

Submission re Draft amendment to the Affordable Rental Housing SEPP

I oppose the Draft amendment to the Affordable Rental Housing State Environmental Planning Policy (ARHSEPP). While I recognise that inappropriate boarding house developments have become problematical in suburban Sydney, the proposed amendment is too broad and will lead to undesirable outcomes. I make the following three points:

1. Proposed Amendment is Counterproductive

The objective of the ARHSEPP is to provide a mechanism for the creation of low-cost accommodation. To simply impose a 12-room limit on boarding house developments works against this objective because it will become uneconomic to develop a boarding house, especially as on-site parking for at least 6 cars plus motorcycles etc can generally only be satisfied in expensive basement parking. Small-scale developments are intrinsically more expensive per unit than larger scale, and the boarding house would become an expensive, not affordable, option for renters.

2. Proposed Amendment should not apply to R2 areas adjacent to R3 and R4 Zoning

The EIE identifies the issue that “built form outcomes of boarding houses in R2 zoned areas...can be incompatible with the low-density nature of surrounding development”. However, the interface between R2-zoned areas and R3 or R4 zoning cannot be included in this picture because the “surrounding development” is obviously not “low-density”.

My personal circumstances are that the property on one side and all those opposite have been rezoned R3, while my property remains R2. There is no sense whatsoever of a “low-density nature of surrounding development” in my R2 zoning!! There are many areas in Sydney where such brutal interfaces have been created.

A boarding house structure that complies with R2 zoning actually provides a useful transition from the medium/high density zoning to the wider R2 zoning away from the interface. Such transition zones are precisely where boarding house developments can be most effective with least disruption to the amenity of the surrounding area while providing access to the services and facilities of medium/high density living areas, including transport and employment.

These transition areas can clearly integrate larger boarding houses without gross disturbance to the low-density amenity of the broader R2 area. Allowing larger boarding houses in these zones has minimal impact on parking and traffic issues beyond those associated with the adjacent medium- and high-density zoning.

Location of larger boarding houses in transition zones between R2 and higher-density zones can absolutely comply with the needs of providing the housing needs of the community within a low-density residential environment. Permitting development in this way also satisfies the

stated intention of the proposed amendment “to ensure that the built form of boarding house development in the R2 zone is compatible with the built form of other development in the local area”.

3. Savings Provisions

The cost of assembling a sound DA for a boarding house development can be anything up to \$150,000. Applications submitted in good faith ahead of the minister’s announcement should not simply be annulled if the proposed amendment is adopted as that would destroy trust in the planning system which must consider both existing residents’ concerns as well as the need for investment in new forms of affordable, well-located accommodation.

Any new regime should be introduced in an orderly fashion, without destroying investments made in response to the existing regulations. At a time when the housing sector is going into a downturn, it would be foolish to simply cut off an existing pipeline of new investment.

Any changes to the AHRSEPP should only be made with savings provisions for applications submitted ahead of the Minister’s announcement of the proposal.