

## APPENDIX A –SUGGESTED MODIFICATIONS TO SOME KEY PARTS OF THE DRAFT APARTMENT DESIGN GUIDE

Part 2 Developing the Controls	Suggested Modifications	Reason for Modification
2E – Building depth	<p>Objectives</p> <p>Ensure building depth supports apartment layouts that meet the performance criteria <del>and acceptable solutions</del> within the Apartment Design Guide</p> <p>Ensure that the bulk of the development is <del>in</del> <u>scale compatible</u> with the existing or desired future context</p>	<p>This does not recognise that alternative solutions may also be used to meet the performance criteria as outlined on page 11 of the ADG. The focus should be placed on meeting the overall objectives and performance criteria. As specified on page 11 this can be through the listed design solutions, the listed alternative solutions or another alternative design solution not listed.</p>
	<p>1. Use maximum apartment building depths of 12-<del>25</del><u>18</u>m when precinct planning and testing development controls to help ensure apartments receive adequate daylight and natural ventilation and optimize natural cross ventilation.</p>	<p>Tower apartment buildings typically have a depth of between 20 to 25m, which have been approved on the basis of achieving good residential amenity.</p>
2F – Building Separation	<p>3. Minimum separation distances for buildings within a site and between adjoining sites for buildings are:</p> <p>Up to four storeys (approximately 12m)</p> <ul style="list-style-type: none"> <li>• 12m between habitable rooms/balconies</li> <li>• 9m between habitable and non-habitable</li> <li>• 6m between non-habitable <u>or habitable rooms with no eye level windows or where appropriate screening is provided to habitable rooms and balconies</u></li> </ul> <p>Five <del>to eight</del> storeys <u>and above</u> (<del>approximately 25</del><u>over 25m</u>)</p>	<p>A common issue with the current RFDC is that it defines a habitable room as including most rooms except bathrooms and kitchens and therefore despite whether a living room or kitchen for instance has a high level window or appropriate screening, the greater building separation distances still apply. It is reasonable that where there are no overlooking impacts from one habitable room or balcony to another that a lesser separation distance may apply.</p>

	<p>18m between habitable rooms/balconies</p> <ul style="list-style-type: none"> <li>• 12m between habitable and non-habitable</li> <li>• 9m between non-habitable <u>or habitable rooms with no eye level windows or where appropriate screening is provided to habitable rooms and balconies</u></li> </ul> <p><del>Nine storeys and above (over 25m)</del></p> <ul style="list-style-type: none"> <li><del>• 24m between habitable rooms/balconies</del></li> <li><del>• 18m between habitable and non-habitable</del></li> <li><del>• 12m between non-habitable</del></li> </ul>	
	<p>Suggest adding acceptable design solution:</p> <p>Where habitable rooms do not contain eye level windows or where appropriate screening is to be provided to minimise overlooking such as louvered screens the building separation distances may be reduced. In such instances building separation distances should be assessed on their merit taking into consideration the performance criteria for building separation.</p>	As per above
<b>Part 3 – Siting the Development</b>	<b>Suggested Modifications</b>	<b>Reason for Modification</b>
3B-2	<p>Delete acceptable solution 4 and 7</p> <p>Delete wording “...to the south or down the hill...” in solution 5.</p>	<p>Rely on acceptable solutions 3.</p> <p>Solar modeling will confirm where setbacks should be adopted.</p>
3C	<p>Diagram 1 pg 52– modify</p> <p>Diagram 2 pg52 – modify front</p>	<p>1m maximum level change is too restrictive on sloping sites</p> <p>1m front fences and walls</p>

