

16 April 2018

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

**RE: PROPOSED CHANGES TO BOARDING HOUSE CAR PARKING
RATIO - RESPONSE FROM PACIFIC LINK HOUSING**

1. Overview of Proposed Changes

We understand that the NSW Department of Planning & Environment is reviewing the Car Parking ratios applying to Boarding houses under the Affordable Rental Housing SEPP (2009). The proposed changes will see the minimum non-discretionary standards (ie – the consent authority cannot refuse an application if compliant) for car parking associated with a boarding house be changed:

From

- 0.2 car parks per room for accessible sites, or
- 0.4 car parks per room for non-accessible sites.

To

- 0.5 car parks per dwelling for all locations.

2. Key Considerations

As a registered Community Housing Provider (CHP) providing social and affordable housing for the community, we have first-hand experience in delivering and managing Boarding Houses. We believe that the following key aspects should be considered:

Site Location

The location of the proposed development should be considered when determining car parking impacts. Developments in regional NSW should be considered differently to in the Sydney metropolitan area, as the impacts of car parking are considerably less in regional NSW. The application of a single ratio in a “one size fits all approach” will not address these key differences.

Car Parking Demand Experience

PLH's experience in managing our boarding houses indicates that the existing parking ratios are sufficient. Our existing 31 room boarding house in Woy Woy NSW was required to have 6 car parks for residents. At no time have we required more than this amount for tenants. Our current Boarding Houses do not present parking problems to the community.

In addition to this, research commissioned by the former Wyong Shire Council (now Central Coast Council) indicates that 74% Public Housing (Social Housing) Tenants living in studio or 1 bed room apartments do not own a car.

3. Unintended Consequences

Whilst we understand that the intent of the proposed changes are to remove the impact of additional car parking on the adjoining streets / neighbourhoods, it may also have the following unintended consequences.

Assuming a 30 room boarding house, an additional 9 car parks would be required compared to an existing accessible site location. The impacts of these additional spaces may include:

Increased Capital Development Costs

- The additional spaces would require a minimum of 250sqm of land (assuming on grade). Depending on the site location this will require \$200K - \$500K of additional land investment.
- Constriction of the additional car parking, retaining walls, drainage etc would require an additional \$80K-\$150K.
- The additional costs equate to an extra \$300K-\$650K in capital investment (\$10K-\$20K per room), which is up to 10% extra.
- The additional costs to the project reduce the financial viability for the provision of Affordable Rental Housing to the community.

Reduction in Affordable Rental Housing

- In many instances the space requirement for additional car parks may be unable to be accommodated due to site constraints, meaning that an overall reduction in the quantity of rooms that could be provided.
- This reduces the financial viability for the provision of Affordable Rental Housing, whilst also reducing the supply of new accommodation.

Accessible and Non-Accessible Site Provisions

- The introduction of a blanket 0.5 car parking ratio will remove the current incentive for the development of Affordable Rental Housing within close proximity to public transport nodes (aka accessible sites).
- Whilst the current provisions respond to the residents' transport options, the proposed provisions will not.

4. Recommendations

PLH provides the following recommendations in relation to the proposed changes above:

- a. That the proposed 0.5 car parking ratio is not adopted within the ARHSEPP, as the existing parking ratios appear adequate for Boarding Houses owned and operated by a Community Housing Provider.
- b. That should any changes be made to the car parking ratios, then they still retain a distinction between accessible and non-accessible sites.
- c. That consideration is given and distinction is made relating to the car parking demand ratios associated with:
 - Sydney Metropolitan vs Regional NSW areas.
 - Boarding house developed and managed by not-for-profit registered Community Housing Providers (which supply social and affordable housing options), compared to private developers that provide market rental accommodation.

Please contact the undersigned should you require any further information.

Regards,



Mark Glew
Manager Property Assets & Development