



**Format**  
HOMES

**Submission**

**Phase Three of the Planning and Design Code  
(Urban Areas)**

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# Background

## Format Homes

Format Homes is an independent, family owned and operated residential builder, specialising in steel frame home design and construction in the Adelaide Metropolitan Area and surrounding country districts. The Head Office and administrative base is located in Flinders Park, with 12 display homes open to the public across 6 display villages.

Over the past 19 years since opening, Format Homes has experienced sustained growth, presently constructing approx. 110 - 120 single and two storey homes per year, with an office and sales team of 20 full & part-time personnel, an on-site construction & maintenance team of 3 direct employees, and utilising a core trade base of over 70 sub-contractors. Our commitment to service, quality and continuous improvement has resulted in being awarded multiple HIA (SA) Housing Awards and MBA (SA) Building Excellence Awards, previously being named MBA (SA) Master Builder of the Year (Display Homes Builder), and being awarded HIA SA Medium Professional Builder 5 years in a row.

Our core business is a custom design, knock-down and rebuild offering, typically for the owner/occupier market. The full design and construct service model starts with initial design advice, developing concept designs and working drawings, right through the approvals and selection processes to construction and full turn-key completion.

As most of our work is building homes for our clients, we build them the homes that they want to and can afford to live in, within the framework provided by the NCC and Planning System in place at the time. We provide plans and display homes for them to look at and for guidance, but we are very much directed by our client's wishes. Hence we believe that we have a good perspective and insight into what those who are looking at building a new home nowadays will be wanting to build.

## Assumptions and Conditions

This submission has been made purely on the State Planning Commission's draft Planning and Design Code for Phase Three (Urban Areas) document that was released on 1 October 2019.

There are several other aspects to the new planning system that were not available to comment on as part of this Consultation Process:

- The ePlanning 'one-stop shop website'
  - specifically the Online lodgement website for development applications, and other online tools
- Ministerial Guidelines to provide guidance for assessor for code assessed development
  - the only available guidance to date appears to be the Deemed-To-Satisfy requirements.

Due to the above, the majority of comments in this submission relate to the 'Accepted Development' assessment pathways in relation to newly built Residential Housing.

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# Areas of Concern and Proposed Solutions

## Trees and Deep Soil Zones

*Reference: "Design in Urban Areas" DTS/DPF 21.2 Page 2240*

While we agree with the general benefits of tree plantings and general greening of suburbs, the requirements to provide trees to front yards raises several issues both in design and construction of new homes:

- Footings – Engineers when designing footings for new homes will have to factor in these future tree plantings. This will require additional steel and concrete which will increase the price of building new homes.
- Engineer's Professional Indemnity – Trees near homes will likely increase potential exposure for their Professional Indemnity Insurers. This will quite likely lead to increases in Insurance Premiums for the Engineering firms which will again further drive prices higher for those building new homes.
- Enforcement – It is not clear how these plantings will be enforced and where the responsibilities will be for both monitoring enforcement and rectification if required. Some questions that arise:
  - How long do the trees need to survive to be compliant?
  - If a tree dies is it the owner's responsibility or the applicant's (where the applicant is the builder or a designer)?
  - Will damage to Council furniture (i.e. footpaths) from a tree on-site be a responsibility of the owner, applicant or Council's to fix?

DPTI have made comments at various forums that they are open to the idea of 'cost recovery' for the enforcement and compliance of requirements. These are further costs again that will end up being passed down to those building new homes.

It can be expected, especially in areas of lower housing values, that there will be pattern of maybe one to three different tree species maximum that will be used, due to them being the most economical and/or the least likely to cause future damage.

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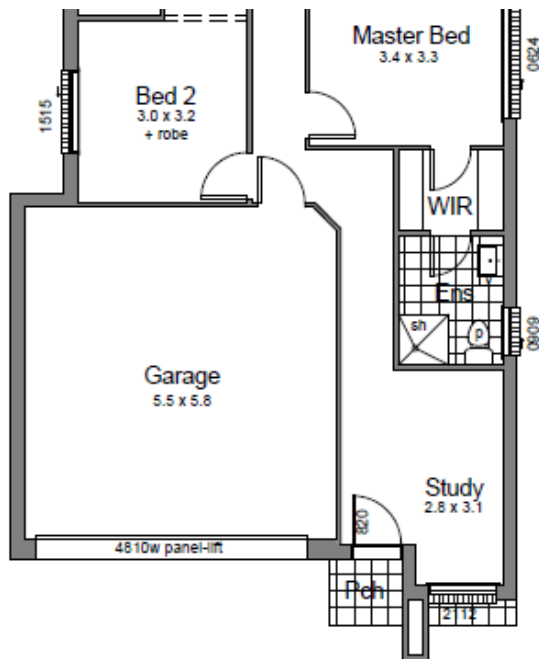


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## Garaging and covered car park requirements

Reference: "Design in Urban Areas" DTS/DPF 18.1 page 2238

One of Format Homes' most popular plans is the 'Ashton 3' (the front of this design being shown below), which is on display at Seaford Heights and provides a 10 Metre wide home with a double garage and fits on a 300m<sup>2</sup> allotment. This home is compliant with the current 'ResCode' requirements, and obviously suits a great number of those building new homes.



