

# **CITY OF ADELAIDE DRAFT HOUSING STRATEGY CONSULTATION SUMMARY**

VERSION – 30 JANUARY 2024

## Background

In February 2023 Council requested a new Housing Strategy to replace the Homelessness, Social Housing and Housing Affordability Policy endorsed in May 2022. Council was seeking separate strategies for housing and homelessness that propose an increased role for Council in both the housing and homelessness sectors.

The draft Housing Strategy identifies the roles of the tiers of government, private and community sectors in housing, and highlights the intent of the City of Adelaide to take an increased role in the areas of affordable rental and adaptive reuse.

## Public Consultation and Responses

Consultation ran from 23 November 2023 to 19 January 2024 with further extensions up to 25 January 2024 provided to several agencies at their request.

Stakeholders from 75 organisations, including a range of State Government agencies, community housing providers, development industry, community groups and not for profit organisations were emailed asking for their feedback on the draft Housing Strategy. In some cases, they were also asked for feedback on the draft Homelessness Strategy.

Online engagement was concurrently undertaken through YourSay.

Individual meetings were held with the following organisations and subject matter experts:

- Property Council of Australia
- Study Adelaide
- Renewal SA
- Mr D O'Loughlin
- Australian Gas Infrastructure Group
- SAAlliance to End Homelessness

## Response to Engagement and Submissions

A total of 25 written submissions and 43 YourSay submissions were received and are summarised in this document.

Written feedback was received from:

- Shelter SA
- Property Council of Australia
- JFA Purple Orange
- Urban Futures Exchange
- Grounded
- ODASA
- Junction Australia
- BPW Australia
- Department of Premier and Cabinet
- Australian Institute of Architects
- COTA
- State Planning Commission
- Arup
- UDIA
- Airbnb
- Study Adelaide
- REISA
- Australian Hotels Association
- Housing Choices
- SA Housing Authority/Department of Human Services
- Australian Gas Infrastructure Group
- Four emails/written submissions from individuals

The response to the online YourSay engagement was as follows:

- **2541 'Aware' visitors:** are unique visitors, who could be individuals or individuals visiting on behalf of organisations, who made 3,220 visits to the YourSay Adelaide page.

- **469 ‘Informed’ visitors:** are visitors who have explored the available consultation materials more closely to learn more about the Strategy.
- **43 ‘engaged’ visitors:** are the people who have submitted feedback through the online survey.

### Key Themes arising from Consultation

The key themes arising from written responses to the consultation, workshops and meetings include (refer to Table 1 and Table 2):

- Overwhelmingly positive support for the draft Housing Strategy and proposed targets.
- Enhance the liveability of the city and attract housing investment through improvements to the public realm.
- Encourage flexibility in housing design to meet changing city demographics.
- Any changes to the planning system to encourage mixed use with multiple tenures and dwelling types.
- Accelerate housing delivery through a more proactive role in assembling land to enable development.
- To respond to the reduction in housing stock available due to holiday/short-term rental accommodation.
- Increase accessible housing in the city and align with the Disability Access and Inclusion Plan
- The Housing Strategy should be more ambitious with sustainability targets/requirements.
- Identification of barriers and solutions to achieving the goals and targets, particularly adaptive reuse.
- Strong alignment with State Government Agencies and non-government organisations strategies including the

Department of Premier and Cabinet and State Planning Commission.

- Support for partnerships and advocacy.

**Table 1 Summary of written submissions on Draft Housing Strategy 2023**

Summary of Submission	Response
<b>Shelter SA (elements most relevant to Housing Strategy)</b>	
<p><i>Defining Affordable Housing</i></p> <p>Shelter SA has long advocated for a review of the South Australian Inclusionary Zoning policy to move away from 'affordable housing' and mandate inclusion of social rental housing instead of affordable sales or rentals.</p> <p>Affordable home sales do not quarantine affordability after the first sale.</p> <p>The greatest need for housing exists within the very low income household cohort (below \$42k per annum).</p> <p>If Council aims to act where the market has failed, it should advocate for social housing inclusion in new developments.</p> <p>Build to rent projects need to include mixed opportunities – not just luxury apartment market.</p>	<p>Noted.</p> <p>The Housing Strategy identifies Council's intent to increase the supply of affordable rental housing within the city. This will include initiating partnerships and facilitating opportunities for the private sector and specialist housing organisations. This has been amended to also identify that Council will continue to advocate to the State Government for additional social and public housing.</p> <p>Goal 1 – <i>Levers of Change</i> has been amended to clarify that Council will continue to advocate for Mandatory Inclusionary Zoning (including a definition of affordable rental housing).</p> <p>Council will also continue to advocate to the State and Federal Governments for financial incentives and initiatives which result in more affordable housing in the private rental market, including opportunities available through the Housing Australia Future Fund.</p>
<p><i>Modern Village Concept</i></p> <p>Shelter SA has developed the <u>Shelter SA Modern Village Concept</u> with the aim to restore fair access to home ownership. The Modern Village Concept represents disruption to traditional ways of building homes and is essentially a land lease model, that does not include the subdivision or sale of land with the dwellings.</p>	<p>Noted</p> <p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors, including references to alternative housing models.</p>
<p><i>Partnerships</i></p>	<p>Offer to partner with Council noted and will be considered further through the implementation of the Strategy.</p>

Summary of Submission	Response
<p>Shelter SA wants to continue to support CoA through advocacy. Request to include Shelter SA as a contact organisation in the Housing Strategy</p> <p>Council could also partner with modular housing manufacturers.</p>	<p>Shelter SA has been included in the list of contact organisations in the Housing Strategy.</p>
<p>Shelter SA has previously provided information to Council about activating vacant residential properties and we would be pleased to assist to develop a pilot project to bring these back into the private rental market through liaising with rate payers.</p>	<p>Offer for assistance noted and appreciated. City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.</p> <p>The Housing Strategy identifies that the City of Adelaide will research the development of a program to target long-term (2-5+ years) vacant properties and land without current development applications with the aim of stimulating development. This will begin with any site which could leverage opportunities for affordable housing and adaptive reuse.</p>
<p>Shelter SA is developing a Homeshare service in South Australia. The service aims to bring together older single women who are living alone in larger homes with older single women who need a safe place to stay. Homeshare is not a crisis service but aims to safely screen, match and support older single women to address loneliness and the housing crisis.</p>	<p>Noted.</p> <p>Acknowledge that this service will provide another housing option for older women. Recent advocacy by City of Adelaide to State and Federal parliamentary housing inquiries has highlighted the vulnerability of women in accessing affordable, secure and appropriate housing.</p>
<p><i>Public Housing in the City</i></p> <p>Council could advocate to the Housing Authority to return the Box Factory and Manitoba to their former status as safe, amenable places for people to live.</p>	<p>Noted, the Strategy has been updated to confirm that Council will continue to advocate for additional social and public housing.</p>

Property Council of Australia (PCA)	
<p>Recommendations from the PCA's Housing Report – <i>'A Stark Reality: The State of Housing Choice in Australia'</i></p> <ul style="list-style-type: none"> <li>• Delivering the housing we need where we need it</li> <li>• Great and sustainable cities</li> <li>• Unlocking investment in new forms of housing</li> </ul> <p>PCA supports CoA ambition to increase the population of the City.</p>	<p>Note the recommendations that PCA has made through other submissions relevant to the draft Housing Strategy.</p> <p>The Housing Strategy seeks to encourage growth and diversity across the housing system.</p> <p>Council is currently developing its new City Plan to be finalised in 2024. It is a future-ready planning strategy emphasising the imperative to diversify and elevate housing designs. The City Plan proposes a diversified housing approach which is geared to meet the future needs of an expanding demographic while also addressing affordable housing requirements.</p> <p>City of Adelaide has a major role to play in making the city a more desirable place to live. Council is developing a new Economic Development Strategy which includes a focus on the Central Living District with targets to improve city liveability and desirability.</p> <p>Attracting investment to deliver a diversity of housing that is affordable, accessible and sustainable is a key target of the Housing Strategy.</p>
<p>Suggestions for new housing models in the City of Adelaide:</p> <ul style="list-style-type: none"> <li>• CoA needs to explore long term rental and shared equity or 'rent-to-buy' housing models that provide stable, secure, long term or in many cases full-life tenure.</li> <li>• Housing is accompanied by effective place design and master planning processes incorporating considerations of green space, connectivity, amenity, and location with access to eating, entertainment, and shopping precincts.</li> <li>• The right structure would include 25+ year land leases, deferred payments and equity share on exit.</li> </ul>	<p>Noted</p> <p>The draft Housing Strategy identifies that:</p> <ul style="list-style-type: none"> <li>• Council will advocate for and facilitate through partnerships innovative housing models.</li> <li>• Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</li> </ul>

<p>What is the role of the private sector? What is the role of Council?</p> <p>Private sector:</p> <ul style="list-style-type: none"> <li>• Close collaboration with the private sector is essential because government policy will signal to the private market whether they should engage or disengage with a particular market or jurisdiction.</li> <li>• To expand and grow the share of alternative housing, barriers and opportunities for capital need to be jointly explored by local and state government in a forensic manner with providers of those asset classes.</li> <li>• Understanding of the investment criteria and how the Adelaide proposition stacks up compared to other jurisdictions investors may need investigating.</li> <li>• Invest SA may be able to assist Council to develop a list of State and Local Government policy collaborations to improve the investor experience and could inform effective policy making that could create a compelling and comprehensive value proposition.</li> <li>• Community Housing Providers (CHPs) are critical private sector partners in the delivery of new supply if affordability is a key policy focus.</li> <li>• Access to subsidies, capital, tax breaks, place management systems infrastructure and genuine investment in community development is essential to the success of mixed density and vertical communities that thrive with vibrancy.</li> <li>• The models can include joint ventures on development management agreements or long-term structures to ensure multiple interests and risk sharing is maintained throughout. All models however must ensure subsidy, tax and planning incentives are fully maximized.</li> </ul> <p>Council role:</p> <ul style="list-style-type: none"> <li>• Concessions on Council Rates.</li> </ul>	<p>The City of Adelaide recognises the roles of the private and public sector and the Housing Strategy identifies a number of ways in which Council will work with the private sector, as well as community housing providers and State and Federal Government to deliver the targets of the Strategy.</p>
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<ul style="list-style-type: none"> <li>• Joint ventures with developers to purchase sites with a Development Management Agreement.</li> <li>• Fast track approval process for development that meets required outcomes.</li> <li>• Shared equity schemes for first home buyers in new projects.</li> </ul>	
<p>Who else would the City of Adelaide need to work with to achieve these targets?</p> <ul style="list-style-type: none"> <li>• The private market – both the development sector and landowners to understand their needs, which are often unique and differ on a site-by-site basis.</li> <li>• Collaboration with State and Commonwealth Governments</li> <li>• PCA has several Policy Documents and Submissions that are relevant to Council's Housing Strategy and Targets</li> </ul>	<p>Noted</p> <p>The Housing Strategy identifies a number of ways in which Council will work with private sector, community housing providers as well as State and Federal Government to deliver the targets of the Strategy.</p>
<p>What are the biggest barriers to achieving these targets and how to overcome?</p> <ul style="list-style-type: none"> <li>• There are major – though not always insurmountable - obstacles to implementing adaptive reuse. Projects are very case by case, in the end individual projects must stack up financially.</li> <li>• City of Adelaide is encouraged to examine the barriers that make adaptive reuse challenging in terms of the required expertise to make such project viable. These include tax, planning, building code and finance/lending barriers.</li> </ul> <p>Additional barriers to hitting the targets include:</p> <ul style="list-style-type: none"> <li>• Over engineering procurement processes.</li> <li>• Getting suboptimal sites because they 'fix' other liabilities or problems.</li> <li>• Short-term wins at the expense of long-term outcomes – generated by political agendas.</li> <li>• Poor strategic execution of the housing strategy once decided.</li> <li>• Cost of construction.</li> </ul>	<p>Noted</p> <p>The City of Adelaide, in conjunction with the State Government, through the Capital City Committee has committed to explore and progress adaptive reuse outcomes. The target of 50 dwellings annually relies on both tiers of government working to understand and address any barriers.</p> <p>Feedback from PCA members is welcomed and will inform implementation of the Strategy moving forward.</p>



<ul style="list-style-type: none"> <li>• Skilled workforce.</li> <li>• The complexity, risk and cost of executing adaptive reuse projects.</li> </ul>	
<b>JFA Purple Orange</b>	
<p>The Housing Strategy should align with Council’s Disability Access and Inclusion Plan (DAIP)</p> <p><b>Recommendation 1:</b> The Housing Strategy Team should remove the label of ‘vulnerable people’ (p.9) and ensure the draft Housing Strategy aligns with the City of Adelaide’s Disability Access and Inclusion Plan (DAIP) and the Social Model of Disability. It should make clear that fulfilling the urgent need for more accessible housing will benefit the whole community and not associate this with ‘vulnerable people’ or ‘disability support’.</p>	<p>Comments noted.</p> <p>The Housing Strategy has been amended to remove reference to ‘Vulnerable People’ and include references to accessible and appropriate housing in the Introduction and City of Adelaide Approach.</p> <p>City of Adelaide recognises that there are additional opportunities for advocacy for improved planning policy and compliance with the National Construction Code 2022 Livable Housing Design Standard which have been added / strengthened in the Strategy. (refer to Goal 1 – <i>Levers of Change</i>).</p>
<p>Increase the focus on the urgent need for more accessible housing</p> <p><b>Recommendation 2:</b> The City of Adelaide should include an additional Goal and associated Targets in its draft Housing Strategy to ensure the urgent need to increase the supply of accessible dwellings is given similar weight as other goals and targets. We propose the addition of the following:</p> <p>GOAL 4: Making housing accessible for all</p> <p>Our Target: Accessible housing, all new dwellings delivered and countered toward targets under this Strategy adhere to the National Construction Code 2022 Livable Housing Design Standard without exemptions or concessions.</p> <p>Our Target: ‘Gold level’ accessible housing, deliver 50 dwellings annually that comply with the ‘Gold level’ of the Livable Housing</p>	<p>Goal 1 – Housing For All now includes the following:</p> <p>Accessible Housing: new dwellings adhere to the National Construction Code 2022 Livable Housing Design Standard without exemptions or concessions.</p> <p>.</p> <p>In addition, the Housing Strategy has been amended to include a requirement for CoA lead/partnered/facilitated housing to include 10% that complies with the Livable Housing Design Voluntary Standard – Beyond Minimum Standard 2022, in the section on <i>City of Adelaide Developments</i>.</p> <p>Add definition of accessible housing to the Glossary as follows:</p>

Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia.	<p><b>Accessible Housing</b> is housing designed in accordance with the National Construction Code 2022 Livable Housing Design Standard such that it is:</p> <ul style="list-style-type: none"> <li>(a) easy to enter; and</li> <li>(b) easy to navigate in and around; and</li> <li>(c) capable of easy and cost effective adaptation; and</li> <li>(d) responsive to the changing needs of occupants</li> </ul>
Ready to assist the housing team at the City of Adelaide as it gives consideration on how best to design and implement an authentically accessible and inclusive Housing Strategy.	Council values the existing support and advice provided by FPA Purple Orange on access and inclusion related projects and will continue to seek advice as required through the implementation of the Housing Strategy.
<b>Urban Futures Exchange (UFX)</b>	
UFX supportive of the draft Strategy and emphasise the importance of direct investment in achieving the goals and targets identified.	Support is noted.
Goal for 1000 dwellings per year commendable but note this is above the historical average of only 551 dwelling approvals per year – what factors contribute to this gap given that demand is currently outstripping supply (as per vacancy rates and prices).	Council's Strategic Plan 2024-2028 seeks to be bold, aspirational and innovative. The Housing Strategy identifies that we will seek to attract investment to increase housing supply and seek out partnership and facilitation opportunities. We recognise that to meet the growth and housing targets of our Strategic Plan and the Housing Strategy the City of Adelaide must play an active role in housing supply.
Note the recent trend towards hotel and short-term accommodation over housing projects – based on higher financial returns.	CoA is investigating options to reduce the impacts of short-term rental accommodation on housing supply (refer to draft Economic Development Strategy).

Options for Council to be active in the development process – consolidating land parcels to enable a master planned approach.	The draft Housing Strategy has been amended to acknowledge that City of Adelaide can support housing supply through monitoring options for land assembly (Refer to City of Adelaide Approach)
Additional environmental considerations needed – including proper ventilation and waste management in new builds. This is a gap in the current Planning and Design Code policies.	<p>Waste management is identified as an area for policy improvement through Council's endorsed submission to the State Planning System Implementation Review in January 2023.</p> <p>Through investigations for the proposed Sustainability Code Amendment, Council will be considering a wide range of environmental matters, with the intent to strengthen policies in the Planning and Design Code.</p>
<p>Key lever for Council is investment in enhancing neighbourhood and street amenities. Public realm investments suitably targeted to improve connections, walkability, perception of safety, and the accessibility and quality of green spaces, serve as potent incentives for fostering the desired developments in strategic locations.</p> <p>Council has a key role in community integration and capacity building. By encouraging existing residents to be integrated into the placemaking/social benefits of developing communities.</p> <p>These investments should stem from a nuanced understanding of the unique characteristics and values of neighbourhoods and precincts, leveraging this insight to unlock development opportunities.</p>	<p>The Housing Strategy recognises that Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</p> <p>Council is currently developing its City Plan to be finalised in 2024. We will use City Plan to identify, test and facilitate a planning policy framework emphasising imperative to diversify and elevate housing designs, promote community integration and neighbourhood characteristics. City Plan is geared to meet the future needs of an expanding demographic while also addressing affordable housing requirements.</p>
Ensuring flexibility in use is critical – both in terms of transitions between apartment sizes and conversions between commercial and residential use, and adaptive repurposing between hotel and student/key worker accommodation. This flexibility needs to be part of the development assessment process – Council can advocate for policies to this effect to be introduced/enhanced the Planning and Design Code.	Agree that flexibility of design and adaptability of housing is critical to long term viability of housing, particularly when combined with universal design principles. This is identified as an area for policy improvement through Council's endorsed submission to the State Planning System Implementation Review in January 2023.

	Investigations for Code Amendments and advocacy for improvements to the Planning and Design Code will include these considerations.
<p><i>New Housing Models</i></p> <ul style="list-style-type: none"> <li>• Build to rent is an emerging model (albeit not specifically an affordable housing model).</li> <li>• Public housing is critical.</li> <li>• Opportunities for key worker housing to be integrated with student housing.</li> <li>• Note the bulk of CoA housing is 'missing middle' - Council should focus on affordable and key worker housing – allow the market to address the higher end of the market.</li> </ul>	The Housing Strategy acknowledges Council's intent to act where we will have the most impact and community benefit.
<p><i>Partnership with UFX</i></p> <p>As an organisation which seeks to lead discussion and engage in advocacy, we are likely to be most able to contribute to the advocacy related goals. This would include changing policy settings (e.g. regarding electrification of new dwellings). This could include running events, articles etc in collaboration with the City of Adelaide, relating to the goals of the strategy.</p>	Acknowledge offer of support.
<p><i>Other Partnerships</i></p> <ul style="list-style-type: none"> <li>• State and Commonwealth Governments</li> <li>• Community housing providers</li> <li>• Developers</li> </ul> <p>The community of course are fundamental to all things and will be particularly relevant in relation to City Plan and more spatial planning decisions.</p>	City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.

<p>Barriers and Solutions to Targets:</p> <p><u>Target 1 (150 affordable homes per year):</u></p> <p>Barrier: dwelling construction is well below the 1000 per year that this figure is based upon.</p> <p>Solution: this could be accelerated by taking a more active role in site acquisition and consolidation</p> <p>Barrier: improper application of the Affordable Housing Overlay, given that many DA decisions will be made by SCAP</p> <p>Solution: Closely monitoring whether approvals include affordable housing, and holding State Government to account if they fail to enforce the requirements.</p>	<p>The Housing Strategy identifies Council's intent to increase the supply of affordable rental housing within the city. This will include initiating partnerships and facilitating opportunities for the private sector and specialist housing organisations.</p> <p>Council will also continue to advocate to the State and Federal Governments for financial incentives and initiatives which result in more affordable housing in the private rental market, including opportunities available through the Housing Australia Future Fund.</p> <p>Goal 1 – <i>Levers of Change</i> has been amended to identify Council's continued advocacy for Mandatory Inclusionary Zoning, including a definition for affordable rental housing</p> <p>Note a new Target created seeking to deliver accessible housing.</p>
<p><u>Target 2 (Reducing rental pressures and increasing supply):</u></p> <p>Barrier: substantial private investment is into short-term accommodation, ie high-rise hotels. Our view is that the trend for Airbnb (and other similar platforms) has likely seen its peak, and while it does contribute to a reduction in long-term housing stock, it is not the primary contributor. Substantial numbers of people who primarily live in rural or suburban areas own a second home in the CBD, which is mostly left vacant for when they visit the City.</p> <p>Solution: additional taxes etc at underutilised dwellings (e.g. those occupied less than 3 nights per week), in order to direct investment towards long-term housing (if such taxes are possible for a Local Government).</p>	<p>City of Adelaide is investigating options to reduce the impacts of short-term rental accommodation on housing supply in the city. Refer to draft Economic Development Strategy.</p>

<p><u>Target 3 (Adaptive reuse of underutilised buildings):</u></p> <p>Barrier: The assembly of suitable building stock, mixed with regulatory difficulties in the National Construction Code.</p> <p>Solution: Council could consider providing rate relief or subsidies to help cover the cost of such upgrades.</p>	<p>The City of Adelaide, in conjunction with the State Government, through the Capital City Committee has committed to explore and progress adaptive reuse outcomes. The target of 50 dwellings annually relies on both tiers of government working to understand and address any barriers.</p>
<p><u>Target 4 (All-electric new dwellings):</u></p> <p>Barrier: the attitude of the State Government, who seem at present to have limited appetite to implement regulatory barriers to gas connections.</p> <p>Solution: Continuing work to encourage residents to use electric appliances, and partnering and supporting organisations advocating in this space will be important in attempting to shift that attitude.</p>	<p>City of Adelaide is committed to decarbonisation and will consider current and emerging technologies to support the transition to net zero. Electrification is a key strategy in Council's draft Integrated Climate Strategy to be released for consultation in February 2024.</p>
<p><u>Target 5 (Attracting investment for affordable rental properties):</u></p> <p>The same barriers and solutions as for Target 1 are likely to apply here.</p>	<p>The Housing Strategy identifies Council's intent to increase the supply of affordable rental housing within the city. This will include initiating partnerships and facilitating opportunities for the private sector and specialist housing organisations.</p> <p>Council will also continue to advocate to the State and Federal Governments for financial incentives and initiatives which result in more affordable housing in the private rental market, including opportunities available through the Housing Australia Future Fund.</p>

<p><u>Target 6 (Utilising incentive schemes to ensure better outcomes):</u></p> <p>Barrier: Shifting political priorities threatening incentive schemes shifting economic conditions rendering them obsolete.</p> <p>Solution: continuing visibility of the impact of such incentives and programs is important to build support, ensuring that the impact of this work is clear to see. On the latter point, active monitoring to ensure that the incentives remain fit for purpose will be an important step.</p>	<p>Noted. Council continues to monitor the suitability and relevance of its incentive schemes.</p>
<b>Grounded</b>	
<p>Commend the City of Adelaide for taking a leadership role to unlock new housing models and ensure that Council led developments are an example of best practice.</p>	<p>Noted</p>
<p>Adaptive reuse, key redevelopment sites and unlocking potential air rights are effective ways to increase the number of dwellings within the CBD footprint.</p>	<p>The City of Adelaide, in conjunction with the State Government, through the Capital City Committee has committed to explore and progress adaptive reuse outcomes. The target of 50 dwellings annually relies on both tiers of government working to understand and address any barriers.</p>
<p>Encourage collaboration with neighbouring Councils</p>	<p>Noted. City of Adelaide collaborates with neighbouring Councils on a range of matters, including planning policy.</p>
<p>Encourage housing models that can deliver affordable home ownership and security of tenure to also be prioritised in the strategy (in addition to affordable rental).</p>	<p>The Housing Strategy identifies City of Adelaide's commitment to making appropriate interventions to foster and grow a new affordable rental asset class to provide appropriate rental housing including for key workers. However, it also identifies that Council will continue to advocate for 15% of new homes to be affordable for either rental or purchase.</p>

<p><i>Community Land Trust (CLT)</i></p> <p>The CLT model has the capacity to be a robust housing model while enabling flexibility and adaptability to meet localised needs.</p> <p>CLTs can deliver perpetually affordable home ownership, secure affordable rental and even commercial leases.</p> <p>A CLT is a body established to maintain perpetual affordability of land and therefore housing. The resident owns the house, whilst the trust acts as a custodian of the land.</p>	<p>Note the CLT model identified in the submission. Council will include consideration of this model as it explores ways to partner and support delivery of affordable housing.</p>
<p><i>Working Together</i></p> <p>Grounded are keen to partner with the City of Adelaide to include CLTs as part of Adelaide's housing future. We see our potential role being that of a project partner, specialised consultant or member of a project working group. Grounded could also assist in the governance structure of the Trust.</p> <p>Grounded support the council strategy of developing partnerships to deliver housing while retaining ownership of land, either through long term lease arrangements or with council as the land owner. The CLT model is compatible with both of these models and could provide a mechanism for council revenue to deliver more affordable housing.</p>	<p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors, including references to alternative housing models.</p>
<p>Barriers and strategies to address them</p> <ul style="list-style-type: none"> <li>• we need a change in the narrative regarding housing with a move away from 'housing as a wealth creation strategy' and a return to 'housing as homes'.</li> <li>• there needs to be stronger oversight developed to minimise the market manipulation that drip feeds supply to maximise profit.</li> <li>• new housing models and projects need to deliver on their promises.</li> </ul>	<p>The City of Adelaide wants to be a city where people are not burdened by housing costs and have a choice in the type of housing they live in.</p> <p>The City of Adelaide's 2024-2028 Strategic Plan sets a growth target of 50,000 residents by 2036. To provide housing for this growing residential community, the City of Adelaide is seeking to play an active role in housing supply.</p>



