



# **Northern Beaches Strategic Community Group**

## **Community Brief re: SEPP's Schedule 2 - Planning Changes to Parking in the AHSEPP**

**Prepared for:**

**The Hon. Anthony Roberts MP**

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**Copy to: The Hon. Brad Hazzard MP**

**Cr Mayor Michael Regan**

**(Submission Response dated 10/04/18)**

Further to previous submissions, the Northern Beaches Strategic Community Group (NBSCG) is pleased to be included in ongoing discussions with the Department of Planning and Environment focusing on a broader review of SEPP planning policy; as it applies to Affordable and Seniors housing. Our latest response to developments (and in particular the change to carparking allocation) is provided in this Schedule 2.

The Minister for Planning and Housing has invited community comment in relation to specific planning changes to provide more parking spaces for Boarding Houses. The NBSCG is encouraged by the Minister's initiative and response to community concerns with both this short and a long-term review and response to SEPP planning policy.

We have sought opinions from the Northern Beaches community and have attempted to synthesise a range of views into a consolidated practical response. We believe this response generally reflects the communities' position on the matter as it relates to car parking allocation.

We see that the evolution of the housing mix and client type (refer Appendix 1) in Sydney to suit various housing needs requires further refinement. This is evidenced through the challenges of local councils charged with responding to the application of SEPP provisions, along with the evolving landscape of client requirements.

This is particularly due to the unintended consequences appearing when developers attempt to apply the current SEPP requirements in inappropriate areas. We understand it is basically agreed by Councils and the State, that the current requirements, (when generically applied to some local areas) are detrimental to the surrounding communities they are randomly imposed upon.

The Northern Beaches peninsula is a typical example of this, where we are seeing Development Applications for boarding house "micro-apartments" in small narrow streets, cul-de-sacs and other R2 zoned low density areas. The streets in these areas do not have sufficient supporting infrastructure or regular access to rapid transport links. The majority of people on the Northern Beaches drive at various times. This is because the bus links from inside the suburbs to the arterial roads are insufficient (at this time) to meet transport requirements of the populous. The Northern Beaches is at capacity from a

transport and infrastructure perspective. The North-South B-Line is a great step in the right direction. More infrastructure is needed however, as is an East-West dedicated bus lane and B-line from Dee Why to Chatswood.

There is also no limit or quota to the number of applications, even in suitable correctly zoned areas. This creates further implications for the at-capacity soft and hard infrastructure required to support these additional density increases on a broader scale. This acknowledged detrimental impact is the driver for the continuing review of the State Environment Planning Policy.

In relation to the parking provision, we see that a ratio of 0.5 car spaces per room, in a facility that is located within a maximum 200m distance from high volume rapid public transport corridors; would be appropriate for Boarding Houses operated by Not for Profit (NFP) type community groups. These cases would require demonstration that they meet these specific requirements along with others, to be eligible for the \$10K rebate. Operation for less fortunate or disabled clients would be required for a minimum of 25 yrs, for example, at a capped rental rate so that it is affordable.

It is these NFP groups and client types, that are supporting the disabled and those less fortunate in the community. They are the ones that are missing out in the application of the planning provisions in accordance with the original intent of the SEPP (notionally Traditional Boarding Houses) on the Northern Beaches. It is expected that this proposed adjustment will increase the attractiveness of this type of development for socially responsible developers introducing these developments into appropriate areas.

There should also be dedicated manager or carer spaces for any of these types of developments along with the use of dedicated share car spaces, such as GoGet or PopCar and visitor parking requirements. The ratios would need to be applied in the same way as for unit developments for these types of Boarding Houses, where full time managers are also considered necessary.

New Generation Boarding Houses (or Micro Apartments) are typically more suitable for other client types - notably some key workers, remote area professionals and displaced individuals on the Northern Beaches. This is confirmed by the rental incomes these types of developments are currently attracting in the marketplace. It is also expected the same provisions should

apply across Sydney, and in the rest of NSW, to these and the abovementioned traditional Boarding House developments. These developments should also meet the same boundary setback specifications that are required of apartment developments today.

Again, these types of developments should occur in correctly zoned areas suitable for medium to high density home unit accommodation (or a new Affordable Housing Zoning noted in Appendix 1). This should be as agreed in consultation with local councils, through their LEP's and broadly in compliance with Greater Sydney Commission planned quotas.

These Micro Apartment developments should have a minimum requirement of one parking space per room and be provided within 400m of suitable transport corridors. Again, dedicated visitor and share car spaces are required along with on site manager parking as appropriate for unit developments.

There remains a need for suitable accommodation for the majority of Key Workers on the Northern Beaches as it is not considered that Boarding Houses provide an appropriate solution to the majority of Key Workers' needs. It is important that this aspect is not neglected in the housing affordability considerations under contemplation by the State. Best practice reviews indicate that old style boarding houses are subject to negative health impacts for long term occupants. More suitable, larger floor space ratios incorporating better streetscape activation, green space requirements and noise and privacy proofing should also apply. This is so that the surrounding communities welcoming these new developments can continue to reasonably expect to live in 'quiet enjoyment' of their local area.

