

## **AGENDA**

**FOR POLICY AND PLANNING COMMITTEE MEETING TO BE HELD ON**

**17 FEBRUARY 2025 AT 6.30PM**

**IN LITTLE PARA CONFERENCE ROOMS, SALISBURY COMMUNITY HUB,  
34 CHURCH STREET, SALISBURY**

### **MEMBERS**

Deputy Mayor, Cr C Buchanan (Chairman)  
Mayor G Aldridge  
Cr B Brug  
Cr L Brug  
Cr J Chewparsad  
Cr A Graham  
Cr K Grenfell  
Cr D Hood  
Cr P Jensen (Deputy Chairman)  
Cr M Mazzeo  
Cr S McKell  
Cr S Ouk  
Cr S Reardon

### **REQUIRED STAFF**

Chief Executive Officer, Mr J Harry  
Deputy Chief Executive Officer, Mr C Mansueto  
General Manager City Infrastructure, Mr J Devine  
General Manager Community Development, Mrs A Pokoney Cramey  
General Manager City Development, Ms M English  
Manager Governance, Mr R Deco  
Governance Support Officer, Ms M Prasad

### **APOLOGIES**

### **LEAVE OF ABSENCE**

### **PRESENTATION OF MINUTES**

Presentation of the Minutes of the Policy and Planning Committee Meeting held on 09 December 2024.

---

**REPORTS**

*Administration*

1.0.1 Future Reports for the Policy and Planning Committee ..... 11

1.0.2 Recommendations of the Intercultural Strategy and Partnerships Sub  
Committee meeting held on Monday 10 February 2025 ..... 13

*For Decision*

1.1.1 Body Worn Camera Trial ..... 19

1.1.2 Accommodation Diversity Code Amendment ..... 39

**QUESTIONS ON NOTICE**

There are no Questions on Notice.

**MOTIONS ON NOTICE**

There are no Motions on Notice.

**OTHER BUSINESS**

*(Questions Without Notice, Motions Without Notice, CEO Update)*

---

**ORDERS TO EXCLUDE THE PUBLIC**

**1.4.1 Recommendations of the Confidential Intercultural Strategy and Partnerships Sub Committee meeting held on Monday 10 February 2025 (ISPS3 - First Nations Strategic Group Update)**

**Recommendation**

Pursuant to section 83(5) of the *Local Government Act 1999* the Chief Executive Officer has indicated that, if the Policy and Planning Committee so determines, this matter may be considered in confidence under Part 3 of the *Local Government Act 1999* on grounds that:

1. *Pursuant to Section 90(2) and (3)(a) and (c) of the Local Government Act 1999, the principle that the meeting should be conducted in a place open to the public has been outweighed in relation to this matter because:*
  - *it relates to information the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person; and*
  - *information the disclosure of which would reveal a trade secret.*
2. *In weighing up the factors related to disclosure,*
  - *disclosure of this matter to the public would demonstrate accountability and transparency of the Council's operations*

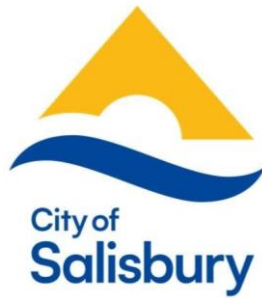
*On that basis the public's interest is best served by not disclosing the **Recommendations of the Confidential Intercultural Strategy and Partnerships Sub Committee meeting held on Monday 10 February 2025 (ISPS3 - First Nations Strategic Group Update)** item and discussion at this point in time.*

3. *Pursuant to Section 90(2) of the Local Government Act 1999 it is recommended the Policy and Planning Committee orders that all members of the public, except staff of the City of Salisbury on duty in attendance, be excluded from attendance at the meeting for this Agenda Item.*

**CLOSE**

Confidential Item 1.4.1





**MINUTES OF POLICY AND PLANNING COMMITTEE MEETING HELD IN LITTLE  
PARA CONFERENCE ROOMS, SALISBURY COMMUNITY HUB,**

**34 CHURCH STREET, SALISBURY ON**

**9 DECEMBER 2024**

**MEMBERS PRESENT**

Deputy Mayor, Cr C Buchanan (Chairman)  
Mayor G Aldridge  
Cr B Brug  
Cr L Brug  
Cr J Chewparsad  
Cr A Graham  
Cr D Hood  
Cr P Jensen (Deputy Chairman)  
Cr S McKell  
Cr S Ouk  
Cr S Reardon

**STAFF**

Chief Executive Officer, Mr J Harry  
Deputy Chief Executive Officer, Mr C Mansueto  
General Manager City Infrastructure, Mr J Devine  
General Manager Community Development, Mrs A Pokoney Cramey  
General Manager City Development, Ms M English  
Governance Support Officer, Ms M Prasad  
Governance Officer, Ms M Woods  
Governance Administration Officer, Ms K Hernen  
Manager Strategic Development Projects, Ms S Klein  
Manager Sport and Recreation, Mr C Grocke  
Manager Community Participation and Partnerships, Ms C Giles  
Manager Community Experience, Ms C Kroepsch  
Team Leader Community Compliance, Mr B Scholefield  
Manager Community Diversity and Inclusion, Ms V Haracic  
Senior Recreation Planner, Ms M Matej  
Manager Urban, Recreation and Natural Assets, Mr J Foong  
Manager Infrastructure Design and Delivery, Mr J Collins

The meeting commenced at 6.36pm.

---

The Chairman welcomed the Elected Members, members of the public and staff to the meeting.

## **APOLOGIES**

Apologies have been received from Cr K Grenfell and Cr M Mazzeo.

## **LEAVE OF ABSENCE**

Nil.

## **PRESENTATION OF MINUTES**

Moved Cr P Jensen  
Seconded Cr A Graham

The Minutes of the Policy and Planning Committee Meeting held on 18 November 2024, be taken as read and confirmed.

**CARRIED**

## **REPORTS**

### *Administration*

#### **1.0.1 Future Reports for the Policy and Planning Committee**

Moved Cr P Jensen  
Seconded Cr J Chewparsad

That Council:

1. Notes the report.

**CARRIED**

## **QUESTIONS ON NOTICE**

There were no Questions on Notice.

## **MOTIONS ON NOTICE**

There were no Motions on Notice.

---

**OTHER BUSINESS**

*(Questions Without Notice, Motions Without Notice, CEO Update)*

**P&P-MWN1     Salisbury Intercultural Strategic Alliance and Salisbury Intercultural Community Alliance Information Report**

Moved Cr J Chewparsad  
Seconded Cr C Buchanan

That Council:

Request Administration to provide information reports to the Intercultural Strategy and Partnership Sub Committee commencing February 2025 providing an update on discussions and outcomes from the quarterly Salisbury Intercultural Strategic Alliance and Salisbury Intercultural Community Alliance meetings.