<p>The biggest barrier to achieving the goals set out in the draft housing strategy is likely to be the influence of those benefiting from the current system and their desire to maintain the status quo.</p> <p>Build to rent sector needs greater oversight to enable it to be considered viable housing for middle income earners.</p> <p>Community led housing projects with a for-purpose rather than solely for-profit focus are one of the best strategies to ensure housing meets community needs. Building strong communities is perhaps our best chance at adapting to a rapidly changing climate and a need to move towards a better use of shared resources.</p>	
<p>Recommendations:</p> <p><u>Goal 1 Housing for all:</u></p> <ul style="list-style-type: none"> <li>• CLTs are added to the potential new models to be piloted as part of the housing strategy</li> <li>• CLTs, along with other innovative housing models, are promoted using a narrative of housing as a home, rather than an investment vehicle for wealth creation</li> <li>• Community led housing projects are championed as a vehicle to ensure housing meets community needs and to build dynamic, vibrant communities</li> <li>• Council to pursue projects where council either retains role as land owner or enters into long term (99 year) land leases</li> <li>• Review of height limits - any additional air rights entitlements on council owned buildings to be contributed to CLTs and/or affordable housing developments</li> <li>• Inclusionary zoning and/or VPAs to provide a simplified incentive option for market developers to contribute funds or dwellings to CLTs</li> <li>• Consider ways to stimulate development or sale of long term vacant properties and land such as the recent Victorian vacancy tax or additional rates levies.</li> </ul>	<p>Acknowledge recommendations for achieving the goals. Advocacy, partnerships and facilitation opportunities will be key to Council delivery of the goals and targets.</p> <p>Goal 1 – <i>Levers of Change</i> has been amended to clarify that Council will continue to advocate for Mandatory Inclusionary Zoning (including a definition of affordable rental housing)</p> <p>Additional commentary and community land trust is added to description of the Housing System – <i>Alternative Housing Models</i>.</p> <p>The City of Adelaide has undertaken a Social Infrastructure Assessment and identified where there are potential gaps and possible interventions to ensure future population is supported.</p> <p>Council is currently developing its new City Plan to be finalised in 2024. We will use City Plan to identify, test and facilitate a planning policy framework emphasizing the imperative to diversify and elevate housing designs, promote community integration and neighbourhood characteristics. City Plan is geared to meet the future needs of an expanding demographic while also addressing affordable housing requirements.</p>

## Goal 2 Innovation and sustainability in housing

We support the ambitions, levers of change and delivery mechanisms outlined for this goal. In particular we support:

- City of Adelaide development standards and would encourage any planning levers that would see other developers held to similar accountability
- Adaptive reuse as a way to retain embodied carbon but also the history and character of neighbourhoods / precincts
- Diversifying tenure and housing stock to encourage more affordable housing options, including for families / diverse households
- Curation of neighbourhoods / precincts and the inclusion of broader definitions of families and contemporary community facilities that are responsive to all ages, multi-generational houses, kids, pets and changing community needs

We recommend including the following:

- Ensuring that affordability requirements include both rental and ownership models
- CLT model used to improve tenure options - can be rental or equity purchase for residents with land ownership seen as stewardship for future generations
- Encouraging innovative designs that include shared facilities and lower ongoing costs
- Consideration of a medium density design competition that could see the development of a planning booklet of preapproved designs that could be adopted by City of Adelaide and other councils in SA.

## Goal 3 Investing in our Housing Future

We recommend that where possible:

- Retention of council owned land to ensure housing outcomes for current and future generations

City of Adelaide has a major role to play in making the city a more desirable place to live. Council is developing an Economic Development Strategy which includes a focus on the Central Living District with targets to improve city liveability and desirability.

<ul style="list-style-type: none"> <li>• Property Strategy / AEDA to specify that any land contribution / sale is first option to CHPs, NFP housing organisations &amp;/or housing models with affordability locks</li> <li>• Seed funding is secured to support the establishment of CLT pilot projects that will then transition to self-funding models</li> <li>• Setting a planning policy framework with state government to support the establishment of an affordable housing ecosystem</li> <li>• Advocate to federal government for an expansion of the Housing Australia mandate to include a wider range of housing organisations</li> <li>• Council to invest in high quality public spaces and social infrastructure</li> <li>• Promotion / inclusion of Homes for Homes type caveats to fund future housing initiatives.</li> </ul>	<p>The Housing Strategy recognises that Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</p>
<b>Office for Design and Architecture SA (ODASA)</b>	
<p>Support the vision and priorities of the draft Strategy, in particular using City Plan 2036 to test and determine suitable policy environments that may enable desired change.</p>	<p>Support is noted</p>
<p><i>New Housing Models</i></p> <p>Co-housing – as proposed through the Future Living Code Amendment initiated by the State Planning Commission in 2021.</p> <p>Alternative construction methods – such as offsite prefabrication. This can reduce construction time and minimise disruption to the existing urban environment.</p>	<p>Options identified are noted and will be taken into consideration in the implementation of the Strategy.</p> <p>City of Adelaide is reviewing the suitability of the outcomes proposed through the Future Living Code Amendment.</p>
<p><i>Opportunities for collaboration with ODASA may include:</i></p> <ul style="list-style-type: none"> <li>• Establishing a Local Design Review panel under the Local Design Review Scheme to provide independent and expert design advice</li> </ul>	<p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors. This includes consideration of Local Design Review.</p>

<p>on private development proposals and the City's own development projects</p> <ul style="list-style-type: none"> <li>• Facilitating access to specialist technical advice from ODASA's highly regarded State Design Review panel members, including alternative housing models, best practice and innovations</li> <li>• Providing strategic design advice during the preparation of draft policy, Code Amendments and other strategies.</li> </ul> <p>Welcome the opportunity to collaborate to establish systems and processes to achieve the targets prioritising high quality and sustainable design outcomes.</p> <p>Recommend Council encourage proponents to engage with ODASA State Design Review process.</p>	
<p><i>Who should CoA be working with:</i></p> <ul style="list-style-type: none"> <li>• Continue engaging with residents, workers, commuters and neighbouring local governments to finalise and implement the Strategy.</li> <li>• Additional non-government stakeholders identified.</li> </ul>	<p>The Housing Strategy identifies a number of ways in which Council will work with private sector, community housing providers as well as State and Federal Government to deliver the targets of the Strategy.</p> <p>Council will continue to engage with all stakeholders through the finalisation and implementation of the Housing Strategy.</p> <p>Engagement on City Plan 2036 will be a key opportunity for further engagement to inform the implementation of the Housing Strategy.</p>
<p>Barriers and Solutions:</p> <p><u>Planning for Growth</u></p> <p>Encourage the City to consider the impacts of the population target of 50,000 by 2036 to ensure it can be planned for in a socially, environmentally and economically responsible way.</p> <p>Consideration may include:</p> <ul style="list-style-type: none"> <li>• improve walking and cycling, including connections with neighbouring council areas</li> </ul>	<p>Implementation of the Housing Strategy will align with City of Adelaide's other strategic plans and modelled and monitored through City Plan.</p> <p>City of Adelaide is also investigating options to reduce the impacts of short-term rental accommodation on housing supply in the city. Refer to draft Economic Development Strategy.</p>

<ul style="list-style-type: none"> <li>• increase tree canopy cover in areas that are not within the Adelaide Park Lands and Squares, such as streets, laneways and pocket parks</li> <li>• upgrade key public transport corridors to encourage public transport use, improve public safety and enhance local environmental quality, such as the North Terrace West and Currie/Grenfell Street bus corridor</li> <li>• improve the public realm and active travel connections to encourage new development</li> <li>• identify and encourage appropriate development for target areas.</li> </ul> <p><u>Short-term rentals</u></p> <p>The City may wish to consider investigating the impact of short-term rentals on local housing availability to inform an evidence-based response.</p>	
<b>BPW Adelaide (combined submission to Housing Strategy and Homelessness Strategy)</b>	
<p>Women are far more vulnerable than men when under housing stress, in precarious housing or homeless.</p> <p>The gender pay gap and superannuation gap mean women at all life stages are at risk of financial insecurity, which means the cost of housing has a greater impact on women.</p>	<p>Recent advocacy by City of Adelaide to State and Federal parliamentary housing inquiries has highlighted the vulnerability of women in accessing affordable, secure and appropriate housing.</p>
<p>Co-housing is an identified model of interest to older women living alone, including granny flats. Need for regulation changes to remove barriers to these housing options.</p>	<p>The City of Adelaide is currently reviewing the Future Living Code Amendment (initiated by the State Planning Commission) to determine if the co-housing model proposed would be suitable in the city.</p>
<p>BPW Housing Policy Statement on Housing Stress provided detailing the concerns which have been raised through various state and federal government submissions.</p>	<p>The BPW Housing Policy Statement aligns with the recent submissions prepared by the City of Adelaide to the State and Federal government inquiries. These submissions have been</p>

<p>In particular the role of local government to amend short-term rental accommodation regulations and remove barriers to innovative housing solutions for women, including co-housing.</p>	<p>informed by investigations that have informed the development of the Housing Strategy.</p> <p>The City of Adelaide is currently reviewing the Future Living Code Amendment (initiated by the State Planning Commission) to determine if the co-housing model proposed would be suitable in the city.</p> <p>City of Adelaide is also investigating options to reduce the impacts of short-term rental accommodation on housing supply in the city. Refer to draft Economic Development Strategy.</p>
<p><b>Junction Australia</b></p>	
<p><i>Strategy on a Page</i></p> <ul style="list-style-type: none"> <li>• The strategy addresses some much-needed solutions</li> <li>• Have you considered the workers and family of the future? <ul style="list-style-type: none"> <li>○ Can we consider flexibility in design in the housing need to address how it can adapt as the workforce changes over the next 25+ years?</li> </ul> </li> <li>• We also need to focus on the environment surrounding the housing to attract tenants. This includes transport and ease of getting around the city, safety, amenity and community. <ul style="list-style-type: none"> <li>○ the strategy doesn't call this out.</li> <li>○ In addition, the recently released Housing Australia clearly calls out new, quality and well-located housing.</li> </ul> </li> </ul>	<p>Council's Strategic Plan 2024-2028</p> <ul style="list-style-type: none"> <li>• Support increased residential growth and housing affordability through partnerships and advocacy</li> <li>• Increase the share of family households from 12.5% to 15% living in the city</li> <li>• Support the maintenance and development of bold and interesting community, cultural and civic places and infrastructure in step with residential growth, enabling connections into and out of the city.</li> </ul> <p>Greater recognition of place-based approaches included in the Introduction – <i>Our Housing Priorities</i>.</p>
<p>Goal 1:</p> <ul style="list-style-type: none"> <li>• Agree the State Government seems focused on volume projects in the Greenfields. These projects tend to increase and spread social issues rather than providing housing where there are</li> </ul>	<p>Noted. Support for housing in the city and new housing models.</p> <p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.</p>

<p>already social and community support. We would support larger projects in the City that can offer a sharing of amenity and support services.</p> <ul style="list-style-type: none"> <li>• I suggest the 15% target needs to be increased through incentives by the CoA – we should look at the London model. This could also be achieved through partnering with CHP's and using Housing Australia funding.</li> <li>• Seed funding for CHP's – while it would be supported, this would not achieve a scale outcome. Land lease or land investment models would assist greatly.</li> <li>• Also, in my view no one party/organization can fix the housing crisis therefore we are very supportive of the partnership focus and approach. CoA are a vital partner in this.</li> </ul>	
<p>Goal 2:</p> <ul style="list-style-type: none"> <li>• Need to consider a scale option like bulk buying green power or green power schemes.</li> </ul>	<p>Through the CoA draft Integrated Climate Strategy, we have committed to continue to investigate the use of community batteries and energy projects that capitalise on our green grid and support more affordable electricity, grid stability and equitable sharing of renewable resources.</p>
<p>Goal 3:</p> <ul style="list-style-type: none"> <li>• Need to ensure longer tenure of affordable rental properties (eg 25 years plus) and creation of an asset class.</li> <li>• Need to consider not just affordable, but mixed use and mixed tenure (include social and affordable).</li> </ul>	<p>The Housing Strategy identifies Council's commitment to making appropriate interventions to foster and grow a new affordable rental asset class to provide appropriate rental housing including for key workers.</p>
<p><b>Department of Premier and Cabinet (DPC)</b></p>	
<p>Social licence will be required to make these changes, particularly relating to key site redevelopment, heritage, adaptive reuse and social housing. This needs to be a key focus going forward,</p>	<p>Through the development of City Plan further opportunities for engagement and input into the future of the City will be determined.</p>

particularly on how key stakeholders will be engaged and how social licence will be built as the strategy is implemented.	
The roles and responsibilities section (page 12) identifies that policy landscapes for all levels of Government are changing and doesn't list how they're changing or what to. The section seems to be lacking some direction and its purpose is slightly confusing.	The Roles and Responsibilities section of the Housing Strategy has been updated to clarify that the housing crisis has elevated the significance of housing policy across all levels of government and the need to update policies to support the development of additional housing across the system.
There is no mention of alternative building and construction methods. Consideration should be given to the potential role that construction methodologies such as cross-laminated timber and modular may have in ensuring that housing goals can be met – particularly as a pathway to meet housing goals quickly and how the City of Adelaide can support these methodologies.	The Housing Strategy seeks to explore innovation in housing products and delivery models (refer City of Adelaide approach). The section on the Housing System - <i>Alternative Housing Models</i> is updated.
There will be a need to deliver significant social infrastructure upgrades to support an increased population in the City of Adelaide. Walkability, cycling corridors, pocket parks and public transport will all be required infrastructure, particularly to reduce the impact of cars in the CBD and make the City a more pedestrian friendly environment.	<p>The City of Adelaide has undertaken a Social Infrastructure Assessment and identified where there are potential gaps and possible interventions to ensure future population is supported.</p> <p>The City of Adelaide Strategic Plan 2024-2028 includes a key action to:</p> <p>Support the maintenance and development of bold and interesting community, cultural and civic places and infrastructure in step with residential growth, enabling connections into and out of the city.</p> <p>Social infrastructure provision will be addressed through City Plan.</p>
What are the anticipated timelines to deliver on the advocacy and facilitation? These are significant challenges and understanding the timeline for implementation would provide greater confidence to the community.	The Housing Strategy has a 10 year timeframe, with delivery of outcomes to align with key CoA strategic plans, including City Plan 2036.



