

14395
17 November 2014

Acting Director, Local Plans, Codes and Development Guides
The Department of Planning and Environment
GPO Box 39
SYDNEY, NSW 2001

Dear Sir or Madam

**DRAFT SEPP 65 AMENDMENTS & APARTMENT DESIGN CODE
IGLU STUDENT ACCOMMODATION**

We write to you on behalf of Iglu Pty Ltd in relation to the draft amendments to *State Environmental Planning Policy No. 65 – Residential Flat Design* (SEPP 65) and the draft Apartment Design Guide. Iglu Pty Ltd is a student accommodation provider with operational facilities in Chippendale and Chatswood and new facilities being planned in Redfern and QLD. Iglu strives to provide a high level of amenity for residents developing unique and purpose-built buildings which provide amenity for students over and above that usually required by Council's planning controls or found in similar student accommodation.

Iglu are hoping to open several more facilities in NSW and, whilst they have a strong intention to provide a high level of amenity for future residents, they are concerned that the draft amendments to SEPP 65 and the draft Apartment Design Guide will be applied by Councils to student accommodation developments due to the revised wording of Clause 4 of the SEPP. The draft wording is as follows:

- 4 *Application of Policy*
This Policy applies to development for the purpose of a residential flat building, shop top housing or mixed use development with a residential accommodation component if:
- a) *The development consists of any of the following:*
 - (i) *The erection of a new building,*
 - (ii) *The substantial redevelopment or the substantial refurbishment of an existing building,*
 - (iii) *The conversion of an existing building for use as a residential flat building, shop top housing or mixed development with a residential component, and*
 - b) *The building concerned is at least 3 storeys (not including levels below the ground level (existing) providing for car parking, and*
 - c) *The building concerned contains at least 4 or more dwellings.*

Student accommodation is commonly classified as a 'boarding house' under the Standard Instrument Template in the absence of a more appropriate definition that recognises the unique typology and characteristics of student accommodation. As the department would be aware, boarding houses fall under the residential accommodation group term and as such a mixed use development proposing retail at the ground level with student accommodation above (as currently being contemplated by Iglu Pty Ltd) would be subject to the provisions of the SEPP and Apartment Design Guide.

The design of student accommodation developments is becoming increasingly more sophisticated and varied in terms of accommodation types that are offered. Such developments now provide rooms which are purpose built with private bathroom, kitchenette and study nook. Generous communal facilities are provided on-site that form an integral part of student's living amenity. Whilst rooms are designed to meet the student's basic needs, it is the design intent to encourage students to utilise communal spaces rather than their private rooms to meet their amenity needs so as to promote a more social experience. These communal spaces are designed to cater to socialising, recreation, relaxing and study, and are purpose-built to cater to students' needs. Consequently such developments tend to be significantly different to that of a standard residential flat development, for example bedrooms tend to be smaller, most developments will offer common open space in lieu of private open space and in many cases facilities are shared. As a result student accommodation is often cheaper and more affordable for students.

Notwithstanding the differences from the draft Apartment Design Guideline, the developments provided by Iglu still achieve a high level of amenity for the occupants of the building that is more appropriate for the needs of students. This is evidenced by the photos of existing Iglu facilities provided below.





If however student accommodation developments are required to fully comply with SEPP 65 and the draft Apartment Design Guidelines, Iglu are concerned that this will have an impact on:

- a) The ability to gain an approval for student accommodation as the current housing models are not capable of complying with provisions such as unit sizes, apartment depths, unit mix, solar access, cross-flow ventilation, on-site parking provision and the like, and
- b) The affordability of this type of accommodation.

It is therefore requested that a specific subclause be entered into the draft SEPP which makes it abundantly clear to all consent authorities that the provisions of SEPP 65 and the draft Apartment Design Guide do not apply to student accommodation (boarding house) developments.

Rather, such developments could be required to demonstrate that they have sought to apply the generic design principles as set out in Schedule 1 of the draft SEPP in the preparation of the concept design as is current practice. This would require an applicant to demonstrate that the proposed development is appropriate to its context, is sustainable and will provide a suitable level of amenity for future occupants. This is all without imposing onerous and unrealistic numerical controls which a student accommodation development could never comply with and without affecting the affordability of the product type.

We note that Iglu does not subdivide its student accommodation buildings and provides accommodation only to full-time students, resulting in the continued genuine use of these buildings for student accommodation. This is a key point of distinction from typical residential accommodation to which the draft SEPP and guidelines are designed to apply.

There is such a strong demand for student accommodation, particularly within Sydney. The controls applying to such development should recognise the differing accommodation needs of students and also the ability to provide accommodation types at differing price points and affordability such that more of this accommodation type can be delivered where it is needed. We therefore request that the Department gives serious consideration to this submission and includes an additional subclause in the draft SEPP.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or cswan@jbaurban.com.au.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'J. Buchanan'.

Jennie Buchanan
Associate

A handwritten signature in blue ink, appearing to be 'Clare Swan'.

Clare Swan
Director