

16 April 2018

Our Ref: 2018/145020-01

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

Dear Sir/Madam,

State Environmental Planning Policy (Affordable Rental Housing) 2009: Draft amendment to parking provisions

Thank you for the opportunity to comment on the proposed amendment to the car parking standards for boarding houses in State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP).

The proposed amendment

The City's understanding is that the proposed amendment relates only to standards that cannot be used by the consent authority to refuse development consent. The proposal is to increase the numerical car parking standard specified in Clause 29(2)(e) of the ARHSEPP to 0.5 spaces per boarding room for all sites, regardless of the level of public transport accessibility.

The City understands that boarding houses proposals cannot be refused on the basis of car parking if they meet the minimum standard of 0.5 spaces per boarding room. However consent can still be granted for proposals which provide more or less parking, if supported.

In the City of Sydney, many of the boarding house proposals provide little or no on-site parking for residents. This is acceptable in the context of high public transport accessibility and usage. It is also consistent with the car parking standards in Sydney Local Environmental Plan 2012 which sets maximum car parking rates. Clause 29(2) of the ARHSEPP allows the City the flexibility to permit boarding houses with fewer parking spaces than specified in the ARHSEPP. The City expects to see this flexibility retained. The City would strongly object if the car parking provisions were to move to Clause 30 of the ARHSEPP and become a minimum requirement for approval.

General comments

The City does not support the proposed increase to car parking rates for boarding houses for the following reasons:

- The provision of additional on-site parking should not be encouraged and will increase car usage, traffic congestion and pollution through vehicle emissions. Rather, new developments should be designed to encourage the uptake of more sustainable forms of transport, such as cycling, walking and public transport.

- Previously, the ARHSEPP acknowledged that where good public transport is available, less parking should be provided to encourage use of that public transport. The proposed amendment to allow more on-site parking for boarding houses which are well located in terms of public transport and does not encourage residents to make use of available public transport, cycling and walking options.
- The overall intent of the ARHSEPP is to increase the supply and diversity of affordable rental and diverse housing types throughout NSW. Increased on-site parking will increase the costs of delivering boarding house developments. This will either result in reduced supply, and/or an increase in the cost in delivering affordable housing. Both outcomes conflict with the intent of the ARHSEPP.

The City urges the Department to prioritise a more comprehensive review of the boarding house provisions in the ARHSEPP. The City recognises the importance of boarding houses in contributing to the housing mix needed to support a diverse community, and supports their traditional role in providing low-cost, temporary and crisis accommodation. However, we remain concerned about 'new generation' boarding houses where the rents charged typically exceed the earnings of low income households. These types of boarding houses are not necessarily contributing to the supply of affordable housing. The City is also concerned that the development standards in the ARHSEPP for boarding houses are not always achieving quality outcomes in terms of built form, neighbourhood character or residential amenity. We would welcome the opportunity to contribute to a comprehensive review of the boarding house provisions in the ARHSEPP.

If you would like to discuss this further, please contact Siobhan Fox-Roberts, Senior Planner - Strategic Planning and Urban Design, on 02 9265 9776 or by email at SFoxRoberts@cityofsydney.nsw.gov.au

Yours faithfully

DRAFT – NOT YET APPROVED BY DIRECTOR

GRAHAM JAHN

Director City Planning, Development and Transport