	<p>wall height</p> <p>Image 3 pg 53 – Delete</p> <p>3C-1 Performance Criteria 4 – update to 1.5m</p> <p>3C-1 Performance Criteria 5 – Delete</p> <p>3C-1 Performance Criteria 6 – Delete</p> <p>3C-2 Performance Criteria 4 – Delete “Substations” and “other service requirements”.</p>	<p>will not allow privacy or security in courtyards that face the street. Blinds will always be closed, windows and doors will be locked shut, which will encourage an unactivated streetscape.</p> <p>This image articulates why low walls should not be a design control - all the blinds are shut, and there is no furniture in the “private” open space</p> <p>1m is too restrictive as noted above. Images on pages 8, 18, 33, 40, 43, 54, 67, 69, 76, 78, 107 and 128 all do not comply with this control, but are good examples of higher fencing.</p> <p>Need to consider the site context – site falls, planters, privacy, solar, dwelling types, neighbouring buildings etc.</p> <p>Seating at the front entry would potentially compromise security, not enhance it. It will also potentially block paths of travel for fire egress.</p> <p>Substations and fire services are often not able to live within the building envelope i.e. they MUST be on the street.</p>
3D	<p>Add Alternative Design solution:</p> <p>Having regard to the size of an apartment building, its location, context of a site and its proximity to existing community open space and facilities, the design may</p>	<p>There are numerous instances in inner city locations where a new building may be well located across the road from a park or playground or in close proximity to open space areas or community facilities. In such instances it could</p>

	<p>provide less than 25% of the site as communal open space provided good access to local facilities can be satisfactorily demonstrated.</p> <p>3D-2 Performance Criteria 3 – Delete “electrical substations”</p>	<p>reasonably be argued that less than 25% of site could be provided as communal open space.</p> <p>Indoor community spaces such as gyms, pools, business hubs and the like should also be considered.</p> <p>Often there is no choice on the location of substations, booster valves and the like.</p>
3E Deep Soil Zones	<p>3E-1 Performance Criteria 3 – Delete soil volumes</p> <p>3E-2 Performance Criteria 2 – Delete</p>	<p>Mature planting and turf can be achieved without deep soil beneath them. Suggest relooking at deep soil to be a % of “Landscaped Area” to achieve permeable surface objectives, rather than to achieve a quantum of trees. Deep soil zones are very restrictive on efficient and legible basement design.</p> <p>Mature trees do not require these soil volumes.</p> <p>This solution is not achievable on large sites with complex hydraulic &amp; civil requirements.</p>
3F	<p>Figure 3F-10 – Delete</p> <p>3F-1 Performance Criteria 3 – Delete</p>	<p>The 45 degree angle is not reasonable, as it rare that a person will stand right in front of a window and look at a neighbouring building facade, particularly if it has windows.</p> <p>Figure 3F.10 prohibits a window into a kitchen for cross vent, which is now a proposed performance criteria.</p> <p>This is unreasonable</p>

	3F-1 Performance Criteria 4 – Delete	Rely on solar access criteria
3H	3H-1 Delete acceptable solution 3, 4, 5 and 7  3H-1 Delete acceptable solution 3	These requirements are driven by traffic impacts, wait times, traffic volumes and the Australian Standards.  Difficult to control in council owned land.
3J - Bicycle and Car Parking	Table 2 Add sites within 400m of metro bus stop into first row of table to also require nil parking requirement. This would enable sites located in dense urban areas with good access to transport such as Neutral Bay and Rozelle for instance to also take a more sustainable development approach to the provision of parking.	The Sydney Buses website states: <i>“Sydney’s Metrobus network is comprised of 13 routes, providing high-frequency, high-capacity links between key employment and growth centres across Sydney. These extra Metrobus routes provide 400,000 additional bus passenger spaces a week.”</i>  It is appropriate that the new minimum parking requirements apply not only to sites located in close proximity to rail and light rail but also to metro bus stops where frequent services are provided.
	3J-4 Criteria 1 – Delete  3J-4 Criteria 2 “Where on grade parking is unavoidable...”	This contradicts affordability argument. We currently try to build our basements above ground, particularly along rail or in areas where apartment development is very price sensitive.  What constitutes “unavoidable”? Commerciality, demographics, site conditions? Etc?
	3J-5 - Delete  4. Natural ventilation is	Delete as above ground parking often extends to more than 1m out of the