**CARRIED**

---

## ORDERS TO EXCLUDE THE PUBLIC

### 1.4.1 Harmony Week 2025 Major Event Update - Further Information Report as requested at the Intercultural Strategies and Partnerships Sub Committee on 2 December 2024

Moved Cr A Graham  
Seconded Cr P Jensen

*That the Policy and Planning Committee*

1. *Orders that pursuant to Section 90(2) and (3)(b)(i) and (b)(ii) of the Local Government Act 1999, that it is necessary and appropriate to exclude the public for the consideration of Agenda Item 1.4.1 Harmony Week 2025 Major Event Update - Further Information Report as requested at the Intercultural Strategies and Partnerships Sub Committee on 2 December 2024 with the exception of the following persons:*

- *Chief Executive Officer*
- *Deputy Chief Executive Officer*
- *General Manager City Infrastructure*
- *General Manager Community Development*
- *General Manager City Development*
- *Governance Support Officer*
- *Governance Officer*
- *Governance Administration Officer*
- *Manager Strategic Development Projects*
- *Manager Sport and Recreation*
- *Manager Community Participation and Partnerships*
- *Manager Community Experience*
- *Team Leader Community Compliance*
- *Manager Community Diversity and Inclusion*
- *Senior Recreation Planner*
- *Manager Urban, Recreation and Natural Assets*
- *Manager Infrastructure Design and Delivery*

*On the basis:*

- *it relates to information the disclosure of which could reasonably be expected to confer a commercial advantage on a person with whom the council is conducting, or proposing to conduct, business, or to prejudice the commercial position of the council; and*
  - *information the disclosure of which would, on balance, be contrary to the public interest.*
2. *In weighing up the factors related to disclosure,*
- *disclosure of this matter to the public would demonstrate accountability and transparency of the Council's operations*



- non-disclosure of the matter and discussion of this item in confidence would protect confidential information and Council's commercial position.

On that basis the public's interest is best served by not disclosing the **Harmony Week 2025 Major Event Update - Further Information Report** as requested at the **Intercultural Strategies and Partnerships Sub Committee on 2 December 2024** item and discussion at this point in time.

3. Orders that pursuant to Section 90(2) of the Local Government Act 1999 all members of the public, except staff of the City of Salisbury on duty in attendance, be excluded from attendance at the meeting for this Agenda Item.

**CARRIED**

#### **1.4.2 Diversitours Project Update - Further Information Report as requested by the Intercultural Strategies and Partnerships Sub Committee on 2 December 2024**

Moved Cr A Graham

Seconded Cr P Jensen

*That the Policy and Planning Committee Meeting:*

1. Orders that pursuant to Section 90(2) and (3)(b)(i) and (b)(ii) of the Local Government Act 1999, that it is necessary and appropriate to exclude the public for the consideration of Agenda Item 1.4.2 Diversitours Project Update - Further Information Report as requested by the Intercultural Strategies and Partnerships Sub Committee on 2 December 2024 with the exception of the following persons:
  - Chief Executive Officer
  - Deputy Chief Executive Officer
  - General Manager City Infrastructure
  - General Manager Community Development
  - General Manager City Development
  - Governance Support Officer
  - Governance Officer
  - Governance Administration Officer
  - Manager Strategic Development Projects
  - Manager Sport and Recreation
  - Manager Community Participation and Partnerships
  - Manager Community Experience
  - Team Leader Community Compliance
  - Manager Community Diversity and Inclusion
  - Senior Recreation Planner
  - Manager Urban, Recreation and Natural Assets

- *Manager Infrastructure Design and Delivery*

*On the basis:*

- *it relates to information the disclosure of which could reasonably be expected to confer a commercial advantage on a person with whom the council is conducting, or proposing to conduct, business, or to prejudice the commercial position of the council; and*
  - *information the disclosure of which would, on balance, be contrary to the public interest.*
2. *In weighing up the factors related to disclosure,*
- *disclosure of this matter to the public would demonstrate accountability and transparency of the Council's operations*
  - *non-disclosure of the matter and discussion of this item in confidence would protect confidential information and Council's commercial position.*

*On that basis the public's interest is best served by not disclosing the **Diversitours Project Update - Further Information Report as requested by the Intercultural Strategies and Partnerships Sub Committee on 2 December 2024** item and discussion at this point in time.*

3. *Orders that pursuant to Section 90(2) of the Local Government Act 1999, all members of the public, except staff of the City of Salisbury on duty in attendance, be excluded from attendance at the meeting for this Agenda Item.*

**CARRIED**

The meeting moved into confidence at 6.41pm.

The meeting moved out of confidence and closed at 6.43pm.

CHAIRMAN.....

DATE.....

<b>ITEM</b>	1.0.1
	<b>POLICY AND PLANNING COMMITTEE</b>
<b>DATE</b>	17 February 2025
<b>HEADING</b>	Future Reports for the Policy and Planning Committee
<b>AUTHOR</b>	Michelle Whibley, PA to General Manager, City Development
<b>CITY PLAN LINKS</b>	4.2 We deliver quality outcomes that meet the needs of our community
<b>SUMMARY</b>	This item details reports to be presented to the Policy and Planning Committee as a result of a previous Council resolution. If reports have been deferred to a subsequent month, this will be indicated, along with a reason for the deferral.

**RECOMMENDATION**That Council:

1. Notes the report.

**ATTACHMENTS**

There are no attachments to this report.

1. **BACKGROUND**

- 1.1 Historically, a list of resolutions requiring a future report to Council has been presented to each committee for noting.

2. **REPORT**

- 2.1 The table below outlines the reports to be presented to the Policy and Planning Committee as a result of a Council resolution.

<b>Meeting Item</b>	<b>- Heading and Resolution</b>	<b>Officer</b>
18/12/2023 MWON2	<b>Royal Commission into Domestic, Family and Sexual Violence</b> 2. Consider the recommendation of the Royal Commission and requests the administration to bring back a report for information regarding opportunities arising from the Royal Commission recommendations.	Amy Pokoney-Cramey
<b>Due:</b>	May 2025	
28/10/2024 1.4.1	<b>Salisbury North Oval Precinct Plan – Update and Next Steps</b> This resolution is confidential.	Daryl Tian
<b>Due:</b>	January 2025	
<b>Deferred:</b>	March 2025	
<b>Reason:</b>	Awaiting on additional updates to the Plan.	

28/10/2024	<b>Motion on Notice Cr B Brug: Globe Derby Park Illegal Dumping and CCTV Request</b>	Mark Purdie
MON2	2. Requests the Administration to present a report on potential options to mitigate the Globe Derby Park illegal dumping issues, including associated costing around CCTV solutions.  <b>Due:</b> December 2024 <b>Deferred:</b> April 2025 <b>Reason:</b> This resolution will be addressed as part of the Confidential Community Safety CCTV Program report that will be presented to the Asset Management Sub Committee Meeting in April 2025.	
16/12/2024	<b>Motion on Notice: Cr Chewparsad - City of Salisbury Chamber of Commerce</b>	Leandro Lopez Digon
MON1	1. Requests the Administration to present a report to be tabled at the Policy and Planning Committee by April 2025, exploring the establishment of a Chamber of Commerce for the whole City of Salisbury Council area.  <b>Due:</b> April 2025	

#### 4. CONCLUSION / PROPOSAL

- 4.1 Future reports for the Policy and Planning Committee have been reviewed and are presented to Council for noting.

<b>ITEM</b>	1.0.2
	<b>POLICY AND PLANNING COMMITTEE</b>
<b>HEADING</b>	Recommendations of the Intercultural Strategy and Partnerships Sub Committee meeting held on Monday 10 February 2025
<b>AUTHOR</b>	Hayley Berrisford, PA to General Manager Community Development, Community Development
<b>CITY PLAN LINKS</b>	1.2 Our community is physically and mentally healthy and connected
<b>SUMMARY</b>	The minutes and recommendations of the Intercultural Strategy and Partnerships Sub Committee meeting held on Monday 10 February 2025 are presented for Policy and Planning Committee's consideration.

