

According to the Explanation of Intended Effects (EIE), the proposed new higher standard for boarding houses under Clause 29(2)(e) will align with the parking provision for one-bedroom dwellings in in-fill affordable housing development under Part 2 Division 1 of the SEPP ARH 2009.

We strongly suggest the Minister to reconsider this matter based on the following reasons:

1. The proposed higher parking standard for boarding house represents a 250% increase for boarding houses developments located within accessible area under the definition of SEPP ARH, which as a consequence will significantly increase the construction cost and ultimately will be translated into extra rental cost for the future tenants. This is clearly a considerable challenge to the feasibility of the future boarding house developments and can put the whole affordable housing scheme at risk. The likely consequence is a fundamentally contradicting to the Aims of the SEPP, particularly in Aim (b) to facilitate the effective delivery of new affordable rental housing.
2. The proposed new parking provision will make more damage to the delivery of new generation boarding houses in locations where additional floor space incentive is eligible, in urban density occurs where residential flat building is permissible. This should be the areas to encourage delivery of boarding house developments which are compatible with the local character rather than the reverse. By making such development more infeasible may also encourage the illegal operation of boarding houses in existing residential developments without ensuring equitable amenity and safe fire measures to be implemented.
3. The Draft SEPP has removed the locational attribute from the parking standards for boarding house. In other words, the proposed new parking provision does not recognise the contextual differences between the locations in terms of accessibility and life style. Such blanket approach is not consistent with the integration of transport and land use as an overarching goal that NSW Government is aimed to achieve in the long run. A potential consequence is to discourage the utilisation of public transport where the current location-based parking provisions is encouraging as other wise. This is a clear contradiction to the AFH SEPP aim (f) to support local business centres by providing affordable rental housing for workers close to places of work.
4. There is a lack of proof of causality between Boarding Houses and the increase of on street car parking occupancy. This needs to be scientifically justified and conducted through statistical evidence and a thorough study of the different available Boarding Houses and each locations.
5. On-street overparking is only one symptom of a much bigger problem that has many other manifestation, such as traffic congestions. This is car dependency, which needs to be addressed through other means better than hiding the cars from sight. This can and needs to be tackled through other means, such as providing a real and cheaper transport choice through more frequent, safe, reliable and efficient public transport. Increasing the ongoing cost of owning a private car in relation to other options is actually part of the solution. Providing for additional car spaces without carefully balancing the requirements and coming up with a proper figure may work against this aim.
6. Though similar in aim and look Boarding houses are inherently different than the typical infill affordable flat building. Copying a car park rate that was developed for one type and apply to another may not be a proper strategy. Instead, the new generation Boarding Housing needs to be studied as a unique and a new type of use. Based the available stock of buildings, a study

needs to be conducted on Boarding Houses that are located in different zones and within different context, in order to come up with representative and real numbers.

7. Based on the technological changes and the mega trends in the world, the autonomous vehicles may become a reality in the near future. A wasted resource in terms of unused basements that are difficult if not impossible to be reused as habitable spaces. This in addition to big the environmental cost of digging deeper and wider to provide for the additional required car spaces.