DTS / DPF 18.1 has obviously been written to remove this popular option from the market. Our view is that this is short-sighted given the following:

- South Australians are still heavily dependant on motor vehicles for transport, which is due to the general design of the greater metropolitan Adelaide;
- Most households have two or more vehicles;
- There is high call for a double garage on smaller allotments;
- Smaller allotments are more cost-effective, especially for those who require lower cost housing;
- Double garages offer additional off-street parking, which will assist in removing the issues with overcrowded streets due to on-street parking

It is our evident to us that the market has a strong preference for secure, undercover car parking provisions and this DTS/DPF totally removes this option. This has been allowed under the ResCode provisions for the last eleven years and, while it may not aesthetically appeal to everyone has been increasingly popular.

Reference: "Design in Urban Areas" DTS/DPF 23.1 page 2243

The stated dimensions in DTS / DPF 23.1 for covered car parking spaces where enclosed by fencing or walls are somewhat higher than the Australian Standard. The Australian Standard is 3.0m x 5.4m for a single garage, and 5.4m x 5.4m for a double garage, whereas the requirement in the PDI is 3.2m x 6.0m for a single garage, and 6.0m x 6.0m for a double garage.

A 5.4m x 5.4m double garage is unusual, however it is quite common for double garages to have dimensions of approximately 5.8m, especially on tight sites. Many developments that sell 6.0m wide allotments are on the basis that a double garage will fit that allotment width, and the buyers are quite happy to work to that requirement.

It's our view that the PDI requirements should be aligned with the Australian Standards.

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## House driveway access and off-street parking

*Reference: "Transport, Access and Parking" DTS/DPF 3.6 page, 2324*

This onerous requirement requiring a site to have a 20 Metre frontage before allowing a 6 Metre crossover will not achieve it's intended "result" to 'optimize the provision of on-street visitor parking' (PO 3.6)

As per the following:

- Allowing 6.0 Metres for each on-street carpark, a site with a 12.5 Metre frontage will only allow a single on-street carpark regardless of the crossover, as 12.5 Metres – 3.5 Metre crossover only leaves 9 Metres for on-street parking
- The only possible benefit for on-street car parking will be sites between 15.5 Metres to 18 Metres in width.
- Traditional '50 footer' and '60 footer' sites, which comprise the majority of earlier sites in metropolitan Adelaide, will therefore not receive the intended on-street carparking benefit.

Removal of the double crossover for the allotments under 20 Metres will also remove off-street car parking, so other than with the negligible number of 15.5 Metre to 18 Metre width sites, on-street car parking will likely increase, the opposite of the intended result in PO 3.6.

We would recommend allowing a double crossover to 5.5 Metres where a double on-site carpark is present, maybe with scope to look at sharing of on-street carparking where multiple, smaller allotments (i.e. under 12.5 Metres) are being built.

*Reference "Design in Urban Areas" DTS / DPF 23.4, page 2244*

Having a 2 Metre setback from existing street trees (without consent of the 'owner') will have a significant impact on the development of smaller allotments, and also negatively impact on good design

We would recommend at a minimum having a sliding scale setback distance based on the size and/or type of tree. Preferably a method of having street trees moved (i.e. remove street tree, replace with another) that is consistent, if the street tree(s) are impeding driveway access.

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## External Appearance - Frontages

*Reference: "Design in Urban Areas" DTS/DPF 14.1 & 14.2 page 2236*

The requirements listed in DTS / DPF 14.1 & 14.2 are both introducing significant restrictions to what can be done with narrower allotments, especially with price-sensitive single storey homes.

Again referring to our 'Ashton 3' design earlier, these two requirements would appear to be setup specifically to eliminate these quite popular types of homes from the market, without actually addressing the stated objectives.

The requirement to have the front door facing the street will also potentially reduce the opportunity for both owners and designers to look at more progressive designs in the future. There are already numerous new homes that do not meet this requirement, yet still are providing an obvious, legible entry point for visitors.