	provided to basement and sub basement car parking areas	ground to account for site slope and conditions. The key is not to limit the extent parking protrudes above ground level but to introduce requirements for any parking wall that does protrude to be appropriately screened with vegetation or decorative façade treatments. Full above ground parking levels can also be screened with residential or retail uses to hide the parking areas behind activated street frontages.
--	---	---

|

Part 4 Designing the Building	Suggested Modifications	Reason for Modification
4A – Apartment Mix	<p>4A-1</p> <ol style="list-style-type: none"> <li>1. Add dot point: <ul style="list-style-type: none"> <li>• The broader context of established housing in a locality</li> </ul> </li> <li>2. Add to sentence- “as the market dictates”</li> <li>3. Flexible apartment configurations, such as dual key apartments, are <del>to be considered provided</del> to support diverse household types and stages of life including single person households, families, multi-generational families and group households</li> </ol>	<p>So a single development is not considered in isolation to the context.</p> <p>To recognize that apartments need to be sold, and mix should also be linked to this.</p> <p>Some flexibility should be allowed for as it is not always possible to provide flexible apartments such as dual key apartments.</p>
	<p>4A-2</p> <ol style="list-style-type: none"> <li>1. Different apartment types are located to achieve successful façade composition <del>and to optimize solar access. See figure 4A.3</del></li> <li>2. Larger apartment types are located on the ground or roof level where there is potential for more open space and <del>or</del> on corners where more building frontage is available</li> </ol>	<p>There is currently too much focus on achieving solar access compliance which has been driving poorer design outcomes than could otherwise be achieved if a more holistic approach to residential amenity was encouraged. This is covered in 4L.</p> <p>To allow a little more site specific response.</p>
4B – Ground Floor apartments	<p>4B-1</p> <p>Figure 4B.4 The dimension on the elevated terrace should be changed: <del>max approximately</del> 1m</p>	<p>This is inconsistent with most Council’s DCPs which allow 1.2m above ground level. This is very difficult to</p>

	<ol style="list-style-type: none"> <li>1. Direct street access is provided to ground floor apartments <u>where possible</u></li> <li>3. Retail or home office spaces <del>are</del> <u>may be</u> located along street frontages <u>where demand exists</u>.</li> </ol>	<p>achieve uniformly on sloping sites. There is no account for site specific responses.</p> <p>May not be possible due to specific site features or slopes</p> <p>This should not be mandatory. There are numerous situations where the provision of ground floor retail/commercial would sit as vacant spaces due to lack of demand. If demand does not exist it is a much better outcome to provide well designed residential apartments at street level which will at least activate the street frontage and contribute positively to the streetscape rather than vacant spaces.</p>
	<p>4B-2</p> <ol style="list-style-type: none"> <li>1. Privacy and safety is provided without obstructing <del>causal</del> <u>casual</u> surveillance. Design solutions may include: <ul style="list-style-type: none"> <li>• Elevation of private gardens and terraces above the street level <u>by a maximum of 1m (see figure 4B.4)</u></li> <li>• Landscaping and private courtyards</li> <li>• Window sill heights that minimize sight lines into apartments</li> <li>• <u>Integrating balustrades, safety bars or screens with the exterior design</u></li> <li>• <u>Appropriate screening measures</u></li> </ul> </li> <li>2. Solar access is maximised through:</li> </ol>	<p>1m is too low for many sloping sites. It is not necessary to limit the extent of elevation as the treatment should be assessed on its merits with regard to its context. For instance on busy roads a height of greater than 1m might be preferable to satisfactory address potential privacy impacts. This also conflicts with many Council DCPs that allow up to 1.2m elevation above the street which is important for enabling natural ventilation of basements.</p>



