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**RE: Planning Reforms Proposed for Boarding Houses**

Dear Minister,

I refer to the media release of 28 November 2018 on the [planning.nsw.gov.au](http://planning.nsw.gov.au) website in relation to the above, and the invitation for the community to provide comment on proposed amendments to the Affordable Rental Housing State Environmental Planning Policy (ARHSEPP).

While I welcome the proposal to cap the number of rooms in areas zoned R3, the reforms do not go anywhere near far enough.

I write to you as a resident of Northmead where there is a proposal to build a 40 room, 79 bed boarding house (39 rooms for allocated for residents with two residents per room, with one room allocated to a full-time live in manager) **REDACTED**. (DA/689/2018, Lot 13 Sec 5 DP 6436, 5 Campbell Street, Northmead NSW 2152).

Should this proposal go ahead it will have a massive detrimental impact on the local community, many of whom are deeply concerned and have lodged objections with Parramatta Council and contacted our local member, Mr Mark Taylor.

My feedback on the proposed changes are informed by my experiences with the objection process for the above DA, which I invite you to review on the City of Parramatta My Development Website. (<http://eplanning.parracity.nsw.gov.au/pages/xc.track/SearchApplication.aspx>)

**1. The cap should be based on capacity (residents) not rooms.**

The capacity of a boarding house has a greater impact on the surrounding community than the number of rooms.

A 12 room boarding house with two beds per room will have twice the impact on a local community in most respects than a boarding house with one bed per room.

All caps and any other restrictions in the legislation should consider capacity not just the number of rooms.

**2. The room cap should be extended to areas zoned R3.**

I note that you are quoted in your press release as saying:

“We have listened to the community and councils and what we’ve heard is that they want more limits placed on these developments in low density areas.”

While I agree with this statement, I do not agree with the proposed solution. Placing a cap on the number of rooms (or even beds as per point 1 above) in areas zoned R3 is likely to increase the number of boarding house applications in areas zoned R2.

The DA I referred to above intends to build 40 room, 79 bed boarding house on a very narrow, long block of land that was previously home to an elderly couple.

Your proposed changes will not have any impact on this DA, they are likely to create more of them.

The ARHSEPP has allowed developers, under very generous provisions, to build high density accommodation in low density areas. By placing a cap on the number of rooms in areas zoned R2 but not R3, you are essentially kicking the can down the road and creating bigger problems in areas zoned R3.

I ask that you consider extending the cap to areas zoned R3 for a slightly higher number of residents. Perhaps 15 or 20 residents at the most.

### **3. Consider the frequency and number of public transport options available and build boarding houses close to public transport hubs**

While I note that the ARHSEPP contains provisions to ensure that boarding houses are built close to public transport, these provisions do not go far enough as not all areas serviced by public transport are the same.

The DA to which I refer is for a property close to Windsor Road, which is serviced by a limited number of bus routes. Busses from Northmead run towards Castle Hill in one direction and Parramatta in the other. Public transport options in the Hills district are limited which is why we have such high car ownership.

The Developer was even recently quoted as saying that the proposed development would be used for nurses' accommodation for Westmead hospital. This is laughable as there is no direct public transport link between Northmead and Westmead.

I invite the Minister to visit the trip planner on the Transport for NSW website to see how long it would take a nurse from Westmead hospital to get home to 5 Campbell St Northmead after midnight on a weekday, or anytime on a Sunday.

There are considerably more public transport options just a few kilometres down the road in Parramatta, where multiple train lines and bus routes intersect.

I therefore suggest that the legislation should include different provisions for boarding houses built in the vicinity of major transport hubs as opposed to those on a bus route.

Where a boarding house is not near a major transport hub there should be a greater cap on the number of residents, or more parking spaces provided, or both.

### **4. Amend the car parking standards based on the number of residents, not the number of rooms.**

While I acknowledge that your Government has increased the number of parking spaces to 0.5 per room, this does not consider the number of residents.

A 40 room boarding house with one resident per room is subject to the same parking space standard as a 40 room boarding house with two residents per room.

This is both illogical and unfair.

Similarly, a boarding house in the inner city or close to a major transport hub is subject to the same standard.

A boarding house in locations such as Pyrmont or Parramatta is subject to the same parking space standard as a boarding house in suburbia.

As you state in your press release, parking standards to 0.5 spaces per boarding room apply in all locations.

Again, this is both illogical and unfair.

#### **5. Amend the parking space provisions to include mandatory visitors' parking**

Boarding houses require regular maintenance, cleaning, deliveries and other professional services. Residents may also receive visits from family and friends.

However the ARHSEPP does not allow for any visitors' parking.

The ARHSEPP must include provisions for dedicated fulltime visitors' parking spaces. Visitors' parking spaces should be allocated based on a ratio to the number of residents, not rooms. More visitors' spaces must also be allocated where the boarding house is not located near a major transport hub.

In the 40 room / 79 bed monolith that is proposed to be built **REDACTED**, residents are allocated a ridiculous quarter of a parking space per person.

