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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 have spent the last 12 months preparing development applications for two boarding house developments which are both in the R2 Zone. Both are on larger blocks of land than and for greater than 12 rooms (one is 25 rooms the other 29 rooms). Both Development Application have cost over \$60,000.00 each to meet the requirements by Council for various Consultant Reports as well as the Architect and Application Fees.

Therefore, I would be in financial distress should the proposed changes be implemented before these projects had time to be assessed by the Council. Both properties were purchased for the express purpose of Boarding House developments in an area which is desperate for affordable housing. Namely the Central Coast.

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However, Council did refuse it as they had specifically placed controls in their new LEP to control the size of boarding houses in the R2 Zone. The controls included;

- Minimum lot size of 1,200sqm
- Minimum frontage of 20m
- Must be a knock down rebuild, no conversion allowed
- The control was incorporated together with the controls for Multi Dwelling Houses

The Commissioner subsequently ruled in favour of the Council which wanted larger boarding houses in the R2 Zone.

So, in my case I was stopped from doing a Boarding House of less than 12 rooms in the R2 Zone which fully complied within the NSW State Government Legislation and have proceeded to build bigger boarding houses in areas with high demand and local support.

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. The existing legislation allows for more affordable housing options based on demand.

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.

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.

- 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.
- If Councils don't want Boarding Houses in their R2 Zone's then perhaps they should change their LEP's in the same way Canterbury – Bankstown Council has so as to restrict size. If Boarding Houses are not to be permitted in the R2 Zone then remove it from the permitted uses.
- **It should also be noted that the proposed legislation will not work since it doesn't stop someone developing 12 rooms maximum per small block but then doing the same on 3 or more blocks in a row.** In other words the proposed draft amendment would still allow large scale developments to happen.

Thank you for reading and taking this proposal into account.

Regards,

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