



17 August 2020

ODASA Consultation
28 Leigh Street
Adelaide SA 5000

Dear Sir/Madam

Re: Office for Design and Architecture SA - Local Design Review Scheme Consultation

Thank you for the opportunity to make comment on the draft Local Design Review Scheme (the Scheme) announced for consultation on 26 June 2020. The City of Holdfast Bay formally considered the Scheme at its Council Meeting held on 11 August 2020, which has informed the formal response contained in this letter.

The Scheme presents the opportunity to allow for a more detailed examination of a building's design, with the intention of producing better built form outcomes. Unfortunately, in the consultation documentation made available, there was little analysis showing that the Scheme would deliver better design outcomes, with the main benefits focussed on shorter assessment times, which do not necessarily equate to better design outcomes. In this regard, the Scheme may benefit from a deeper analysis of what broader incentives are available for developers to make use of the Scheme, and indeed for Councils to set up Panels under the Scheme.

The City of Holdfast Bay is of the opinion that the Scheme could become a useful assessment tool to allow for better design outcomes, but that significant changes to the draft Scheme are required for this to occur. Specifically, in its review of the draft Scheme, the City of Holdfast Bay offers the following recommendations:

1. **Referrals to the local Design Review Panel should be mandatory for development that involves:**
 - a. **4 or more dwellings; or**
 - b. **A building of 3 or more storeys; or**
 - c. **Commercial development with an internal floor area great that 600sqm; or**
 - d. **Construction of a new dwelling where a historic or character area overlay apply.**
2. **An assessment fee should be included where an application is made to the local design review panel; and**
3. **An option be made available for Councils to refer proposals to the Design Review Panel established by ODASA.**

The draft Scheme states that Councils could provide a list of what types of applications might qualify for a referral, but no detail is provided as to the types of applications that would be deemed suitable for review. This may be dependent on the circumstances and needs of each council. For instance, the City of Holdfast Bay has had a significant increase in recent years in the number of group dwelling developments within its medium density zones. These developments are often located adjacent to arterial roads such as Brighton Road and Anzac Highway. These developments often display poor design as these are typically the result of profit driven ventures where returns are low, often resulting in developments that are architecturally compromised, with minimal associated landscaping. The City of Holdfast Bay considers that these types of developments would significantly improve if they were to be subjected to a review by a design panel.



Similarly, the City of Holdfast Bay has several zones along its Esplanade and around Glenelg North that allow for up to 3 storey residential buildings. It is considered that this form of development would be an exemplary candidate for review under this Scheme to ensure that the buildings are appropriately articulated, given their prominent location. The same could apply for large commercial developments over 600sqm in area, and new dwellings where a historic or character area overlay applies.

One of the biggest concerns with the current draft Scheme is the lack of any fee associated with the service, and the operating costs that a Council will incur if it chooses to operate a Panel. The draft Scheme outlines that a registration and renewal fee is also applicable. There is also the cost to remunerate the Panel members for their service and attendance, and the time required from staff to manage the Scheme. All of these operating costs, in addition to the annual reporting requirements, do not make the Scheme an attractive proposal for Councils to operate, particularly given the voluntary nature of the Scheme.

It is noted that several councils already operate a similar design review program, and all councils currently provide applicants with the opportunity to discuss proposals prior to their lodgement, without charge. In its current cost-prohibitive form, the draft Scheme does not present a proposal that is likely to be taken up by many Councils, particularly as it may not add value to current services provided. Therefore, the City of Holdfast Bay strongly recommends that ODASA look to make changes to the Scheme so that it incentivises both councils and developers to become active and engaged participants.

As listed in the recommendations, the City of Holdfast Bay would also like the option to refer proposals to the ODASA's own design Panel for its expert advice where a council Panel lacks the required expertise. This may be appropriate in circumstances where a council chooses to only have a 1 representative on its design review Panel.

Please contact Michael Gates, Business Partner Transition and Planning Policy, on [REDACTED] should you require any further information or wish to discuss this matter in further detail.

Yours sincerely



Roberto Bria
Chief Executive Officer