

# Submission to the Accommodation Diversity Code Amendment consultation

Strategic Alignment - Our Community

Public

**Tuesday, 4 February 2025**  
**City Planning, Development and Business Affairs Committee**

**Program Contact:**  
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**Approving Officer:**  
Ilia Houridis, Director City Shaping

## EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of a submission to the State Planning Commission on the Accommodation Diversity Code Amendment (the Code Amendment) that is open for consultation until 27 February 2025 ([Link 1](#)).

The Code Amendment is one in a series of State Government led Code Amendments that seek to facilitate increased housing supply and diversity. The Code Amendment addresses this by:

- Encouraging a range of affordable and sustainable smaller housing types
- Providing greater flexibility in design requirements
- Addressing both self-contained and not self-contained housing types, and guiding the provision of common areas and facilities
- Ensuring retirement facilities and supported accommodation are not unreasonably constrained by building height criteria.

The Code Amendment aligns with the City of Adelaide's Housing Strategy – *Investing in our Housing Future*, by supporting housing supply and enabling flexibility of housing to adapt to changing demographics over time.

The City of Adelaide's draft submission contained in Attachment A acknowledges the alignment of the Code Amendment with the Housing Strategy – *Investing in our Housing Future* and the joint ambitions of the State Government and Council to facilitate housing diversity and rental supply.

The submission reiterates comments provided to State Government Agency, Planning and Land Use Services for broader housing policy improvements and recommends some amendments to the proposed policies to ensure that new housing supply is of a reasonable standard to support liveability and residential amenity.

The draft submission expresses some concerns with the level of detail and perceived rigour in the proposed policies. In particular, the potential for the quality and amenity of new housing – particularly co-living and apartment housing to be compromised.

The proposed submission seeks to ensure that any Code Amendment that supports density also puts in place measures that support liveability.

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## RECOMMENDATION

The following recommendation will be presented to Council on 11 February 2025 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the submission to the State Planning Commission on the Accommodation Diversity Code Amendment consultation as contained in Attachment A of Item 7.2 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 4 February 2025.

2. Authorises the Chief Executive Officer, or delegate, to make minor technical or typographical amendments to the submission on the Accommodation Diversity Code Amendment consultation as contained in Attachment A of Item 7.2 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 4 February 2025 for the purposes of finalising and lodging the submission.
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## IMPLICATIONS AND FINANCIALS

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|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| City of Adelaide<br>2024-2028<br>Strategic Plan                        | <b>Strategic Alignment – Our Community</b><br>Support increased residential growth and housing affordability through partnerships and advocacy.<br>Reduce rental pressures by increasing housing supply and unlocking properties for long-term tenants. |
| Policy                                                                 | The recommendation proposed in this report aligns with the City Plan – <i>Adelaide 2036</i> and Housing Strategy – <i>Investing in our Housing Future</i> .                                                                                             |
| Consultation                                                           | This report responds to a consultation process being undertaken by the State Planning Commission in relation to a State Government led amendment to the Planning and Design Code (Code Amendment).                                                      |
| Resource                                                               | Not as a result of this report                                                                                                                                                                                                                          |
| Risk / Legal /<br>Legislative                                          | Not as a result of this report                                                                                                                                                                                                                          |
| Opportunities                                                          | To align Planning and Design Code policies with Council policy relating to the City Plan – <i>Adelaide 2036</i> and Housing Strategy – <i>Investing in our Housing Future</i> .                                                                         |
| 24/25 Budget<br>Allocation                                             | Not as a result of this report                                                                                                                                                                                                                          |
| Proposed 25/26<br>Budget Allocation                                    | Not as a result of this report                                                                                                                                                                                                                          |
| Life of Project,<br>Service, Initiative<br>or (Expectancy of)<br>Asset | Not as a result of this report                                                                                                                                                                                                                          |
| 24/25 Budget<br>Reconsideration<br>(if applicable)                     | Not as a result of this report                                                                                                                                                                                                                          |
| Ongoing Costs<br>(eg maintenance<br>cost)                              | Not as a result of this report                                                                                                                                                                                                                          |
| Other Funding<br>Sources                                               | Not as a result of this report                                                                                                                                                                                                                          |