In the Hills district these are extremely likely to be gobbled up by residents, meaning that anyone visiting the boarding house for personal or professional reasons would need to find parking on what are already overcrowded and parked out streets.

#### **6. Allocate one dedicated full-time parking space for every employee who is also a resident of a boarding house**

Section 29 (2)(e)(iii) of the ARHSEPP notes that

*"not more than 1 parking space is provided for each person employed in connection with the development and who is resident on site"*

DA/689/2018 has taken a very liberal interpretation of this provision and considers the allocation of a parking space for the onsite manager as optional.

I believe the Developer's approach is nonsense and that the fulltime manager must be entitled to a dedicated parking space over and above those allocated to the residents.

I request that amend the wording of S 29 (2)(e)(iii) to make it clear:

- If you work at a boarding house and you live there, you get a dedicated parking space, just for you. It might even have a little plaque or a sign on it with your job title.
- If you work at a boarding house but you do not live there, you get the use of a full-time parking space for the length of your shift.

#### **7. Extend the provision for fulltime managers from one manager for 20 or more beds to one manager for every 20 beds or part thereof.**

Section 30(1)(e) of the ARHSEPP, Standards for boarding houses notes that

*“if the boarding house has capacity to accommodate 20 or more lodgers, a boarding room or on site dwelling will be provided for a boarding house manager”*

DA/689/2018 provides for one fulltime for a 39 room property with 78 residents, which is compliant with the legislation.

I.e. a property with 20 residents requires the same number of fulltime manager positions as a property with four times the number of residents.

The Plan of Management and House Rules submitted as part of the DA note that on site manager's duties. I'd like to share them with you. They include but are not limited to:

- manage the day to day operations of the facility i.e. comprising two large buildings over grounds covering 1,136 sq.m.; 40 rooms; basement car parking on two levels; internal and external communal areas; and laundry
- ensure the premises are well kept to reduce the likelihood of crime
- monitor resident conduct and ensure that House Rules and Plan of Management requirements are followed
- monitor CCTV coverage of the facility from within own residence
- coordinate and manage gardeners and cleaners and various service people
- manage the necessary up-to-date details of all residents
- assess applications for community gatherings e.g. parties in communal areas
- monitor attendance at community gatherings, ensuring attendees are only residents
- monitor and ensure that community gatherings are only conducted during approved times
- monitor and ensure that only registered residents stay in rooms
- manage complaint resolution, both internal and external
- support residents through referrals to local agencies and services as required
- be responsible for contact with emergency services as required, including police

I ask you Minister, how can one individual possibly be held accountable for all of the above activities for 78 residents and 39 rooms?

How can they maintain the infrastructure and ensure the welfare and safety of both the residents and the broader community?

Would you be capable of doing this job?

Would you recommend it to anyone you know?

How would you feel if you knew someone who lived in a boarding house and required a high degree of medical care who was subject to such minimal supervision from one on site manager?

There needs to be a more generous ration of managers to residents. Managers should not be made to work more than a 12 hour shift, five days per week.

The legislation MUST provide for both AM and PM shift managers, with adequate coverage for relief managers on weekends, annual leave and public holidays.

Expecting one fulltime live in manager to maintain a property and care for 78 residents is just inhuman.

## **8. Extend the provisions for common living rooms from 5 or more to every 5**

Section 30(1)(a) of the SEPPARH, Standards for boarding houses notes that

*“if a boarding house has 5 or more boarding rooms, at least one communal living room will be provided.”*

I invite the Minister to view the Architectural Plans for the proposed development at - 5 Campbell Street Northmead.

The proposed development has provided one communal living room , barely enough to comfortably seat six people, for 39 boarding rooms and 78 residents.

Section 30(1)(a) really needs to be amended. There should either be one common living room for each five residents, or common living rooms should be large enough, and contain appropriate furniture and entertainment facilities (TVs, pool or table tennis tables etc.) to accommodate ALL residents.

People in low income housing are at serious risk of social isolation.

Cramming them into tiny rooms, two beds to a room, with a common living area barely big enough to swing a cat greatly increases this risk.

Please amend this section to provide adequate common living areas and facilities. Again, like the other provisions in the legislation it must be based on the number of residents, not the number of rooms.

## **9. Amend the provisions of the ARHSEPP to include adequate laundry facilities**

While the proposed development in DA/689/2018 includes a laundry, like the living room, it's tiny.

I don't know how 79 residents are supposed to launder their clothes. Maybe they will need to book an appointment to use a washing machine, maybe it will be like taking a number at the deli or RMS or maybe residents will just fight over them.

I don't know. But I do know that the ARHSEPP should provide for adequate laundry facilities and it doesn't.

## **10. Amend the provisions of the ARHSEPP to include shared cooking and dining facilities**

As clichéd as it sounds Minister, cooking for one is not always easy. Portions in supermarkets and recipes do not allow for it.

