

Planning Proposal: 14 Rodborough Rd, Frenchs Forest

This proposal should not be supported:

1, It is claimed by the proponents that:

“(the development) utilises innovative prefabricated modular construction which substantially reduces construction costs while achieving high levels of sustainability, therefore improving housing affordability and environmental outcomes.”¹

To me, modular construction has always been a distasteful fusion of the 21st century meeting old Soviet bloc design principles. The artist’s impressions on the bottom of pages 6 and 11 of the proposal document would appear to confirm this. We have seen similar, ugly residential buildings appears in other places, such as Crowsnest, Roseville and North Sydney. It is not as if we lack other potential housing options.²

2. Wall cladding is variously referred to on pages 19, 20 and 57 of the proposal. Given what we know about cladding, the claim on page 20 that it “will be non-combustible magnesium oxide panelling” needs scrutiny. There have been warnings about this material,³ and more recently, questions whether any cladding meets any Australian design or safety standards. From another ABC transcript, directly citing a Senate Committee hearing:

NICK XENOPHON, NXT SENATOR: What standard is non-combustible then?

WADE MARTIN: The standard is AS 1530, part 1.

There is no such thing as a panel that passes AS 1530 part 1 as the product would be supplied.

NICK XENOPHON: What do you mean by no such thing? We have a standard but no one can comply with the standard? Can you explain that to me? So, there's a standard for non-combustible material AS 1530 part 1 but no-one actually complies with that at the moment?

WADE MARTIN: As the material would be supplied.

So, if you supplied a material, the product would not pass that test.

NICK XENOPHON: Sorry I'm being a bit slow here.

What are you saying? So there's a standard we can't comply with?

WADE MARTIN: Correct.

¹ Mark Shanahan Planning Pty Ltd October 2017, p.17

² See e.g.: The Conversation: Articles on tiny houses, <https://theconversation.com/au/topics/tiny-houses-18482> ; also see Housing Observer 2016 (Canada) <https://www.cmhc-schl.gc.ca/en/hoficlincl/observer/upload/tiny-houses-observer-2016-article-3-en.pdf> ; finally, from an Australian perspective - <https://www.tinyhomesaus.com/> (see especially, “Why go tiny?” <https://www.tinyhomesaus.com/why-go-tiny>) as at 3/12/17

³ See ABC 730, This is the hidden potential killer in Australian buildings, <http://www.abc.net.au/7.30/content/2015/s4243787.htm> as at 3/12/17

BRUCE RAYMENT, ALUCOBOND SUPPLIER: Correct.⁴

Based on this, building materials need to be re-considered.

3. It seems policy-makers have “given up” on home ownership and establishing long term committed communities of people. This development is presented as 100% rental and managed by a non-profit or charitable entity. This is presented as a positive in the proposal’s favour,⁵ but is it? Charities and foundations usually have tax-exempt and tax deductible status. The large amount of foregone tax revenues (tax expenditures)⁶ which could have gone to truly public social and physical infrastructure, need to be considered, when advancing these sort of ‘outsourced to charity’ policy “solutions”.

Also, far too often, all Governments seem to be able to ‘farm out’ people on low incomes, people who are elderly, people who are disabled or who have other complexities, to the charitable sector. Few seem to question this, and even fewer query the oversight or direction of such policies. I do, as experiences of charity in my own life have not always been positive and, however altruistic it may begin, I have had real reason to doubt altruism as an appropriate means of public policy.⁷ I appreciate that the operation of charities is not within the Council’s remit, but you do need to be aware of some potential unintended consequences.

Yours faithfully,

Adam Johnston

3/12/17

⁴ ABC 4 Corners, “Combustible” <http://www.abc.net.au/4corners/combustible/8859420> as at 3/12/17

⁵ Shanahan, op. cit., p.5

⁶ See Dr Anne Holmes and Hannah Gobbett (Economics), *Tax expenditures: costs to government that are not in the Budget*, Parliamentary Library, https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/BriefingBook44p/TaxExpenditures as at 3/12/17. Also see Saul Eslake, *Australia's tax system is like 'Swiss cheese'*: Saul Eslake, Sydney Morning Herald, Business Day, September 22, 2015, <http://www.smh.com.au/business/the-economy/australias-tax-system-is-like-swiss-cheese-saul-eslake-20150922-gjs8lt.html#ixzz3wSKqkBFH> as at 6 January 2016.

⁷ See generally, my submission to the NSW Public Accounts Committee, reviewing the Audit Office’s functions and efficiency. Specifically, I sought an amendment to give the Auditor power to examine the books of NGOs in receipt of public money, reflecting on several negative experiences with NGOs.. This was accepted by the Committee, but is yet to be enacted by the Government. See my submission at <https://www.parliament.nsw.gov.au/committees/DBAssets/InquirySubmission/Summary/48395/Submission%20No%207.pdf> and the Committee Report at <https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryReport/ReportAcrobat/5507/Efficiency%20and%20effectiveness%20of%20the%20Audit%20Office%20o.pdf> as at 3/12/17