

SUBMISSION TO THE

State Planning Commission: Accommodation Diversity Code Amendment Consultation

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COTA SA welcomes the opportunity to provide a submission to the State Planning Commission's Accommodation Diversity Code Amendment Consultation. As an organisation dedicated to advocating for the rights, interests, and futures of around 700,000 older South Australians, COTA SA supports planning initiatives that promote housing diversity, affordability, and accessibility for older people, including older renters.

Our population is ageing. In June 2020, approximately 16% of Australians were aged 65 and over and this is projected to rise to 21-23% by 2066¹. Our ageing population should be a major trend for housing that supports older people to age in place of choice.

Support for the Code Amendment

COTA SA is generally supportive of planning amendments that facilitate strategic infill, increase housing density, and provide a broader range of housing options. We recognise the pressing need for housing reform to address the current housing crisis and ensure that older South Australians have appropriate, affordable, and accessible living arrangements.

¹ [Older Australians, About - Australian Institute of Health and Welfare](#)

Increased Housing Density and Diversity

We support amendments that achieve strategic infill, promote mixed-use developments and enable housing diversity, providing older people with more options to age in place while remaining within their communities. The inclusion of commercial tenancies within supported living developments is particularly welcomed, as they can facilitate access to essential services such as allied health providers and community spaces.

Support for Increased Height Limits and supported Living Developments

Given the current shortage of aged care beds, particularly in Memory Support Units, we support the provision allowing supported living developments (retirement facilities and residential aged care) to increase in height². While this amendment could encourage aged care providers to expand supply, we are aware this is likely to be only for new builds. We are aware of only one new aged care facility built in the past year in South Australia, with aged care providers telling us that current high costs of land and construction are major barriers. Demand for aged care places is projected to rise sharply, with a shortfall expected to persist without additional policy interventions³.

Areas of Concern and Further Consideration

While we acknowledge the many positive aspects of the amendment, we raise the following concerns for further consideration to ensure equitable outcomes for older South Australians:

Lack of a Land Use Definition for Build to Rent

COTA SA supports the development of Build to Rent (B2R) to improve housing affordability and security for older South Australians. B2R developments offer long-term rental options with security of tenure, which is particularly crucial for older people seeking stable housing.

We are disappointed that Build to Rent (B2R) is not receiving a specific land use definition. Without clear definitions, there is a risk that B2R developments may later be converted into "build to sell" properties, undermining security of tenure for residents. Research from the University of Sydney's City Futures Research Centre has highlighted that without regulatory safeguards, developers have historically leveraged B2R incentives to access benefits before converting units to traditional housing sales⁴. In Queensland, a similar pattern was observed where affordable housing projects transitioned into private rentals after a fixed government incentive period⁵.

² [New data shows aged care shortage while ambo response time improvements lead the nation | Premier of South Australia](#)

³ [Older Australians, Summary - Australian Institute of Health and Welfare](#)

⁴ [LCOM_0000_Build_to_Rent_Report_WEB.pdf](#)

⁵ [QLD Build-to-Rent Tax Incentives | RSM Australia](#)

COTA SA recommends the introduction of a clear land use definition for Build to Rent (B2R) within the Code Amendment. This is essential to ensure B2R developments remain as long-term rental properties and are not converted into "build to sell" schemes, which would undermine security of tenure for renters. We also call for additional strong safeguards outside the planning code to prevent such conversions, ensuring that South Australian renters may benefit from secure, affordable housing options as they age.

Accessibility and Design Concerns

The amendment proposes a minimum bedroom size of 3m x 3m, which poses significant accessibility challenges. In practical terms, this space would not allow sufficient clearance for a walker or wheelchair around a queen-sized bed, potentially preventing residents from ageing in place. According to the Monash University *Design Guide for Older Women's Housing*, minimum room dimensions should consider assistive mobility devices and ensure sufficient clearance around furniture⁶.

Additionally, the provision allowing only one bathroom per ten residents (including one toilet, one shower, and one bath) is concerning. Similarly, the proposed standard of one washing machine and one dryer per ten residents appears inadequate. A 2023 study by the Housing for the Aged Action Group found that shared bathroom arrangements in aged housing facilities led to hygiene concerns and increased falls due to limited accessibility⁷. To mitigate this issue, we recommend:

- Ensuring a higher ratio of bathrooms to residents.
- Requiring private hand basins in individual residences to alleviate shared bathroom demand.
- Separating toilet, shower, and bath areas to improve accessibility.
- Considering options for mandated cleaning and maintenance regulations for communal facilities.

The Australian Bureau of Statistics data shows that older Australians spend more time at home than younger populations, increasing their usage of all facilities⁸.

Green Space and Climate Considerations

COTA SA has consistently emphasised the importance of integrating environmental considerations into urban planning, especially as they relate to older South Australians. COTA SA takes the threat of climate change seriously and our passionate Climate Change Group is focused on the actions that can be taken at a policy, organisational and personal level. Our [Statement of Interest](#) on Climate Change outlines our commitments to climate change action.

⁶ [A Design Guide for Older Women's Housing - Art, Design and Architecture](#)

⁷ [Housing For The Aged Action Group | HAAG](#)

⁸ [How Australians Use Their Time, 2020-21 financial year | Australian Bureau of Statistics](#)

This includes ensuring that green spaces and tree canopy preservation are prioritised to mitigate heat and improve health outcomes, particularly for vulnerable older populations.

