

HOUSING DIVERSITY SEPP



Boarding House, Co-living and Student Housing Feedback

NEW SOUTH WALES CHAPTER

Submission date: 14 May 2021

ABOUT THE INSTITUTE

The Australian Institute of Architects (the Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to provide input on the Housing Diversity SEPP components: Boarding Houses, Co-living and Student Accommodation
- At the time of this submission the NSW Chapter President is Laura Cockburn, the NSW State Manager is Kate Concannon and the NSW Policy and Advocacy Manager is Lisa King.

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HOUSING DIVERSITY SEPP – BOARDING HOUSES

| TYPOLOGY | BOARDING HOUSES | INSTITUTE FEEDBACK |
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| Category | Affordable | |
| Proposed definition | <p><i>Boarding house means a building that-</i></p> <ul style="list-style-type: none"> <i>• is used for the purpose of affordable housing</i> <i>• provides residents with a principal place of residence for three months or more.</i> <i>• has some shared facilities such as a communal living room, bathroom, kitchen or laundry; and</i> <i>• has rooms, some or all of which may have private kitchen and bathroom facilities, that accommodate one or two adult residents.</i> <p><i>The term does not include backpackers' accommodation, group homes, serviced apartments, seniors housing or hotel or motel accommodation.</i></p> | <p>The Institute supports the definition of a boarding house as affordable housing, however we note that rooms should be self-contained ie. Each room should have its own kitchenette and bathroom. This is critically important for the amenity and dignity of residents. The Institute also suggests that 2 people rather than adults should be considered. Provided rooms are self-contained, a boarding house with a parent and child could be a successful model in addition to current affordable boarding house typologies. The Institute would like to see flexibility here in the proposed definition.</p> |
| Locational requirements | <p>Mandated through SI LEP in zones R1, R3, R4 and B1, B2 and B4</p> <p>No longer mandated in the R2 zone, in the SI LEP</p> | <p>The Institute strongly supports the ability for CHPs to develop boarding houses in R2 zones where permitted. 12 person boarding houses are the same footprint as most large homes.</p> |

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| Accessibility requirements | <p>(a) Sydney Region • within 800m walking distance of a railway station or a Sydney Ferries wharf;</p> <ul style="list-style-type: none"> • within 400m walking distance of a light rail station; or • within 400m walking distance of a bus stop used regularly between 6am and 9pm Monday to Friday, and 8am to 6pm weekends. <p>(b) Outside of Sydney Region • Must be within 400m walking distance of land within a B2 Local Centre or B4 Mixed Use zone, or within an equivalent land use zone.</p> | Supported |
| Minimum tenancy | 3 months or more | Supported |
| Managed by | Community Housing Providers | Supported |
| FSR Bonus | Flat 20% FSR bonus where RFBs are permitted | The Institute strongly supports the bonus being made available to this typology for the purpose of provision of affordable housing. |
| Height and FSR | As per DCP or LEP | Supported |
| No. of rooms | Max 12 rooms in R2 zone (retained the ARHSEPP provision) | Supported |

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| Room size | 12m ² - Single 16m ² - For double (excl. kitchen +bath) | The Institute is keen to see these sizes remain as the minimum possible requirements - no less. |
| Max. room size | 25m ² | Supported |
| Max occupancy | 2 adults | The Institute holds that the requirement should state 2 people to allow for a parent with one child to access this form of accommodation. |
| Car Parking | <p>(Retained the provisions of ARHSEPP- Social housing providers)</p> <ul style="list-style-type: none"> · 0.2 car spaces per boarding room in an accessible location · 0.4 car spaces per boarding room not in an accessible location · At least one parking space provided for each person employed in connection with the development and who is resident on the site. | The Institute supports this car parking requirement, however we recommend that one space be reserved for shared car usage such as GoGet. Additionally, we recommend provision for electric vehicle charging stations be installed. |
| Bicycle | 1 parking space is required for a bicycle and one for a motorcycle per 5 boarding rooms. | Supported |
| Communal Open space | 25% of site area, min dimension 3m | Strongly supported |

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| Communal living area | Min 35m ² for any development containing 6 rooms + 15m ² per 5 rooms (or part) above 6 rooms | <p>The Institute strongly recommends this area be provided adjacent to and openable to outdoor open space. We suggest if these criteria are met the communal living area requirement could be reduced as a bonus for provision of more usable space. We understand many communal rooms are not utilised fully and providers would prefer to allocate this space to accommodate an additional resident. We suggest a requirement to have a smaller space openable to communal outdoor space would provide a gathering space but potentially allow a greater site yield for providers.</p> |
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| Minimum private open space | Nil | <p>The Institute strongly recommends the provision of a small amount of private open space for residents. We hold this is a core amenity and as such has obvious benefits in terms of mental health and well-being. We suggest providers who include private open space for residents along with self-contained rooms may not need to provide the same amount of communal internal space.</p> |
| Landscaped area | As per DCP or LEP | Supported |
| Management | Boarding houses with 20 or more residents must have an on-site manager. | Supported |
| Commercial development | <p>If the boarding house is in a commercial zone, the ground floor of the boarding house which fronts the street cannot be used for residential purposes unless this is permitted by another environmental planning instrument.</p> <p>Commercial floor space permitted in business zones</p> | Supported |

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| <p>Prescribed consent conditions</p> | <p>Restriction on title- To be used for affordable housing, managed by a registered CHP</p> <p>Registered CHP details to be provided to the consent authority prior to OC</p> <p>Registered CHP must demonstrate that the property is providing affordable housing, as required by the Registrar of Community Housing</p> | <p>Supported</p> |
| <p>Other Planning provisions</p> | <p>LAHC self-assessment pathway on government owned land – R2 zone and where permitted</p> | <p>The Institute strongly supports the ability for CHPs to also develop boarding houses in R2 zones where permitted.</p> |

