

Manager, Centres and Urban Renewal Branch
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

31 October 2014

Dear Ms Wing,

City of Ryde's Submission to the exhibition of proposed changes to SEPP 65

Thank you for the opportunity to comment on the proposed changes to the SEPP 65 and the Residential Flat Design Code. While the City of Ryde is broadly supportive of efforts to update the code and to provide greater detail and consistency with respect to the design criteria for proposed residential flat developments a number of the proposed changes are not supported in their current form.

The following proposed changes are supported:

- Extending the policy to mixed-use development and shop-top housing of three or more storeys.
- Giving councils the ability to appoint design review panels and to determine who is on the panel.
- Giving prevalence to certain design criteria in the Apartment Design Guide to promote certainty and consistency.
- Clarification of the Design Quality Principles, particularly the matrix showing the relationship between the Principles and the different Design Guide sections.
- The new requirement for ceiling heights to comply with room depth ratios.
- The new minimum dimension requirements for different room sizes.

In addition to the proposed changes the City of Ryde would like to see:

- The inclusion of appropriate numerical controls in relation to overshadowing of neighbouring properties.
- Clarification to 3F-1.6 such that main bedrooms should not have a light well as the primary source of daylight and ventilation.
- A requirement for the provision of minimum areas of open space for studio apartments.

- Transitional clauses to the SEPP such as those provided in Part 5 of the current Policy.

These transitional clauses are of particular importance to ensure councils and developers can enact a smooth transition to any new Policy and to avoid confusion as to the controls and criteria that apply to the assessment of a given application.

The City of Ryde does not support the proposed changes relating to car parking provisions. Councils should retain the capacity to refuse applications that do not provide appropriate levels of parking given the local context, particularly given the varying levels of service provided at stations across Sydney. The removal of minimum parking requirements for proposed developments within 400m of a railway station or light rail stop in inner and middle metropolitan Sydney is not appropriate and further review to set an appropriate minimum is required. While Council recognises the need to promote sustainable transport, any effective strategy must practically address the local conditions. Allowing new flat developments with no additional parking to be provided for new residents will exacerbate congestion around transport nodes as residents and commuters will be forced to compete for already sparse on-street or station parking spaces. Furthermore, the preference given to underground parking in the current Code should be retained and Council does not support the suggestion that at-grade and above ground parking may be acceptable or desirable (3J-4, 3J-5, and 3J-6).

As noted above, the addition of minimum apartment sizes for studio apartments is supported, however, the removal of the table providing a range of minimum sizes for varying bedroom sizes and layouts is not supported. This table encourages design quality and should be retained as the standard table of minimum apartment sizes.

Finally, while the City of Ryde supports the use of the Roads and Maritime Service's Guide to traffic generating developments, it is Council's view that this document needs to be made more readily available through the RMS and Department of Planning and Environment's websites.

Thank you for the opportunity to comment on the proposed changes.

Regards,



Meryl Bishop,

Acting Group Manager Environment & Planning