During consultation, concerns were raised that this amendment may reduce green space and tree canopy compared to other planning classifications. Given the importance of green space in mitigating heat and promoting wellbeing, we urge the State Planning Commission to ensure adequate environmental protections. Research from RMIT University's *Urban Greening and Heat Resilience Report* confirms that reduced tree canopy contributes to urban heat islands, which disproportionately affect older populations, particularly those with underlying health conditions⁹.

Addressing Accessibility for Older People Living with Disability

While the Code Amendment references universal and adaptable housing principles, it does not specify how these will be integrated into design and development requirements. Without clear standard and enforcement mechanisms, there is a risk that accessibility considerations may not be adequately addressed. We recommend that the Amendment explicitly align with the 2024 National Construction Code's updated accessibility standards, including for upgrades to existing properties, and recommend that the Planning Commission further engage with ageing and disability advocates, to ensure that new housing developments are truly inclusive for all South Australians living with mobility needs, including people with disabilities and older people.

Potential Risks of Elder Abuse in Co-Living Arrangements

While intergenerational living can offer financial and social benefits, it also raises risks of financial elder abuse. Older people contributing financially to a family member's property in exchange for housing often do so without formal legal agreements, leaving them vulnerable. The Australian Law Reform Commission's 2017 *Elder Abuse – A National Legal Response* report found that informal financial arrangements between family members are a leading cause of elder financial abuse¹⁰. We recommend the amendment consider safeguards for older South Australians, including:

- Consumer protection measures for older residents entering co-living arrangements.
- Requirements for formal agreements when older people financially contribute to property modifications or co-living developments.
- Increased oversight of co-living applications involving older homeowners to prevent exploitation.

⁹ [UrbanGreening@RMIT - RMIT University](mailto:UrbanGreening@RMIT)

¹⁰ [Elder Abuse—A National Legal Response \(ALRC Report 131\) | ALRC](#)

Regional South Australia

The increased age profile of regional Australia has been described as the most significant demographic change of the last 30 years¹¹. Already more than 165,000 South Australians (26%) aged over 50 live in country SA¹². As COTA SA's regular engagement around regional South Australia has shown that for older people living in regional communities, access to key elements for a good ageing experience such as housing options to age in place are more challenging. 20-year State Infrastructure Strategy Snapshot identified the increasingly facing challenges related to housing opportunities in regional South Australia¹³.

The Accommodation Diversity Code Amendment provides an opportunity to improve housing supply and diversity, including in regional South Australia. The consultation document acknowledges the need for diverse housing options in regional areas and references co-living as a potential model. However, the Amendment does not propose specific provisions to ensure housing diversity and affordability in these communities.

Without additional policies, and infrastructure improvements, the benefits of co-living and increased housing diversity may be largely confined to metropolitan areas. To ensure regional South Australians have equitable access to housing options, we recommend that planning policy explicitly considers the distinct challenges faced by regional communities and explore complementary measures – such as financial incentives and infrastructure support, to expand housing diversity in these areas.

Short-Term Rentals

While the Accommodation Diversity Code Amendment does not directly address short-term rentals, the increase in housing density and the development of mixed-use zones could have significant implications for the availability of long-term rental housing. In areas with higher-density housing or mixed-use developments, there is potential for short-term rental markets to expand.

This shift can exacerbate housing affordability issues by reducing the supply of rental properties available for long-term tenants. The conversion of properties into short-term rentals can further limit the availability of affordable housing for older South Australians, particularly those who rely on stable, long-term rental options.

¹¹ [RAI Submission Select Committee Regional Australia Final.pdf \(regionalaustralia.org.au\)](#)

¹² <https://www.abs.gov.au/ausstats/abs>

¹³ [20-Year-State-Infrastructure-Strategy-Snapshot_May_2020.pdf](#)

COTA SA recommends introducing clearer guidelines and regulatory frameworks regarding short-term rentals within the Code Amendment. This should include measures to ensure that such developments do not contribute to the conversion of long-term rental housing into short-term accommodations, which could undermine efforts to address housing supply issues.

Parking

The proposed increase in housing density must also take into consideration the parking needs of older residents, many of whom rely on personal vehicles for mobility and accessing essential services. Adequate parking should also be considered to accommodate the mobile workforce of in-home age care workers, whose visits allow a growing number of older South Australians to remain living independently in the community.

COTA SA recommends:

- Ensuring that new developments include sufficient and accessible parking for older people, especially those with mobility impairments.
- Balancing urban density goals and encouraging active and public transport usage, with the need for practical, accessible parking solutions.

Conclusion

COTA SA appreciates the opportunity to contribute to the Accommodation Diversity Code Amendment consultation. We strongly support initiatives that increase housing diversity and affordability while ensuring accessibility and protections for older people. We urge the State Planning Commission to address our concerns to ensure that the needs of older South Australians are adequately considered.

We welcome further discussion on these matters and are happy to engage with stakeholders to refine the amendment to better serve the needs of older South Australians.

Acknowledgement of Country

COTA SA acknowledges and respects Aboriginal people as the traditional custodians of the land of South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to First Nations Elders past, present and emerging and extend that respect to all Aboriginal people.