**RECOMMENDATION**

That Council:

1. Receives and notes the information contained in the Intercultural Strategy and Partnerships Sub Committee Minutes of the meeting held on 10 February 2025 and that the following recommendations contained therein be adopted by Council:

**ISPS1 Future Reports for the Intercultural Strategy and Partnerships Sub Committee**

That Council:

1. Notes the report.

**ISPS2 Update on discussions at the Salisbury Intercultural Community Alliance (SICA) and Salisbury Intercultural Strategic Alliance (SISA) meetings**

That Council:

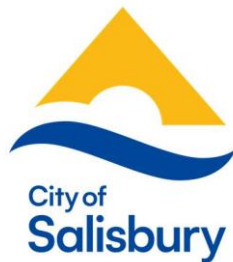
1. Notes the report.

**ATTACHMENTS**

This document should be read in conjunction with the following attachments:

1. Minutes Intercultural Strategy and Partnerships Sub Committee - 10 February 2025





**MINUTES OF INTERCULTURAL STRATEGY AND PARTNERSHIPS SUB COMMITTEE  
MEETING HELD IN**

**WITTBBER & DR RUBY DAVY ROOMS, SALISBURY COMMUNITY HUB, 34 CHURCH  
STREET, SALISBURY ON**

**10 FEBRUARY 2025**

**MEMBERS PRESENT**

Cr Johnny Chewparsad (Chair)  
Mayor G Aldridge (ex officio)  
Deputy Mayor, Cr C Buchanan  
Cr S McKell  
Cr S Ouk (Deputy Chair)  
Cr S Reardon

**STAFF**

Chief Executive Officer, Mr J Harry  
Deputy Chief Executive Officer, Mr C Mansueto  
A/General Manager City Infrastructure, Mr J Collins  
General Manager Community Development, Mrs A Pokoney Cramey  
General Manager City Development, Ms M English  
Manager Community Diversity & Inclusion, Ms V Haracic  
Manager Governance, Mr R Deco  
PA to General Manager City Infrastructure, Ms H Prasad

The meeting commenced at 7.13pm.

The Chairman welcomed the Elected Members, members of the public and staff to the meeting.

**APOLOGIES**

Nil.

**LEAVE OF ABSENCE**

Nil.

## PRESENTATION OF MINUTES

Moved Cr C Buchanan  
Seconded Cr S Reardon

The Minutes of the Intercultural Strategy and Partnerships Sub Committee Meeting held on 2 December 2024, be taken as read and confirmed.

**CARRIED**

## REPORTS

### ISPS1 **Future Reports for the Intercultural Strategy and Partnerships Sub Committee**

Moved Cr S Ouk  
Seconded Cr S McKell

That Council:

1. Notes the report.

**CARRIED**

### ISPS2 **Update on discussions at the Salisbury Intercultural Community Alliance (SICA) and Salisbury Intercultural Strategic Alliance (SISA) meetings**

Moved Cr C Buchanan  
Seconded Cr S Ouk

That Council:

1. Notes the report.

**CARRIED**

## QUESTION ON NOTICE

There were no Questions on Notice.

## MOTIONS ON NOTICE

There were no Motions on Notice.

## OTHER BUSINESS

*(Questions Without Notice, Motions Without Notice, CEO Update)*

Nil.



**ORDERS TO EXCLUDE THE PUBLIC**

**ISPS3 First Nations Strategic Group Update**

Moved Cr S McKell  
Seconded Cr S Ouk

That the Intercultural Strategy and Partnerships Sub Committee:

1. *Orders that pursuant to Section 90(2) and (3)(a) and (c) of the Local Government Act 1999, that it is necessary and appropriate to exclude the public for the consideration of Agenda Item ISPS3 First Nations Strategic Group Update with the exception of the following persons:*

- Chief Executive Officer
- General Manager City Development
- Deputy Chief Executive Officer
- A/General Manager City Infrastructure
- General Manager Community Development
- Manager Community Diversity & Inclusion
- Manager Governance
- PA to General Manager City Infrastructure

On the basis:

- *it relates to information the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead); and*
- *information the disclosure of which would reveal a trade secret.*

2. *In weighing up the factors related to disclosure, - disclosure of this matter to the public would demonstrate accountability and transparency of the Council's operations*

*On that basis the public's interest is best served by not disclosing the **First Nations Strategic Group Update** item and discussion at this point in time.*

3. *Orders that pursuant to Section 90(2) of the Local Government Act 1999 it is recommended the Council orders that all members of the public, except staff of the City of Salisbury on duty in attendance, be excluded from attendance at the meeting for this Agenda Item.*

**CARRIED**

The meeting moved into confidence at 7.24pm.

The meeting moved out of confidence and closed at 7.30pm.

**CLOSE**

CHAIRMAN.....

DATE.....



<b>ITEM</b>	1.1.1
	<b>POLICY AND PLANNING COMMITTEE</b>
<b>DATE</b>	17 February 2025
<b>HEADING</b>	Body Worn Camera Trial
<b>AUTHORS</b>	John Darzanos, Manager Environmental Health & Community Compliance, City Development Mark Purdie, Manager Field Services, City Infrastructure Brad Scholefield, Team Leader Community Compliance, City Development
<b>CITY PLAN LINKS</b>	1.4 Our city is attractive and safe 4.1 Our council’s services are delivered in an effective and efficient manner 4.2 Our council is a great place to work
<b>SUMMARY</b>	This report proposes a trial of Body Worn Cameras by officers within the Community Compliance and Security Services teams. The trial will enable Council to assess the effectiveness and benefits of this technology as a workplace tool to improve safety, transparency, accountability, and community experience. The supporting policy and communication plan has been developed to provide guidance for the use of body worn cameras and key messages on the purpose and details of the trial and are included in the report.

**RECOMMENDATION**

That Council:

1. Approves the trial of Body Worn Cameras for Community Compliance and Security Services teams for a six-month period commencing in March 2025.
2. Adopts the Body Worn Camera Policy for the trial of Body Worn Cameras as per Attachment 1 Draft Body Worn Camera Policy to this report (Item No. 1.1.1, Policy and Planning Committee, 17 February 2025).
3. Approves the Communication Plan for the trial of Body Worn Cameras as per Attachment 2 Body Worn Camera Communications Plan to this report (Item 1.1.1, Policy and Planning Committee, 17 February 2025).
4. Notes that Administration will provide a report post-trial regarding the outcomes of the trial and recommendations for potential future use.

**ATTACHMENTS**

This document should be read in conjunction with the following attachments:

1. Draft Body Worn Camera Policy
2. Body Worn Camera Communications Plan

## 1. BACKGROUND

- 1.1 The proposal to implement a trial of Body Worn Cameras was presented at the CEO briefing session in November 2024, and this report presents the supportive draft policy and communications plan to implement the trial. Body Worn Cameras (BWCs) are personal recording devices that enable the recording of audio and video footage whilst affixed to an officer.
- 1.2 The use of such devices is becoming increasingly common in both government and non-government organisations across a wide range of sectors, as a ‘tool of trade.’ They are utilised by authorised officers, security staff, and law enforcement officers as they provide a range of benefits including:
  - 1.2.1 promoting safety of staff by encouraging safe and mutually respectful interactions.
  - 1.2.2 reducing disputes and enabling complaints to be easily investigated and resolved by reviewing relevant footage.
  - 1.2.3 supporting transparency and accountability for officers while administering their duties and exercising their legislative powers.
- 1.3 In South Australia, the City of Adelaide and the City of Port Adelaide Enfield have utilised BWCs for community compliance functions for several years and both have reported significant reductions in adversarial interactions since inception.
- 1.4 Several other councils in South Australia (City of Burnside, Berri Baramba Council, Copper Coast Council, Port Augusta Council), are also utilising BWCs and have developed and tested governance documents for their use. The use of BWCs in other local governments across Australia is more widespread, in particular the eastern states.