	<ul style="list-style-type: none"> <li>• <u>Providing privacy so occupants feel comfortable with blinds and curtains open</u></li> <li>• Appropriate ceiling height and window size taking into account any privacy issues <del>High ceilings and tall windows</del></li> <li>• Trees and shrubs that allow solar access I winter and shade in summer</li> </ul>	
	<p><b>Alternative Solutions</b></p> <p>Ground floor apartment layouts support small office home office (SOHO) use to provide future opportunities for conversion into commercial or retail areas. In these cases provide <del>higher floor-to-ceiling heights and</del> ground floor amenities for easy conversion.</p> <p>Add an alternative solution to this criteria such as:</p> <p>Variations to Council DCP dwelling mix requirements should be supported by documentation demonstrating that the proposed alternative mix is appropriate for the site.</p>	<p>2.7m high ceilings are sufficient for a small home office. This is an unnecessary cost.</p> <p>It is a reasonable practice to submit a market demand and social impact assessment with an application which seeks to vary a mix control in a Council DCP. Not all Councils accept or agree with this approach however. It would therefore be good for this standard practice to be acknowledged as an acceptable measure across the whole state.</p>
4C Facades	<p>4C-1</p> <p>3. Building facades have appropriate scale, rhythm and proportion to the</p>	<p>It is not practical or cost effective to change floor levels throughout a</p>

	<p>streetscape and human scale. Design solutions may include:</p> <ul style="list-style-type: none"> <li>Well composed horizontal and vertical elements <del>variation in floor heights to enhance the human scale</del></li> </ul>	<p>residential tower. This would have implications for housing affordability.</p>
4D Roof Design	<p>Preamble: <u>Add to the first paragraph:</u> <u>In some contexts a simple flat roof and parapet may be the most appropriate response.</u></p> <p>4D-2 <del>Opportunities to use roof space for residential accommodation and open space are maximised-considered</del></p> <p><u>2.</u> Open space is provided on roof tops <u>where possible</u> subject to acceptable visual privacy, comfort levels, <u>accessibility, wind impacts,</u> safety and security impacts</p> <p>4D-3 <del>2.3. Rainwater tanks are located on roofs where possible</del> Delete this solution</p>	<p>Should acknowledge that it is not always possible to provide rooftop open space. Wind impacts often limit the ability to provide such space on rooftops. Rooftop open space also requires an extension of the lift and accordingly greater height. Where skylights are used to living rooms to achieve natural ventilation requirements it can also be impractical to provide rooftop open space. There are also services and plant requirements that may preclude rooftop open space.</p> <p>Rainwater tanks are best located below the roof and, balconies so water can drain by gravity.</p>
4E Landscape Design	Table 3 – Delete	<p>The number and size of trees to be provided per deep soil zones should be assessed and determined on a site by site basis taking into consideration context, character, proposed use and function of deep soil area and</p>

	<p>4E-1</p> <p>Ongoing maintenance plans are preparedDelete this solution</p>	<p>the opportunities and constraints of individual sites. For example we are currently designing a development with a 3,000m2 deep soil park. The requirement to provide either 37.5 large trees or 75 medium trees in a park within an urban development site that will have both passive and active use functions is impractical and could impact on the design of a proposed active park area.</p> <p>A costly impost.</p>
4G Universal Design	Delete this entire Section	<p>Livable Housing Australia's objective is to have Silver Level design standards incorporated into the Building Code of Australia by 2020. These standards are currently being developed in partnership with industry and LHA, which will likely supercede the current controls that are built into this edition of the ADG creating a conflict between the SEPP and the BCA in the future.</p>
4H Adaptive Reuse	<p>Add into alternative solutions:</p> <ul style="list-style-type: none"> <li>Retention of existing floor to ceiling heights subject to demonstrating a reasonable level of amenity can be achieved.</li> </ul> <p>4H-1</p> <p>1. Design solutions may include:</p> <ul style="list-style-type: none"> <li>new elements align with the existing building</li> <li>additions complement the existing scale, proportion, pattern, form and</li> </ul>	<p>Non-compliant floor to ceiling heights particularly in older non-residential buildings is typically an issue for adaptive re-use projects, which should be acknowledged.</p> <p>Note that the examples shown in Figures 4H.1, 4H.2 and 4H.3 do not align with existing buildings or complement existing scale, in fact they add significant new fabric above the existing building, and yet they</p>