Australian Institute of Architects (AIA)	
The Institute strongly supports the general messages presented in the Draft Housing Strategy.	Support noted.
The Affordable Housing Overlay applies to the majority of south Adelaide and parts of North Adelaide. For developments of at least 20 dwellings 15% are required to be affordable housing.	<p>The City of Adelaide is aware that developers do not always provide 15% affordable housing despite the intent of the Affordable Housing Overlay. In addition, the requirement to list a property at the affordable price point is for a limited time only, after which the property can be offered at the market price.</p> <p>The affordable price only applies at the first point of sale.</p>
“a need to avoid unintended consequences for the housing market”. If ‘unintended consequences’ refers to a decrease in the affordability of housing in the City, then this is Principle is supported. However, increasing diversity and improving affordability constitute changes to the housing market and these changes are at the core of the Draft Housing Strategy.	<p>The reference is to the <i>Principles of Investment</i> in the section of the Strategy titled, City of Adelaide Approach.</p> <p>The Housing Strategy seeks to explore innovation in housing products and delivery models to support increased diversity and affordability (refer City of Adelaide approach).</p>
The ‘missing middle’ does not appear to be as much of an issue in Adelaide as in other Council areas due to existing medium and high-density housing.	The Housing Strategy seeks to explore innovation in housing products and delivery models to support increased diversity and affordability (refer City of Adelaide approach).
<p>The Baugruppen housing model should also be considered. This model (along with Nightingale and Assemble) provides long term affordability through contractual requirements relating to rental and resale.</p> <p>The Institute strongly recommends requirements for preserving affordability through caveats relating to the sale of affordable housing are included in the Strategy.</p> <p>Note that Nightingale is not specifically an affordable housing model.</p>	<p>Goal 1 – <i>Levers of Change</i> has been amended to clarify that Council will continue to advocate for Mandatory Inclusionary Zoning (including a definition of affordable rental housing).</p> <p>The section on the Housing System -<i>Alternative Housing Models</i> is updated.</p>

<p>The inclusion of case studies is useful. They provide evidence of positive action, and alternative housing models.</p> <p>The Central Market Arcade Development case study indicates that only 5.5% of the apartments are affordable. This is well below the 15% of affordable dwellings required to be provided under the Planning and Design Code despite the Affordable Housing Overlay applying.</p> <p>The Homes for Homes program will not address housing supply or affordability in the short to medium term. It also relies on property owners honouring their pledge when they sell. It appears that Homes for Homes has not funded any projects in South Australia to date, and there is no guarantee that projects delivered by the program will be located in the City.</p> <p>However, this is a better outcome than that achieved in the 88 O'Connell St development, where 2-bedroom apartments are being offered from \$1.2M. This development, which also has CoA involvement and is subject to the Affordable Housing Overlay, appears to have no affordable housing component.</p> <p>Activation of this key site through the mixed-use development is viewed as a positive outcome, but the development could have provided further benefit by providing affordable housing for key workers who are employed in the retail, health, service and education businesses in the immediate area.</p>	<p>The City of Adelaide is aware that developers do not always provide 15% affordable housing despite the intent of the Affordable Housing Overlay. In addition, the requirement to list a property at the affordable price point is for a limited time only, after which the property can be offered at the market price.</p> <p>The affordable price only applies at the first point of sale.</p>
<p>GOAL 1: Housing for all</p> <p>Promoting the development of alternative housing models is important in achieving diversity in city residents and in addressing affordability.</p> <p>Advocacy to State and Commonwealth government for financial incentives and planning reform, testing scenarios and mandating universal design principles are supported.</p>	<p>Noted.</p> <p>In the section Levers of Change – <i>Advocacy</i>, the word “entity” is replaced with “approach” to enable further discussions about the most appropriate way to partner.</p>

<p>The establishment of a new partnership entity is questioned.</p> <p>Creating a forum for representatives of existing housing bodies to come together to collaborate and coordinate programs is suggested instead.</p> <p>The Property Strategy and the Strategic Investment Reserve are supported as active mechanisms through which the CoA can support the delivery of new housing to meet the targets established in the Strategy.</p> <p>Code Amendments are supported and are required to facilitate the delivery of alternative housing models and to increase housing supply in the City.</p> <p>Fostering acceptance and understanding of alternative housing models is important.</p>	
<p>GOAL 2: Innovation and Sustainability in Housing</p> <p>The proposed target relating to Adaptive Reuse of underutilised buildings to deliver 50 dwellings annually requires careful consideration. Adaptive reuse of underutilised buildings has been recognised as a strategy for many years but remains challenging for the following reasons:</p> <ul style="list-style-type: none"> <li>• lack of buy-in by property owners</li> <li>• building condition – underutilised buildings, or sections of buildings such as upper floors over ground floor retail space, may have been allowed to deteriorate. This can make the cost of adaptive reuse prohibitive.</li> <li>• the suitability of buildings for conversion to residential use – deep floor plates make access to natural light, views and ventilation limited</li> <li>• limited or no access to private outdoor space or carparking</li> <li>• location – buildings in commercial areas of the City may not been considered attractive by residents due to overlooking,</li> </ul>	<p>Acknowledge support for adaptive reuse project and other elements of the Strategy.</p> <p>CoA is investigating options to reduce the impacts of short-term rental accommodation on housing supply. Refer to draft Economic Development Strategy.</p> <p>Sustainability requirements such as urban greening through green roofs and vertical gardens are included as requirements for City of Adelaide facilitated or developed housing projects, in the section on <i>City of Adelaide Developments</i>.</p>

<p>noise, and pre-conceptions about where housing should be located.</p> <ul style="list-style-type: none"> <li>• regulatory compliance – Achieving fire separation, distance to egress paths, and other life safety requirements when converting an existing building to residential use may be complex and expensive</li> <li>• construction type – depending on the age of the building, it's construction may make conversion complex. For example, a building with a tensioned floor slab construction may make reticulation of new services difficult and therefore expensive.</li> </ul> <p>The Institute strongly supports the adaptive reuse project currently being undertaken and is interested in understanding how it can be involved.</p> <p>The Institute also suggests that an incentive scheme for connecting architects with building owners, so that they can better understand the options available for adaptive reuse be considered.</p> <p>Support for improvements to environmental performance and reduce energy use is strongly supported. The recognition that this needs to occur through the construction of better-quality new homes as well as through the upgrade of existing properties is also very positive. Recognition of the needs of renters as well as homeowners is an important inclusion given the significant percentage of City residents who rent.</p> <p>Electrification of existing homes and regulatory change to mandate that new homes be all electric are strongly supported.</p> <p>The Lever of Change detailed in the Strategy are supported. The Institute is developing resources to increase public understanding of how to achieve 7-star rating and note that, without post construction testing the implementation of NCC 2022 is unlikely to delivery 7-star NatHERS rating in many cases. Mandatory disclosure of energy rating of homes needs to be based on as built testing not the NatHERS Report or the DTS rating stated at Development Approval.</p>	
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Development of a program targeting long term vacant properties and land is strongly supported. Development of these properties could be further incentivised by Council subsidising a program where property owners can engage an architect to develop a concept design for adaptive reuse including a mandated percentage of affordable housing.

Identification of properties offered for short-term rental through Airbnb and other similar platforms is also suggested. Where short-term rentals are being provided in self-contained dwellings - as opposed to apartments in hotels or rooms in permanently occupied homes - that could otherwise be offered as a long-term rental, we suggest that the Council considers what incentives/penalties could be applied to property owners to promote their return to the rental market.

The seven sustainability standards and the requirement that housing developments meet a minimum of six of the seven is strongly supported.

The Institute suggests that the following amendments to the seven sustainability standards be considered:

- High Efficiency – A minimum 7-star NatHERS rating will be a requirement for development approval as of October 2024. We suggest that this is amended to remove the DTS pathway and make inclusion of a NatHERS Report a mandated requirement for Development Approval. A further amendment would be to mandate post-construction testing.
- Urban Greening – Green roofs and vertical walls are two strategies for increasing urban greening. They need to be supported with appropriate maintenance and irrigation to deliver effective long-term outcomes, and in the case of green roofs, provide minimal benefit to the public realm. We suggest that this standard needs to be amended to include street gardens and balconies with integral planting zones including irrigation.
- Transport – consider amendments to carparking provisions in the Planning and Design Code. Housing located in the city has

<p>excellent public transport connectivity as well as access to social infrastructure and employment. This will reduce emissions and road congestion and improve housing affordability.</p> <ul style="list-style-type: none"> <li>• Waste management – Building-in recycling infrastructure is important. Consider provision of shared recycling collection points in locations where existing buildings or building density restricts space for collection. This may also assist with vehicle access to collection points.</li> </ul>	
<p><b>GOAL 3: Investing in our Housing Future</b></p> <ul style="list-style-type: none"> <li>• Recognition that access to affordable and secure housing needs to be supported by high quality public realm and access to social infrastructure is welcomed.</li> <li>• Support for overseas students through provision of housing is supported. This needs to be coupled with State and Federal government support for quality education and improved social and language support programs.</li> </ul>	<p>Support noted.</p> <p>City of Adelaide has a major role to play in making the city a more desirable place to live. Council is developing a new Economic Development Strategy which includes a focus on the Central Living District with targets to improve city liveability and desirability.</p> <p>The Housing Strategy recognises that Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</p>
<p><b>COTA SA</b></p>	
<p><i>Alternative Housing Models</i></p> <p>There are numerous examples of creative approaches to medium-density housing which could be considered. For example:</p> <ul style="list-style-type: none"> <li>• Nightingale Housing - Its underlying focus is, “building apartments that are socially, financially and environmentally sustainable....homes should be built for people, not profit”.</li> <li>• Build- to-rent developments provide a relatively new housing option that gives tenants security of tenure which, in turn, promotes community connection. Incentives are needed to attract more private build-to-rent developers to South Australia and</li> </ul>	<p>Suggestions noted and will be considered as part of Council’s implementation of the Housing Strategy.</p>

commit them to incorporate affordable housing into their private rental developments.	
<p><i>Partnerships</i></p> <p>COTA SA is expert at connecting and engaging with older people to understand their needs and preferences, and also in translating these insights to help organisations improve their programs, services and policies for the 50+ population group. We can bring value as a for-purpose partner and can play an active role to ensure City of Adelaide's strategies are fit for purpose to achieve ageing well outcomes and housing goals.</p> <p>Our social enterprise, The Plug-In, is a specialist market insights operation that is available to undertake consumer engagement and insights research. We welcome the opportunity to collaborate with the City of Adelaide to shape its housing strategy and subsequent plans.</p>	City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.
<p><i>Other Connections</i></p> <p>The Greater Adelaide Regional Plan, State Infrastructure Strategy and Housing Security for Older Women Taskforce, as well as to identify windows of opportunity to leverage the Housing Strategy's outcomes.</p>	Noted.
<p><i>Barriers</i></p> <p>The biggest barrier COTA SA sees in achieving the targets of each goal is the level of influence the City of Adelaide has in its advocacy to government and developers. Where achieving a goal is reliant on undertaking changes that are outside of the City of Adelaide's decision-making power, this poses a risk to the timing and ability to achieve goals.</p>	Noted.

<b>State Planning Commission (comments relevant to Housing Strategy)</b>	
Ambitious population and housing targets will contribute to Greater Adelaide targets.	Noted.
<p>The Goals and Targets align with the outcomes proposed in the Greater Adelaide Regional Plan Discussion Paper.</p> <p>Seek to continue relationship with CoA in 2024 as draft Greater Adelaide Regional Plan is prepared for consultation.</p>	Noted, the City of Adelaide will continue to work with the State Planning Commission and Planning and Land Use Services through the engagement of the Greater Adelaide Regional Plan to seek alignment with Council's City Plan 2036.
The Future Living Code Amendment, and proposed Code Amendments into Student Housing and Build to Rent housing will support new housing models in the city.	<p>City of Adelaide is reviewing the suitability of the outcomes proposed through the Future Living Code Amendment.</p> <p>The City of Adelaide is also interested in the other housing related Code Amendments proposed by the State Planning Commission.</p>
Identification of the importance of housing for key workers is commended.	Support noted.
<b>Australian Hotels Association (SA) (AHA) (relevant to Housing Strategy)</b>	
The AHA SA supports the City of Adelaide's public policy focused on homelessness, and social and affordable housing in the city.	Support noted.
<p>Residential growth in the CBD will help to drive the economic recovery of the CBD hospitality industry, with many venues still struggling to return to pre-COVID levels of patronage.</p> <p>The AHA SA supports CoA approach in intervening in the housing market to increase housing supply and address housing affordability and suggests that in meeting this target the City of Adelaide could impose rate penalties for untenanted residences within the CBD.</p>	<p>Support noted.</p> <p>Council will research the development of a program to target long-term (2-5+ years) vacant properties and land without current development applications with the aim of stimulating development. This will begin with any site which could leverage opportunities for affordable housing and adaptive reuse.</p>



<p>The AHA SA suggests the following:</p> <p>Re-purposing existing buildings where possible (e.g. using residential colleges in North Adelaide over semester holidays for temporary housing).</p>	<p>Housing Strategy has a focus on repurposing existing older and vacant buildings with a commitment to adaptive reuse.</p>
<p><b>Arup</b></p>	
<p>Barriers:</p> <ul style="list-style-type: none"> <li>• Amenity offering of the location and necessity for 'beyond the building' provisions to support housing, i.e. street and urban realm improvements for residents (pedestrianisation of city streets) as well as provisions for water and electricity.</li> <li>• Perception – Public opinion of “affordable housing”, attitudes toward sustainability.</li> <li>• Willingness for private investment to take risks.</li> <li>• Code compliance of existing assets and planning requirements.</li> <li>• Opportunities to overcome these barriers outlined in the submission.</li> </ul>	<p>City of Adelaide has a major role to play in making the city a more desirable place to live. Council is developing a new economic development strategy which includes a focus on the Central Living District with targets to improve city liveability and desirability.</p> <p>The Housing Strategy recognises that Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</p>
<p><b>UDIA South Australia</b></p>	
<p><i>New Housing Models</i></p> <p>Instead of prescribing a preference for a certain model or models, the key to achieving positive housing outcomes will be to incorporate flexibility in the final strategy. This will enable Council to be nimble in response to opportunities and to have an outcome focused approach in its consideration of potential developments.</p> <p>Through collaboration with the UDIA, the CoA can potentially research housing models that have worked positively in similar locations.</p>	<p>Agree that flexibility of design and adaptability of housing is critical to long term viability of housing, particularly when combined with universal design principles.</p> <p>Offer to partner with Council noted and will be considered further through the implementation of the Strategy.</p> <p>City of Adelaide is investigating options to reduce the impacts of short-term rental accommodation on housing supply. Refer to draft Economic Development Strategy.</p>