## 2. EXTERNAL CONSULTATION / COMMUNICATION

- 2.1 Various Body Worn Camera Suppliers
- 2.2 Other Councils already using Body Worn Cameras

## 3. DISCUSSION

### Safety

- 3.1 The use of BWCs to support the health and well-being of staff during identified activities, duties and functions is a key priority for undertaking a trial. The City of Salisbury has a primary duty of care to ensure the health and safety of workers, the health and safety of other persons from work carried out, and the provision and maintenance of safe systems of work.
- 3.2 A key foundation in the City Plan 2040 is that “our City is attractive and safe”.
- 3.3 Body Worn Cameras can support the safety of users and assist in providing safe systems of work by modifying behaviour and reducing or de-escalating incidents with members of the public and provide assurance to the public that staff are acting appropriately and within their powers and responsibilities.

**Benefits of Body Worn Cameras**

- 3.4 Discussion with other users of BWCs and the industry has identified several potential benefits for their use as a workplace tool including:

***Safety and Behaviour Modification:***

- 3.4.1 Support safe systems of work and the safety of key staff such as authorised officers and security staff due to the nature of their work and interactions with public during high-risk situations that have the potential for escalating behaviours.
- 3.4.2 Encourage safe and mutually respectful interactions and modified behaviour.
- 3.4.3 Support the collection and documentation of evidence for incident management.
- 3.4.4 Prevention and de-escalation of incidents.
- 3.4.5 May improve public perception of public safety.

***Effective layered evidence capture:***

- 3.4.6 Support transparency and accountability.
- 3.4.7 Support the collection and documentation of evidence for investigations and enforcement action.
- 3.4.8 Ability to review key operations and activities that allow for staff learning and training.
- 3.4.9 Improve service delivery and community experience.

**Body Worn Camera Trial (Pilot Program)**

- 3.5 It is proposed to undertake a pilot program trialing BWCs with the Community Compliance and Security Services teams. The objectives of the trial are to:
- 3.5.1 Trial and evaluate different products and offerings.
  - 3.5.2 Obtain user feedback for each product to assess wearability, convenience, and quality of recordings.
  - 3.5.3 Review and consider staff and public response.
  - 3.5.4 Test and refine governance protocols (BWC Policy).
  - 3.5.5 Pending successful testing, recommend a preferred solution for future implementation.
- 3.6 The pilot program will run from March 2025 and is expected to conclude in July 2025, with five (5) specific products tested and evaluated during this period.
- 3.7 One device of each type will be tested each month and rotated amongst different staff for detailed feedback and evaluation.

**Governance**

- 3.8 A specific policy for BWCs has been developed for the pilot program to ensure their use is in accordance with stated aims and objectives, complies with relevant legislation, and upholds privacy rights.
- 3.9 The policy includes procedural statements for when and how BWCs are used, including storage and access of data. It forms the basis for works instructions and training for staff in BWC operation.
- 3.10 It is important to note that BWCs will require user activation to capture and record an incident, and therefore staff undertaking the trial will be required to use judgement based on training and supportive procedures, which is common practice in all regulatory and or security areas where BWC's are utilised. Examples of where BWCs will be used include:
- 3.10.1 Where an officer is undertaking a duty and function that has an identified risk from people and could result in a conflict situation or they are working in isolation and there is a reasonable concern for safety or welfare.
- 3.10.2 To investigate and gather evidence of a legislative non-compliance and/or record interactions during the enforcement of legislation that involves a high-risk activity or has the potential for escalation and/or dispute. (e.g., parking enforcement, serving a warrant, seizing a dog, or documenting evidence during an inspection).
- 3.11 BWCs are not to be used or worn when officers are only performing administrative duties or attending meetings and must be deactivated and removed when entering City of Salisbury facilities covered by CCTV, or other City of Salisbury public facilities, unless they enter for an official capacity as part of an active incident or investigation.
- 3.12 BWCs are not intended to record routine interactions with the public where there is no reasonable concern for safety or welfare of the staff member or another person.
- 3.13 Data and footage gathered from the trial will be stored securely in accordance with the draft BWC Policy and will remain the property of the City of Salisbury and be subject to all records management requirements and document storage procedures. If the trial includes BWC's with 4G or 5G connectivity and immediate cloud-based storage, then these will be restricted to either in house storage and or Australian based storage solutions.

**People and Performance**

- 3.14 The BWC trial will enable select members of the Administration and the People and Performance team to review and identify any workplace relation impacts associated with the use of BWCs and alignment with Council's employment and code of conduct polices. This will ensure that any ongoing use of the BWCs is only introduced after adequate consultation is completed with the required parties including staff representatives and affected teams.

- 3.15 It is important that the use of the devices is seen as a benefit to the employees who are required to use them, and that the footage captured is beneficial to their safety and in the interests of the community.
- 3.16 There is also an acknowledgment that no civil liability attaches to an authorised person/officer for an honest act or omission in the exercise, performance, or discharge, of powers, functions or duties under the *Local Government Act 1999* or other Acts.

#### **4. FINANCIAL OVERVIEW**

- 4.1 There is no cost for the trial.

#### **5. CONCLUSION**

- 5.1 Body Worn Cameras are increasingly being used by a variety of sectors as a workplace tool to provide multiple benefits including the work health and safety of staff, safety of the community, transparency in processes and procedures of staff in the field, accountability, and enhanced community experience.
- 5.2 The proposed six-month trial of BWCs by the Community Compliance and Security Services teams will enable Council to assess the effectiveness and benefits of the technology and decide if the product(s) achieves the desired goals.
- 5.3 The trial is supported by the draft BWC Policy that has been developed to address operations and governance surrounding their use and data storage to ensure consistency in use and compliance with relevant legislation.
- 5.4 The supporting communication plan will be utilised to advise key stakeholders on the purpose and details of the trial and ensure transparency in the use of these devices.







**City of Salisbury Values: Respectful, Accountable, Collaborative, Helpful**

## **Body Worn Camera Policy**

Adopted by:	City of Salisbury
Responsible Division:	City Infrastructure
First Issued/Adopted:	TBD
Last Reviewed:	N/A
Next Review Date:	TBD

### **1. Purpose**

- 1.1. The purpose of this policy is to provide guidance and direction concerning the use of body worn cameras to capture work related interactions on audio and video as part of standard duties of Authorised Officers and Security Officers, including investigating customer requests, incident management review and performing legislative compliance and investigative functions, and as part of Work Health and Safety risk mitigation.
- 1.2. The policy provides a framework for the use of body worn cameras by officers and outlines the circumstances in which officers can use body worn cameras.

### **2. Scope**

- 2.1. This policy applies to Authorised Officer/Person or Security Officer positions where it has been determined that the use of body worn cameras will assist in;

- 2.1.1. providing a work health and safety risk mitigation strategy for undertaking identified legislative enforcement and compliance and identified security-related task or activity
- 2.1.2. the effective execution of officer duties and authority for the purposes of legislative authority and administration.

