



Australian  
Institute of  
Architects

# Australian Institute of Architects

**Submission to  
Managing Residential  
Development Advisory  
Committee**

**March 2016**

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## **SUBMISSION BY**

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## **PURPOSE**

This submission is made by the Victorian Chapter of the Australian Institute of Architects (the Institute) to the Managing Residential Development Review Advisory Committee in response to an invitation to comment on the application of zones that provide for residential development in metropolitan Melbourne and the four regional cities of Bendigo, Ballarat, Geelong and Latrobe.

At the time of the submission the office bearers of the Victorian Chapter are: Vanessa Bird (President), Peter Malatt (Immediate Past-President), Rosemary Burne, Robert Goodliffe, Kim Irons, Tim Leslie, Thom McKenzie, Amy Muir, Rowan Opat, Adam Pustola, Fiona Winzar, and Monique Woodward. The Manager of the Victorian Chapter is Alison Cleary.

## **INFORMATION**

The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 12,000 members who are bound by a Code of Conduct and Disciplinary Procedures. The Institute's Victorian Chapter has approx. 3,000 members.

The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.

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## **Introduction**

The Australian Institute of Architects (the Institute) is an independent national member organisation with approximately 12,000 members across Australia and overseas. More than 3,000 of these are based in Victoria. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

The Institute welcomes the opportunity to respond to the review of the implementation of the new residential zones into the Victorian Planning Provisions in July 2013. We acknowledge and support the efforts undertaken by the Victorian Government to develop a long-term vision for the future. We strongly support the need for forward thinking planning policies in managing Melbourne's and Victoria's residential growth for an increasing population. Such policies will help drive innovative, affordable and diverse housing option outcomes.

The Institute supports the government's strategic planning policy thrust proposed in Plan Melbourne, which emphasizes the 20-minute city requiring increased densification; design of sustainable places of well-coordinated public realm; diverse housing with access to employment, entertainment and services; and less reliance on the private car. Increasing the supply of new forms of affordable and diverse housing will be critical to meet the needs of a population which is expected to double by 2050.

However, we believe the restrictive and convoluted nature of the residential controls implemented in 2013 to be a complete mismatch with the broader intent of Plan Melbourne (and likely in Plan Melbourne Refresh). It is expected that they will compound the severity of the challenges facing the liveability of our urban areas if retained in their current form.

## **Demographics and Housing**

Our communities are becoming much more diverse, unsettling the traditional order of housing in our main cities. The National Housing Supply Council has estimated that seven out of ten households can now be termed 'non-traditional'. While traditional two parent households will increase by 20 percent over the next two decades, the number of couples will rise by 36.7 percent and the number of single households will soar by 63.7 percent, with the sixty-five plus age group being the largest growing in Australia. These figures are evident in the take up of different forms of housing.

Increasing numbers of families are now living in apartments in order to be in proximity to employment, entertainment and services. The recent "baby boom" within the City of Melbourne is evidence of this particularly with families concentrated in Southbank and the CBD where there are miniscule numbers of single dwelling housing. As a consequence, this puts pressure on the need to ensure delivery of community and family services and schools in the inner urban areas. The City of Melbourne's Boyd Community Centre and Docklands Community Family Services Hub are examples as is the new multi-level school planned in South Melbourne. It is not only the inner urban areas seeing this demand for new forms of housing, but also the middle and outer areas that are experiencing a similar shift.

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As a consequence, the need for a range of housing types will now be amplified via increased density housing models throughout the urban areas. However, quarantining large areas via restrictive controls regarding height, open space requirements and other techniques will thwart demands for new forms of housing.

### **Housing Trends**

Many Institute members extensively engaged in the housing sector are providing housing for many more of our population than in the past, and importantly, are witnessing higher numbers of “owner occupiers” seeking apartments.

