



**ST PETERS RESIDENTS ASSOCIATION INC.**

E-mail : [info@stpeters.asn.au](mailto:info@stpeters.asn.au)

ABN 86 794 177 385

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

## **Draft Accommodation Diversity Code Amendment**

There are several changes that are proposed in the Draft Accommodation Diversity Code Amendment, and the St Peters Residents Association Inc (SPRA) would like the following comments to be taken into consideration.

### **1. Introduction of a 'co-living' land use definition for residences that rely on shared facilities such as kitchens or bathrooms.**

While we appreciate that shared facilities may cut the cost of new housing, SPRA is concerned that vulnerable people may be subjected to sub-optimal living conditions if required to share essential services such as kitchens, bathrooms and/or laundries

### **2. New and amended policy to improve apartment-style and student accommodation.**

The Code Amendment (CA) introduces the 'co-living' land use definition for developments that involve six or more residences in a single building, and which share facilities such as kitchens, bathrooms and/or laundries.

The CA removes criteria which specifies minimum apartment dwelling size and replaces it with minimum habitable room dimensions, new policy requiring main living areas to provide outlook to open space where possible, and new policy guiding the quantity and quality of communal open space, including allowing private open space to be substituted for communal open space in some circumstances.

SPRA submits that any development where all dwellings have a ground level with a front door directly accessible at ground level should provide each dwelling with individual private open space. Communal open space should only be used as a substitute for private open space for developments which include above ground dwellings.

We note that the terms 'co-located housing' and 'co-living' may create some confusion, and clear definitions should be provided.

### **3. Introduction of a new 'Significant Retirement Facilities and Supported Accommodation Sites Overlay' that allows retirement and supported accommodation to be developed on large sites in residential zones, with increased building height and associated commercial land uses.**

This is the biggest change proposed in this Code Amendment. It includes a definition for 'significant retirement facility and supported accommodation site' which is a site greater than 10,000 m<sup>2</sup> (consisting of one or more allotments) used primarily for a retirement facility or supported accommodation (or both).

The Supported Retirement Facilities and Supported Accommodation Overlay is to facilitate accommodation sites for this type of development in residential areas through policy incentives such as increased building heights and increased commercial floor areas with reduced car parking requirements. Changes to public notification triggers are proposed to exempt significant retirement facility and supported accommodation sites from public notification provided they meet the Overlay policies.

It is not clear whether all residential areas such as the Established Neighbourhood Zone, with or without the Historic Overlay, the Character Overlay and/or the Heritage Place Overlay are to be subjected to this type of development. This needs to be clarified. Large multi-storey retirement complexes being built in an Historic Area, a Character Area and a Heritage Place Overlay residential areas have the potential to undermine historic character and heritage features of these residential areas. Similarly low density, predominantly single storey residential areas, may be negatively impacted by large retirement and/or supported accommodation developments.

The definition of a site for a 'significant retirement facility and supported accommodation' (SRFSA) refers to the site being 'primarily' for a retirement facility and/or supported accommodation. The reference to 'primarily' allows a site to have secondary supporting land uses such as a shop or café. Clarification is needed to set out the extent to which the site can be used for other purposes while still being 'primarily' for retirement or supported accommodation.

Building heights proposed to be allowed by the SRFSA Overlay policy would be up to four storeys on sites between 10,000m<sup>2</sup> and 20,000m<sup>2</sup>, and buildings up to six storeys on sites exceeding 20,000m<sup>2</sup>. The Overlay requires a 'building envelope' policy which requires the building to be stepped back from side boundaries as the building height increases. Many of the residential areas potentially affected by this policy change are predominantly single storey and low-density residential areas. Despite the building envelope policy, four to six storey buildings, even if on large allotments will be in marked contrast to predominantly single storey residential suburbs. This policy change is likely to generate substantial conflict with local communities in Historic Overlay, Character Overlay and Heritage Place Overlay areas, as their character and/or heritage may be detrimentally affected by 4-6 storey development. Similarly, low density, largely single storey residential neighbourhoods, may be detrimentally impacted by large multi-storey retirement/supported accommodation developments.

Developers may well push the boundaries and be rewarded with 'bonus' heights so that four storeys become six, and six become eight or more.

SPRA considers that the scale of development envisaged in the policies proposed is significantly at odds with existing and desired character across much of our residential suburbs, particularly in Character Overlay, Historic Overlay and Heritage Place Overlay areas. SPRA submits that the maximum building height in the overlay be reduced to three storeys for sites between 10,000<sup>2</sup> and 20,000m<sup>2</sup> and four levels for sites exceeding 20,000m<sup>2</sup>. We are told by the retirement development industry that older people wish to age in their own communities. This may be true. But we are sure that older people do not wish to bulldoze and trash their communities in the process.

SPRA also submits that development applications for these retirement/supported accommodation complexes should be subjected to public notification requirements. The input of local residents is important in the development application process to improve the final development outcome, particularly with regard to reducing negative impacts on neighbours from large developments. Most residents do not have contact with the planning system in the Code Amendment phase when development rules are changed. If they are not consulted when development applications are lodged, then they are largely shut out of our planning system. This is not good for a liberal democracy such as ours.

Thank you for the opportunity to comment on this proposed Code Amendment.