# DISCUSSION

## Background

1. The State Planning Commission has prepared the Accommodation Diversity Code Amendment (the Code Amendment) which affects the whole of South Australia and is open for consultation until 27 February 2025.
2. A submission to the Code Amendment is being made as part of the City of Adelaide's Code Amendment Program which includes Code Amendments led by the City of Adelaide and submissions to relevant State Government led Code Amendments.
3. The Code Amendment is one in a series of State Government led Amendments that increase housing supply and diversity. These include:
  - 3.1. Future Living Code Amendment – consultation completed in August 2024. Council decided on 5 March 2024 not to participate in the Code Amendment.
  - 3.2. Ancillary Accommodation and Student Accommodation Definitions Review Code Amendment – Council made a submission on 12 April 2024 in support of the intent of the Code Amendment given the alignment with Council's housing growth and diversity ambitions. The Code Amendment was finalised in November 2024.
  - 3.3. Affordable Housing Code Amendment – Initiated in October 2024 and to be released for consultation in early 2025.

## Key changes proposed in the Code Amendment

4. The draft Code Amendment proposes to:
  - 4.1. Introduce a new 'co-living' land use definition for residential accommodation that is not self-contained as it does not contain either a full kitchen or full bathroom and provides shared facilities.
  - 4.2. Replace minimum floor area requirements for dwellings and apartments with minimum habitable room dimensions.
  - 4.3. Include policies for the provision of communal recreation space and shared facilities for student accommodation.
  - 4.4. Update policies for communal open space to clarify that private open space can be substituted with communal open space, with a lower rate applying for apartments, and new provisions guiding design such as solar access, planting areas and facilities.
  - 4.5. Introduce a new 'Significant Retirement Facilities and Supported Accommodation Sites Overlay' to be applied over suburban neighbourhood-type zones, including the City Living Zone in the City of Adelaide. The new Overlay:
    - 4.5.1. Allows for buildings up to four storeys on sites over one hectare and up to six storeys on sites over two hectares (without public notification).
    - 4.5.2. Includes policy that seeks to mitigate interface impacts with adjoining properties.
    - 4.5.3. Supports non-residential uses in association with supported accommodation or retirement facility development, such as a café or consulting rooms for the provision of allied health services.
  - 4.6. Amend Significant Development Sites policy in Urban Corridor Zones (which does not affect the City of Adelaide).

## Draft Submission

5. A draft submission is provided as **Attachment A** – Submission on the Accommodation Diversity Code Amendment.
6. It notes the alignment of the draft Code Amendment with the strategic ambitions of the City of Adelaide, including the City Plan – *Adelaide 2036* and the Housing Strategy – *Investing in our Housing Future*, and the role of the Adelaide City Centre as a State significant infill and urban renewal area as referenced in the draft Greater Adelaide Regional Plan.
  - 6.1. The City Plan seeks a population for the City of Adelaide of 50,000 by 2036, with the Housing Strategy outlining Council's commitment to increasing housing diversity, affordability and supply within the city to support population growth.