There is a shift underway in housing for better quality apartments in terms of amenity and location however, price points will remain sensitive. The shift away from developer’s preference for the investor small apartment model is partly due to pending oversupply and to a perceived, and in many instances, a real level of unsatisfactory amenity.

New developments such as The Commons and Nightingale Projects are new exemplar local models of collaborative community based projects involving crowd funding for delivering housing at lower price points. Purchasers are allowed to bespoke their apartments and community facilities are designed to be shared. These are delivered at lower levels of price points.

This disruptive form of the development model will likely shift into the mainstream development providing access for the types of housing across demographics. However, the planning controls limiting height and density contained in many of the recently implemented strategies and zones by municipalities will have a significant impact on the design and delivery of new forms of suburban housing.

These policies will also thwart the regeneration of community orientated integrative mix use developments at larger scale of precinct (*AHURI: Towards a new development model for housing regeneration in greyfield residential precincts 2011*). Yet public transport, jobs and services access tends to be good for many of the suburbs subjected to restrictive planning controls.

The new development models outlined in the AHURI report present an opportunity in Melbourne’s existing suburbs to maximise their potential for new and existing residents, and their local community. Unfortunately they are unrealisable within the context of the current planning framework. New developments that provide a diverse mix of housing styles and costs, encourage use of public transport or walking, provide a sense of place that encourage the social capital networks and reinforce neighbourhood, and able to, due to scale, incorporate precinct wide energy, water and waste systems are not possible.

Adequate emphasis on regeneration policy formulation and frameworks for ageing suburbia is required to meet the current and increasingly urgent social and environmental imperatives. Now is not the time to rehash restrictive policies seeking to maintain past conditions.

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## **Shutting Down Innovation**

In addition to individual municipalities formulating local controls being of concern to the Institute, the application of such controls also limits the diversity of potential dwelling outcomes, restricting opportunities for innovative design solutions and site-specific development responses.

The new Residential Zones were a clear shift from a merit based assessment system to a suite of mandated outcomes that create an expectation of where development types will and will not be allowed. This has resulted in a loss of innovation and diversity.

As we predicted in 2012 one effect of mandated outcomes has been a greater focus on height rather than design as the relevant arbiter of what defines acceptable development, resulting in a lack of innovation and limitations on the diversity of housing types available in the market. An approach which includes both consideration of planning aspects – including but definitely not limited to height limits - and specific responses based on the context of the site and surrounds complemented by excellence in design - should be the key measure in assessing the impact of any development.

Mandated outcomes result in limited flexibility to respond to Melbourne's changing population needs and so providing the housing diversity that we need will be difficult to achieve. Melbourne's changing housing needs are centred on an increasing population and smaller households that would prefer to live in established residential areas. On the contrary, the Residential Zone reforms have limited housing provision, discouraging attached housing styles, and making it harder to achieve approvals and increased density in established housing areas.

The Institute is also concerned about the implications of requiring each council to set their own Objectives and Decision Guidelines for each individual Zone and Schedule to the zone.

Previously the objectives and decision guidelines were set in the State Planning Policy Framework and furthered by the VPP, and were largely consistent across the entire municipality. This change was of great concern as it radically undermined a traditional strength of the Victorian system, which aims for the central coordination and the relatively consistent application of planning objectives. The reform meant that every zone area potentially has different objectives and different decision guidelines.

The scope for increased complexity and inconsistency is immense. Planning policy for adjoining properties either side of a municipal boundary can be attempting to achieve different objectives and require different weighting of factors in planning decisions. As users of the planning system, the Institute sees this change as the antithesis of strategic vision in planning.

Planning approval processes that impose both objective parameters such as height, lot size, dwelling and open space sizes, in conjunction with subjective parameters, such as preserving neighbourhood character, will result in a "business as usual" industry of highly risk-averse tick the box planning compliance of familiar building forms and housing types with replicated siting strategies. The result will be a lack of innovation that presents as an informal, self-imposed standardisation within the building industry of small scale development where architectural design is largely absent.