<p>The UDIA encourages the CoA to support innovation in housing models and to cater for a range of models across the city or within a single development, including:</p> <ul style="list-style-type: none"> <li>• Build To Rent (BTR)</li> <li>• Adaptive Re-use and Change of Use (e.g. Office or Tourist Accommodation to Residential)</li> <li>• Affordable Housing</li> <li>• Community Housing</li> <li>• Student Accommodation</li> <li>• Serviced Apartments</li> <li>• Short-term Accommodation</li> <li>• Tourist Accommodation</li> </ul>	
<p><i>Partnerships</i></p> <p>The UDIA is able to partner with the CoA through sharing industry insights and by providing positive connections to Council with the development industry.</p> <p>Other partners:</p> <p>Through both private partnerships with developers and partnership opportunities with State Government and CHP's, the CoA can ensure the long-term viability of housing in the city.</p> <p>Partnerships with the development sector can facilitate and expedite the improvement and activation of public spaces in association with the development of precincts and catalyst sites.</p>	<p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.</p>
<p><i>Council opportunities</i></p> <p>We believe the CoA has a key role to play through acting as a facilitator by establishing the relevant connections, policy leadership, strategic partnerships and through the dissemination of the appropriate information.</p>	<p>The Housing Strategy recognises that Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</p>

<p>The CoA also has an important role in making the city an attractive place to live through the enhancement and activation of public spaces. These works have the capacity to create distinct precincts clustered around and taking advantage of public assets.</p> <p>The Council can also incentivise the adaptive re-use of heritage buildings through rate concessions and other measures.</p>	<p>The City of Adelaide recognises the importance of amenity and public realm on improving great and sustainable cities.</p> <p>The City of Adelaide, in conjunction with the State Government, through the Capital City Committee has committed to explore and progress adaptive reuse outcomes. The target of 50 dwellings annually relies on both tiers of government working to understand and address any barriers.</p> <p>Incentives addressed in multiple sections including the Introduction, Roles and Responsibilities, and Goal 2.</p>
<p><b>Barriers</b></p> <p>We see the biggest barriers to achieving these targets as the ability for Council to unlock sufficient development capacity which will accommodate the targeted housing outcomes and development costs which ultimately impact on housing affordability.</p> <p>The UDIA would also support and encourage the CoA reviewing and working with the State Government to seek amendment to the Code to introduce a more supportive planning policy framework for alternative housing models.</p>	<p>Council's Strategic Plan 2024-2028 seeks to be bold, aspirational and innovative. The Housing Strategy identifies that we will seek to attract investment to increase housing supply and seek out partnership and facilitation opportunities. We recognise that to meet the growth and housing targets of our Strategic Plan and the Housing Strategy the City of Adelaide must play an active role in housing supply.</p> <p>Council has endorsed a proactive Code Amendment program.</p>
<p><b>Airbnb</b></p>	
<p>In a survey of Adelaide Hosts on Airbnb in 2023, more than half said they plan to use the money earned by hosting on Airbnb to help cover the heightened cost of living, while almost one-third said their hosting income has helped them stay in their home.</p>	<p>City of Adelaide acknowledges the information provided in the submission and the support for the Housing Strategy.</p> <p>City of Adelaide is investigating options to reduce the impacts of short-term rental accommodation on housing supply in the city. Refer to draft Economic Development Strategy.</p>
<p>Any future housing strategy must be cognisant of the important role that short-term rental accommodation plays in Adelaide. It is crucial to ensure there is a healthy mix of accommodation and housing</p>	<p>The importance of diversity in accommodation is noted.</p>

typologies in the City of Adelaide to suit the current and future needs of the population, as well as the contribution to the local economy.	
Airbnb supports the proposed measures to amend land use planning and simplify the planning process to allow for more homes to be built in order to deal with the new supply challenges communities are facing.	Support noted.
In 2022 Airbnb announced a suite of proposed measures to help build stronger communities and foster sustainable tourism growth including a visitor levy to fund key infrastructure and housing in local communities, a statewide registration scheme to gather the crucial data required to make informed policy decisions and a Code of Conduct to set clear behavioural expectations for the industry.	Noted.
Airbnb is committed to working with all levels of government to find common sense policy solutions to address issues communities face, backed by sound evidence.	Offer to collaborate with Council noted and will be considered further through the investigations into short-term rental accommodation to be undertaken in 2024.
<b>Study Adelaide</b>	
Support growth targets	Support noted.
Providing for accommodation mix that is appealing to international students will support meeting population target	The Housing Strategy commits to exploring innovation in housing product, typologies and delivery models. Purpose-built student accommodation included in Goal 2.
Latest data shows international students are likely to be older, and therefore may have partner or family members with them. Accommodation for this cohort needs to be considered.	Noted, the City of Adelaide will continue to collaborate with Study Adelaide to support students living in the city.
Support ongoing collaboration with CoA.	Support noted.

REISA	
<p>Suggestions for new housing models:</p> <ul style="list-style-type: none"> <li>• Co-housing/Co-locating shared facilities</li> <li>• Tiny Homes</li> <li>• Eco-Villages</li> <li>• Modular Housing</li> <li>• Affordable Housing Cooperatives</li> <li>• Adaptive reuse Housing</li> </ul>	<p>Suggestions noted.</p> <p>The section on the Housing System -<i>Alternative Housing Models</i> is updated.</p>
<p>Partnerships and Roles:</p> <p>Real Estate Industry</p> <p>Additional collaborators:</p> <ul style="list-style-type: none"> <li>• Peak bodies</li> <li>• Affiliations</li> </ul>	<p>Noted.</p> <p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.</p>
<p>Barriers</p> <ul style="list-style-type: none"> <li>• Land Availability</li> <li>• Regulatory Challenges</li> <li>• Community Resistance</li> <li>• Market Conditions</li> </ul>	<p>The draft Housing Strategy has been amended to acknowledge that City of Adelaide can support housing supply through monitoring options for land assembly (Refer to City of Adelaide Approach).</p>
Housing Choices	
<p>Access to, and the prohibitive cost of land is key barrier to the development of affordable rental housing. Rental for low to very low income relies on significant land, construction and operational subsidies.</p> <p>Councils directly partnering with CHPs through transfer of land or ground lease models, can protect the Council (community) interest in</p>	<p>City of Adelaide is exploring innovative ways it can partner to support delivery of affordable housing by other sectors.</p> <p>The Housing Strategy identifies a number of ways in which Council will work with private sector, community housing providers as well as State and Federal Government to deliver the targets of the Strategy.</p>

<p>the land while supporting development of affordable not for profit build to rent housing. Significantly more affordable outcomes can be delivered in this way than through land use and zoning controls.</p> <p>CHP led affordable housing projects capture government investment value for the whole of life of the asset built by not-for-profit organisations and built only for rent to those on low to moderate incomes, unlike affordable zoning or home purchase subsidies which pass through the development to the developer or purchaser.</p> <p>Housing Choices has experience in partnering and would be happy to share details.</p> <p>While the federal government are addressing the supply of construction funds for affordable housing through HAFF, and the state government will look to leverage its own land and assets, a strong local government land contribution could be a further strategic move aimed at maximising the number of affordable housing outcomes achievable in South Australia through the federal investment.</p>	
<p>Note the focus on adaptive reuse in the housing strategy. While we are broadly supportive, our experience with adaptive reuse of heritage property on Light Square, and in our general portfolio heritage property upgrades come with numerous challenges for the delivery of affordable housing. These projects can be difficult and expensive to execute compared to new build projects. We would welcome participation in any forums and focus group discussions to share learnings from our experiences in this area as you further develop an approach to adaptive reuse across the city.</p>	<p>Noted broadly supportive of adaptive reuse.</p> <p>The opportunity to share experience is noted.</p>
<p>The value of placemaking strategies cannot be overemphasised in any housing strategy. It is not bricks and mortar that make good places to live, but the experience of the overall place and its connection to community life.</p>	<p>City of Adelaide has a major role to play in making the city a more desirable place to live. Council is developing an Economic Development Strategy which includes a focus on the Central Living District with targets to improve city liveability and desirability.</p>

<p>We would encourage utilisation of any levers available to drive development that is designed to create neighbourhoods essential to overall wellbeing and liveability in the City of Adelaide.</p> <p>We would further encourage Council to consider strategic public investment into the spaces adjacent major residential development to support communal activity, ie. green spaces and street furniture at street level for people to interact and gather outside of their individual homes, playground areas, street sculpture and co-located community facilities. One area that we have a particular interest, and footprint in, is the Light Square precinct.</p> <p>In recent years the Light Square precinct has experienced significant residential development on and close to the Square. As a result, Light Square and the associated western Light Square street frontage warrants a focus as a discreet inner-city village. We would welcome and actively participate in Council supporting placemaking initiatives in growing residential hubs such as this.</p>	<p>The Housing Strategy recognises that Council will facilitate improved public realm and social infrastructure through funding mechanisms that facilitate and align with broader master plans, amenity upgrades and programmed infrastructure improvements.</p> <p>Council approved development of a Master Plan for Light Square in the 2023/24 annual business plan and budget.</p>
<b>SA Housing Authority and Department for Human Services</b>	
<p>In understanding and addressing housing security, we encourage the City of Adelaide to also consider responses that enable affordable and accessible housing for:</p> <ul style="list-style-type: none"> <li>- Aboriginal and Torres Strait Islander people.</li> <li>- Older women (aged 55 and over).</li> <li>- People with disability.</li> <li>- People experiencing mental health.</li> <li>- People exiting care or institution.</li> <li>- Young people.</li> </ul>	<p>Recent advocacy by City of Adelaide to State and Federal parliamentary housing inquiries has highlighted the vulnerability of these key groups of people in accessing affordable, secure and appropriate housing and the need for greater action by all levels of government. A new section is included in Goal 1 to strengthen the focus in the Housing Strategy:</p> <p>The City of Adelaide also recognises people will experience the worsening housing affordability challenges in different ways. The City of Adelaide is committed to working with the State Government and other partners to better understand these and address the challenge faced due to inequalities in our current housing system. This will include a focus on, Aboriginal and Torres Strait Islander people, older women (aged 55 and over), people with disability, people</p>

	<p>experiencing mental health, people exiting care or institution and young people.</p> <p>Attracting investment to deliver a diversity of housing that is affordable, accessible and sustainable is a key target of the Housing Strategy.</p> <p>Goal 1 – Housing For All now includes the following:</p> <p><i>Accessible Housing:</i> new dwellings adhere to the National Construction Code 2022 Livable Housing Design Standard without exemptions or concessions.</p> <p>The City of Adelaide will work with stakeholders to improve access and affordability of student housing in the city.</p>
Recommendation 1: Strengthen alignment and make explicit the relationship between the City of Adelaide's draft Homelessness and Housing Strategies.	<p>Section added to the Introduction:</p> <p><i>This Strategy responds to provision of long-term housing. City of Adelaide's Strategy to end homelessness is outlined in our Homelessness Strategy "Everyone's Business". The Homelessness Strategy has a focus on prevention and early intervention to divert people from entering homelessness while continuing to support efforts by government and non-government organisations to provide support and services to people to gain and sustain long term housing.</i></p>
Recommendation 2: Promote Council's role in enabling the State Government's 15 per cent Affordable Housing Policy.	<p>Goal 1 – <i>Levers of Change</i> has been amended to clarify that Council will continue to advocate for a stronger Mandatory Inclusionary Zoning policy (including a definition of affordable rental housing).</p>
Recommendation 3: Explore how Local Government can address social inequities that may exist within the goal area "housing for all."	<p>The City of Adelaide will continue to do this in its broader work in the community in addition to strengthening statements in the Housing Strategy including an addition to Goal 1:</p> <p><i>The City of Adelaide also recognises people will experience the worsening housing affordability challenges in different ways. The City of Adelaide is committed to working with the State Government and</i></p>



	<i>other partners to better understand these and address the challenge faced due to inequalities in our current housing system. This will include a focus on, Aboriginal and Torres Strait Islander people, older women (aged 55 and over), people with disability, people experiencing mental health, people exiting care or institution and young people.</i>
Recommendation 4: Clarify terms, definitions and targets.	Clarifications made and new definitions included.
Recommendation 5: Explore Council's role to facilitate connection to applicable grants or subsidies to support energy efficient practices.	<p>Council will also continue to advocate to the State and Federal Governments for financial incentives and initiatives which result in more affordable housing in the private rental market, including opportunities available through the Housing Australia Future Fund.</p> <p>Council continues to monitor the suitability and relevance of its incentive schemes.</p>