- 6.2. The Code Amendment seeks to facilitate housing supply, with a focus on a new housing form: co-living, as well as amendments to apartment design and communal spaces policies.
7. The City of Adelaide was included in early discussions with State Government Agency, Planning and Land Use Services, and had the opportunity to provide preliminary feedback to early draft policy changes. While the Code Amendment is focused on housing supply, the City of Adelaide requested that the Amendment address housing and design-related matters including:
  - 7.1. Urban greening and open space provision
  - 7.2. Universal design and adaptability for future use
  - 7.3. Liveability including functional internal spaces with access to light and ventilation
  - 7.4. Sustainability and design of waste collection systems
  - 7.5. Interface management including building height and design.
8. The draft submission notes that limited content, investigations and changes to broader housing policies suggested by the City of Adelaide were included in the Code Amendment.
9. The draft submission expresses some concerns with the level of detail and perceived rigour in the proposed policies. In particular, the potential for the quality and amenity of new housing – particularly co-living and apartment housing to be compromised.
10. The proposed submission seeks to ensure that any Code Amendment that supports density also puts in place measures that support liveability, to that end, the draft submission seeks that the State:
  - 10.1. Retains and strengthens policies to ensure that all housing is developed to a reasonable standard of amenity.
  - 10.2. Ensures new co-living development is designed to be adaptable in the future to cater for changing housing needs and preferences.
  - 10.3. Includes additional policy to facilitate adaptive reuse for apartment/co-living development design, with an additional recommendation that this be supported by a new Adaptive Reuse Practice Guideline.
  - 10.4. Ensures communal and private open space is accessible, functional and fit for purpose.
11. A detailed table of technical comments on the Code Amendment is provided and is summarised as follows:
  - 11.1. Co-living
    - 11.1.1. There is uncertainty about how this form of housing will operate or be managed. Whilst there is potential that it could provide an affordable rental opportunity there is concern that the requirements identified in the planning policies and in the Practice Guideline may result in poor quality and liveability of the built form outcomes.
    - 11.1.2. The draft submission seeks amendments to the policies for co-living to ensure quality long term housing outcomes.
    - 11.1.3. The draft submission seeks to unbundle car parking spaces from individual residences to enhance choice and affordability.
  - 11.2. Apartment Design
    - 11.2.1. Further consideration of the proposal to replace minimum dwelling sizes with minimum habitable room dimensions is requested.
    - 11.2.2. The City of Adelaide supports minimum bedroom dimensions of three metres rather than 2.5 metres as proposed in the draft Code Amendment, as is required in Victoria's Better Apartments Design Standards and Planning NSW's Apartment Design Guide.
    - 11.2.3. Additional policy is recommended to facilitate adaptive reuse for apartment and co-living housing.
    - 11.2.4. Communal open space requirements are supported with recommendations to amend the policies to ensure that open space provision is proportional to number of residents with prescribed minimum dimensions.
  - 11.3. Student Accommodation
    - 11.3.1. Additional policies to guide communal spaces (internal and external) in student accommodation are supported.

- 11.3.2. Amendments are recommended to require the inclusion of minimum dimensions of open spaces to ensure the provision of functional spaces.
- 11.4. Significant Retirement Facility and Supported Accommodation Overlay
  - 11.4.1. Acknowledge that there are currently no sites within the City Living Zone that are currently one hectare or greater, so the application of this policy would rely on site amalgamations in the City of Adelaide.
  - 11.4.2. Much of the City Living Zone is in the Historic Area Overlay, with many properties also in the Local Heritage Place Overlay or State Heritage Place Overlay. Clarification is sought on how the policies in these Overlays would operate if the Significant Retirement Overlay policies were to be relevant.
- 11.5. Review the content of the Practice Guideline - Communal Recreation Areas and Shared Facilities, as some content may be more suited within the Planning and Design Code.
- 11.6. The City of Adelaide is progressing a program of Code Amendments informed by its City Plan and Housing Strategy and will consider addressing broader housing and design policy matters through these amendments, including car parking, waste management, built form interface management such as building height and design.

#### **Next Steps**

- 12. Pending Council's decision, the submission will be provided to the State Planning Commission before consultation closes on 27 February 2025.

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## **DATA AND SUPPORTING INFORMATION**

**Link 1 – [Accommodation Diversity Code Amendment for consultation](#)**

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## **ATTACHMENTS**

**Attachment A – Submission on the Accommodation Diversity Code Amendment**

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- END OF REPORT -