

31 August 2016

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Ms Elizabeth Kinkade  
Executive Director, Planning Policy  
Department of Planning & Environment  
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**Australian Institute of Architects**

Dear Elizabeth

### **Simplified Housing Code**

Thank you for the opportunity to make a late submission on this draft policy document.

The Institute is an enthusiastic supporter of the complying development codes and welcomes the Department's objective of simplifying the housing code to make it more accessible to the public. It appears, however, that this worthwhile objective has not been realized in the draft document released for comment a few weeks ago.

We thoroughly support:

- the use of tables to describe the standards;
- diagrams to explain the meaning of the standards;
- use of standard instrument terminology, including the treatment of gross floor area in the same way as a development application under the standard instrument; and
- revised structure separating controls into primary, secondary and tertiary standards.

However we are concerned that the separation of development standards to relate to different lot types is unnecessary, complicates something that was easily understood, and lengthens the document.

The Built Environment Committee met with Michelle Walker last night to discuss her submission. The Institute agrees with her basic proposition that, in its present form, the simplified code does not clearly present the specific development controls for alterations and additions. In splitting the development types of alterations and additions, new dwellings and detached development you would expect that there would be significant differences, however there are only six clauses that are different. We do not believe that the duplication increases the comprehension of the code.

In addition, we consider it is essential to clarify that the controls in the simplified code apply only to new additions and alterations, not retrospectively to the existing building.

The Institute considers it is likely that these matters are the unintended negative consequences of the drafting process. We would be pleased to assist the Department in correcting these deficiencies as you proceed with the next draft.

Yours sincerely

A handwritten signature in black ink, consisting of several overlapping loops and a final horizontal stroke.

Shaun Carter  
**NSW President**