<b>Australian Gas Infrastructure Group (AGIG)</b>	
<p>AGIG are committed to decarbonisation and are leading the transition from natural gas to renewable gases, such as hydrogen and biomethane.</p> <p>AGIG have invested, in partnership with the State Government, in Hydrogen Park South Australia at Tonsley Innovation District.</p> <p>Gas network systems are resilient to severe weather and supports and complements the electricity system during times of peak demand.</p> <p>Reducing customer choice and limited energy supply options may exacerbate housing affordability and cost of living issues.</p> <p>A renewable gas future provides a decarbonisation pathway for the existing natural gas network.</p>	<p>City of Adelaide acknowledges the commitment of AGIG to decarbonisation and renewable gas and the work being undertaken in partnership with the State Government.</p>
<p>Recommend that the City of Adelaide advocate for the delivery of a renewable gas future rather than reducing options for customers.</p>	<p>City of Adelaide is committed to decarbonisation and will consider current and emerging technologies to support the transition to net zero. Electrification is a key strategy in Council's draft Integrated Climate Strategy to be released for consultation in February 2024.</p>
<b>Individual email submission</b>	
<p>Offer of support and expertise to Council based on experience in real estate sector and business community connections in the City.</p>	<p>Noted</p>
<p>Identified the Never too Small movement as an approach to design for small spaces to bring people back to living in the city.</p>	<p>Noted</p>

Individual email submission	
More housing should be included in the Homeseeker program and should have a requirement to be owner occupied for a minimum of 3 years.	Goal 1 – <i>Levers of Change</i> has been amended to clarify that Council will continue to advocate for Mandatory Inclusionary Zoning (including a definition of affordable rental housing).
Rent to buy schemes should be implemented as another way to enter the property market.	Rent to buy and other alternative tenure and opportunities will be considered through implementation of the Housing Strategy.
Sustainable elements such as vertical or rooftop gardens should be included.	Sustainability requirements such as urban greening through green roofs and vertical gardens are included as requirements for City of Adelaide facilitated or developed housing projects.
Important for the homeless to have access to facilities in the city to gain access to housing.	Noted. Council's Homelessness Strategy reinforces City of Adelaide's partnerships with homelessness service providers who connect people with services and housing.
City of Adelaide should pay attention to the area around Whitmore Square, improve maintenance. No shelter for anyone to gather under.	Noted.
We do not need more Airbnbs or overpriced rentals in the city. City of Adelaide should advocate for everyday Australians who need or want to buy a home.	CoA is investigating options to reduce the impacts of short-term rental accommodation on housing supply. This is being addressed through a draft Economic Development Strategy.
Individual email submission	
Gawler Place Chambers is a beautiful historic building. which is overdue for a bit of TLC. it would be nice to see that building turned into accommodation to get people off the streets. what I mean by accommodation is rooming/ lodging house. there is a five story building sitting going to waste.	Acknowledge suggestion for possible adaptive reuse in the city.

Individual email submission	
There are many opportunities to with hundreds of older City of Adelaide B, C, D grade buildings with the highest vacancy levels in the City of Adelaide's history.	<p>City of Adelaide will research the development of a program to target long-term (2-5+ years) vacant properties and land without current development applications with the aim of stimulating development. This will begin with any site which could leverage opportunities for affordable housing and adaptive reuse.</p> <p>The City of Adelaide, in conjunction with the State Government, through the Capital City Committee has committed to explore and progress adaptive reuse outcomes. The target of 50 dwellings annually relies on both tiers of government working to understand and address any barriers.</p>
Individual submission	
Concern that an aggregated land tax for people with multiple properties has negative impact for private rentals. It means that people who own multiple properties can't compete with those who own one, causing sale of property that would otherwise be rented, and pushing up rentals, forcing more vulnerable people onto the streets.	<p>Noted</p> <p>City of Adelaide will continue to advocate for State and Federal Governments to consider financial and tax policy to improve housing affordability outcomes.</p>

**Table 3 Verbatim YourSay submissions on Draft Housing Strategy 2023**

**Question 1: Do you have any comments on the Draft Housing Strategy?**

No	Submission
1	I support it, but believe it could be more ambitious with the targets
2	ACC should look for opportunities to build more housing in Adelaide. Maybe some of the car parks you own should be knocked down and housing could be built in their place
3	I am highly supportive of the Strategy, and it is good to see Council be proactive.
4	There shouldn't be a compromise on the seven sustainability standards - all seven of the Sustainability Standards should apply for residential development projects.
5	Yes
6	Really appreciate this forward looking strategy. I would love to see larger (3 bedroom) dwellings targeted in these plans, particularly to increase the supply of affordable housing for families.  There are a lot of surface-level parking lots in the city. It would be a much better use to convert these to housing.
7	The strategy should be showing where the residential areas of subsequent change, incremental change and minimal change will be within the LGA. The Housing Strategy needs to outline where extra dwellings will be built to help support the population growth in the LGA to 50,000 by 2036. Rather than just talk about targets, plan for where the infill will go.  The housing strategy also does not go into any detail about different housing typologies or even what apartment standards ACC will be advocating for. Please turn this into a proper housing strategy, that is related to planning, not just a series of targets
8	Great to see a strategy across all areas of housing. The targets could be increased, but are a step in the right direction.
9	I would like to be involved in this strategy as I am a property manager that has some insight and can provides some advice and consultation

10	It is important for the dignity and standing of the City to show and act as a socially responsive place. A while back, I was shocked to meet a former school principal now deeply alcoholic and sleeping in the parklands. We can do better.
11	More social housing is needed to help the most vulnerable, for whom "affordable" housing is completely out of reach. Even those with jobs are falling into homelessness. Rent needs to be means tested.
12	I would like to see more affordable housing within the city: to rent or to buy, with more accommodation that can be included in the HomeSeeker plan. I think that there should be little or no properties that investors should be able to touch as we do not need the housing crisis to get worse. If ACC can deliver on this with the backing of the state government, it will make our city centre more vibrant and most of all, help to alleviate the housing crisis
13	Why were Housing SA properties sold? Were they ever replaced? The community has grown, especially with the migrant population, many of whom require assisted housing. What planning has been done for the increased population? Many people state that they have been waiting for public housing for >20 years, we have not kept up.
14	More affordable rent intertwined with owner occupiers. I would rather pay half my income than live in social housing. I am not a snob...I just wish to live out my final years in peace.
15	Congratulations on this important policy re-shaping that will help enormously, but I would argue for an even greater commitment, co-ordinated with the SA government, and championing design and ESD with a low, or a no, carbon development if any real progress is to be made.
16	We should be more critical of our future. The document says without building so many houses, we are "stymieing our ability to increase our population", as if this is a bad thing. Instead of building more and more housing, how about we find our ideal population number? A number where we can achieve a variety of living styles. And with this, establish programs to help people migrate in as needed, and help people move out if they prefer, without adding housing stress. Our beaches are feeling more crowded, our nature walks are feeling less serene, hills are being covered up with tall towers of people stacked on top of each other, and we're losing private affordable single story dwellings. We are losing a lot, by adding more people.
17	The Adelaide City Council housing strategy is excellent, however it does not reference the two sub cultures that exist and are quite distinctly different . Adelaide City and North Adelaide have their own characteristics, social dynamics and demographics. 65 years or older are more highly represented in North Adelaide, compared to the median age in SA and Australia (2021, Census ABS). The report

	could perhaps also include: - Identification of older people as part of the vulnerable population. - housing spectrum identifying retirement living and aged care as an alternative housing option.
18	Something needs to be done trying to survive and pay such high rent is ridiculous. Not to mention not being able to secure a rental property due to the shortage. Homelessness is becoming more common and as I walk around Adelaide and see people doing it so tough it reminds me of my time in America seeing elderly people homeless and dying in the streets and no help or support.
19	The Draft Housing Strategy is ambitious and community conscious but lacks any mention of, relevant statistics or plan on how to manage the real effects on housing accessibility caused by a deregulated Short Stay/Rental Accommodation market. Is it safe to assume ACC doesn't have any? 'If Adelaide wants to be one of the world's most liveable cities'...by...'reinforcing the unique identity of local neighbourhoods', it must study and learn from other great cities such as Barcelona, New York and Paris if it is serious about 'avoid(ing) unintended consequences for the housing market' because of lack of foresight. It can be assumed Adelaide's increased housing stock will be dominated by apartments. What is the point of statements like 'Our Target: Reduce Rental Stress, reduce rental pressures by increasing supply and unlocking properties for long-term tenants.' if deregulated Short Rental Accommodation is allowed to continue unchecked?
20	Housing priority should be to increase housing ACCESS, not necessarily supply. The growth target of 50,000 residents by 2036 (p.8) should be challenged, especially due to changed Federal Govt immigration policies. This target is also based upon the equivalent of 36 x 36-storey new apartment buildings, the embodied carbon of which would adversely impact the city's climate mitigations aspirations. Arguably, tall apartment buildings are NOT a suitable solution for affordable and social housing, and can be highly isolating for occupants/tenants. Preference should also be given to long term rental not sale, and for public housing. I can see little in the documents about the need for public housing or community housing options, as housing is a human right. I am concerned about Code Amendments, especially Review of building height limits. This again affirms the intent of City Shaping Group to pursue a huge increase in apartment towers, with which I STRONGLY disagree. Sustainability continues to be misunderstood. While it is acknowledged that adaptive reuse can reduce the embodied carbon in the construction of new buildings, the target of 50 dwellings per year will be far outweighed by the very high number of new dwellings. Adaptive reuse of Shop-top dwellings is unlikely to deliver as many dwellings as would adaptation of vacant and under-utilised office towers, which could include mixed use facilities - much like U City but within existing fabric, not new. It is misleading to claim U City is South Australia's first carbon neutral building due to the high amount of embodied carbon generated by its construction. It is disappointing that 'sufficiency' is not mentioned in the strategy, Circular economy is unlikely to be effective unless accompanied by sufficiency. Overall, the strategy could be enhanced by viewing affordable housing in the wider housing system context of services for living, including recreation, health, food, social services, child care etc in close proximity. I acknowledge though community facilities are mentioned. I am concerned at the undue influence of AEDA as a delivery mechanism, as their usual 'city shaping approach' is developer oriented and based on build more and bigger.

21	Support the ideals and values of it
22	Adelaide has many empty houses or single level of houses which have been used properly. For sustainability purposes, the empty house or unused property should be used before building more properties
23	Once policy is approved ensure that it is implemented properly.
24	The short-term Accommodation Association Australia (STAAA) has concerns regarding the City of Adelaide target to Reduce Rental Stress, reduce rental pressures by increasing supply and unlocking properties for long-term tenant and your Housing Priority to increase housing supply to make it easier for people to find housing and help grow the number of people who call the city home. It is unclear at this stage if any provisos regarding short-term rental accommodation (STRA) will be including in the City Plan - Adelaide 2036 as the draft is not yet available. We also have concerns regarding the lack of a Privacy legislation currently in SA.
25	I run and airbnb in the city with my retired mother. She has been on the public housing waiting list for over 10 years and is still waiting. My husband and I purchased the apartment with the intention for my mum living it, which she will hopefully one day, when we can afford to do so. Having an airbnb has not only been very personally rewarding for both of us it's also given us all a great sense of pride in the city we live in. I also value the fact that the revenue from this goes to our family, and not to large international hotel chains. It's also very obvious to me that there are huge numbers of vacant commercial buildings in the city, that if converted in to appropriate housing could be an incredible way to provide more housing both public and private rental.
26	In short, we (the community) need more development land to be released, we need the ability to go and go out, we need shorter DA determination times, we need less red tape and cost to ensure speed and ultimately less cost to the end user (buyer, customer) who always ultimately pays for the increased red tape

#### **Response to Question 1 submissions**

Note the general overall support for the Housing Strategy.

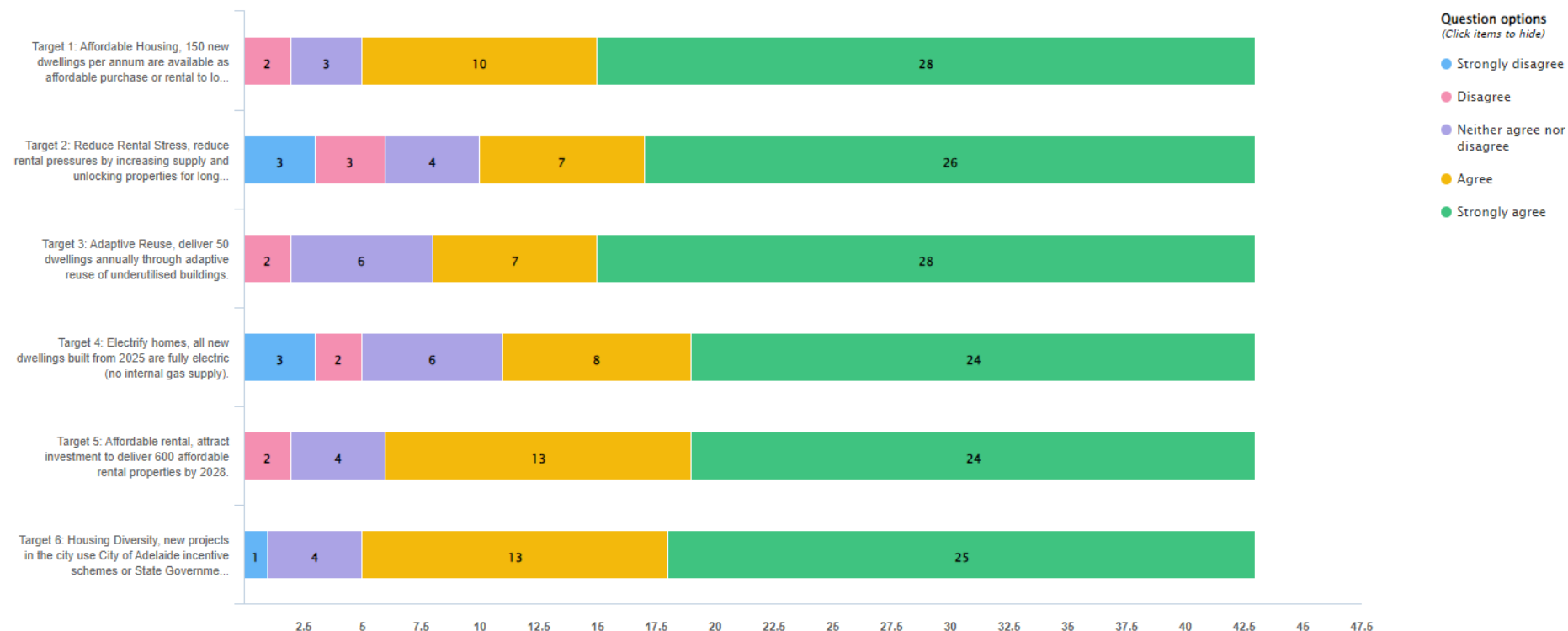
Determining where housing growth occurs will be undertaken through the development of City Plan in the first half of 2024.

