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NSW Country Division



PRM Architects  
Town Planners

General Manager  
Kiama Council  
P.O. Box 75, Kiama, NSW  
Date: Monday 25<sup>th</sup> June 2012



Attention: Ms Kim Bray,  
Manager Strategic Planning

Dear Ms Bray,

cc: Mr Brett Whitworth, DoP Wollongong

**Ref: Kiama Council Draft DCP-2011 –Public Exhibition Submission**  
**Topic: Chapter 5-Medium Density Development-Specific Issues**

## Specific Issues and comment

### 1. Chapter 5 – Control C4.

*‘Provision of lift access for Class2, Class 3, and Class 4 Buildings (as identified in the BCA) where there are 2 or more storeys above ground. Except for where the 2<sup>nd</sup> or more storeys are contained within a single sole occupancy unit.’*

- 1.i) In the first instance we refer you to the attached letter from **Mr Gareth Ward MP**. His submission is specific to previously raised concerns of council’s decision to require lifts to all 2 storey apartment buildings (Class 2, 3 & 4) in the Kiama LGA & economic impact.
- 1.ii) We note this Draft DCP is an amendment to the original ‘matrix’ in the 2011 version by differentiating Townhouses from Apartment Style units.  
However, PRM consider Council’s requirement to impose a lift for **all two story buildings** which contain a residence on the second floor is unreasonable and a counterproductive economic constraint to:
  - i.a) **Creating affordable housing strategies.** Medium Density housing apartments, provide ideal opportunities for young families, young working couples and young people generally to purchase and live in small, compact residential apartments, which the requirement to walk up and down one flight of stairs does not impose an unreasonable constraint.
  - i.b) This condition overstates and **over regulates** two storey apartments as a principal provider of housing for an aging population.  
This ignores census data for the balance of the community; where low cost affordable housing is required. This is best provided by apartment buildings and not single detached housing on conventional car dependant residential subdivisions, which are not low cost, affordable or ecologically sustainable.
  - i.c) **First home buyers** do not in majority need lifts and are a significant medium density market group. What they need is greater access to lower cost residences of all types, especially medium density housing apartments of all standards in quality and design. Lifts in two storey buildings defeat creating affordable housing.

Vincentia 444 16 444

Gerringong 42340-444

Mail: P.O. Box 323 Gerringong NSW 2534 Fax 42 340 341 Email: [patrick@prmarchitects.com.au](mailto:patrick@prmarchitects.com.au) A.C.N 136 888 581

Director: **Patrick Mahedy, Architect, Bachelor of Architecture UNSW, Town Planner, Master of Town Planning UTS**  
**Patrick Mahedy**, Architects Registration Board No. 4770 is the **Nominated Architect** for PRM Architects + Town Planners P/L.

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- 1.iii) PRM recommend the following alternatives which would be more economically sustainable and meet a wider cross section of the existing census demographic of our local and future communities:
- i.a) Require that as a minimum, 50% of all ground floor apartments be disability accessible.
  - i.b) Require lifts only to 3 storey and greater in height apartment buildings (Class 2, 3 & 4).
- 1.iv) **General Comment:** Council must allow for variable market forces and developers to be project specific with the level of finish. Existing NSW state Design standards such as SEPP-65 for apartment design, Amcord for amenity and Disability and Discrimination Act for accessibility are already significant references.

For high value properties such as those with water views or located in CBD where 'Walkability' generates high quality of lifestyle, the costs of Lifts can be offset by the higher 'payoff' of amenity and quality of life. This choice should be the developers, not Council.

However, for projects which are 'out of town' and with low standard amenity, such as no views and location disadvantaged such as adjacent main roads or railway lines, are better suited to 'affordable housing' where greater flexibility is needed.

Developers not council, 'take the risk'. If developers do not meet market forces, which include 'affordability', current trends and communities' needs as perceived at the time, their risks are increased. These forces change year to year, site to site, and Council should not dictate blanket control over these intangible issue.

## 2. Chapter 5 Control C6.

*25% of each development **must** be designed to accommodate, **home business/Multi generational housing/unrelated adults.***

- 2.i)PRM agree in principal and endorse the importance of creating flexible Live/Work housing design models. However, we are unable to ascertain from this DCP exactly what and how Council define these three criteria, which '**must**' be provided in 25% of all Medium Density housing unit layouts.

In support of this concept PRM suggest the following broader definitions.

- i.a)**Home business's** should be designed so that the business activity is conducted and has public access separate to the principal residence. Ideally, the Home business 'Office' or workspace should be designed with its own clearly defined point of access or be immediately off the main entry or readily identified from the main street.
- i.b)**Multi Generational housing.** PRM consider the 'Granny flat' (Secondary Dwelling) design code articulates the three options for Multi-Generational Housing. However we are not convinced this style of accommodation is compatible with the higher density, compact nature of Medium Density housing. By example, Granny Flats include a separate kitchen and living areas, to enable independent amenity which is unlikely to be achieved in a medium density context. Multi generational housing is more suited to conventional residential home sites where greater separation for privacy is possible on larger than 450 Square Meter sites.

i.c) **Unrelated Adults.** PRM endorse this concept and have for many years been designing apartments which have an Ensuite to each bedroom and for each bedroom to be larger. To enable unrelated groups to 'share' accommodation. This methodology is in contrast to the Real Estate tradition where 'property values' are based upon the number of bedrooms.

