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Reference: ACC2025/14160



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xx February 2025

Mr Craig Holden  
Chair  
State Planning Commission  
GPO Box 1815  
Adelaide SA 5000

Via email: [planASubmissions@sa.gov.au](mailto:planASubmissions@sa.gov.au)

Dear Mr Holden

### **Submission to the draft Accommodation Diversity Code Amendment consultation**

Thank you for the opportunity to provide input to the Accommodation Diversity Code Amendment (the Code Amendment) on consultation until 27 February 2025.

On 11 February 2025, Council endorsed the following position on the Code Amendment.

In 2023, Council set its ambition for increased population and greater housing diversity in the City of Adelaide through its Strategic Plan 2024-2028. Council's Housing Strategy - *Investing in our Housing Future* in 2024 reflects Council's desire to increase population and act where the market has failed to provide sufficient affordable housing.

Whilst Council supports the intent of the Code Amendment to enable greater housing diversity and rental supply, it does not support proposed changes that promote housing supply at the cost of liveability and amenity and considers that the proposed policies for co-living and changes to apartment design may result in sub-optimal housing outcomes.

The following elements of the Code Amendment are of particular concern to Council:

- Minimum bedroom dimensions of 2.5m is insufficient and should be increased to 3.0m as per Victoria's Better Apartments Design Standards and Planning NSW's Apartment Design Guide.
- Requirements for the provision of shared toilets and other shared facilities must be increased. One toilet per 10 beds does not provide liveable housing.
- Management of co-living accommodation needs clarification to ensure maintenance, operation and amenity are provided to potential residents.
- The provision of shared open and communal spaces should be aligned with the number of bedrooms/individual residences provided.
- Policies requiring the development of all housing types to a high standard of amenity and designed for flexibility and adaptability are critical in ensuring that the additional housing supply is liveable in the short and longer term.

In addition, the City of Adelaide has previously requested the Amendment adequately address related matters including:

- Urban greening and open space provision
- Universal design and adaptability for future use
- Liveability including functional internal spaces with access to light and ventilation
- Sustainability and design of waste collection systems
- Interface management including building height and design.

The Code Amendment includes limited consideration of some of these matters and not to the extent that Council considers adequately addresses policy gaps for development in the city.

The City of Adelaide is progressing a program of Code Amendments informed by its City Plan and Housing Strategy and will consider addressing broader housing and design policy matters through these amendments, including car parking, waste management and built form interface management such as building height and design.

The City of Adelaide does not support proposed changes that reduce the standard of amenity sought for apartments, group dwellings, co-living and battle axe developments and considers that the proposed policies for co-living and changes to apartment design may result in sub-optimal housing outcomes.

It is recommended that policies be reviewed to ensure that all housing is developed to a reasonable standard of amenity and that co-living and apartment developments are designed for flexibility and adaptability to cater for changing housing needs and preferences.

The City of Adelaide recommends that the Code Amendment include policies to facilitate adaptive reuse of existing non-residential buildings for residential purposes such as apartments and co-living. These policies would contribute a further stream to housing supply and diversity and facilitate the preservation of architectural heritage, reduce commercial vacancies and contribute to sustainability targets.

To support these policies a new Practice Guideline for Adaptive Reuse is recommended. The City of Adelaide has developed guidelines through the Adaptive Reuse City Housing Initiative (ARCHI) for shop-top adaptive reuse that may inform the development of a Practice Guideline on a wider scale. Details are available on the City of Adelaide website [Adaptive Reuse City Housing Initiative | City of Adelaide](#)

Enclosed is a table of technical comments that includes detailed recommended changes to the policies in the Amendment.

The City of Adelaide is progressing a program of Code Amendments informed by its City Plan – *Adelaide 2036* and Council's Housing Strategy – *Investing in our Housing Future* and will consider addressing broader housing and design policy matters through these amendments.

The City of Adelaide encourages ongoing collaboration with the State Planning Commission to facilitate planning policy that promotes a diversity of quality, affordable and accessible housing outcomes in the city.

To that end, I invite you to contact Sarah Gilmour, Associate Director, Park Lands, Policy and Sustainability on 8203 7033 or [s.gilmour@cityofadelaide.com.au](mailto:s.gilmour@cityofadelaide.com.au) to discuss how the City of Adelaide can work with the State Planning Commission and Planning and Land Use Services on housing diversity and affordability.

