

Attachment 2

Proposed Policy	Current Policy	Comment
Sites over 1 hectare (10,000m ²) in area can accommodate a building height of up to 4-storeys (15 metres), and up to 6-storeys (22 metres) on sites over 2 hectares (20,000m ²) in area.	<p>2-storey height limit in General Residential Zone</p> <p>5 to 7-storey height limit in Urban Corridor Zone (Jetty Road Glenelg)</p> <p>2-storeys in High Density Neighbourhood Zone (Jetty Road Brighton)</p> <p>3-storeys in Waterfront Neighbourhood Zone</p>	<p>Height allowance of 4 to 6-storeys is too great in areas where the prevailing character is 1 to 2-storeys</p> <p>Clarity and certainty required as to whether increased heights are intended for prescribed zones or to include Established Neighbourhood Zone, particularly as the SCAP is the relevant authority for development over 4-storeys and too much discretion may be applied</p>
The policy requires development to be within a building envelope that is projected out from a site boundary (excluding with a road) either 30 degrees or 45 degrees	No current policy	The inclusion of this quantitative standard is a positive, although there needs to be qualitative standards to ensure good design outcomes for the streetscape
Significant retirement facility and supported accommodation site: Means a site greater than 10,000m ² , which may include one or more allotments, used primarily for a retirement facility or supported accommodation (or both) Significant Retirement Facility and Supported Accommodation Sites applies to all suburban neighbourhood-type zones	No current definition	The application of 'significant retirement facility and supported accommodation sites' is too broad and should be applied where the established character of an area can accommodate. Identification of suitable sites should occur prior to allowances being created.

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Subordinate non-residential uses in association with supported accommodation or retirement facility development, such as a café or consulting rooms for the provision of allied health services up to 450m ² in floor area per tenancy	No allowance for such commercial activity in General Residential Zone, High Density Neighbourhood Zone or Waterfront Neighbourhood Zone	Clarification is required as to whether these associated commercial premises are for the exclusive use of apartment residents or are they intended for general public patronage. Commercial uses outside of designated centre zones is highly problematic with negative interface outcomes, typically involving high volumes of traffic and inadequate parking.
No additional on-site car parking will not be required for subordinate non-residential uses given the provision of parking associated with the primary use	On-site car parking requirement for all commercial uses at various rates	This is highly problematic, particularly if the commercial premises are open to the general public arriving by car. It is recommended that these premises are either for the exclusive use of apartment occupants or that adequate car parking quotas are applied.
Retirement facilities and supported accommodation is exempt from public notification	Public notification currently required for any development exceeding 2-storeys in height in the General Neighbourhood Zone Public notification currently required for any development exceeding 3-storeys in height in the Waterfront Neighbourhood Zone and High Density Neighbourhood Zone	This is not supported, particularly as these buildings will have a significant visual impact on adjacent residents, in addition to an expected decline in general amenity caused by the intensification of uses on the site. Public notification must be included for any development exceeding current building height parameters, as this is the current practice under the Planning and Design Code.
New “co-living” definition: contains 6 or more private residences that do not	No current definition	There is real concern that the residents of the living units require heavy reliance on communal

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include either a full kitchen (provision for a sink, fixed oven, food preparation area and full-sized fridge) for its exclusive use or a full bathroom (provision for a bath or shower, toilet, and a wash basin) for its exclusive use		services. Whilst this may satisfy certain objectives for affordable housing, the liveability of such places is heavily compromised and diminished.
Co-living residence: 0.5 spaces per bedroom except Urban Corridor at 0.25 spaces per bedroom (Carparking fund does not apply in lieu of shortfalls)		It cannot be assumed that not all residents will own a motor vehicle and therefore not require onsite car parking. The existing congestion in residential streets will be exacerbated by providing fewer car parking spaces for multi-storey accommodation, particularly if the Code Amendment also dispenses with the need for car parking associated with the commercial activities on the site.
With respect to Apartment Dwellings, remove the criteria specifying minimum apartment sizes applying to apartment-type dwellings	Current minimum dwelling size 200m ² for	It remains important to have some control or measure for residential density. A cap on the number of apartments relative to building size is an efficient measure to manage density.
Main living areas to provide outlook to private open space or communal open space, where possible	No current requirement for communal open space	This is supported as the confined living areas proposed would isolate residents if not for an outlook onto an activated space.
co-living residence with a frontage to a public street: 1. includes at least one window facing the primary street from a	Habitable room to have outlook to primary street	This is supported as the confined living areas proposed would isolate residents if not for an outlook onto a public space.

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habitable room that has a minimum internal room dimension of 2.4m ² . has an aggregate window area of at least 2m ² facing the primary street		
Communal open space incorporates a minimum dimension of 5 metres and 2.5m ² per residence	No current requirement for communal open space	This is supported as the confined living areas proposed would isolate residents if not for communal open space areas.
New definition: Build-to-Rent Housing. Purpose-designed rental apartment stock which is then managed by a single entity on an ongoing basis. The developer retains ownership of all apartments and offers them for rent. Build-to-Rent developments typically offer longer-term leases, which provides tenants with greater security of tenure.	Currently assessed as a residential flat building or a dwelling	It is imperative that repayment options do not entrench disadvantage or create areas of high disadvantage. State Government oversight of the Rent-to-Buy scheme is recommended to ensure that residents are not exploited.
In all Urban Corridor zones, the Code Amendment proposes to list supported accommodation and retirement facilities as a new trigger for “Significant Development Sites”, which allows for building height 30% above the zone’s applicable building height on sites greater than 2500m ² in area	Height limit of 5-storeys in the Urban Corridor Zone (Jetty Road Glenelg)	There is always concern where the maximum prescribed height of an area is open to concessions. The preference is for the retention of maximum building heights to ensure that streetscapes have a consistent built form character.