Council will continue to advocate for more social and community housing within the city.



## Question 2 We have identified 6 Targets in the Draft Strategy. To what extent do you support each Target?

The following table identifies the number of responses to this question.



### Response to Question 2 submissions

Note the extent of support for the targets generally.  
Note where there is disagreement with the targets.

In response to submissions received the targets have been amended to merge Targets 1 and 5 and add a new Target to ensure accessible housing is developed in the city.

**Question 3** Do you have any additional comments to make on any of the targets?

No	Submission
1	All new dwellings should be fully electric sooner, and 150 new dwellings per annum is a fairly low target.
2	Some of them seem a bit low.
3	Increase adaptive reuses. Increase taxes on vacant properties to provide incentive to develop, sell or rent.
4	The more ambitious, the better! Density should increase close to tram stops (current and future) and key bus routes.
5	revisit the planning laws to give ACC more control over the nature and scope of new developments so that you can achieve your aims.
6	Target needs to be much higher for low income earners and homeless.
7	Instead of creating 'affordable rentals' it would be better if state and local government could come together to create more social housing. 6.4% social housing is absolutely dismal when there are so many people homeless. It is concerning that homeless people are being displaced to further out of the city instead of being homed.
8	The numbers of new dwellings in each category seems quite low. Could it be increased?
9	Adaptive reuse is great - there are so many empty buildings on north terrace for example that are in an excellent location for housing, particularly affordable housing.  Improving cycling infrastructure will help the city grow without increasing traffic.
10	Cannot address increased urban living without increased infrastructure for transport education health water sewage and electricity but no mention of infrastructure here. Why not? Free public transport for CBD residents within square mile and North Adelaide would help

11	I strongly support the repurposing of unused office buildings into housing, where possible, rather than the continual demolition and rebuilding that seems to be occurring. The city seems to be a continual building site, which is not easy to live within. There are so many unused or under-utilised buildings that could provide accommodation for those in need. At the same time, I strongly support diversity in housing within the city, including accommodation suited to families. At present residents seem to be mostly international students, young adults and much older (retired) people.
12	Please relate them back to the Planning and Design code, make this a strategic planning document
13	No
14	It would be great to see a target for transforming on-grade car parking to housing.
15	Great ideas, homelessness is a blight on our society and should not exist in our wealthy country. I understand that it is a complex issue with some homeless people preferring that lifestyle while domestic violence, drugs and alcohol and mental health issues are often contributing factors.
16	There are so many disused building in the city and I would I would like to help in finding ways to adapt these in to affordable sustainable housing
17	Conventional housing has had its day. Be courageous for the future.
18	Help change regulations to allow small homes and tiny homes on land without existing dwellings on them across the state. Thank you.
19	Again, the dwellings should not be in the hands of investors. Air BnB within the city centre should be confined - our new travel accommodation should be sufficient and it will allow for new ones to be built if necessary. The western corner of the Central Ward where the Salvation Army is the most problematic. ACC should work with the Salvation Army to build shelter for the homeless.
20	Restrict short-term rentals (Air B'n'B) to no more than 10 rentals per year and maximum of 3 months total duration) to increase supply for long term renters.
21	No

22	Targets are not big enough
23	I would multiply all targets by a factor of at least 5 or ideally, 10.
24	See original comment; we should be more critical of our future. The document says without building so many houses, we are "stymieing our ability to increase our population", as if this is a bad thing. Instead of building more and more housing, how about we find our ideal population number? A number where we can achieve a variety of living styles. And with this, establish programs to help people migrate in as needed, and help people move out if they prefer, without adding housing stress. Our beaches are feeling more crowded, our nature walks are feeling less serene, hills are being covered up with tall towers of people stacked on top of each other, and we're losing private affordable single story dwellings. We are losing a lot, by adding more people.
25	No
26	2028 is too long 600 affordable rental properties by 2028 is nowhere near enough to make a major change or even a minor change. By 2028 there will be so many people on the streets it will be ridiculous.
27	No
28	Target 1. Why should dwellings be new? They should just be affordable and of habitable standard. Renovated existing dwellings are likely to be more affordable Target 3. Delivering only 50 dwellings annually via adaptive reuse is far too low and unambitious, compared with the high target for new dwellings. Shop top housing, while supported by Lord Mayor, will not enable access to a sufficiently a high number of dwellings. Much more can be achieved by adaptive use of the vast tracts of large office space.
29	Particularly like the reuse, deliver 50 dwellings annually through adaptive reuse of underutilised buildings
30	Many researchers believe that the shortage of housing is not coming from sharing economic activity such as a short-term housing. A property to build it takes a long time as well as a building. Building a property is not faster as a migration who just buys a flight ticket and then next 12- 24 hours to arrive in a new place. Sharing economic activity has been in our history many many years ago, due to the technology of the internet , sharing economic becomes a real business in the world .
31	On Target 2, I think the council should not be interfering on how we use our own property by restricting whether we have a ling term or short-term tenants. It's not council competency. The council should invest in building affordable new homes and within these new

	developments set it clear from the beginning that they are for proprietors living or long term only. That is clear from the beginning for any people buying for investment.
32	In adaptation of current buildings and new builds include the latest technology to be energy efficient eg I have been hearing about the success of voltaic cells being incorporated into windows for some years but have not heard of it being used locally. Developers argue that if they include sustainability strategies the housing will be more expensive and that needs to be challenged and solved. How much profit should any enterprise be able to make? Focus needs to be on ensuring liveability for everyone - not the few.
33	It is unclear at this stage if any provisos regarding short-term rental accommodation (STRA) will be including in the City Plan - Adelaide 2036 as the draft is not yet available.

### Response to Question 3 submissions

Note that whilst the targets are generally supported, there is support for going further with the targets.

In response to submissions received the targets have been amended to merge Targets 1 and 5 and add a new Target to ensure accessible housing is developed in the city.

The Housing Strategy is one of the tools that will inform the development of City Plan in the first half of 2024. This will in turn also inform future Code Amendments to assist in the delivery of the Housing Strategy targets.

**Question 4** A key role for Council is advocacy, how can Council best advocate for the outcomes sought in the Strategy?

No	Submission
1	Through the use of planning approval
2	Get residents and businesses involved in lobbying state government.
3	Council can best advocate by engaging with State and Federal MPs. South Australia tends to get a shrinking 'slice' of the 'GST pie', despite increasing costs associated with construction, procurement, tendering and costs in general.
4	refer answer above no 3 (Q 3 answer – ‘revisit the planning laws to give ACC more control over the nature and scope of new developments so that you can achieve your aims’).
5	Work closely with community housing providers and homelessness services
6	Through advocating to and working with state government to secure more public housing in the city. Also through identifying land that would be good for these sort of developments.
7	Working in collaboration with the state government and not for profit sectors, as well as private developers.
8	Have discussions with PLUS, talk to more councils to get them to support the advocacy or commission work that shows why that advocacy needs to be done
9	Get on with it.
10	Advocate for the lifestyle of living in the city to counter the assumption that people should “drive until they can afford housing”

11	Apart from additional funds from the Federal and State Governments, I would like to see participation from large corporations and the real estate industry as a Co-op and administered by a board involving stakeholders.
12	To deliver this strategy to attract stakeholders, investors, and philanthropists to redeveloped these disused buildings into affordable housing.
13	Keep developing stories about the people to be helped. Hutt Street Centre is good at that.
14	To advocate for people and residents as opposed to businesses. I understand that business within the city is important but we have a housing crisis where young people cannot afford to buy a home or rent. The ACC should and most advocate on the behalf of those who are in the lower-middle income.
15	By promoting affordable housing options with developers.
16	If Council agrees to the increased population, planning must be done to accommodate those needing public housing.
17	To get Federal and private investment in decent rental properties in quiet environments. The city is not necessarily noisy.
18	By entering into an enforceable and public strategic partnership with the SA government, (or by borrowing money and forging ahead with it all on your own) if the SA government isn't interested in such far-reaching targets and being held to account for them. Design and building take a long time to come to fruition. The earliest finished handover time from now is 2 years with everything going right is Jan 2026, so there is no time to waste!
19	Have a survey online about what people would like. High-story buildings everywhere to add in as many people as possible. Or a balanced variety of lifestyles and dwellings, where we hover around a "key" population number. Keep our city feeling unique and vibrant in the lifestyles we can offer.
20	We would be interested in creating a strong relationship with council as we development our Masterplan to ensure we can create a world leading ageing and wellbeing precinct that integrates new models of housing, care and services. Open, honest and informal dialogue, will add valuable insight and the support of council is important.



21	Get places like what used to be the housing trust involved. There are so many housing trust properties that are left empty for long periods of time and yet people are living on the streets. It's absurd.
22	I agree Council should advocate for mechanisms to support delivery of improved public realm and critical infrastructure, including essential services for communities. Council should advocate for federal and state tax credits and the like to 'incentivize' adaptive reuse, as well as rate reductions, and identify potential sites and opportunities. In addition, work with state Government and university researchers to overcome legislative barriers to adaptive reuse. I led a submission to Chair, State Planning Commission, on this matter in December 2023, which I understand has been shared with Council.
23	Targeting audience like this and advocating for low income and socially disadvantaged - lobby in the street with info more available
24	The role of Council is to balance the needs from people.
25	Lead by example and accept that we are transitioning to living within our finite resources and uncertainties as to extreme weather events and their impacts, not just locally but within Australia and worldwide.
26	If the Council are to consider any aspects of STRA properties than it is advised to consult with STRA key stakeholders with STAAA being a key stake holder in which we would like the opportunity to have discussions with the City of Adelaide.

#### **Response to Question 4 submissions**

Suggestions for how Council can achieve the most benefit as an advocate are appreciated and will be used to inform Council's advocacy work.

**Question 5** The City of Adelaide is proposing that housing developments that Council delivers or facilitates will be required to meet a minimum of six out of seven sustainability standards. Do you agree with our proposal?

No	Submission
1	Strongly agree.
2	Yes - please continue to push sustainability standards.
3	Yes strongly.
4	I strongly agree. This will help identify existing buildings that are worth retrofitting.
5	do not make it too hard
6	No, see comment above - all seven should apply. It should be minimum 8 star NatHERS rating - this is easy to achieve with good design and saves the occupant money on heating and cooling.
7	Yes, energy efficiency is important for low income households.
8	Yes
9	Yes
10	I'm all for having strong sustainability goals. I hope private developers will be held to the standards too
11	Yes, but I'd prefer they meet all 7. Additionally, reducing or eliminating minimum parking requirements city-wide would be a fantastic step to encourage people who live in the city to go car-free, use active and public transit, and car share when needed. Electric car

	<p>share services should be in areas with reduced car space requirements.</p> <p>Urban greening requirements should be increased. The provision of green space to be required at the ground level as well, through additional street tree plantings, or through the use of courtyard-style housing with communal gardens for the residents. It would be wonderful if people didn't need to leave the city if they are planning families, and these designs allow for children to play safely off the street.</p> <p>Designs should also include elements that help manage flooding, including through rain gardens, and permeable surfaces.</p>
12	No but 5 ok
13	Yes.
14	Yes
15	Yes, as long as its tied back to the Planning and Design code, so they are enforceable through stat planning
16	Yes
17	Yes, but only where this is not at the cost of great public realm outcomes.
18	Yes
19	Yes, however I do think they should be aiming for all seven
20	Yes, that is the future. Good architecture can achieve that. Avoid fripperies. See Nightingale.
21	Yes
22	Yes
23	Yes

24	I guess
25	Yes, essential
26	It's always good to be sustainable.
27	I am supportive of this, however the cost of build will be on estimate 24% higher and needs to be weighted up with (depending on the type of proposed housing development) with the additional goals of creating affordable housing and increasing housing stock.
28	That's a great concept but at the moment people Need homes to get off the street.
29	Yes
30	Emission reduction is supported, including built with lower upfront emissions. This can be achieved not only via design and material use considerations, but also by building less floor area. Metrics for embodied carbon is certainly missing and required urgently. Climate change mitigation by reducing upfront embodied carbon associated with new construction should be required. Highly efficient should be accompanied by 'SUFFICIENT'. This includes shared spaces that support sustainability outcomes, as is mentioned. It also includes per capita floor area standards, which are missing from the strategy. Constraints on built floor area per person will also greatly reduce emissions.
31	Yes
32	Yes agree
33	I don't agree with restricting gas usage.
34	Wish it was seven out of seven
35	Yes

**Response to Question 5 submissions**

Note majority support for this approach, and support for higher standards to be sought.

Acknowledge that there is some disagreement with the number of measures to be met.

In response to submissions received it is proposed to add the requirement for developments to meet the Livable Housing Design Voluntary Standard – Beyond Minimum Standard 2022.

