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16 April 2018

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

Via Email: deborah.brill@planning.nsw.gov.au

Dear Ms Brill

Submission re proposed amendment to car parking standards for boarding houses

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

Car parking standard

LGNSW has argued for increased car parking provisions for boarding houses in previous submissions on boarding houses (most recently, our Submission to Affordable Rental Housing SEPP Review, March 2011). We therefore welcome the proposal to increase car parking standards for boarding houses. LGNSW is pleased that Department of Planning and Environment (DP&E) has recognised that the current ratios of 0.2-0.4, depending on proximity to public transport, are inadequate and are having a negative impact on on-street parking. A ratio of 0.5 car spaces per boarding room, as proposed, is the absolute minimum we consider reasonable.

In addition, there should be at least one space provided on site for visitors and parking provision for a permanent on-site manager. Ideally, we would advocate the standard should be one car space per room, but we acknowledge that a large increase in the parking requirement may impact on the viability of boarding house construction and therefore undermine the intent of the ARHSEPP, which is to increase the supply and diversity of affordable rental housing.

Support for affordable housing provision

Councils have a commitment to ensuring availability and variety of genuine affordable rental housing in their local areas, and many have adopted Affordable Housing Policies which demonstrate this commitment. Councils appreciate that boarding houses are an important form of rental accommodation and as such, a much-needed part of the housing mix. They also have obligations (under Regional Plans and, in Sydney, the five District Plans) to meet housing targets, including provision for affordable rental housing. However, many will attest that striking a balance between planning rules that support this much needed type of housing, in a form that respects local character and amenity, can be challenging.

Other boarding house issues and review of ARHSEPP

LGNSW and councils have been advocating for the DP&E to address car parking and other issues with boarding houses for some years. Representations by LGNSW and councils to the Hon. Anthony Roberts, Minister for Planning and Infrastructure over the past year highlight car parking impacts as just one of many issues our members are experiencing following a steep rise in the number of boarding house developments.

The proposed change to car parking standards is recognition of only one of the concerns of councils associated with the sharp increase in new boarding house developments in recent years.

Other concerns relate to: intensification of use through 'clustering' of boarding houses; difficulty in planning for additional impacts on infrastructure capacity (due to uncertainty about where and how many boarding house developments might occur within a neighbourhood); and questions about genuine affordability of rental accommodation being offered.

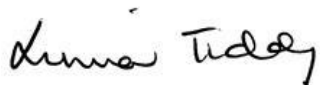
The Department's "review of other boarding house provisions and the wider ARHSEPP" (referenced in the Frequently Asked Questions (FAQs) is fundamental to improving the planning outcomes for this type of development within our communities. LGNSW therefore urges DP&E to expedite its review of the ARHSEPP, with input from experts in the local government, industry and housing sectors. The aim should be to better provide for this much needed type of housing in a form that respects local character and allows councils to plan the infrastructure to support them. We ask that DP&E engages with our sector to understand the full extent of the issues and identify effective solutions.

LGNSW welcomes the fact the government appears to be listening to communities about issues with boarding houses. In summary, LGNSW:

- supports the proposed adjustment of the current car parking standards to 0.5 spaces per boarding room;
- recommends that the Department expedites its review of boarding house provisions and the overall ARHSEPP; and
- requests the Department to consult local government practitioners to understand the broader issues to do with boarding houses and identify some balanced and workable policy options.

Should your staff have any questions, please ask them to contact Shaun McBride, Senior Strategy Manager (P: 9242 4072; E: shaun.mcbride@lgnsw.org.au).

Yours sincerely



Lillian Tiddy
Acting Chief Executive