

Our ref: R96/0115-11.lb Out-28437

17 December 2018

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
Sydney NSW 2000

Dear Ms McNally

Proposed amendment to State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP)

Thank you for the opportunity to comment on the Department of Planning and Environment's Explanation of Intended Effect outlining the proposed amendment to the ARHSEPP.

LGNSW welcomes the proposal to limit the number of boarding rooms in a boarding house development in the R2 zone to a maximum of 12 boarding rooms.

LGNSW has advocated for changes to the ARHSEPP for some time in response to significant council and community concern that boarding house developments are incompatible with local character in low density residential areas.

The proposed amendment together with changes made to car parking provisions earlier this year, are positive steps, however LGNSW considers that the changes may not fully address issues for the following reasons:

- The proposed amendment will not address overdevelopment of small sites in the R2 zone due to the inability to provide sufficient setbacks and open space on site to meet the needs of residents and reduce impacts on adjoining properties.
- There are no controls preventing redevelopment of several sites in a local area. An accumulation of boarding houses in one street or locality with consequent impacts relating to additional traffic, demand for car parking and streetscape.
- There is still potential for developers to subdivide larger lots and develop multiple 12 room boarding houses.

LGNSW understands that some councils are preparing planning proposals to establish minimum site controls for boarding house development. This is consistent with the requirement for councils to develop locally-appropriate responses to the housing diversity, affordability and supply objectives in District and Regional Plans.

An ongoing issue for councils that is not addressed in the proposed amendment, is the extent to which boarding houses developed by the private sector are providing housing that is affordable. Any further consideration of the ARHSEPP or affordable housing policy should consider this issue.

Should your staff have any questions, please ask them to contact Linda Blinkhorn, Senior Policy Officer, Planning (P: 9242 4094; E: linda.blinkhorn@lgnsw.org.au)

Yours sincerely

A handwritten signature in black ink that reads "Kylie Yates". The signature is written in a cursive style with a large initial 'K' and a long horizontal stroke at the end.

Kylie Yates
Acting Chief Executive