To ensure that Council's requirements continue to meet best practice NatHERs rating (currently 7 stars) the Strategy has been amended to include an annual review of this standard.

**Question 6** Do you have any additional relevant information, research or policy suggestions for Council to consider prior to finalising the Housing Strategy?

No	Submission
1	Use of transport is key in making living more affordable and sustainable. Important steps include making the streets around housing safer for bicycles and pedestrians, improving public transport links, and encouraging small local businesses to reduce car trips.
2	Consideration to lower off street parking requirements for developments to allow innovation. Combined with promotion of car sharing (Council supported zones) and parking space availability within existing off street parking infrastructure.
3	Council should push for an abolition of carparking minimums. In 2019, the city of Helsinki literally ended homelessness by giving a home to anyone who needed one, unconditionally: <a href="https://www.theguardian.com/cities/2019/jun/03/its-a-miracle-helsinkis-radical-solution-to-homelessness">https://www.theguardian.com/cities/2019/jun/03/its-a-miracle-helsinkis-radical-solution-to-homelessness</a>
4	avoid great big high towers bought by rich investors many of whom have no connection with our community.
5	<p>Ban airbnbs in the City of Adelaide. They are contributing to housing unaffordability.</p> <p>Medium/ high density housing must be accompanied by green space and public transport otherwise it is extremely undesirable. Many Australians have only ever seen shoebox, low quality apartments with no courtyard or green space. If the council wants to convince the public to get on board with high/medium density housing they need to prove to locals that these places are spacious and still have access to green space. The current apartments being built are low quality and there is no trust between potential buyers and builders/ property developers. Myself and many of my peers want to buy a house but do not trust property developers as new builds that we have seen are extremely low quality. Buyers need a guarantee that developers will be held accountable for any low quality builds.</p> <p>Currently housing is simply not affordable for the average person. This is made worse by first home buyers being required to pay stamp duty in South Australia for both new and old properties. When new housing is built- first home buyers should get priority over investors.</p>

6	UNFCCC report "sustainable low-emission housing and building solutions" <a href="https://unfccc.int/sites/default/files/resource/Technical_Paper_2020-Low_Emission_Report.pdf">https://unfccc.int/sites/default/files/resource/Technical_Paper_2020-Low_Emission_Report.pdf</a> Lots of good research being done in Spain for the future of cities, and reducing urban heat island effects.
7	No
8	Encourage more medium rise buildings through the city and North Adelaide.
9	Yes, The strategy should be showing where the residential areas of subsequent change, incremental change and minimal change will be within the LGA. The Housing Strategy needs to outline where extra dwellings will be built to help support the population growth in the LGA to 50,000 by 2036. Rather than just talk about targets, plan for where the infill will go.
10	Get the owners and developers on board.
11	There is not yet a section on integration with other policies - it would be good to make explicit links to greening strategy / urban heat island reduction, transport strategy / public transport improvement etc.
12	Pressure on the Federal Govt to provide Negative Gearing and reduced CGT for investors on their first investment property only, with subsequent properties denied those tax advantages. The capital saved could then be allocated to States for public housing.
13	No but am happy to do the work to offer more once I know more
14	Resist demand for parking. At one recent city tower show, I heard a prospective buyer ask for space for a boat as well as his big car.
15	ACC should as part of their Housing Strategy find a solution to the homeless and our indigenous people who hang around Whitmore Square to make the area safer and less derelict. I have suggested a pavilion be built in the middle of Whitmore Sq with security cameras so that the homeless have shelter when it rains or for the Christian group to hold their sessions there. If not, some other solution should be found so that they don't make use of any sheltered parts of private property and in turn cause a lot of disturbances

	to residents. It has been shown that when people have a place to call home, they have more agency and more dignity. There is a higher chance for them to turn their lives around.
16	Foster mix demographic developments that combine affordable, middle and lux options in a single apartment complex.
17	No
18	Just think about people not numbers
19	It is so important to embrace design-lead thinking and 'left-field' ideas for this. Can I suggest that certain blocks of the city are concept designed, both existing buildings renovated, adapted and air-rights developed and vacant land developed, but within a lower scale human-oriented personal scale e.g. 5/6 storey Paris, incl. rooftop housing, or courtyard style super blocks, a la Barcelona.
20	Please consider how people feel when they're living in crowded conditions.
21	Property Council of Australia's Retirement Living - Better housing for better health (Nov 2023) paper is worth reading and referencing and discusses the key elements of the Adelaide City Housing Strategy from an ageing -friendly lens.
22	Apart from overseas cities that have addressed the devastation caused by STR's, I urge ACC research the Victorian town of Pt Fairy and the consequences they now face because of deregulation in the holiday rental market. Close to 50% of housing stock is unavailable for long term rental - they are totally committed to STR. In the off season, it is a ghost town. Businesses can not find workers because they, in turn, can't find affordable housing meaning that during peak times shops, restaurants and pubs sometimes have to operate with restricted hours. So much for unique bustling neighbourhoods filled with local workers. The same will eventually happen in Adelaide if this is not addressed NOW! ACC must be proactive before anything like this happens in our city. 1) It must only allow what can be termed 'Tradition B&B' where occupiers could rent out spare rooms - not the entire dwelling. 2) Those that qualify must be registered with ACC and pay a levy of some sort for operating their BUSINESS which inevitably uses the city's facilities. 3) ACC needs to limit the number of conforming occupiers within apartment buildings and monitor these on a regular basis. 4) ACC needs to demand any future HOTEL developments include accommodations more suitable to the STR market instead of just the 'high end' of the market.
23	It is time for Council to consider and implement specific carbon reduction targets, especially for embodied carbon, and policies that enable housing access with far less new construction. Denmark, for example, has a target for steep cuts in emissions from housing construction, including reducing the rate of new construction. Refer <a href="https://reductionroadmap.dk">https://reductionroadmap.dk</a> As indicated previously I am always



	will to provide further advice. Council should be cooperating with university researchers such as myself via an Education/Research partnership to bring to bear latest knowledge, policies and practices.
24	No
25	Please make the city more secure, there are many personal items got stolen.
26	We would refer you to the QLD State Government independent report regarding: A Review of the Impacts of Short-term Rental Accommodation in Queensland <a href="https://planning.statedevelopment.qld.gov.au/data/assets/pdf_file/0020/83333/a-review-of-the-impacts-of-short-term-rental-accommodation-in-queensland.pdf">https://planning.statedevelopment.qld.gov.au/data/assets/pdf_file/0020/83333/a-review-of-the-impacts-of-short-term-rental-accommodation-in-queensland.pdf</a> We also have concerns regarding the lack of a Privacy legislation currently in SA.

#### Response to Question 6 submissions

The City of Adelaide is currently preparing the City Plan, that will be the key spatial planning tool used to identify where additional housing could occur in the City.

The Housing Strategy commits to continuing to advocate for taxation reform to support delivery of housing.

The Housing Strategy also commits to innovation in housing and sustainability by exploring alternative housing product, typologies and delivery models.

City of Adelaide's draft Economic Development Strategy consider implications of short-term rental accommodation on housing and tourism.

**Question 7** We are interested in the range of innovative housing models being developed in Australia and abroad. Do you have any ideas of new models that we could consider for future inclusion in the City of Adelaide?

No	Submission
1	<a href="https://www.nightingalehousing.org/">https://www.nightingalehousing.org/</a>
2	CLT constructed buildings. Energy efficient dwellings with high energy ratings.
3	Build-to-rent is gaining some traction, and I believe a new construction in Bowden will make use of this model.
4	More builds like the 'Troppo' building on Whitmore square, less of the student and other towers that are disproportionate to our built form.
5	Co housing for women 50+
6	Many housing developments in Europe - thinking particularly about the Netherlands - are built around shared open spaces that are child- and family-friendly. It would be nice to see more of this kind of development in Adelaide.
7	Co-op housing should be encouraged (good examples in Netherlands) Bowden development model is great but public transport connections are necessary
8	I understand this is likely out of scope, but the super blocks in Barcelona have been recently further improved. It would be amazing if some of this style of housing and public space could be incorporated here.
9	I'm afraid not. I'm just a resident, not an expert in housing models.
10	Build to Rent models being rolled out in various locations on the eastern coast Or the Future Homes designs in Victoria - ready made architectural designs available from the Department of Planning and Transport

	that assist in speeding up the planning approval stage that come with mandatory standards but still have various items that can be adapted.
11	Build more houses.
12	Nightingale – without the RenewalSA interventions to ruin the project. Would be great to see ACC showing how the model should actually be rolled out by adapting policy to suit the model not the model to suit outdated policies and assumptions.
13	Tonsley Village is providing medium to high density living including apartments and townhouses at affordable prices. The land west of Sir Lewis Cohen Ave would be an ideal location for such a village. The rates received from such a development would allow Council to extend their interest in providing additional public housing.
14	I strongly believe that disused buildings and their space could be transformed into housing, and some of these would have character and can provide beautiful spaces due to older and interesting architecture, that would also add to the beautification and community of Adelaide
15	I have seen successful Donga designs (two unrelated people sharing). Hub of 5 small units with common space and 1 support unit. Etc
16	ACC developed housing cooperatives.
17	Buildings currently unused, could be converted to apartments, if suitable. Facilities, mainly schools, must also be available. How many schools are currently available for primary aged children in this city?
18	More rent and lease for any income with low or no deposit. MAKE RENTERS EQUAL TO OWNERS. Have long-term rentals where renters can change their property. Decorate at their own expense and then will consider where they live as their home. Renters are not scumbags. Look to Europe esp France and Holland where people rent all their lives. I am currently frightened about where I will live after the next 3 years.
19	Reference to historic city-building 'old models', not new, Christopher Alexander et al - A Pattern Language' develops whole parts of cities from a human-centric viewpoint, it provides a wonderful template, that could be overlaid as a test study of part of the City. But its

	critical to agree and deliver on time, rather than knowing everything about it before pushing any buttons. It must involve a search for excellence and not merely be 'risk adverse'. Detailed conceptual architectural design (thinking) is crucial to be commissioned here early to let creative outcomes be searched for and then let lose on the problem. Yields studies require quick test case design strategies based on so many units of such a size, say 75, 100 and 140 sqm units, (all with 25sq, or 50sqm outdoor spaces) being developed on real property footprints. All to building code and with super green credentials.
20	Establishing a "key" population number. Establish programs to help people migrate in, and help people migrate out. Ensure we can still have high-rise in the city, medium in the outskirts, and untouched single-storey in the suburbs. No more propping up 10 townhouses in a random suburb; because the population would be balanced out.
21	Over the past three years, Helping Hand has been working on its strategic property plan. A key project within this is our North Adelaide real estate which comprises approximately 24,000sqm of land with 21 unique allotments combining heritage listed buildings, two aged care residential homes (165 residents) and retirement living. Helping Hand has partnered with Woods Bagot Architects to create a cohesive masterplan. Our vision is to create an integrated community which creates positive human experiences for older South Australians. Over the next five years, Helping Hand is likely to be investing over \$60m into new build and refurbishment within North Adelaide. I wish is to create a community ageing well precinct that supports not just Helping Hand residents, but our broader North Adelaide community. We believe our precinct strategy will support Adelaide City Councils housing strategy by: - Providing suitable accommodation for retirees and older citizens and 'releasing' family style housing back into market. - Providing low or no cost housing for our most vulnerable. Over 21% of residents within our aged care home have their accommodation either fully or partially subsidized. - continue to offer residential accommodation for 165 residents and increase retirement living by approximately 60 townhouses/apartments. - Redesigning of our public spaces (street fronts) to create active community spaces - Create accessible, aged-friendly housing that supports people to remain at home.
22	By having Federal, State and Local Governments work together, I believe Adelaide could lead world's best practice by repurposing an asset that will become available in the near future. The Women's and Children's Hospital current site. Although premium real estate prime for 'luxury' apartments desirable to developers, what about a brave proposal addressing a combination of our current Health and housing issues? 1) Use part of the current facilities for mental health and drug related emergencies. This would alleviate the ramping crisis currently experienced at RAH. Minimal modifications would be required. Beds are already there. Short to medium requirements could be catered for. 2) Consultation and ongoing services would easily be catered for in the already available facilities. 3) Part of the vast complex could be remodelled to service the needs of those experiencing homelessness in our community. Singles, couples and even family quarters are possible. 4) Services for these people would also fit into the complex easily. 5) Part of the complex could easily be transformed into either affordable rental or transitional accommodation, or both. A city that aspires to the claims of ACC and is presented with this opportunity to regenerate and repurpose such a site for the benefit of all, not just developers, would truly become leaders in best practise in responding to the real needs of it's community.

23	Rather than huge apartment towers, 'urban acupuncture' as practiced in parts of UK can be a more effective and innovative housing model, with community inclusiveness and far less carbon and cost. see <a href="https://wecanmake.org/">https://wecanmake.org/</a> Bristol. I can provide more info if required.
24	More use of underutilised buildings....and a percentage of new builds to be for people in need
25	Nil
26	Shared facilities within housing options eg laundry, often present issues. I wonder if there are examples where these type of issues have been successfully addressed over time? Maybe setting up laundrettes as a small local business may work - be they within a highrise building or a few more laundrettes available within an area.

#### **Response to Question 7 submissions**

The Housing Strategy recognises that partnerships and relationships across all tiers of government are critical to addressing the housing crisis.

All suggested models and ideas are welcomed and noted for consideration in the implementation of the Housing Strategy. Further investigations may be required to determine where/how opportunities for innovative design and/or tenure may be implemented based on access to suitable sites/funding/investment options.

The Housing Strategy recognises the role vacant buildings can play in housing with a commitment to adaptive reuse.