PRM recommend greater definition of the value and benefit of this alternative.

However, this Policy also includes self defeating aspects where the 'size' of a Medium Density apartment is based upon its net area. It is conceivable for two spacious bedrooms, each with an Ensuite to constitute a 'large unit' rather than be a two bedroom 'medium' unit. This variance needs to be considered in this policy.

### 3. Chapter 5 Control C9.

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*'Cutting and filling on site is limited to 900mm.'*

3.i) This Control defeats to value and benefit available if a project wishing to create a 'basement' car park, as defined under the KLEP-2011 which states:

*'Basement means the space of a building where the floor level of that space is predominantly below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing).'*

3.ii) To achieve this concession, where the floor to floor height of 2700mm plus foundation excavation depth of at least 200mm and be only 1 meter above natural surface, then the minimum depth of excavation would need to be 1900 mm, this is for a 'flat site'. A great many sites in the Kiama LGA are steep and have significant cross falls and therefore an excavation depth of over 2.5 Metres would not be uncommon.

3.iii) This control should either be amended or revoked.

### 4. Aging Population Debate: Trends by historic Census analysis.

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PRM were advised by Council in 2011, a significant 'driver' or imperative behind the strategies of the 'Kiama Housing Needs & Directions Study' of November 2007, was based upon the statistical analysis of the 2006 Census in comparison to the 2001 Census.

On face value this information indicated the KIAMA LGA would achieve a greater rise in aging population trends than the NSW State Average.

However, PRM consider this information is based upon a number of *false assumptions* and not only skews the overall Planning foundations of the DCP, but makes no allowance for other demographic possibilities and important housing accommodation needs, such as our youth and earlier migration to the LGA of younger families.

#### 4.i) Age Skewing:

The recently released Census data of 2011 clearly identifies how skewed the original assumption is. Demographic evaluation and comparison of Gerringong's population in comparison to Werri Beach by example identify the following information quite clearly:

#### Exit migrating trends:

i.a) Gerringong and Werri Beach, show from Age years 5 to 19 an above NSW average number of youth per capita. Around 250

- i.b) However, immediately coinciding with the completion of the HSC, there is a **40% loss** in age group, or outward migration, for universities, education and work reasons.
- i.c) This trend continues until around **age 45** when the migration trend reverses and goes above the NSW state average.
- i.d) What is important is that **60%** of these age groups choose to remain!...Chapter 5 needs to answer/address the following housing issues:
- What accommodation options are being provided for in this demographic?
  - Do they need lifts? Or
  - Do they need 'affordable housing' and what 'type' of housing might this be?
  - How does Chapter 5 respond to this demographic?
- i.e) Also, how do we 'retain' and attract' the exit migrating 40% to return if not stay in the first place?  
Retaining and attracting this age group is achieved by **Job Creation** and **providing affordable housing** NOT by singularly focusing on the 'aging' element of our population.

### **Retirement housing – Skewing the demographic:**

- i.f) The 2011 Census for Gerringong indicates there are 725 Adults over the age of 65, and of this group, **there are 189 over the age of 85**. Where are they living? and are they 'local residents or did they migrate to Gerringong?
- i.g) Gerringong has Mayflower Village (Kiama has Blue Haven), this retirement community has three levels of accommodation. In total, Mayflower provides accommodation for just over **267 elderly residents over 65 years of age** (see attached accommodation profile). However, **only 61** of these residents (23%), listed on the Census, are local (from Gerringong). **Over 206 elderly (77%) migrated to Gerringong** to reside in Mayflower.
- i.h) When the 206 migrated elderly residents to Gerringong from the total 725 adults over 65 are deducted, this group represents 28% of this aged population, skewing the demographic.
- i.i) When the 206 migrated residents and the 100 self care residential apartments are removed from the housing mix of Gerringong, all of a sudden, Gerringong is no longer 'an accelerating' aging population in comparison to NSW demographic averages.  
The census does not show this aging migration, which is skewing the demographic.  
PRM consider the same type of numbers should be expected at Kiama's Blue Haven Retirement Village.
- i.j) **In reality**, we need to provide accommodation for our Youth, young families and lure back the outward migrating age demographic by providing more affordable housing and local employment....Not focus upon building retirement accommodation with lifts which will **attract an aging population migration**, not just meet the needs of an existing community.

Yours Faithfully,

**Patrick Mahedy**, RAIA, PIA, CPP

**Architect + Town Planner**

PRM Architects + Town Planners P/L

NSW Architects Registration Board No. 4770

Certified Practising Town Planner No. 5463RUE