



8 June 2022

Hon Rita Saffioti
Minister for Transport, Planning, Ports
9th Floor, Dumas House
2 Havelock Street
WEST PERTH WA 6005

Dear Minister

RE: LETTER OF SUPPORT FOR THE MEDIUM DENSITY CODE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation representing over 12,500 members across Australia and overseas. More than 1,100 of these are based in Western Australia and are supported by the WA Chapter.

The Institute supports the introduction of the new Medium Density Code SPP7.3 (the Draft Code) and commends the Department of Planning, Lands and Heritage (DPLH) on the collaborative and consultative process it has undertaken in developing this policy.

The Draft Code elevates the focus on design quality, and it is our professional hope that it will revolutionise the approach to medium density developments – and make good design more accessible for all West Australians.

Support for proposed reforms

As outlined in our submission in response to the Draft Code dated April 2021¹, the Institute is generally supportive of the proposed reforms that positively resonate with member sentiments.

In particular, the Institute commends the following initiatives:

- Incentivised retention of mature trees;
- Optimising the quality of outdoor spaces, through the consolidation of primary outdoor spaces and gardens to primary location, with good solar access and access to living spaces;
- Optimising the quality of indoor living spaces through solar orientation of dwellings, connection to outdoor spaces and appropriate sizing; and
- Improving sustainability of housing and neighbourhoods;
- Consideration of local context and “neighbourliness”.

These design considerations in the Draft Code, with a focus on passive design principles and context, will enhance housing diversity and improve the design quality of infill and, importantly, improve the operational performance of dwellings.

¹ Refer Australian Institute of Architects and ACA joint submission: <https://www.architecture.com.au/wp-content/uploads/RAIA-ACA-SPP7.3-Medium-Density-WA-April-2021.pdf>



Climate

The Institute is committed to a net zero carbon building and construction industry by 2030 and to achieve this we support the introduction of the Draft Code, which alongside the 2022 National Construction Code, will considerably influence residential energy requirements.

Practically, it is great to see that the introduction of the Draft Code will result in real ongoing operational cost savings for occupants, with DPLH's research projecting cost savings of \$1,460 per dwelling per year² through optimised passive sustainability principles, reduced neighbourhood heat island effect and stormwater penetrability.

Residential buildings are responsible for around 24% of overall electricity use and 12% of total carbon emissions in Australia³. Accordingly, energy efficiency in residential buildings can have a significant impact on WA's economy and the reliability of the WA energy grid.

Feasibility

We understand that the Ministerial Office and DPLH have received feedback from some in the construction sector that the Draft Code will limit the feasibility of developments. With respect, such assertions are simply not true and may be a response from those in the industry that are unwilling to adapt and adjust their development models, which we understand is in fact the aim of the Draft Code.

Our members have demonstrated on a number of occasions that the yield of a well-designed, innovative, affordable and cost-conscious development does not decrease yield but may increase it.

As you are aware, the Draft Code does not propose a change in the construction methodology of developments, but rather demands a more considered and strategic approach to medium density developments which will result in homes that are more liveable, cost less to run and provide an improved quality of life.

The R Codes, which are now nearly four decades old, no longer support modern housing requirements. In recent decades, the R Codes have enabled poorly designed developments – dwellings which are all roof and no garden, often delivered with small and ineffective living and bedroom spaces, designed with no private open space, result in major loss of tree canopy and contribute to urban heat island effect. Arguably it is this type of development which has led to negative community sentiments towards medium density in many suburbs.

Accordingly, the State Government's initiative in compiling the Draft Code to address current design issues is welcome and overdue. The Draft Code is well considered and demonstrates the optimal way to increase density in areas where there is already great amenity. The document's emphasis on the garden, passive design, light and ventilation shows how density can be done well – protecting both the end user and neighbourhoods.

The Draft Code will encourage and enable far more considered and contextually responsive built form possibilities that, from a planning and design perspective, will bridge the gap between low density detached homes and traditional apartment development.

² Wider costs of Medium Density Development, SGS Economics and Planning, 2020:
<https://www.wa.gov.au/system/files/2021-06/DWA-Analysis-of-Typical-Development-200501.pdf>

³ Department of Industry Science Energy and Resources www.energy.gov.au/government-priorities/buildings/residential-buildings.



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In my role as the Western Australian Chapter President, I would like to meet with you to discuss the Medium Density Code and WA's broader Planning Reform process. Our National Policy and Advocacy Manager, Beata Davey will be in touch with your office to arrange a time.

Yours sincerely,

Sandy Anghie RAIA

STATE PRESIDENT WESTERN AUSTRALIA

CC: Kathy Bonus, Chief Planning Advisor
Department of Planning, Lands and Heritage
Rebecca Moore, Government Architect
Office of the Government Architect

Enc. Examples of Medium Density Developments in Western Australia



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Examples of medium density developments by MDC Architects at Carrington Street Palmyra (above) and Peter Hobbs Architects at 15 Cummins Street Willagee for The Department of Communities (below).