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Planners have a unique role having the role of drafting planning law, yet for a few exceptions, much of local government planning is overworked, under resourced and lacking a sufficient design skill base to be effective in determining innovative solutions that can meet the future needs of our community: in other words, the reinforcing what's there, rather planning for what should be or could be.

### **Prioritising Good Design**

In a 2011 submission on Planning Policy reform to the previous Government, the Institute spoke strongly of the need to embed design principles and outcomes in to all levels of the Planning System. At the highest level this would involve amending objectives for planning in Victoria to include reference to high quality design as proposed in the 2009 draft Planning and Environment Bill, or similar, and including the twelve principles of the Victorian Urban Design Charter in the State Planning Policy Framework. At the component level – including zoning – this means recognising and embedding the important role of design review mechanisms (e.g. The Victorian Design Review Panel process, establishment of local government design advisors, and greater, more consistent use of design review panels at the local level). This can assist in properly evaluating design quality in relation to all aspects: including responsiveness to heritage; appropriateness of heights and massing; and so on through to building form, articulation, and detail. The expert advice provided through rigorous independent review in this way can provide greater confidence to the community and to decision makers as to the merits of any given proposal. The Institute continues to support the strengthening of the role of design review at all levels of the Victorian Planning system.

### **Recommendations**

The Institute offers the following recommendations to the Committee with a view to ensuring a consistent application of planning principles and policies which have the scope and flexibility for increasing density and diversity, in both small and conventional development, and in addition, for precinct scale development to occur.

The AIA is interested in promoting the merits of design being incorporated into the Planning system, particularly the way in which design responds to context. Our recommendations are:

#### **Zoning reform:**

##### *Neighbourhood Residential Zone:*

- Rewording to allow for reasonable flexibility regarding building height.
- Align neighbourhood character implementation with appropriate weight with the broader objectives of densification and merits of design response.
- Delete reference to density and building height metrics to allow appropriate and innovative forms of development based on merits of design response.

##### *General Residential Zone:*

- Distinguish neighbourhood character from replication allowing flexibility of response based on consistent policy objectives and merit of design responses.

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- Delete mandatory height requirements and allow for discretionary height controls based on merits of design response.

*Residential Growth Zone:*

- Promote discretionary height and remove reference to up to and including 4 storey buildings.
- Provide new design guidelines for residential development above three level. Rescode provisions are used inappropriately with developments over 3 levels having being formulated for a maximum of three levels.

**Other recommendations:**

*Development Contributions:*

Currently, developer contributions are seen to be applied arbitrarily and without justification and as such can inhibit development. As a result, Melbourne and its suburbs has seen limited development beyond that which is government sponsored. The Institute recommends a full review of the current Government policy and guidelines on Development Contributions and an investigation in to alternative mechanisms that present investors and developers with a *value proposition* that inspires innovative interpretation and allows design professional to fashion best practice responses supported by the various residential zones.

*Promoting Design Excellence:*

The AIA would welcome the opportunity to assist local government in elevating design formulation of Design Review Panels. Ways that this can be achieved include:

- Mandating the use of registered architects for residential development over 3 or more levels.
- Incorporating Design Review Panels in the assessment of development design merits to assist local government better assess the design merits of the applications before them.

**Conclusion**

We believe that it is in the interests of the City, the State and its citizens that the planning scheme be implemented for the public good and with a degree of independence from day to day political interference. For a long-term strategy to be effective, it is our view that it must be supported and developed over the life of several governments and possibly changing political persuasions.

We see this submission as part of an ongoing process of consultation and development and welcome the opportunity to appear before a Public Hearing. At the Hearing we plan to expand on this submission through detailed commentary on a number of contested residential zone amendments, including Geelong C300 and Knox 131. We also plan to look at inner city in fill development, implications for outer growth area densification at Local Activity Centre level and alternative incentives to mechanisms such as Development Contributions as a means to ensuring good development outcomes for Victoria.