## Waste Bins Storage

*Reference: "Design in Urban Areas" DTS /DPF 24.1, page 2244*

The requirement for waste bin storage in DTS / DPF 24.1 mandates additional area being taken up for a storage area that may or may not be used by home owners. It would be expected in practice that in many cases homeowners will still leave their bins out the front of the homes, probably pushed up against a side fence on the other side from the garage, as is common today.

This would also suggest Councils will need to enforce compliance with the use of this area.

We would recommend the removal of this requirement, as we already build homes for clients that planned for this area and will use it. For others it is simply another requirement that will impact their final design in a way that does not suit their lifestyle.

# Rainwater Tanks and Plumbing Requirements

*Reference "Design in Urban Areas" DTS / DPF 22.1, Page 2242*

There are three changes in this requirement that will add significant cost to homeowners again without any true benefit to them:

- Rainwater tank minimum sizing (Table 1, page 2242) – smaller allotments are making it harder again to fit all required items, and rainwater tanks take up a significant amount of area, reducing actual, usable Private Open Space. These tank sizes are all noticeably higher than the current 1,000 Litre tank requirement.
- Plumbing the tank to all toilets, and either the laundry cold water outlets or Hot Water Service simply adds further cost to the home owner. This comes as additional plumbing costs and also a sediment filter. Already existing systems have pumps that have maintenance costs, replacement after warranties expire etc.
- Plumbing 60% of the roof area (80% for row dwellings) adds further cost to the stormwater system, now requiring more of it to be a sealed system than the current requirement

*Reference: "Design in Urban Areas" DTS / DPF 22.2, Page 2242*

This requirement adds a *significant* cost to developments of between 5 – 19 dwellings. We cannot understand why a specific development of (for example) 12 dwellings requires a stormwater management system, whereas 12 individual dwellings that happen to be adjacent each other on the street would not do so.

The requirements of the systems being proposed also require on-going maintenance, and it would be suggested that after 6 – 12 months of operation it will not be performing the task required of it unless a body corporate maintains it, again adding further costs to the homeowners.



# Public Notification Requirements

*Reference: Procedural Matters (PM) Notification of Performance Assessed Development, page 180*

Item (a) 'the site of the development is adjacent land to land in a different zone' would appear to be intended to capture development where there are *significant* differences in the land use, i.e. a residential zone adjacent a rural or employment zone. However it acts as a 'catch-all' and would seem somewhat superfluous where adjacent zones are both of a similar type (i.e. residential zones)

We would recommend Public Notification only be required where the Zones are of a *significant* difference. We cannot see any logical reason that Public Notification should be required where (for example) two residential Zones meet.

Our general view is that Public Notification is an onerous requirement, and should only be required in *extreme* cases, rather than minor deviations from what is considered 'the norm'.

## Possible Errors Identified

*Reference: Page 1009, "Deemed-to-Satisfy Development Classification Criteria", 'General Development Policies'*

All references to 'Design in Urban Areas' from [All Residential Development – Flooding] DTS 18.1 onwards are out by one paragraph (i.e. Flooding is covered in DTS/DPF 17.1 on page 2238)

*Reference: "Design in Urban Areas" Table 1, page 2253*

References to site areas for Detached, Semi-detached, Row and Group dwellings:

Recommend Site area < 300m<sup>2</sup> be adjusted to Site area < 301m<sup>2</sup>,  
Site area 300m<sup>2</sup> – 500m<sup>2</sup> be adjusted to Site area >= 301m<sup>2</sup> to 500m<sup>2</sup>  
Site area 500m<sup>2</sup> – 1,000m<sup>2</sup> be adjusted to Site area > 500m<sup>2</sup> to 1,000m<sup>2</sup>

## Summary

The Planning Reforms that are currently underway as per the *Planning, Development and Infrastructure Act 2016*, are an overall benefit and nett positive to the state as a whole, significantly reducing the number of different Planning Zones that need to be adhered to. The potential of the ePlanning Tools to speed up Development Applications and make the Planning System less obscure to everyone is welcome.

It is our view though that the 'Draft Planning and Design Code for Phase Three (Urban Areas)' contains numerous significant issues and incongruencies that need to be addressed before they can be relied upon by both assessors and the general public to make decisions on.

There also appears to be an element of attempting to remove certain types of housing that do not meet a criteria that appears to be based purely on some sort of aesthetic requirement, or some other non-quantifiable means, which simply reduces options for the buying public, especially those on lower incomes, that have requirements that are not 'outside the norm'. It is also quite obvious that there are also numerous requirements in even this brief read-through that do not actually contribute to the stated Performance Objectives.

Our view is that the system is not yet ready for the intended July 2020 or September 2020 activation, and should be open to further review when the proposed ePlanning Tools become available for us to be able to review and assess.