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Director, Housing and Infrastructure Policy
Department of Planning and Environment
GPO Box 39
Sydney NSW 2000

9 April 2018

Re:- Parking Ratio changes for boarding houses

Dear Director,

I am writing to you in regard to 'Proposed amendment to ARHSEPP 2009 – Boarding Houses' increase of parking ratio on accessible boarding house developments from 0.2 to 0.5 per room.

One of the key aims of the ARHSEPP, is to increase the supply of affordable, rental and social housing through a range of housing types including boarding houses. One of the key contributors to the success of this legislation **in creating supply** is the ability to construct a boarding house in low-density areas on a smaller scale in comparison to large-scale boarding houses which are usually built in high density areas and have easier provisions such as wider block sizes and basements to allow for this parking ratio to be met.

By increasing the parking ratio in accessible areas to 0.5, this will create a major limitation on the ability for small scale boarding houses in low-density zones to be designed and approved, particularly when dealing with small lot sizes and block widths.

It is important to note that the existing SEPPARH 2009 – Boarding Houses is designed to provide affordable accommodation in Accessible locations (ie. 400m from a bus stop with buses operating between certain times). Therefore it is designed for low income boarders who mostly do not drive and cannot afford to run a vehicle. So why all of a sudden the need provide parking ?

There is no specific evidence suggesting the current 0.2 parking ratio is not effective in providing sufficient parking for accessible boarding houses. Prior to the proposed amendment to the SEPPARH 2009 – Boarding Houses being made to increase parking in accessible areas to 0.5, a study of current occupied boarding houses should be undertaken to determine that there is actually a need for an increase in parking ratio. Given that properties located within 400 metres of a bus stop or train station provide ample transportation for occupants, a need for the additional parking ratio should be determined using evidence, prior to proposed changes being made to the SEPPARH 2009.

The 'Proposed amendment to ARHSEPP 2009 – Boarding Houses – Explanation of Intended Effect' discussion paper outlines community feedback as the key reason for the proposed amendment. I would question at which point these community concerns have been raised, as I would assume these types of concerns would have been raised at a planning level, following DA submission to council and prior to the boarding house being operational. I question whether these 'community concerns' have been put forward in refusal to development of the boarding

houses, rather than after completion and occupation. This should be determined and taken into consideration, prior to the advocacy of such changes.

Unfortunately there is a lack of education around what modern and new-age boarding houses are, many residents across NSW have a negative impression of these types of developments and types of occupants they believe may reside in the development. I believe that this issue of parking ratio increase is an attempt to inhibit the development and approval of small scale boarding houses in residential areas and **should not proceed**.

Further, I believe that this change to parking requirements will make many Boarding House projects (especially in the 2B Zone) un-attractive for small developers. The extra parking will reduce the number of potential rooms and this will lead to fewer Boarding Houses being built therefore further significantly reducing the availability of affordable rental housing to the community.

Please contact me should you wish to discuss any of the above further.

Regards,
Nick Karahalios
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