### 3. Legislative Requirements and Corporate Policy Context

#### 3.1. Legislative considerations

- Freedom of Information Act 1991
- State Records Act 1997
- Local Government Act 1999
- Summary Offences Act 1953
- Surveillance Devices Act 2016 (SA)
- Work Health and Safety Act 2012

#### 3.2. We will focus on our organisation's innovation and business development, by:

- delivering effective and efficient Council services, exceptional community experiences and quality outcomes
- making our organisation a great place to work
- engaging and connecting with our community

### 4. Interpretation/Definitions

- **Body Worn Camera** - means a camera designed to be worn/affixed by a person to make audio and/or video recordings.
- **Council** - is the City of Salisbury and includes delegates of the City of Salisbury
- **Officer** - is any worker of Council as defined under the Work, Health and Safety Act and Regulations 2012.
- **Official Record** - is a record made or received by the Council in the conduct of its business.

- **Authorised Officer or Authorised Person** - Refers to a Council officer authorised as prescribed under the Local Government Act 1999 or other legislation administered by Council that can include legislative enforcement and compliance.

## 5. Policy Statements and Procedure

- 5.1. Body worn cameras are an assistive tool that aim to provide a range of benefits during identified high risk tasks and specific enforcement activities including:
  - promoting safety of staff and community members by encouraging safe and mutually respectful interactions.
  - ensuring transparency in decision making and investigations involving Council officer interactions with members of the public where it is deemed appropriate to use.
  - assisting in reducing, deterring, preventing, and monitoring anti-social behaviour and other behaviours of concern;
  - assisting in the investigation of legislative offences and unlawful activities by obtaining supportive information for evidentiary purposes;
  - reducing aggression and disruptive behaviour by members of the public towards Officers, and
  - reducing inaccurate reports made against Officers.
- 5.2. This policy does not prevent authorised officers from taking notes, photographs and or video evidence as part of the expressed legislative authority whilst undertaking and exercising their powers during official duties, and this can be undertaken with a body worn camera or other video recording device.
- 5.3. Body worn cameras must not be activated when officers are only performing administrative duties or attending meetings and must be deactivated when entering City of Salisbury facilities covered by CCTV, or other City of Salisbury public facilities, unless they enter for an official capacity as part of an active incident or investigation.

- 5.4. Use of body worn cameras outside of normal working hours is only for identified and approved functions and tasks undertaken as part of rostered after hours or call out functions.

***Use of Body Worn Cameras***

- 5.5. Before leaving the worksite and body worn camera recharge workstation, the Officer will attach the body worn camera on their person and place it in standby mode.
- 5.6. Subject to the provisions below, the body worn camera may be activated to record at the discretion of an Officer.
  - 5.6.1. The body worn camera should be activated to record when it is observed that an offence is about to occur or when it becomes apparent that video needs to be taken of an offence occurring as required for an identified task or investigation. This does not negate the need for normal compliance procedures being carried out.
  - 5.6.2. The body worn camera should be activated to record as a safety measure when approaching or being approached by a person who is exhibiting anti-social behaviours or when a person becomes aggressive or disruptive or when the officer believes this may occur or the officer is expressing their due diligence to ensure their safety and record the interaction and the person must be advised as soon as practical that they are being recorded.
- 5.7. At the commencement of any recording the user is to make a verbal announcement to indicate why the recording has been activated. If possible, this should include:
  - 5.7.1. Confirmation, where practicable, to those present that the incident is now being recorded using both video and audio,
  - 5.7.2. Where practicable the officer will include a verbal recording of the Date, time, and location at the start of the interaction and recording or if not practical at the end of the interaction.

Notice Examples:

*(Scenario A) An officer is approached by an aggressive person, the officer should immediately initiate the record button, and advise the person promptly of the following: " I am wearing a camera and you are being filmed", and when practical include the date, time, and location*

*(Scenario B) Investigating a dog attack incident in a park patrol. If the recording has commenced prior to arrival at the scene of an incident because aggressive behaviour is observed on approach, or the officer believes it's important for their work health and safety, the officer shall record the date, time, and location and when approaching they should announce to the individuals present at the incident that actions and sounds are being recorded. Specific words for this announcement have not been prescribed, but users should use straightforward speech that can be easily understood by those present, such as, "I am wearing a camera and you are being filmed"*

5.7.3. Officers equipped with a body worn camera must ensure that the equipment is clearly visible to members of the public. No body worn camera, or any other personal recording device may be concealed by a Council Officer.

5.8. Recording must be incident specific

5.8.1. Users should not indiscriminately record entire duties or patrols. If such recordings are made, all recordings will be downloaded upon return to office and reviewed by immediate Manager to determine if it to be stored as a record. All required recordings are subject to Storage of and access to data provisions in Polciy.

5.9. Private dwellings

5.9.1. It is legal to record in a private place so long as the person recording is a party (involved in) the activity. At the commencement of any recording the user is to make a verbal announcement to indicate why the recording has been activated. If possible, this should include:

- Confirmation, where practicable, to those present that the incident is now being recorded using both video and audio,
- Where practicable include date, time, and location

5.9.2. If a person becomes excessively agitated, disruptive, or aggressive, the Officer should withdraw from the situation and report the matter to

line manager and log incident onto the Council's Work Health and Safety management software.

5.9.3. Recording should continue until the Officer has safely exited the scene, i.e., When the Officer has returned to their vehicle, or is out of sight of the situation; is back in the office or at a location deemed by judgement as a place of safety.

5.10. Do not interrupt filming

5.10.1. Unless specific circumstances dictate, the recording must continue uninterrupted from commencement of recording until the conclusion of the incident.

5.11. Concluding filming.

5.11.1. Recording shall continue for a short period after the incident to clearly demonstrate to any subsequent viewer that the incident has concluded, and the user has resumed other duties or activities.

5.11.2. Prior to concluding the recording, the user should verbally announce they are ending the recording and state the reason, date, time, and location (where practicable) for concluding the recording.

5.12. If alleged criminal activity occurs, the incident should be reported to the South Australian Police (SAPOL).

5.13. Once a report is lodged and a SAPOL reference is provided to Council, the Officer is responsible for collating any Audio/Visual Recordings relevant to the alleged criminal activity and subject to approval by CEO or delegate, supplying the evidence to SAPOL.

5.14. Storage of and access to data

5.14.1. All footage recorded to the body worn camera will be downloaded at the end of the officer's shift.

5.14.2. Data must be downloaded onto the dedicated workstation in the presence of an independent person from either the Security team or the officers immediate Line Manager.

- 5.14.3. If no recordings were made, then officers should return the units to their storage location and put on charge.
- 5.14.4. Units are not to be taken home except for officers on rostered call out and or after-hours rosters and required for specified tasks or as identified for work health and safety requirements.
- 5.14.5. Once data is downloaded, it must not be altered or deleted by an Officer.
- 5.14.6. Data captured by a body worn camera is an official record for the purposes of the State Records Act and Council's Records Management Policy.
- 5.15. Data is subject to the Council's record keeping obligations and can only be disposed of in accordance with General Disposal Schedule (GDS) 40.
- 5.16. The Freedom of Information Act facilitates access by members of the public to records held by the Council. Under the Act, Council official records, including data captured by Council surveillance devices, may be accessible to an applicant.
- 5.17. Any loss of a body worn camera or data must be reported into the Council's Work Health and Safety management software and reported to the Manager People and Performance and General Manager Business Excellence.
- 5.18. All requests for data must be approved by the Chief Executive Officer (CEO) or Delegates and must follow the release of data procedures noting permitted access for authorised officers for the purpose of documenting evidence.
  - 5.18.1. Recording captured by authorised officers in the exercise of their duties and under legislative authority to record images and video will be accessible for review of grievances and evidentiary purposes to all persons required to decide in any matter including, Team Leaders, and Manager. A copy of the recording captured can also be supplied in any brief to lawyers and/or in context of legal proceedings or appeals.

