

## Councillor Martin - QoN - City Building Heights Code Amendment

Tuesday, 11 November 2025  
Council

**Council Member**  
Councillor Phillip Martin

Public

**Contact Officer:**  
Sarah Gilmour, Acting Director City Shaping

## QUESTION ON NOTICE

**Councillor Phillip Martin will ask the following Question on Notice:**

'Noting the Premier's announcement on October 27, 2025 of proposed changes to the Code, is the Administration able to comment on;

1. The nature of possible impacts inferred by the Affected Area Map (provided to elected members) on the City of Adelaide's City Plan including for Main Street Zones
2. The impacts on City of Adelaide infrastructure of residential uplift as a result of changes flowing from the proposed Code amendment, as well as other previously anticipated developments
3. The necessity for new strategies or funding to meet associated challenges and/or opportunities?'

## REPLY

1. A Proposal to Initiate the City Building Heights Code Amendment (Code Amendment) by the State Government was approved by the Minister for Planning on 24 October 2025. The Code Amendment proposes to:
  - 1.1 *"increase maximum building heights within portions of the City of Adelaide to increase opportunities for growth without compromising the safety or operation of the Adelaide Airport. The Code Amendment will also consider the application of minimum building height criteria for appropriate locations within the Affected Area"*
2. Advice was provided to Council Members via E-news on 3 November 2025.
3. Planning policy amendments are proposed in the: Capital City Zone, City Main Street Zone and Airport Building Heights (Regulated) Overlay.
4. The Code Amendment does not intend to increase building height limits where the Historic Area Overlay applies or within areas where low-scale built form is envisaged.
5. The Proposal to Initiate the Code Amendment is available on the Department for Housing and Urban Development website ([Link 1](#)), including an Affected Area Map ([Link 2](#)).
6. The State Government made a subsequent announcement on 7 November 2025 that the Code Amendment would introduce minimum building height limits on parts of West Terrace.

### **Nature of possible impacts on the City of Adelaide's City Plan including for Main Street Zones**

7. The Code Amendment will assist in facilitating the City of Adelaide's residential growth target of 50,000 people by 2036 as per the Strategic Plan 2024-2028, the City Plan – Adelaide 2036 (City Plan), and the Housing Strategy – Investing in our Housing Future.

8. The Affected Area Map for the Code Amendment includes the City Main Street Zone as it relates to the Hindley Street Sub-zone, Rundle Mall Sub-zone, Rundle Street Sub-zone (western portion only), and Gouger and Grote Street Sub-zone (excepting a small portion of the south-west corner).
9. It does not include the City Main Street Zone as it relates to areas around Hutt Street, Halifax Street and Sturt Street, Adelaide in the City High Street Sub-zone.
10. The Code Amendment includes a review of interface management policies between high-rise and medium low rise-built form and areas, including a review of the City Main Street Zone policies.
11. Council called for a review of interface management policies through its submission to the Planning System Implementation Review in January 2023.
12. Until the Code Amendment has been drafted and released for public consultation, the Administration has limited details on the nature of possible impacts.

#### **Impacts on City of Adelaide infrastructure of residential uplift**

13. Following the initiation of the Code Amendment, the next stage in the process is that the State Government will undertake investigations and draft the Code Amendment for public consultation.
14. The Proposal to Initiate identifies the following investigations to be undertaken:
  - 14.1 Building height comparison and mapping – a comparison of the maximum airport height limits (Obstacle Limitation Surface) against existing maximum building heights in the Code, and identification of opportunities for alignment.
  - 14.2 Building height assessment and mapping – identification of appropriate maximum and minimum building heights where significant height could be achieved within the airport height limits (Obstacle Limitation Surface), taking into account sensitive interfaces.
  - 14.3 Interface management – review of existing zone policy providing guidance on management of amenity and other impacts of high-rise built forms on adjacent established and envisaged medium-low-rise built forms.
15. The Code Amendment does not include a specific infrastructure investigation(s).
16. Independently, the City of Adelaide completed a social infrastructure assessment as part of the development of its City Plan, to identify needs for community facilities as the population grows. This work informed the Council's Community Facility Policy adopted on 8 April 2025.

#### **Necessity for new strategies or funding to meet associated challenges and/or opportunities**

17. While the projected growth supports the City Plan's vision for a more vibrant and connected capital city, it will increase pressure on transport networks, open space, stormwater systems, waste management, and community facilities.
18. Proactive planning and targeted investment will be required to manage these challenges and ensure growth contributes positively to city liveability and sustainability.

#### **Next steps**

19. Administration will write to the Chief Executive of the Department for Housing and Urban Development and the Minister for Planning acknowledging the initiation of the Code Amendment and the invitation to collaborate with the City of Adelaide through the investigation process.
20. The letter will again seek the Minister's support for the City of Adelaide to progress the Catalyst Site Policy Review and Waste Management Code Amendment concurrently, to facilitate improved outcomes for multi-unit developments and strengthen interface policies consistent with the Expert Panel's recommendations from the Planning System Implementation Review.
21. The Administration are meeting with the Department for Housing and Urban Development on 27 November 2025 to discuss how the City of Adelaide can collaborate on the investigations for the Code Amendment. The Administration will recommend that investigations consider the impact of increased development potential on infrastructure requirements and their provision in the City of Adelaide
22. Once released for public consultation, the Administration will complete a review of the Code Amendment in preparation for a report to the City Planning, Development and Business Affairs Committee to make a submission to the consultation process.

Staff time in receiving and preparing this reply	To prepare this reply in response to the question on notice took approximately 5.5 hours
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