HOUSING DIVERSITY SEPP – CO-LIVING

| TYPOLOGY | CO-LIVING | INSTITUTE FEEDBACK |
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| Category | Diverse | |
| Proposed definition | <p><i>Co-living means a building or place that:</i></p> <ul style="list-style-type: none"> • <i>Has at least 6 private rooms</i> • <i>Each room accommodates no more than 2 people</i> • <i>Some all rooms may include a private kitchen and / or bathroom facilities</i> • <i>Provides occupants with a principal place of residence and managed communal spaces and facilities</i> <p><i>Does not include backpacker's accommodation, a group home hostel hotel or motel accommodation, seniors housing or a serviced apartment</i></p> | The Institute supports the definition of co-living but suggests 3-5 dwellings should also be prescribed as co-living. We also add co-living may exist as part of a development not always in a stand-alone capacity. |
| Locational requirements | Permitted with consent wherever RFB, shop top or multi-dwelling housing is permitted | Supported |
| Minimum tenancy | 3 months | Supported |
| Managed by | Respective property managers | Supported |

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| FSR Bonus | Nil | The Institute commends the government on its decision to offer no height and FSR bonus in this typology. We strongly hold that an incentive or bonus must deliver positive outcomes for the community as a whole. |
| Height and FSR | As per DCP or LEP | Supported |
| No. of rooms | At least 6 private rooms Maximum 12 rooms in R2 zone | The Institute believes a minimum of 3 rooms could constitute successful co-living. |
| Room size | 12m ² - Single 16m ² - In any other case | Supported as minimum - no less. |
| Max. room size | 25m ² (all values exclude private kitchen or bathroom facilities) | Supported |
| Max occupancy | Each room accommodates no more than 2 people | Supported |
| Car Parking | Max. parking allowed under LEP or DCP for multi dwelling houses in zones R2 and R3 0.5 parking spaces per room (which equals to 6 car spaces given all the 12 rooms are single) | The Institute supports the car parking provisions but suggests a lower rate such as 0.2 could be prescribed in accessible locations, and a shared car parking space (ie. GoGet) could suffice for some of the parking allocation. We suggest electric vehicle charging provisions should be included. |
| Bicycle | Minimum 1 bicycle space per 5 rooms | The Institute strongly advocates more bicycle parking be allocated (ie. one per room) |
| Motorcycle | Minimum 1 motorcycle space per 5 rooms | One bicycle/motorcycle space per room. |
| Communal Open space | 25% of site area, min dimension 3m | Strongly supported |

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| Communal living area | Min 35m ² for any development containing 6 rooms + 15m ² per 5 rooms (or part) above 6 rooms | Supported |
| Minimum private open space | Nil | The Institute strongly recommends the provision of a small amount of private open space for residents. We hold this is a core amenity and as such has obvious benefits in terms of mental health and well-being. We suggest providers who include private open space for residents along with self-contained rooms may not need to provide the same amount of communal internal space. |
| Management | Includes on-site management | Supported |
| Commercial development | Permitted with consent wherever shop-top housing is permitted | Supported |
| Prescribed consent conditions | Compliance with POM | Supported |

HOUSING DIVERSITY SEPP – STUDENT ACCOMMODATION

| TYPOLOGY | STUDENT ACCOMMODATION | INSTITUTE FEEDBACK |
|--------------------------------|---|---|
| Category | Diverse | |
| Proposed definition | <p><i>Student housing is a building or a place that:</i></p> <ul style="list-style-type: none"> • <i>Provides accommodation and communal facilities for students enrolled to study at an educational establishment during the period of their enrolment,</i> • <i>May accommodate other residents who have an affiliation with the educational establishment</i> • <i>May include private kitchen and/or bathroom facilities in some or all rooms,</i> • <i>Includes on site-management</i> | The Institute supports the definition of student housing. |
| Locational requirements | No mandatory permissibility or prescribed zones | Supported |
| Minimum tenancy | Not specified | 3 months |
| Managed by | Respective property managers | Supported |

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| FSR Bonus | Nil | The Institute commends the government on its decision to offer no height and FSR bonus in this typology. We strongly hold that an incentive or bonus must deliver positive outcomes for the community as a whole. |
| Height and FSR | As per DCP or LEP | Supported |
| Room size | 12m ² - Single 16m ² - In any other case | Supported - no less |
| Max. room size | 25m ² | Supported |
| Car Parking | 0.5 parking spaces per room 0.2 car parking spaces per room where development is within 1km of an educational institution in Greater Sydney | The Institute supports the car parking provisions of 0.2 car parking spaces per room but suggests a shared car parking space (ie. GoGet) could suffice for some of the parking allocation. We suggest electric vehicle charging provisions should be included. |
| Bicycle | One space per 10 rooms | The Institute recommends one bicycle/motorcycle space per 2 rooms |
| Motorcycle | One space per 10 rooms | The Institute recommends one bicycle/motorcycle space per 2 rooms |
| Communal Open space | 25% of site area, min dimension 3m | Strongly supported |

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| Minimum private open space | Not specified | <p>The Institute strongly recommends the provision of a small amount of private open space for residents. We hold this is a core amenity and as such has obvious benefits in terms of mental health and well-being. We suggest providers who include private open space for residents along with self-contained rooms may not need to provide the same amount of communal internal space.</p> |
| Management | 24/7 on-site management | Supported |