

# mclean design

landscape architecture | master planning | urban design  
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## **Re: Submission Against Proposed changes to SEPP ARH 2009**

As a professional Urban Designer, Landscape Architect, and as a concerned Sydney resident, I am extremely concerned with the proposed changes to the SEPP ARH 2009, specifically as they relate to Boarding Houses and new parking requirements.

The change seems quite abrupt and without any accompanying detailed research data and seems to present a very strong prejudice against the future ability for an important type of alternate affordable accommodation in this city.

With such a staggering amount of research and media releases clearly demonstrating that we are currently going through a crisis in terms of shortage of rental accommodation options, it seems counter-intuitive to be forcing increased parking requirements on a style of accommodation where tenants are not necessarily vehicle owners, and where they are wanting to take advantage of these more affordable housing options where there is less need for a vehicle and as in accordance with the SEPP itself, improved accessibility to public transport as a specific requirement.

Why are we introducing targeted legislation which will obviously make the implementation of future boarding houses impractical, if not impossible? By implementing these changes, we run the risk of potentially wiping out this type of accommodation altogether across NSW which will only serve to worsen the current shortfall in affordable housing options.

I find this staggering at a time when many concerned Government agencies, community leadership groups and professional designers are all trying to work together to increase the yield and diversity of affordable housing options in this state, which can only be achieved through incentives to development of better boarding houses, as opposed to disincentives which will wipe them out altogether.

One must also ask why NSW Planning is proposing changes to the SEPP ARH 2009 that are contrary to the aims of the policy itself, and which are specifically in conflict with some of the key points as set out in Part 1 (3) of the SEPP ARH 2009 as follows:

- (a) to provide a consistent planning regime for the provision of affordable rental housing
- (b) to facilitate the effective delivery of new affordable rental housing by providing incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards

(d) to employ a balanced approach between obligations for retaining and mitigating the loss of existing affordable rental housing, and incentives for the development of new affordable rental housing,

(g) to facilitate the development of housing for the homeless and other disadvantaged people who may require support services, including group homes and supportive accommodation.

If the proposed changes are adopted, they would generally make Division 3 (Boarding Houses) of the SEPP ARH 2009 redundant, since the proposed parking provisions are extremely prohibitive, rather than being facilitating of development as described in item (g) above.

If the proposed changes are adopted, the proposed number of parking spaces required would result in more parking area being required than building area (i.e. a 3-level boarding house may require a 4-level basement to accommodate the parking requirements. This would render the development unviable as generally 3x more parking per m2 would be required for a Boarding House as compared to a RFB of the same size).

The existing parking requirements (0.2 for accessible locations and 0.4 for non-accessible locations) provide more than enough parking spaces for the occupants as most occupants don't own cars and either use public transport, bicycles or motorbikes.

The proposed change does not differentiate between accessible and non-accessible locations. This will lead to boarding houses being developed in less than ideal locations as non-accessible land is usually cheaper and would potentially make boarding house projects more viable in these areas which again is counter-intuitive to good social planning principles and equitable rights to live and work in proximity of higher value community green space and generally better recreational facilities.

The proposed changes if applied would effectively make the provision of Boarding Houses in NSW unviable, and remove another layer of accommodation 'hope' for people unable to purchase a new home or rent in more expensive accommodation options. This sadly also primarily includes critical members of our society such as essential services personnel including teachers, nurses, students, policemen and women, emergency service and aged care workers.

These are the very people we should be trying to assist, and Boarding houses provide this opportunity to allow people to live and work in a diverse and vibrant social environment.

I trust the NSW Department of Planning will carefully review these proposed changes and agree to not introduce them on the basis that if the supply of new Boarding houses is mitigated then this would only succeed in placing further pressure on Sydney's worsening rental affordability crisis.

Sincerely,

A handwritten signature in black ink, appearing to read 'D McLean', with a stylized, flowing script.

**Darrell McLean** AILA / RLA

*Registered Landscape Architect No. 000376*