

# North 62 Pty Ltd

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Director, Housing Policy  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

**Re: - Submission to the "Draft amendment to the Affordable Rental Housing SEPP (ARHSEPP) - Proposed changes limiting Boarding Houses to 12 rooms per site in the R2 Zone.**

Dear Director,

I would like to make this submission as an owner, operator and developer of boarding houses with three generations of experience operating lodgings and boarding houses in Sydney and the Central Coast.

We are currently building our first "New Age Boarding House" with two more on the drawing board. The two new boarding houses were recently caught up in the last changes to the parking rules.

We had preliminary plans drawn up by our architects for "Pre-DA Consultation with Council" which we had to re-design to provide the newly required parking numbers which resulted in a lower number of rooms as well as lost time. This is because the new parking regime only applied to Private Owner/Operators and not to Community Housing Providers.

Although we are not a Community Housing Provider (CHP), we do work with them to help house suitable people in many of our properties and also feel that any legislation which exempts the CHP's but is enforced on private owners only reduces opportunities for affordable housing.

These two projects are now close to being submitted and we have spent about \$60,000.00 each project in consultant's fees to meet the existing legislation and Council requirements. The properties were also purchased recently based on the existing legislation.

Therefore, we would like to request that any changes to the legislation do not affect current proposals either submitted or close to being submitted to Council.

Further to the above I would also submit the following;

- The maximum proposed of 12 boarding rooms does not take into account the size of the land. For example, on the Central Coast like many other areas, larger properties are available in areas which are now starting to be re-developed. So smaller housing is turning into medium density housing which increases the existing density of an area over time.
- The Central Coast has a great shortage of "Affordable Rental Housing" which is clearly outlined in the recent "Central Coast Council's Draft Affordable and Alternative Housing Strategy" undertaken by "Judith Stubbs & Associates" for the "Central Coast Council" which was recently on exhibition, where support is given to well-located and well-designed boarding houses.

- Evidence in the above strategy shows that problems with boarding houses are minimal as the occupants tend to be respectable lower income workers, students and pensioners.
- If a boarding house proposal meets the requirement for “Accessible Area” or can show that its location will rely on suitable public transport and provide the required parking it should also be considered, especially if it fits the above two criteria.
- Boarding houses larger than 12 rooms can be well-designed well-located and well-managed in the R2 Zone and there should be no discrimination between Community Housing Providers and Private Operators. Even smaller boarding houses if badly managed would be a problem.

### **Conclusion:**

I am not in favour of the new draft amendment to the ARHSEPP and request that it does not proceed for reasons outlined above.

I believe the recent changes to provide greater parking in the R2 Zone has not had time to take effect and that once boarding houses start being built with higher off-street parking this will alleviate the largest concern of existing and future residents.

The existing legislation allows for more affordable housing options especially on the Central Coast where blocks of land are generally larger and affordable housing is in high demand.

Any amendment to the current legislation should take into account land size in areas where all the blocks are larger as they will undergo re-development over time and the scale of a boarding house to fit onto a larger block of land would generally be appropriate for suburbs with large blocks of land being more common or available.

### **Recommendations:**

- The proposed draft amendment does not proceed
- Development of larger blocks should be subject to local strategies
- A one size fits all approach does not work
- Many areas which have larger blocks of land will be redeveloped with Medium Density Housing based on current Local LEP's and still fit the character test
- Larger boarding houses on larger lots will still maintain character of the area as the area is re-developed with higher density over time
- Should this draft proceed it should give people who have purchased land with the view to developing and operating boarding houses in the R2 Zone adequate time to finalise and submit their development application proposals to their local Councils. Especially when they have spent hundreds of thousands of dollars buying land, preparing architectural plans and paying for various consultant reports.

Thank you for reading and taking this proposal into account.

Regards,

Nick Karahalios

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