



**ST PETERS RESIDENTS ASSOCIATION INC.**

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Representing the Residents of St Peters, College Park, Hackney, Stepney, Maylands, Evandale & Joslin.

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Dear Sir/Madam,

**Re: Submission: Future Living Code Amendment**

Our Association views with concern the proposal to allow dwellings to be built in rear and side garden areas in six Council areas (Campbelltown, Walkerville, Unley, Prospect, Burnside and Alexandrina).

We note the work done by Dr Damian Madigan in his 2023 book “Bluefield Housing as Alternative Infill for the Suburbs”, and the development of concepts such as bluefield housing and the “Missing Middle” to refer to inner and middle ring garden suburbs which consist largely of detached single-storey dwellings.

We have difficulty with the use of the expression “Missing Middle”. It is very Orwellian language. It is harder to argue against something which is said to be “missing”. The inner and middle ring suburbs contain many gardens and trees. These are our garden suburbs, and they contribute greatly to the urban tree canopy of Adelaide and to its cooling in summer. They also provide much habitat for urban wildlife. The Greater Adelaide Region is a biodiversity hotspot, as Professor Chris Daniels has pointed out many times. Introducing backyard units will undermine the vegetation which currently supports birds, possums, bats, lizards and a host of invertebrates.

To claim that the “middle” suburbs are missing something (dwellings) is to ignore the gardens, trees, the natural environment, and the lifestyles of Australians which these suburbs support (including the important task of raising children). This neglect of the positive environmental and social qualities of our garden suburbs directly contradicts a key aspiration in the Greater Adelaide Regional Plan for a “greener and wilder” Adelaide up until 2051.

Loss of gardens, trees and understorey vegetation will lead to a rise in hard surfaces, higher summer temperatures and more stormwater runoff. Most trees and vegetation will be cleared before development applications for co-located housing are lodged. It is naïve to think otherwise. We have been told that trees will be protected, but this will only be the Regulated Trees and Significant Trees that remain on site when an application is lodged. Many unprotected trees will be cut down. Attempts to sensitively design new housing around the few protected trees can be undermined by determined applicants. While the more affluent council areas may experience better quality backyard development, other councils which regularly approve poor quality development now, will probably continue to do so.

Campbelltown Council has a particularly bad reputation for the quality of much of its new infill housing, with no landscaping in many cases and miserably small quantities of landscaping in others. We have also noted some shockingly ugly new infill development in the Burnside Council area. We are hugely concerned that these Code Amendment provisions will be progressively rolled out across all of metro Adelaide council areas in time, if it is judged to be a “success” by the Planning Commission. We hope the Commission will judge the success or failure of this experiment not solely on the number of extra dwellings built in these council areas, but also on changes in the tree canopy/green cover over time and the views of residents on their quality of life.

### **Trees and Open Space for Co-located housing**

Requiring each shared garden space to have one tree which can grow into a large tree is all very well. But who will ensure this new tree is looked after? Will council planning officers be peering over side fences to check how big a mandated tree is getting? And if it is not thriving, what will be done? Will there be compulsory gardening classes for transgressors? Some people hate trees. They particularly hate trees which drop leaves or berries on or near their dwellings. There will be nothing to stop the mandated tree being quietly removed and replaced with plastic lawn or a tomato plant. Please ban plastic lawn in these small garden areas.

It is also a concern that all of this “open space” may end up as a roofed area with one tree in a pot, thanks to the excessively generous, but unwise, definition of open space as including areas under verandas, carports and pergolas, provided the sides are not built in.

We submit that a maximum roofed area for the proposed common garden space should be set at 20-30 per cent in Performance Outcome 4.1 (c) (iii) in the Code.

### **“Aging in Place”**

The emphasis on aging in place may be appropriate for some people where elderly family members may be happy to live in small units in the former backyards of family members. But over time this familial link will surely be diluted or lost altogether. Low income people will probably end up renting backyard units and the landlord will live in the established house facing the street.

It is not always nice to share your open garden space with others. No casual wandering outside in your dressing-gown? Let's hope these residents all get on well. If not, it may be a recipe for bullying, disputes and misery.