# Additional Planning Announcements

We also provide initial comment on two of the latest planning announcements:

## **On the \$290 million spend on greenspace announcement:**

*‘Communities will have access to more open spaces and playgrounds, as part of a \$290 million funding injection from the Government to make NSW communities more liveable and green.’*

We are encouraged to see that the government is taking a positive stance to ensuring that there is provision for important greenspace as development of our State continues. This is evident through this announcement and it has the potential to protect current greenspace and create new greenspace.

A portion of this greenspace funding needs to be set aside for both SEPP Affordable Housing and SEPP Seniors Housing developments, to ensure protection of current mature and protected flora, fauna and species. This needs to be apportioned across the quantity of developments to be built. An important further aspect relates to biodiversity offset improvements and the purchase of premium, key areas of land, that may be adjacent to existing designated wildlife corridors. The NBSCG will provide a further submission in relation to this separate planning announcement in the future.

## **On the Terrace Houses and new SEPP medium density announcement:**

*‘The medium-density housing code, which is being introduced alongside a design guide, WILL NOT ALLOW terraces and other two-storey developments into AREAS WHERE EXISTING PLANNING LAWS PROHIBIT that type of building.’*

This same prohibition needs to be added to both SEPP Affordable Housing and SEPP Seniors Housing. The NBSCG will provide a further submission in relation to this separate planning announcement for medium density ‘client’ requirements in the future.

In the longer term, it is expected that local area councils developing their LEP's, (which are compliant with the broader scale provisions developed by the Greater Sydney Commission) would be exempt from the SEPP override. This type of exemption will be very important for progressive Councils, such as the Northern Beaches Council, who are charged with representing their local communities. The Northern Beaches Council are embracing and implementing the latest planning requirements being introduced by the State. This is a particularly important compliance reward that can be provided as we transition into an orderly and more appropriate planning process.

Best regards

A handwritten signature in black ink, appearing to be 'Gopala Maurer', written in a cursive style.

Gopala Maurer

President

**The Northern Beaches Strategic Community Group**

# Appendix 1

## Relevant SEPP POLICY REVIEW POINTS

(extract from Schedule 1 provided previously (slight italicised changes))

1. **AH Zoning** - Has the department considered creating a dedicated *zoning type* for affordable housing? This could be named the **“AH Zone”**. This would enable a zone checkpoint (before affordable housing DA's were able to be submitted). A zoning compatibility assessment could be undertaken by Councils to determine the *“relevance to current zoning in that area”*. This could save costs and time at Council and Town Planning; Review Panels and IHAP levels; as these personnel would not need to be engaged until the right zoning checkpoint had been completed. This could also streamline work efficiency.
2. **Affordable Housing types and client types:** Has anyone undertaken a review of who “the client” is and what that landscape looks like today? Affordable housing needs have and will continue to change rapidly given our anticipated population growth to 2030. Clarification of who the *“affordable housing client”* is may be required. For example, housing in Sydney is already unaffordable for young professionals and most of the community yet to rent or purchase their first property. The landscape of issues experienced by each client is specific and there are different needs in relation to affordable housing. A review is needed to prevent further decentralisation of families which increases pressure on current transport networks. Some housing need examples include:
  - a. **Old fashioned boarding house style accommodation** - One Dwelling multiple bedrooms, shared bathroom, kitchen, living and outdoor spaces (urgent crisis care).
  - b. **Micro-apartments** - New style boarding housing, individual rooms with internal bedroom, living area, kitchen, bathroom. Shared greenspace. Minimum 1 car space per unit requirement. 200 metres to a main arterial road and B-Line or Railway line.
  - c. **Seniors Housing** – 2 to 3 bedroom full size apartments, with balcony or grass outdoor space, parking for 2 cars and lifts.

- d. **Young Couples Housing** – Similar requirement to seniors housing with parking for 2 cars.
- e. **Young Families** – Small block single dwelling house; or dual occupancy; or semi-detached. All with 3+ bedrooms, living, dining, kitchen 1 - 2½ bathrooms outdoor living space (grass yard) parking for 2 cars.
- f. **Singles Housing** – Primarily large style apartment living 2 to 3 bedrooms with greenspace or balconies and minimum 1 car space.
- g. **Key and out of area workers** – Fly-in-fly out/ shift workers 1 to 2 bedroom apartment living or detached or semi-detached housing with 1-2 car spaces. Out of area professionals, *displaced individuals*, plus key worker occupations: Workers on very low to moderate incomes critical to the economic and social development of the State, including but not limited to occupations such as school teachers, carers, midwifery and nursing professionals, hospitality and retail workers, personal carers and assistants, child carers, fire fighters, police, carers and aides, automobile, bus and rail drivers, cleaners and laundry workers.
- h. **Low Socio-economic** – May require subsidised 1 to 3 bedroom full apartment accommodation with appropriate 1 to 2 car-spaces (depending on the needs of: the homeless, temporarily and urgent displaced families, training Drs & Nurses (long hrs little pay)).
- i. **Homeless people** – Health issues arising from poorly planned affordable housing. In some case's homeless people prefer to risk sleeping rough rather than face potential violence arising from close quarter living in tiny boarding house style developments.
- j. **Disabled and less abled people** - In addition to the health and other issues raised above, all of these client types include disabled people; and accordingly appropriate accessibility measures must be included in the designs. In addition, the 400 metre measure of bus stops needs review as this distance discriminates against these clients. Particularly noting safe crossings, footpaths; and accessibility to bus stops for both the forward and the return journeys.