a major train station. This would improve efficiency of land development, encouraged increased housing density and supply in areas of high amenity. This is consistent with the approach promoted in the Department of Planning's Liveable Neighbourhoods document.
- Explore opportunities to improve the R Codes, learning from New South Wales SEPP45, in relation to its focus on apartment design considerations, including housing adaptability, social interaction opportunities, universal design, and ease of maintenance.

To discuss the issues raised in this submission in further detail, please don't hesitate to contact Shelter WA's Policy Officer, Robert Gough, on (08) 9325 6660 or policy@shelterwa.org.au.

Yours Sincerely,

Joe Calleja
Interim Executive Officer
Shelter WA