



16<sup>th</sup> April 2018.

To: The Director, Housing and Infrastructure  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2000

Submission on:

**Proposed amendment to the State Environmental  
Planning Policy (Affordable Rental Housing) 2009-  
Boarding Houses Parking provisions contained at Part  
2, Division 3.**

on behalf of the:

Property Owners Association of NSW.  
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Thank you for your invitation to make a submission on the proposed amendment to the State Environmental Planning Policy (Affordable Rental Housing) 2009- Boarding Houses Parking provisions contained at Part 2, Division 3.

### **Summary**

**To maintain and enable the improvement of the existing stock of established low cost boarding houses in NSW, the Government should provide an exemption to the proposed parking amendment to the ARHSEPP for existing registered boarding houses that are currently listed on NSW Fair Trading register and/or on Local Council records.**

### **Background**

The Property Owners Association of NSW (POA NSW) was formed in 1950 to represent property owners in NSW, and is the peak body that represents private boarding house owners and operators in NSW. The issues associated with affordable and low cost housing is a topic and concern constantly being discussed within the association.

### **“Genuine affordable” boarding houses, do not cause resident parking congestion**

It is acknowledged that population growth and congestion is a major problem in Sydney. This is putting intense pressure on the inadequate infrastructure, and the availability of street car parking spaces. POA NSW believes this is a function of

population growth and increasing car ownership, but is not related to 'genuine affordable' boarding house development.

**Genuine affordable boarding houses, and in particular the existing traditional boarding house market occupants, as opposed to the 'new gen' boarding houses, have extremely low private motor vehicle ownership rates.**

Registered Boarding houses represent an extremely small number of buildings in NSW. **There were only 1002 registered general boarding houses (both "new gen" and 'traditional boarding houses') in the whole of NSW as at October 2017.** [Evaluation of the Boarding Houses Act 2012- Final Report by Associate Professor Gabrielle Drake ACU February 2018 page 5]. This represents an extremely small percentage of buildings and occupants when compared to the total number of residential buildings and people in NSW.

Infact we know via NSW Revenue that **of the 776 registered boarding houses in 2014, 720 were providing low cost accommodation in 2013.**[(Boarding House Act Evaluation Report 1 2014 Appendix 9.10, pg 110) & (Evaluation of the Boarding Houses Act 2012- Final Report by Associate Professor Gabrielle Drake ACU February 2018)]. These figures could be updated for 2018 by obtaining the latest numbers from NSW Revenue.

Further growth in the number of registered boarding house numbers has been moderate at about 7%pa since 2014 (776 registered boarding houses in 2014). POA NSW estimates that most of the increase in boarding houses since 2009 is due to the construction of 'new gen' boarding houses, while it is likely the traditional boarding house market supply has declined in numbers.

The ARHSEPP is an essential planning instrument designed to address the critically inadequate supply of affordable accommodation. This policy is especially important for the traditional boarding house market. It should be noted that the registered traditional boarding houses are the only commercially available supply of long term accommodation which enable 'flexible' access to low cost accommodation to a diverse range of people near public transport nodes. This is critical supply for essential workers who are often on very low rates of pay in areas where rents or supply is extremely difficult or inflexible.

It is a **NSW government objective to "promot[e] the sustainability of, and continuous improvements in, the provision of services at registrable boarding houses"** (The Boarding House Act 2013 Section 3(d). Requiring existing boarding houses to provide more parking is contrary to current NSW government policy, and will remove the ability of operators of long standing existing boarding houses to improve the quality of their low cost accommodation supply.

When an existing boarding house is modified or upgraded through a development application these proposed new additional parking provisions would prevail. In the case of adaptive reuse of existing buildings into boarding houses in urban areas, especially those close to public transport, it is highly unlikely that it will be possible to provide a large area for car parking on site. Car spaces at ground level are very costly to provide and are extremely expensive at below ground level. The cost benefit of such a provision is totally inconsistent with affordable low cost living. It would represent a total waste of valuable space and costs if the car parking were not used in a boarding house. The more that Government imposes additional costs in an ad hoc manner, the more unviable the provision and improvement of low cost rental housing becomes.