**6. Related Policies and Procedures**

- 6.1. Work Health and Safety Policy
- 6.2. Closed-Circuit Television (CCTV) Policy & Procedure
- 6.3. IT Acceptable Use policy
- 6.4. Records Management Policy
- 6.5. Code of Conduct

**7. Approval and Change History**

Version	Approval Date	Approval By	Change
1	TBD	Council	

**8. Availability**

- 8.1. The Policy is available to be downloaded, free of charge, from Council’s website [www.salisbury.sa.gov.au](http://www.salisbury.sa.gov.au)
- 8.2. The Procedure will be available for inspection without charge at the Civic Centre during ordinary business hours and a copy may be purchased at a fee as set annually by Council.

City of Salisbury Community Hub  
 34 Church Street, Salisbury SA 5108  
 Telephone: 84068222  
 Email: [city@salisbury.sa.gov.au](mailto:city@salisbury.sa.gov.au)

**9. Review**

This Policy will be reviewed:

- If a new Policy - within 12 months of a Council election and thereafter as necessary; or
- The frequency dictated in legislation; or
- Earlier in the event of changes to legislation or related Policies and Procedures; or
- If deemed necessary by Council.

**Further Information**

For further information on this Policy, please contact:



Responsible Officer: General Manager City Infrastructure  
Address: 34 Church Street, Salisbury SA 5108  
Telephone: 08 8406 8222  
Email: [city@salisbury.sa.gov.au](mailto:city@salisbury.sa.gov.au)



COMMUNICATIONS PLAN	
<b>Project</b>	Body Worn Cameras Trial

**Background**

Body Worn Cameras (BWC's) are personal recording devices that enable the recording of audio and video footage whilst affixed to an officer.

The use of such devices is becoming increasingly common in both government and non-government organisations across a wide range of sectors, as a 'tool of trade.' They are utilised by authorised officers, security staff, and law enforcement officers as they provide a range of benefits including.

- promoting safety of staff by encouraging safe and mutually respectful interactions
- reducing disputes and enable complaints to be easily investigated and resolved by reviewing relevant footage.
- support transparency and accountability for officers while administering their duties and exercising their legislative powers.

In South Australia, the City of Adelaide and the City of Port Adelaide Enfield have utilised BWC's for community compliance functions for several years and both have reported significant reductions in adversarial interactions since inception.

A number of other Councils in South Australia (City of Burnside, Berri Barmera Council, Copper Coast Council, Port Augusta Council), are also utilising BWC's and have developed and tested governance documents for their use whilst the use of BWC's in other local governments across Australia is more widespread, in particular the eastern states.

It is proposed to undertake a pilot program trailing BWC's with Community Compliance team and Security Services teams. The objectives of the trial are to:

- trial and evaluate different products and offerings,
- obtain user feedback for each product to assess wearability, convenience, and quality of recordings,
- review and consider staff and public response,
- test and refine governance protocols (BWC Procedure)
- pending successful testing, recommend preferred solution for future implementation.

The pilot program will run from February 2025 and is expected to conclude in June 2025, with five (5) specific products tested and evaluated during this period.

One device of each type will be tested each month and rotated amongst different staff for detailed feedback and evaluation.

A specific procedure for BWC's has been developed for the pilot program to ensure their use is in accordance with stated aims and objective, complies with relevant legislation, and upholds privacy rights.

The Procedure provides instruction for when and how BWC's are used, including storage and access of data. It forms the basis for works instructions and training for staff in BWC operation.

It is important to note that BWC's will require user activation to record, and therefore staff undertaking the trial will be required to use judgement based on training in the procedure. Examples of where BWC's will be used include:

- Where an officer is undertaking a duty and function that has an identified risk from people and could result in a conflict situation or they are working in isolation and there is a reasonable concern for safety or welfare).
- To investigate and gather evidence of a legislative non-compliance and or record interactions during the enforcement of legislation that involves a high-risk activity or has the potential for escalation and or dispute. E.g., parking enforcement, serving a warrant, and seizing a dog, or documenting evidence during an inspection.

BWC's are not intended to record generic interactions with the public where there is no reasonable concern for safety or welfare of the Staff Member or that of another person.

Data and footage gathered from the trial will be stored securely in accordance with the BWC Procedure and will remain the property of the City of Salisbury and subject to all records management requirements and document storage procedures.

A communications plan is required to support the trial, with consistent approved messaging for staff and the community.

#### City Plan links

---

- The health and wellbeing of our community is a priority.
- People are valued and they feel safe, included, and connected.
- The City of Salisbury is recognised as a great place to work.
- We engage meaningfully and our community is aware of Council initiatives.

#### Project management

---

- Mark Purdie - Manager, Field Services
- John Darzanos – Manager, Manager Environmental Health & Community Compliance
- Jess Sammut - Communications Advisor
- Christie Thompson – Media and PR Advisor

#### Communications objectives

---

- To inform relevant staff, stakeholders, and community about the trial, as required, including what it is, why we are doing it and what we want to achieve from it.
- To have key messages prepared for any enquiries from the community or the media about the trial and why we are doing it.

#### Target audience

---

- City of Salisbury staff and volunteers
- City of Salisbury community members, specifically those who visit and use CoS facilities

#### Stakeholders:

- Elected Members
- Media

#### Key messages

---

- The City of Salisbury is implementing a six-month Body Worn Camera (BWC) trial for Security and Community Compliance staff (Authorised Officers).
- In recent years, the demand for enhanced security measures has grown significantly. Traditional security measures, while effective, are not always sufficient in addressing the evolving challenges of the modern security landscape.
- Body-worn cameras are a valuable tool in creating a more secure environment for staff and community.
- The BWC trial aims to leverage technology to improve transparency, accountability, and overall safety effectiveness.

- The trial will allow council to assess the impact of BWC's on incident resolution, employee behaviour, and community experience.
- Five body worn camera types will be trialled which are currently in use within government agencies and the wider security industry. The body worn camera suppliers are allowing council to trial these devices free of charge.
- Currently, other local governments use body worn cameras to capture authorised officer interactions with the community, with results of reduced aggressive or threatening behaviours and reported incidents.
- BWCs solutions are widely used in many government agency applications as public behaviour escalates against Authorised and Public Officers. They are turning to this solution to have a single source of truth in evidence gathering of public offences, staff behaviour, public interactions and provide improved customer experiences in facilities or public areas.
- The City of Salisbury has CCTV policy and procedures which have been updated to reflect this trial. In addition, a specific Body Worn Camera Policy has been developed to guide their usage during the trial.
- The trial is due to commence 1<sup>st</sup> March 2025
- Data and evaluations gathered during the trial will be assessed during and post-trial to determine ongoing usage of this technology and any amendments to protocols and procedures.

#### **Communications tactics**

---

##### Internet (CoS Website)

- Add a page or section about the BWC, key objectives, link to the Procedure.

##### FAQs

- A series of FAQs will be developed and adapted into two versions – one for community and one for staff and published on the web site and intranet site respectively.

##### Intranet

- Add a page or section about the BWC trial on the Security page  
<https://intranet.salisbury.sa.gov.au/security.aspx>
- Link to policy and procedure
- Consider a home page promotion pointing to this page.

##### All staff email - sent by CEO.

- Information about the trial will be sent to all staff, linking to the intranet.

##### Affected staff emails – sent by Mark Purdie and John Darzanos

- A more detailed email about the trial, feedback during the trial, the work instructions, and any other specific information about BWCs.