Crammed two per tiny room, many residents are likely to subsist on takeaway which is neither inexpensive nor healthy in most instances.

Boarding houses, particularly large boarding houses like the one proposed for 5 Campbell St Northmead must include common kitchen and dining areas.

These will greatly increase interaction between the residents and further reduce the risk of social isolation.

## **11. Extend the three week consultation period and notify more residents**

Parramatta Council notified owners of adjacent properties of the proposed development via an advertising package and there was a three- week window in which to lodge an objection.

Both the number of people notified and the length of the consultation period were no means adequate.

- **Number of people notified**

A 40 room boarding house with a two storey underground carpark built on a narrow block of land, across the road from a shopping centre and down the road from a high school impacts a lot more people than the adjacent property owners.

Anyone associated with the local high school didn't know. The local shopkeepers did not know. The local shop keepers immediately across the street and people who regularly shop there didn't know. Anyone who owns a property even a few houses didn't know. And they have a right to.

- **The length of the notice period**

Building a three-story edifice while digging another three storeys into the earth (into almost solid sandstone by the way, how much noise is there likely to be during the construction period, and how long will it last?) only 150 centimetres from neighbouring properties is a bit more complicated than the bloke next door building a pergola or deck out the back.

I spent the first week of the objection period learning everything I could about the ARHSEPP before pouring through hundreds of pages in the DA and trying to make sense of them. When you're not a town planner, architect or property developer these documents are not easy to read or understand.

Together with a small group of my neighbours, I spent the second week trying to mobilise the community and the third week writing my objection and assisting others with theirs.

Preparing and lodging our objections was like doing a university subject with a group assignment where the majority of students didn't even know that they were enrolled in the course.

Three weeks was not enough time for this process.

To put things in perspective Minister, in my day job I manage the **REDACTED**

The three-week consultation period for the DA coincided with a **REDACTED**. I believe you can imagine how much work that entails.

There were nights during the consultation period where I worked on my objection till 2:00 in the morning before getting up at 5:30 to go to work. Three weeks is not enough

time for this. Not nearly enough. Particularly when you have a demanding day job and all of this is new to you.

The icing on the cake Minister is when you read the hundreds of pages of documents lodged with the DA. The architectural plans, the BASIX certificate, the Statement of Environmental Effects, the traffic report and the waste management plan you realise that while a small group of local residents were given a three week consultation window the dates on some of these documents indicate that the Developer has had a veritable army of paid professionals who specialise in this stuff working on it for months.

I therefore urge the Minister to amend the legislation to:

- Consult more broadly by directly notifying a much larger group of effected residents, not just those adjacent to the development.
- Significantly increase the consultation window

For boarding houses with eight residents or less everyone in the block should be notified. For boarding houses with nine residents or more everyone in each block adjacent to the block where the boarding house is proposed should also be notified.

The consultation period for ANY boarding house should be at minimum 8 weeks. Boarding houses with 20 residents or more should be double that.

Developments for multiple boarding houses on adjacent blocks should be treated as a single development to prevent developers from circumventing these or any other provisions.

## **12. Encourage smaller developments and discourage large complex developments**

I refer the Minister to the City of Parramatta's Draft Affordable Housing Policy (2017). While I acknowledge that the Policy is in draft, I draw the Minister's attention to the diversity and social mix objective of the Draft Policy,

*"Diversity and social mix – the move away from concentrated areas of social housing towards a 'salt and pepper' mix of housing tenures is driven by a recognition that it is good to have a diversity of housing. A diverse and mixed range of housing tenures and forms also has the added benefit of creating a social mix – a variety of different people in a locality that make it an interesting place to live."*

I am pleased to advise that a salt and pepper approach has been successfully implemented in my local community which already includes a safe house for families escaping domestic violence and a half-way house for prisoners re-entering society.

These facilities work because they are unobtrusive and in character with the local area.

The boarding house proposed under DA/689/2018 is not. It is not in character with the surrounding area and is completely at odds with the 'salt and pepper' mix in the Policy.

The proposed development intends to squeeze 78 affordable housing residents like sardines into one property. This is not a "salt and pepper" approach. It is more like taking 78 bags of salt, stacking them in piles three storeys high into a long, thin narrow property surrounded by low density pepper.

This will only increase the sense of isolation experience by low income housing residents. They will also feel different from the surrounding community which may lead to resentment on both sides.

I urge the Minister to amend the legislation to encourage diversity and social mix and discourage large complex developments.

**13. Stop the rot – put a hold on ALL Boarding House applications until more reasonable legislation can be enacted.**

I note from your press release Minister that you are prepared to listen to the Community and I thank you for the opportunity to provide feedback.

I further note that you are of the view that the AHRSEPP has not always delivered affordable low cost housing aligned with community expectations.

The decision to build a boarding house is harder to reverse once the project enters the construction period.

I therefore urge the Minister to place an indefinite hold on all boarding house development applications where construction has not commenced until more reasonable legislation can be put in place.

Yours faithfully,

**REDACTED**