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Reference:

XX December 2025

Hon Nick Champion MP
Minister for Planning
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Dear Minister

Response to the Engagement Report for Accommodation Diversity Code Amendment (Part 2)

Thank you for your letter dated 15 October 2025 regarding the determination of the Accommodation Diversity Code Amendment (the Code Amendment) and your request for Council's advice on the spatial application of the Significant Retirement Facility and Supported Accommodation Sites Overlay (the Overlay) in Part 2 of the Code Amendment.

On 11 February 2025, Council endorsed a submission to the draft Code Amendment during consultation and acknowledged its alignment with Council's population growth ambitions and its *Housing Strategy: Investing in our Housing Future*, while raising concerns about housing quality, amenity standards, and the interaction of proposed policies with heritage areas.

The City of Adelaide notes the post-consultation changes made to the Code Amendment (Part 1), including:

- Opportunities the Code Amendment will provide for the supply of alternative housing types in the City of Adelaide in support of greater housing diversity.
- Amendments to improve design quality and occupant amenity for future housing.
- The introduction of public notification for development above 4 storeys or 15 metres in height.

Council noted that you have approved the Overlay applying to the City Living Zone and have sought its advice regarding Part 2 of the Code Amendment, specifically in relation to the spatial application of the Overlay in Historic Areas.

Council preferred not to identify individual sites within the Historic Areas and supports the Overlay being applied across all Historic Areas. This is consistent with the Council's ambitious target to double the population by 2036 and increase housing diversity as set out in the Strategic Plan 2024-2028, City Plan – *Adelaide 2036* and Housing Strategy – *Investing in our Housing Future*

The Council also noted that several key concerns raised in its February 2025 submission remain unresolved:

- The absence of policies to facilitate adaptive reuse of existing non-residential buildings for residential purposes, and the absence of a Practice Guideline to support adaptive reuse as a catalyst for housing supply and diversity.
- The definition of Co-living still includes subjective requirements such as a full-sized fridge.
- The Code Amendment uses terminology that supports a 'reasonable level of amenity'. This is an improvement to the consultation version but does not seek 'high amenity' as was previously required and supported by the Council.

The City of Adelaide reiterates the importance of the above matters in the context of this Code Amendment and others contained within the City of Adelaide's February 2025 submission. We encourage the State Government to consider addressing them through future Code Amendments or policy reviews to ensure that increased housing supply is supported by appropriate standards of quality, amenity and longevity.

The City of Adelaide acknowledges the importance of facilitating accommodation options for our ageing communities and rising demand for aged care, retirement living and supported accommodation across South Australia.

The City of Adelaide seeks ongoing and meaningful collaboration between its Administration and the State Planning Commission via the Department for Housing and Urban Development, to facilitate planning policy that promotes a diversity of quality, affordable, and accessible housing outcomes in the city.

Yours sincerely,

Michael Sedgman
Chief Executive Officer