##### Media holding lines.

- Draft holding lines outlining key messages, focusing on the why and benefits.
- Link to CCTV policy.

**Action plan**

<b>Tactic</b>	<b>Actions</b>	<b>Responsibility</b>	<b>Timing</b>
Update Policy procedure		Field Services Community Compliance	Dec/Jan
CoS Website	Trial overview	Comms	March
Intranet	Trial overview Link to policy, procedure	Filed Services Comms	March
Staff emails	All staff email, link to intranet Affected staff email	Comms Field Services	March
Holding lines	Draft Seek approvals (CEO, Mayor)	Comms	March

<b>ITEM</b>	1.1.2
	<b>POLICY AND PLANNING COMMITTEE</b>
<b>DATE</b>	17 February 2025
<b>HEADING</b>	Accommodation Diversity Code Amendment
<b>AUTHOR</b>	Kynan Mann, Senior Policy Planner, City Development
<b>CITY PLAN LINKS</b>	1.1 Our city has a diversity of housing that meets the needs of our community 3.2 Our city’s growth is well planned and supported by the integrated delivery of infrastructure 3.3 Our city centres are active and prospering
<b>SUMMARY</b>	The State Planning Commission has released the Accommodation Diversity Code Amendment for consultation until 27 February 2025. The code amendment seeks to introduce; a new form of ‘co-living’ accommodation, allow increased building heights for large retirement and aged care facilities, facilitate greater flexibility for apartment and unit design and provide additional guidance for the provision of shared living facilities and spaces. A draft submission to the State Planning Commission that identifies areas of support, matters of concern and requested amendments to the proposed code amendment is provided for Council’s consideration.

**RECOMMENDATION**

That Council:

1. Approves the Draft Accommodation Diversity Code Amendment submission as contained in Attachment 1 (Item 1.1.2, Policy and Planning Committee, 17 February 2025) to the State Planning Commission.
2. Delegates the Chief Executive Officer (or delegate) to finalise the draft submission in accordance with Council deliberations.

**ATTACHMENTS**

This document should be read in conjunction with the following attachments:

1. Draft Accommodation Diversity Code Amendment Submission
2. Draft Accommodation Diversity Code Amendment (Circulated under separate cover)
3. Code Amendment Fact Sheet
4. Code Amendment FAQs

**1. BACKGROUND**

- 1.1 South Australia’s Housing Roadmap outlines the housing challenge that the State, and all of Australia is currently facing.

- 1.2 The Housing Roadmap identifies a series of initiatives aimed at addressing the housing shortage, including supporting housing diversity.
- 1.3 The Accommodation Diversity Code Amendment (the Code Amendment) seeks to amend the Planning and Design Code (the Code) by:
  - 1.3.1 Introducing 'co-living' as a new form of residential use that provides for separate residences which may share one or more of a combination of kitchen, bathroom or laundry facilities. New general development policies relating to the design and servicing of co-living residences have also been included.
  - 1.3.2 Amending the existing general development policies to capture new co-living type developments.
  - 1.3.3 Enabling greater flexibility for new apartment and unit style dwellings.
  - 1.3.4 Improving design outcomes for communal open spaces facilities provided as part of student accommodation.
  - 1.3.5 Introducing a new administrative term 'Significant Retirement Facility and Supported Accommodation Site' and supporting policy to enable retirement and aged care facilities to be developed with supporting land uses and greater densities in neighbourhood type zones.
- 1.4 Council staff have prepared a submission in response to the proposed code amendment that outlines areas of support, matters of concern and requested amendments. The draft submission is in Attachment 1 of this report.
- 1.5 The draft Code Amendment, fact sheet and frequently asked questions information sheet have also been included and form Attachments 2, 3 and 4 respectively. Other documentation on the Code Amendment can be found on the PlanSA website via the following link: [View code amendment | PlanSA](#)
- 1.6 The Code Amendment is currently under public consultation with responses due to the State Planning Commission by 27 February 2025.

## **2. EXTERNAL CONSULTATION / COMMUNICATION**

- 2.1 Not applicable.

## **3. DISCUSSION**

- 3.1 There is currently a housing crisis in South Australia (and Australia more broadly), with a significant shortage of affordable housing supply.
- 3.2 The amount of single person households in the City of Salisbury is growing rapidly as it is across the remainder of metropolitan Adelaide. There is a limited amount of housing suited to single person household needs, with the majority of housing within the City of Salisbury being on large blocks with three or more bedrooms.
- 3.3 Additionally, an aging demographic through both a greater proportion of the population being above retirement age and longer lifespans, continues



to place increasing pressure on retirement and aged care accommodation supply.

- 3.4 The Code Amendment seeks to amend the Code in the following manner:
  - 3.4.1 Introduce a new land use term 'co-living' and associated general development policies which support the development of accommodation that provides for separate residences (minimum of six) which may share one or more of a combination of kitchen, bathroom or laundry facilities.
  - 3.4.2 Amend the existing general development policies so that they also apply to co-living type developments and enable more flexible arrangements for new apartment and unit style dwellings – particularly through the removal of minimum internal floor areas and the inclusion of minimum internal dimensions for habitable rooms.
  - 3.4.3 Prescribe a general car parking rate for co-living developments of 0.5 spaces per bedroom and a rate of 0.25 spaces per bedroom in designated areas.
  - 3.4.4 Prescribe a bicycle parking rate of 1.1 bike parks per co-living residence.
  - 3.4.5 Improve design outcomes for communal open spaces as well as common facilities provided as part of new student accommodation developments.
  - 3.4.6 Introduce a new administrative term 'Significant Retirement Facility and Supported Accommodation Site' and supporting policy to enable large sites containing retirement and aged care facilities to be developed with supporting land uses and building heights of up to 4 levels on greater than 1 hectare and up to 6 levels on greater than 2 hectares sites in neighbourhood type zones.
- 3.5 The intent of the proposed code amendment is considered to be consistent with the directions of the City Plan 2040.
- 3.6 The Code Amendment displays substantial merit for providing a greater diversity of housing in well serviced, high amenity areas. However, further investigations and policy refinement are required to successfully apply the aspirations of the Code Amendment in a typical, low serviced suburban context.
- 3.7 The draft development policies applying to co-living arrangements do not adequately consider infrastructure capacity, waste provision, car parking or proximity to shopping, employment, public transport and public open space within suburban areas.
- 3.8 The City of Salisbury remains car dominant given a limited supply of public transport as well as the separation between most members of the community and surrounding services. Active transport is a small percentage of transport undertaken.
- 3.9 The private open space and communal open space requirements for co-living arrangements are also considered to be inappropriate within a

suburban context given that no general development provisions have been included which seek to locate these land uses appropriately. The Code Amendment identifies a minimum of 2.5 square metres of either private open space or communal open space per residence. While this is considered appropriate within a large co-living arrangement in a well serviced high amenity area, a co-living arrangement of 6 residences in a suburban area only needing to supply a combined total of 15 square metres of communal open space for the use of all occupants is considered an inappropriate outcome.