**Further these policies that curtail legal supply, simply fuel the growing supply of illegal, non compliant share houses that take up the desperate excess demand for affordable accommodation. Often at 3<sup>rd</sup> world standards, these illegal premises rarely provide adequate fire safety, which poses a great risk to the health and safety of occupants and their neighbours, as well as Australia's international reputation.**

### **Other factors**

**Motor vehicles are expensive;** financing, registration, insurance, depreciation, repairs, wear and tear, fuel etc. POA NSW estimates a motor vehicle costs the average person about \$10,000 pa. A low paid worker would not be able to justify weekly expenses, potentially in excess of \$200 pw. **While public transport is relatively cheap...** *"With an Adult Opal card you can travel as much as you want on trains, buses, ferries and light rail within the Opal network and you never pay more than \$15.40 a day, \$61.60 a week, or \$2.60 on Sunday"*. [<https://transportnsw.info/tickets-opal/opal/opal-card-fares/adult-fares>]. Given established boarding houses are located within close proximity to cheap public transport service; motor vehicle ownership for such residents is extremely rare.

Local Government in inner city and suburban locations are now promoting alternative methods of transport and it is commonplace for residential, retail and office development to allow for bicycle accommodation. Bicycle pathways and priority roads are now featured in most local government areas. Specialised bus, light rail and heavy rail services are continuing to be pursued by all governments in an attempt to improve public mobility.

Furthermore, the ongoing and rapid development of services like **'peer to peer ride sharing'** and **'car sharing schemes'** are likely to lead to a decline in car ownership in the years to come. In fact research shows that **"the average share car takes about 12 private vehicles off the street"** (Page 3. Shaping the future of parking in Waverley,

Waverley Council, 2018). POA NSW believes this trend is likely to accelerate, with technological developments like driverless electric cars, which have the potential to provide even cheaper forms of ride sharing and public transport. It is expected that within 10-20 years car private ownership rates will significantly reduce in Sydney, reducing the parking congestion issue.

In the meantime, councils' resident parking schemes are a simple way for councils to manage the number of car parking spots allocated to any one building. By **installing a resident parking system, council can limit the number of cars that can park in specific zones, easily alleviating any excess parking congestion.** Further councils can provide daily parking permits so as to provide flexibility for residents who may have occasional need for extra parking (eg visitors).

### **Proposed ARHSEPP Solution.**

The Proposed amendment to the State Environmental Planning Policy (Affordable Rental Housing) 2009- Boarding Houses Parking provisions contained at Part 2, Division 3 **should not apply to existing established boarding houses that supply genuine affordable accommodation.**

This policy solution could be achieved by utilising the existing register of boarding houses held and maintained by the NSW Department of Fair Trading [<http://parkspr.fairtrading.nsw.gov.au/BoardingHouse.aspx>]. This Boarding House register provides comprehensive information on the address and size of the 1002 (as at October 2017) registered boarding houses in NSW at any one point in time since 2014.

Alternatively, Local Councils would maintain records of approved boarding houses, and this could also establish whether or not any development application related to a currently existing Boarding house or a new proposed boarding house.

**These existing lists of registered boarding houses, could provide a reliable framework for an exemption for the proposed parking changes to the ARHSEPP for currently existing 'genuine affordable' boarding houses.**

### **Conclusion.**

Sydney has been recently identified as one of the most expensive cities to live in worldwide. Low cost rental residential accommodation, especially if close to public transport is vital for people of varied incomes to live in Sydney. Traditional boarding

houses are a significant part of private sector provision of affordable low cost rental accommodation close to public transport. The concessions in the ARHSEPP are critical to the ongoing viability and ongoing improvements in this sector.

**An exemption to the proposed parking changes to the ARHSEPP should apply to the NSW Department of Fair Trading/Local Council lists of existing registered boarding houses so as “*promot[e] the sustainability of, and continuous improvements in, the provision of services at registrable boarding houses*” [The Boarding House Act 2013 Section 3(d)]. register**

Yours Faithfully,

On behalf of The Property Owners Association of NSW.

*P. Dormia*

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