Yours sincerely

Michael Sedgman  
**Chief Executive Officer**

Enc: Technical Comments Draft Accommodation Diversity Code Amendment



## Enclosure 1 - City of Adelaide - Technical comments on the draft Accommodation Diversity Code Amendment

Topic	Comments	Changes or outcomes recommended
<b>Co-living</b>		
Definition	<p>The definition of co-living could be difficult to interpret, especially as terms like residence, residents and occupants are all used within the policies.</p> <p>For example, the difference between the terms co-living and co-living residences requires clarification.</p> <p>In addition, the definition relies on terms including 'full sized fridge' which are difficult to determine and enforce or control, thereby making a determination on the land use difficult. This is exacerbated when the definition is similar to other residential land uses (but specifically excluded from) such as student accommodation and ancillary accommodation.</p> <p>Co-living <i>accommodation</i> may be easier to understand and align with the student accommodation definition. Within this definition private spaces could be referred to as bedrooms or residences.</p>	<p>Recommend review of the definition and terminology to ensure clarity of both the definition and its application within the policies.</p> <p>Remove subjective requirements such as 'full sized fridge' from being a determining factor in the definition.</p>
Policies	<p>Long term options for this built form must be ensured, therefore flexibility and adaptability are critical to be considered at the design and assessment stage of development.</p> <p>It is recommended that an additional policy be included, similar to PO 41.2 in Design in Urban Areas applying to student accommodation, to ensure flexibility/adaptability for other uses/dwelling types in the future.</p>	Include additional policy in Design/Design in Urban Areas similar to PO41.2 in Design in Urban Areas.
Policies	Removal of 'provide a high standard of amenity for occupants' from PO22.1 in the Design General Policies and PO31.1 in the Design in Urban Areas General Policies is not supported. Given that these policies apply to a wide range of housing types, and co-living relies on shared and communal facilities, it is imperative that liveability and amenity are	Review policies to ensure high standards of amenity and liveability are still required in the assessment of all housing types.

Topic	Comments	Changes or outcomes recommended
	maintained. Replacement with 'layouts are functional and provide for efficient use by occupants' does not seek to aim for the highest level or even a reasonable level of amenity for the wide range of housing types that these policies apply to.	Where accommodation relies on communal or shared spaces and facilities the requirements for these spaces should be of an extremely high quality to mitigate smaller/non self-contained accommodation.
Policies	Support for PO 22.7 in the Design General Policy and PO 31.7 in the Design in Urban Areas General Policy, however it is recommended that the policy is amended to refer to accessible housing designed using universal design principles that meet the National Construction Code – 2022 Liveable Housing Design Standard rather than disability access units.	Revise wording of proposed PO22.7 in the Design General Policies and PO31.7 in the Design in Urban Areas General Policies.
Policies	Car parking provision for co-living housing in high density locations is likely to add significant cost to the development, with relatively little return. Car parking spaces should be 'unbundled' from individual residences to provide choice and flexibility of cost.	It is recommended that car parking requirements are not linked to individual residences to provide options and flexibility for prospective residents.  Consideration should be given to providing other options, including provision of car sharing facilities.
Applicability in the city	It is noted that the co-living policies will apply to most zones in the City of Adelaide (other than the Adelaide Park Lands, City Riverbank and Community Facilities Zone). This aligns with the City of Adelaide's Housing Strategy – <i>Investing in our housing future</i> by facilitating a diversity of housing outcomes across the city.	No changes required, subject to new built form meeting relevant zone requirements in regard to scale, intensity, height and heritage adjacency etc.
<b>Apartment Dwellings</b>		
Apartment room size dimensions rather than minimum apartment size	There is some concern that the change from minimum apartment sizes to minimum habitable room dimensions could result in more onerous and time-consuming assessment processes.	Ensure that the policy approach does not result in a more onerous assessment process.

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	<p>In addition, the City of Adelaide considers that the minimum dimensions and storage requirements should facilitate long term liveable housing standards. As previously advised to Planning and Land Use Services, the proposed minimum of 2.5m for secondary bedrooms is considered too small, a minimum of 3.0m is recommended for all bedrooms as is required in Victoria's Better Apartments Design Standards and Planning NSW's Apartment Design Guide. Given that co-living will be a rental housing outcome, the design standards (including minimum room sizes) should be in accordance with the requirements of the Building Code and Housing Safety Authority (with respect to rooming houses).</p>	<p>It is recommended that the minimum dimension of any bedroom is 3m.</p>
Policies to guide shared facilities and indoor communal spaces for student accommodation	<p>The City of Adelaide supports the addition of PO 41.3 and PO 41.4 in the Design in Urban Areas General Policies to guide the provision of communal indoor recreation space and shared facilities for student accommodation. However, as noted in comments on the draft Practice Guideline, the policy guidance needs to be updated to include students or provide more guidance in the Planning and Design Code.</p>	<p>Provide greater guidance in the Planning and Design Code on how to address these criteria or include reference to student residents or simply refer to residents serviced, in Column B of the draft Practice Guideline.</p>
Opportunities for adaptive reuse	<p>To facilitate adaptive reuse, include additional policy for apartment/co-living design (see suggestion).</p> <p>An Adaptive Reuse Practice Guideline may further assist with the adaptation of non-residential buildings for residential uses. The City of Adelaide Adaptive Reuse City Housing Initiative (ARCHI) has a range of resources that could inform the development of a Practice Guideline</p>	<p>Suggested additional policy:</p> <p><i>Where an existing building envelope is being adapted to accommodate a new residential use, provision of private open space/ communal space may be compensated with high quality living spaces that exceed minimum internal room dimensions and benefit from good access to natural light, ventilation and outlook.</i></p> <p>Recommend an Adaptive Reuse Practice Guideline be prepared to support and facilitate adaptive reuse as a mechanism to support housing diversity and housing supply.</p>