	<p>rhythm</p> <ul style="list-style-type: none"> <li>• use of contemporary materials and finishes</li> <li>• <u>New elements may contrast in scale or add to existing buildings</u></li> </ul> <p>4H-2 Delete “deeper apartments have greater ceiling heights”.</p>	<p>have been included as good examples.. In recognition of this add another point.</p> <p>Changing the heights of individual apartments depending on their layout and depth is not achievable as a consistent ceiling height needs to be applied across each floor for construction purposes. Higher ceilings and/or changing ceiling heights across individual floors would increase construction cost significantly and have an adverse impact upon housing affordability.</p>
4J Mixed Use	<p>Figure J.2 Delete commercial floor from image</p>	<p>To provide one commercial floor in what is essentially a residential flat building with perhaps some shops/café at ground level is unviable. This issue is justified in economic impact reports regularly. The demand for commercial offices is more typically limited to business parks and in commercial office buildings within existing centres. Furthermore, as residential and commercial uses require their own lift cores, aside from the lack of demand for such space it is uneconomic to construct one level of commercial offices within a building.</p>
4L Solar Access and daylight Access	<p>Preamble: 3<sup>rd</sup> paragraph- Access to sunlight for habitable rooms and or private open space is measured at mid winter (21 June) as this is when the sun is lowest in the sky and</p>	<p>A 2.5m deep balcony in front of a living area 20 deg or more from due north will not allow 3 hours of sunlight into the living room. There are few sites that enable perfect</p>

	<p>represents the 'worst case' scenario for solar access.</p> <p>Figure 4L.1 Shading devices on balconies should shade summer sun and allow winter sun access to living areas <u>or private open space/balconies</u></p> <p>4L-1</p> <ol style="list-style-type: none"> <li>2. Single aspect, single storey apartments have a northerly, <del>or</del> easterly <u>or westerly</u> aspect.</li> <li>3. The number of single aspect <del>west and</del> south facing apartments is minimized</li> <li>4. Living rooms <del>and or</del> private open space of at least <del>67</del>0% of apartments in a buildings receive a minimum of <del>23</del> hours direct sunlight between <del>89</del>am and <del>43</del>pm in mid winter</li> <li>5. A maximum of 15% of apartments in a building have no direct sunlight <del>between 9am and 3pm</del> in mid winter</li> <li><u>6.</u> Living areas are located to the north and service areas to the south <del>and west</del> of apartments, <u>where possible</u></li> </ol>	<p>northerly orientation, resulting in apartment plans that position the balcony to side of the living area in order to comply with the control. A better control would be to achieve sunlight to the living room OR balcony/private open space.</p> <p>The westerly aspect plays a very important role in being able to achieve or get close to achieving the solar access requirements. Shading devices can be used either within or external to an apartment to address issue of heat penetration during the warmer months.</p> <p>It is very difficult to achieve solar access to 70% of apartments for 2 hours mid winter in inner Sydney locations largely due to the density of development and the fact that typically available sites do not have an ideal orientation. A 60% target is more reasonable and would allow for improved design outcomes such as the ability to locate balconies directly in front of living rooms rather than offset them in order to achieve solar access requirements into the living room. We have also suggested that the time period be increased an hour in the morning and afternoon which would not compromise amenity as sunlight received between 8 and 9am and between 3pm and 4pm is considered to be quite valuable particularly</p>
--	---	---