Even young people may not want to share an open “garden” area (ie a tree and some paving) with a landlord. There are many refugees from the hippy love-in of communal housing in Nimbin and Adelaide's Willunga area. It is a naïve middle-class view to suggest that all will be well when people share gardens and perhaps other facilities. With successive generations of people living in back-yard dwellings and less likely to have family ties with the tenant/owner of the pre-existing house lining the street, Low income earners renting backyard units may not have much choice about moving on to other accommodation when shared gardens and laundries (for example) are imposed.

We are most concerned that the **“Aging in Place”** studies are part of a developer-led strategy to open up the back gardens of all of our residential zones in the Greater Adelaide Region to backyard infill units (aka “granny flats”).

### **Sensitive backyard housing?**

What will stop a developer buying up 4-5 or more adjoining houses, amalgamating their backyards and then applying for permission to build 10 or more backyard units? Would this be “sensitive” infill? Clearly this co-located housing will be allowed to be rented out. Twenty or thirty bins in the street instead of ten on rubbish collection day?

We note that all housing zones in the selected councils will be made available for co-located housing, including Historic and Character Overlay Areas. We express some alarm that the provision in the Planning Code which specifies that the Historic Overlay Areas will retain their “historic pattern of subdivision” may be dominated by the new co-housing provision with individual titles for community housing in backyards. The “historic pattern of subdivision” will be virtually annulled by the co-housing subdivision provision. Similarly, the Character Area Statement for the Character Overlay Areas speaks of areas ‘characterised by a consistent rhythm of allotment patterns’. This consistency will be undermined by co-located housing provisions.

This strikes us as the use of more Orwellian language. Black means white. Consistent means diverse. Yes means no. The public continues to be puzzled by planning double-speak.

There appears to be some conflict within the documents on co-located housing as to the size of proposed new dwellings in backyards. The Plan SA “A Short Guide to Co-located Housing” talks of creating “additional small-footprint housing” (p3) and “providing smaller housing choices” (p4). The “Co-located Housing: An Explanatory Guide” speaks of increasing housing diversity and more affordable housing opportunities for people in neighbourhoods “facing increasing levels of unaffordability” (p5). There are other references to small and smaller-footprint co-located houses in this document.

However, when reading the proposed Planning and Design Code provisions, it is very difficult to locate any reference to proposed new co-located dwellings being “small” or with “small footprints”. It seems that if a backyard area is large, then large new co-located dwellings with large footprints will be allowed. If this occurs, then it will be at odds with much of what the public has been told about the benefits of co-located housing.

### **Environmental impacts**

Residents living next to co-located housing infill developments will be subjected to a net loss of local vegetation and trees, hotter summer temperatures and more noise from extra units and residents living in backyards. Sometimes the extra tenants may be older people who may not make much noise. Over time more young people will move into these units and they may make considerably more noise.

Please ban black paint on the exteriors of these new dwellings as black buildings are heat traps in summer, and please try to keep them single-storey and as unobtrusive as possible. The only good thing we can see in this Code Amendment is that more existing houses lining streets will be retained.

However, we will still have two for one ad hoc infill in many residential areas, plus the dreaded battle-axe and hammerhead subdivisions, which have attacked and removed much of our back -gardens for some 40 years. As well, the Greater Adelaide Regional Plan will impose multi-storey towers on many main roads, including major arterials carrying heavy traffic volumes. Street trees often struggle to survive on main roads and the heavy shade and wind tunnels created by apartment towers may make their lives shorter still. So, our relatively green and pleasant suburbs may become less green and pleasant.

All of the infill proposed in this Code Amendment, combined with the Greater Adelaide Regional Plan Code Amendment, if it is built, it will result in more parked cars in streets and more traffic congested roads. Elderly people will not be using e-bikes nor e-scooters. Mothers with babies, and shopping to do will not be on push bikes. People will still need cars. We note the provision of one car park space on site for each new backyard co-located dwelling. However, these residents will have visitors and the elderly may have Meals on Wheels rocking up daily. More cars parked in streets will lead to more friction between neighbours.

Six rubbish bins in front of a property, where once there were two, will not help reduce potentially negative neighbourly interactions.

Thank you for the opportunity to provide comments on the proposed Code Amendment on co-located housing.

David Cree  
President.

6 November 2024