

31 October 2014

Department of Planning

Re SEPP65 and the Residential Flat Design Code
NSW Government's review of the policy.

Thank you for the opportunity to comment on the proposed changes to SEPP65 and the Residential Flat Design Code currently on exhibition.

DEXUS has briefed its professional consultants to provide detailed comments. Unfortunately, we have not completed the report and formally request an extension to the submission date of 7 November 2014.

We provide a number of general comments and suggestions for your consideration;

- There should be adjustments, or concessions, available to design criteria to take account of location circumstances, such as CBD / high density / high rise developments compared to fringe City or more suburban locations
- A dilemma remains between proscriptive codes and codes that allow for interpretation and creative solutions, which should be encouraged, to meet the objective of residential quality and amenity
- Possibly consider a *Bonus System* linked to the codes. For instance the purpose is design quality and amenity, which is effectively "design excellence". Design Excellence is granted FSR and/or Height bonuses in the City of Sydney, Parramatta City, etc. Accordingly, achieving SEPP65 design quality may be a more tangible achievement of design excellence compared to running design competitions. Or at least, achieving SEPP65 objectives gains "points" towards a design excellence bonus
- Essential that the revised codes are supported by transparent feasibility assessments to demonstrate that the proposed changes result in viable and affordable residential developments in NSW

In conclusion, we support the Government's initiative in reviewing the codes to ensure they remain relevant to the provision of viable, and quality, residential developments in NSW.

Yours sincerely

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