		for people to enjoy such amenity while they are at home prior to or following school or work. Many people are at work or school between the core hours of 9am and 3pm.
	<p>4L-2</p> <p>Reasonable levels of direct sunlight is provided to habitable rooms- <del>and</del> <u>or</u> balconies.</p> <p>1. Apartments that receive direct sunlight in accordance with the acceptable solution 4L-1.4 need to demonstrate that a person is able to sit in the sun in a habitable room or on a balcony of an apartment in mid winter <u>between 8am and 4pm</u>. See Figure 4L.1 DELETE</p>	<p>The draft provision requiring an applicant to demonstrate that a person can sit in the sun within a habitable room in mid winter is an overly prescriptive control that will add significant time and cost to the application process. Furthermore, as suggested through-out this submission the current difficulty in achieving the solar access requirements for the RFDC which are less onerous than the draft controls has led to the suggestion that the solar access provision be altered to require access to either the living room or balcony in order to allow an improved design outcome of being able to locate balconies directly in front of living rooms.</p>
	<p>Alternative solutions –</p> <p>In these circumstances the development should receive a minimum of 2 hours of direct sunlight to 70% of living rooms <del>and</del> <u>or</u> balconies at mid-winter.</p> <p>Add the following words:  Variations to the acceptable solutions are permitted where it can be demonstrated that site constraints prevent the achievement of the solar access target and that a satisfactory level of amenity can be achieved through a holistic approach to amenity. The</p>	

	factors that may contribute to amenity include (but not limited to) views, outlook, proximity to open space, transport, shops and services, natural ventilation, privacy, size of private open space, extent of facade glazing and access to daylight.	
	4L-3	Please note that some of the acceptable solutions to achieve shading affect the ability of a development to achieve the solar access targets.
4M Common Circulation and Spaces	4M-1 1. The maximum number of apartments off a circulation core on a single level is <del>eight</del> <u>twelve</u> .	10 to 12 is a common design outcome with the provision of a slot or skylight for natural daylight penetration
4N Apartment Layout	Remove all dimensions from indicative layout plans  Delete second paragraph from alternative solutions requiring ceiling height to increase as habitable room depth in single aspect apartments increases.  Delete Figure 4N.3	The dimensions should be removed to avoid developments being assessed against such calculated examples. As per the proposed SEPP the focus should be on the minimum apartments sizes in table 6 which satisfactorily address the issue of housing affordability. The images can remain as examples provided there is no potential assessment tool associated with them if they are not replicated.  The proposed habitable room depth control is a significant issue and cannot be reasonably applied or complied with. Using this control an allowable 8m depth requires a 3.3m high ceiling. This will have a significant impact on affordability. A requirement for a 2.7m ceiling is a good outcome. Requiring any room

	<p>4N-1</p> <p>2. <del>A window should be visible from any point in a habitable room Delete</del></p> <p>4N-2</p> <p>1. <del>Habitable room depth complies with the ceiling height to room depth ratio as per figure 4N.3</del></p> <p>2. For open plan layouts, combining the living room, dining room and kitchen, the back of the kitchen is a maximum of <del>9.8</del> metres from a window.</p> <p>6. Delete 7. Delete 8. Delete</p> <p>4N-3 Delete acceptable solutions 1 through to 6</p>	<p>more than 6.75m deep to have ceilings higher than 2.7m is unreasonable.</p> <p>Study nooks, which are often inboard, are very valuable to occupants. Studies are classed as habitable rooms in the Glossary, and as such providing these will be difficult because of this control.</p> <p>Delete this control. This requires any room deeper than 6.75 to have a ceiling height higher 2.7m</p> <p>We request that the 8m depth of kitchen control be extended to 9m to allow for apartment design to be able to return to a kitchen that flows to open lounge and dining in front. Allowing for a zone of 3m each for living and dining and 2.7m for the kitchen is reasonable and not excessively deep. The 8m control limits the opportunity to provide open plan living along this design model without breaches, which is a design the market appreciates and desires because it does facilitate good amenity.</p> <p>These controls area unrealistic and restrictive.</p> <p>These are highly prescriptive and unnecessary and will add an excessive compliance burden of compliance tables</p>
--	---	---