Topic	Comments	Changes or outcomes recommended
Private and Communal open space requirements	<p>The City of Adelaide supports the addition of private and communal open space criteria for student accommodation and co-living based on an amount per bedroom/residence. This requirement should ensure that spaces are proportionally increased based on the number of residents living in these types of accommodation.</p> <p>However, to ensure that these spaces are usable for the residents, minimum dimensions should be prescribed, as currently applies for other housing types.</p>	Include minimum dimensions for private and communal open space for co-living and student accommodation as per dwellings.
<b>Significant Retirement/Aged Care Overlay</b>		
Policies	The increasing need and demand for retirement and supported accommodation facilities is acknowledged and the opportunity to facilitate new and updated housing for these markets is supported.	No changes required.
Policies	The City of Adelaide recommends that opportunities for retirement and supported accommodation also be encouraged in mixed use locations and buildings (ie U City in the CBD), that don't rely on large sites but provide housing choice in locations close to transport and services.	Consider strengthening policies in the Code to encourage retirement and supported accommodation in mixed use zones and within mixed use buildings around transit stops/stations and services where accessibility is rated high to facilitate opportunities to age in place.
Policies and notification	City of Adelaide acknowledge that larger sites enable greater management of interface with adjoining lower density/height development, however there is a missed opportunity to include additional design and interface policy to support developments of this scale and mitigate community concerns, particularly given the limited opportunity for public notification with this approach.	Consider additional policies to guide interface management and building and site design policies to minimise impacts on adjoining property owners.
Policies	PO2.1 provides an opportunity for increased development yield but does not provide any guidance on what is meant by 'off-site impacts'. For	Further detail should be included to ensure consideration of all relevant off-site impacts at assessment.

Topic	Comments	Changes or outcomes recommended
	example, whether this includes traffic, parking, noise, waste management and/or contextual impacts.	
Policies	There is an opportunity to ensure that universal design principles are added to the Code (notwithstanding that these are relevant to all housing types, not just retirement and supported accommodation).	Recommend that policies include a requirement to be designed in accordance with the National Construction Code 2022 Liveable Housing Standard.
Applicability in the City of Adelaide	<p>The Code Amendment proposes to apply the new Overlay across the City Living Zone within the City of Adelaide.</p> <p>The FAQs for the Code Amendment indicate that the Overlay is not proposed to be applied to residential areas that do not anticipate residential infill such as the Established Neighbourhood Zone, however the Amendment Instructions – Amendment to Part 3 – Overlays includes the Established Neighbourhood Zone.</p> <p>Whilst this does not impact the City of Adelaide, it is unclear what the intention is regarding application of the Overlay in residential areas that do not anticipate residential infill. For the City of Adelaide, this may mean that application of the Overlay is unsuitable for the North Adelaide Low Intensity Subzone of the City Living Zone.</p> <p>Whilst there are currently no sites within the City Living Zone that are 1 hectare in area, the definition does allow for more than one site (as per catalyst site definition) so it does not preclude this potentially being applicable.</p>	Clarify the areas to which the Overlay is deemed appropriate to apply, taking into consideration expected intensity of development of the underlying Zone or Subzone.
Interaction with other Overlays – in particular the Historic Area Overlay and Local Heritage Place/State Heritage Place Overlay etc	It is unclear how the proposed Overlay policies apply in areas where Heritage/Historic Area Overlays also apply. Whilst the likelihood of applicability in the City Living Zone is limited given current allotment sizes, as much of the City Living Zone is also within the Historic Area Overlay – enabling 4-6 storey retirement/aged living without notification could be cause for concern.	Further clarification is needed on how the policies in the Overlay would interact with other Overlay policies that may apply, particularly heritage and historic areas.

Topic	Comments	Changes or outcomes recommended
<b>Other/Technical comments</b>		
Consistency of terminology	Further to comments regarding the co-living definition, refine terms used in the policy.	Review use of co-living, co-living residence, co-living occupants etc to ensure consistent approach.
<b>Practice Guideline</b>		
Column B – Policy Guidance	<p>The policy guidance provided refers to co-living and self-contained residents only, however the Planning and Design Code Policy that is referenced also includes shared spaces and facilities for Student Accommodation.</p> <p>Review the policy guidance to ensure that outcomes address all relevant housing options.</p>	Include reference to student residents in Column B or simply refer to residents serviced.
Communal Recreation Spaces and Shared Facilities	Minimum ratios for shared facilities are very low (ie 1 toilet per 10 residents). Whilst it is acknowledged that this aligns with the requirements for the Building Code of Australia (for a rooming house), it could lead to poor outcomes for residents.	Review how the requirements for shared facilities are expressed to ensure that co-living housing provides a reasonable amenity for residents and enables flexibility of design to adapt to alternative uses.