		in DAs
4O Ceiling Heights	<p>Figure 40.5</p> <p>Services bulkheads are <del>wholly</del> <u>generally</u> contained within non-habitable rooms and are a <u>minor intrusion</u> into habitable spaces</p>	<p>It is not always possible to have no bulkheads in habitable rooms,. For example when apartments do not stack due to set back requirements, or horizontal exhaust of wet areas can require a small bulkhead along the side of a room.</p>
4P Private Open Space and Balconies	<p>4P-1</p> <p>2. Private open spaces and balconies predominantly face north, east or west and <del>solar access to living rooms is not impeded</del></p> <p>4P-2</p> <p>2. Balcony minimum sizes should be adjusted to</p> <p>1 bedroom- 6 m2</p> <p>2 bedroom- 8 m2</p> <p>3 bedroom- 10 m2</p> <p>The minimum depth of 2m should be the same for all apartments.</p>	<p>This will result in loss of connection between balconies and living areas, as balconies will have to be moved to the side of living areas. Balconies are a valuable means of shading to living areas- it is desirable to reduce the solar load on living room glazing</p> <p>These requirements are new and as a minimum size are too large.</p> <p>Maintain the current RFDC minimum of 2.0m for all balconies</p>

<p>4Q Natural Ventilation</p>	<p>Figure 4Q.1</p> <p>4Q-2</p> <p>2. Light wells are not the primary air source for <del>habitable rooms</del> <u>living rooms</u></p> <p>3.</p> <ul style="list-style-type: none"> <li>• <del>lightwells or building indentations with a width to depth ration of 2:1 or 3:1 where possible to ensure effective air circulation and avoid trapped smells</del></li> </ul> <p>4Q-3</p> <p>1. At least <del>56</del>0% of apartments are naturally cross ventilated</p> <p>2. For apartment buildings 9 storeys and over an appropriately qualified wind consultant has confirmed that <u>50%</u> of apartments achieve cross ventilation</p> <p>3. Overall building depth does not exceed 12-<del>25</del><u>18</u>metres.</p> <p>5. Delete</p>	<p>There is a danger that this could be interpreted as requiring depths more than 6.75m to have greater than 2.7m ceilings</p> <p>This control could prohibit the use of slots to achieve cross-ventilation. It should be acceptable for kitchens, studies and bedroom to have ventilation through lightwells/slots</p> <p>This ratio is too prescriptive and will force apartments to be wider reducing yield on sites and increasing cost per apartment, all contributing to reduced affordability.</p> <p>A 50% target is more readily achievable.</p> <p>A more appropriate depth would be 20m to external walls or 25m to balconies. However there are numerous other controls on amenity that this control should not be necessary.</p> <p>Excessive compliance burden</p>
-------------------------------	---	--

4R Storage	4R-1 1. Studio apartments $\pm 6 \text{ m}^3$	In line with the ADG statement that storage “should be provided proportionally to the size of the apartment” the storage requirement for studio apartments should be 4 m <sup>3</sup>
4T Noise and Pollution		All of this should be to Acoustic Engineer’s advice and BCA. This section is unnecessary
4U Energy Efficiency	Figure 4U.4	This aspect is covered by BASIX. This is duplicating not only BASIX controls but also increasing controls in the BCA. At the very least and acceptable solution should be “compliance with BASIX”  We note that this layout conflicts with controls for cross ventilation.
4V- Water management and Conservation		This aspect is covered by BASIX. This is duplication of controls. At the very least and acceptable solution should be “compliance with BASIX”
4W Waste Management		All Councils have Waste Management DCPs. This is unnecessary duplication.