- 3.10 By the definition contained within the draft Code Amendment, co-living is excluded from the definition of a dwelling. Therefore, the minimum allotment size or density requirements identified within neighbourhood type zones do not apply to co-living land uses. This provides a pathway for co-living to be established in a form that is both substantially out of character with the locality as well as the desired outcomes for these zones.
- 3.11 Conversely, co-living has not been identified as an envisaged land use nor given a set of defined assessment provisions within the Urban Activity Centre Zone or the Suburban Activity Centre Zone. These zones contain the commercial centres of Salisbury City, Mawson Lakes, Ingle Farm and Salisbury Downs and which provide some of the greatest accessibility to retail, transport and other services.
- 3.12 The introduction of Significant Retirement Facility and Supported Accommodation Sites (SRFSA sites) is considered necessary to address concerns associated with housing an aging population, however the scale at which these sites could be developed in some areas of the City of Salisbury poses some concern.
- 3.13 The Code Amendment will enable the establishment of buildings on SRFSA sites up to four levels of sites of 1 hectare or more and up to six levels on sites of two hectares or more. The General Neighbourhood Zone, which encompasses the majority of the City of Salisbury's residential areas, ordinarily permits development up to two building levels.
- 3.14 The resulting Code Amendment would enable buildings on SRFSA sites being constructed up to four levels greater than any of the surrounding development on a two hectare or larger site. Whilst impacts such as overshadowing and overlooking may be mitigated on these larger sites, the character and amenity of these localities will be drastically altered where buildings of this scale are introduced.
- 3.15 Given the need for retirement and aged care accommodation, a balanced approach is required in consideration of the urban form surrounding SRFSA sites. It has therefore been recommended that buildings on SRFSA sites of one hectare or more may exceed the building height prescribed by the zone by one building level, where the site is two hectares or more – buildings may exceed the building height prescribed by the zone by two building levels.

- 3.16 Whilst this will still result in impacts to the visual amenity and character of localities, it is considered a more balanced approach that responds better to the context of the surrounding built environment.
- 3.17 The need to provide greater housing diversity to respond to increased housing demand is undeniable. However, it will be the local government authorities that will be laden with managing the impacts of poor-quality housing provision and loss of community amenity if the Code Amendment is adopted in its current form.
- 3.18 A detailed submission has been prepared and is contained in Attachment 1 which details the portions of the Code Amendment that are requested to be amended to address the matters raised above along with other administrative, drafting and technical matters contained within the draft Code Amendment.
- 3.19 Given the potential that co-living arrangements may be taken up as an alternative to ancillary accommodation on large sites containing stand-alone dwellings, it is also recommended that the Department for Housing and Urban Development prepare material for the community to promote this as an option for landowners with easy-to-understand information about the planning and building requirements, the costs and the processes involved, and the expected quality outcomes.

#### **4. FINANCIAL OVERVIEW**

- 4.1 There are no financial implications of this proposal.

#### **5. CONCLUSION**

- 5.1 The housing shortage has led to the State Government undertaking a number of initiatives for a more diverse housing mix to meet current housing demand. The inclusion of co-living, providing greater flexibility for apartment and unit style housing, and enabling greater building heights for retirement and aged care facilities on large sites within residential areas will assist in meeting housing demands.
- 5.2 Council supports initiatives that provide greater housing diversity and promote affordability, however there are some concerns resulting from potential outcomes of the draft Code Amendment that will adversely impact our communities.
- 5.3 The City of Salisbury submission in response to the draft Code Amendment is considered to identify these matters and requests that the State Planning Commission reviews and amends the draft Code Amendment in a manner that overcomes the concerns of Council.



City of Salisbury  
ABN 82 615 416 895  
34 Church Street  
PO Box 8  
Salisbury SA 5108

(08) 8406 8222  
city@salisbury.sa.gov.au  
salisbury.sa.gov.au



5 February 2025

State Planning Commission  
GPO Box 1815  
ADELAIDE SA 5001  
[plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)

### **City of Salisbury Submission – Accommodation Diversity Code Amendment**

Dear State Planning Commission,

Thank you for inviting the City of Salisbury to provide a submission in response to the draft Accommodation Diversity Code Amendment. Council met on Monday 24<sup>th</sup> February 2025 to discuss the Accommodation Diversity Code Amendment, and resolved to provide feedback as outlined below.

Council supports the intent of the draft Code Amendment to create a clear assessment pathway for co-living development and an ability for retirement facilities to gain access to additional density (where impacts can be mitigated effectively).

The City of Salisbury residential areas are pre-dominantly zoned general neighbourhood zone. Many of these areas have poor access to public transport. In addition, some areas are not in close proximity to shops and services and are not conducive to active forms of transport. Cycling rates are low.

Council does not support applying the policy amendments as a blanket approach across all of our general neighbourhood zone. It is considered that it will create poor social outcomes and reduced amenity especially in areas that already contain vulnerable communities.

Council does support the approach in locations in the general neighbourhood zone that have access to good public transport, shops, services and irrigated reserves. It also recommends that similar policy amendments should apply to Urban Activity Centre Zones and the Suburban Activity Centre Zone.

Additionally, there are some concerns with the intent and interpretation of the policy provisions as drafted.

-  
-

These matters and others are addressed in further detail in the attached table of comments, which reviews the changes proposed by the Accommodation Diversity Code Amendment relevant to the City of Salisbury.

We trust that the feedback provided within this submission will be carefully considered and express our thanks again to the State Planning Commission for inviting Council's comments on this Code Amendment. If any further clarification regarding Council's comments would be of assistance, please do not hesitate to contact Kynan Mann, Senior Policy Planner at [KMann@salisbury.sa.gov.au](mailto:KMann@salisbury.sa.gov.au)

Yours sincerely,

**Gillian Aldridge OAM**  
Mayor, City of Salisbury  
*(On behalf of Council)*

DRAFT

**City of Salisbury Table of Comments – Accommodation Diversity Code Amendment**

Planning and Design Code Reference	Recommendation	Comments
Part 2 – Zones and Subzones		
Pg. 48-71 – Inclusion of Co-living to Zones as an envisaged land use and conditional exclusion from public notification	Conditional support with amendments	<p>The inclusion of co-living as an envisaged land use, and its conditional exclusion from public notification is considered appropriate within the following zones:</p> <ul style="list-style-type: none"> <li>- Urban Neighbourhood Zone</li> </ul> <p>However, it is not supported within the following zones:</p> <ul style="list-style-type: none"> <li>- General Neighbourhood</li> <li>- Housing Diversity Neighbourhood Zone</li> <li>- Strategic Innovation Zone</li> <li>- Suburban Business Zone</li> <li>- Suburban Neighbourhood Zone</li> </ul> <p>The inclusion of co-living as an envisaged land use, and its conditional exclusion from public notification is not considered appropriate within these zones given the following:</p> <ul style="list-style-type: none"> <li>- Table 1 – General Off-Street Car Parking Requirements identifies co-living requiring a car parking rate of 0.5 parks per bedroom when it is located in the above zones. Substantial portions of these zones can be significantly isolated from public transport, employment opportunities, healthy food retailers, community services and other amenities. Where co-living is established in poorly serviced areas and used to house some of the most vulnerable in our communities, one of the following outcomes will occur, none of which are considered appropriate: <ul style="list-style-type: none"> <li>o All occupants will have their own vehicle, and with some bedrooms having more than one occupant, more than half of the occupants vehicles will be parked in the street.</li> <li>o There is no provision for visitor carparking, when there is likely to be more than one group of visitors at a time.</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>○ Substantial expenses by low income occupants will be dedicated to rideshare or taxi services.</li> <li>○ Significant distances will need to be traversed by occupants to access services and amenities. Some occupants may not have the physical ability to traverse such distances and therefore may result on greater demand on support services.</li> </ul> <p>- Given that co-living is not a self-contained residence and is excluded from the definition of a dwelling, and density terms refer to the number of dwellings per hectare, there are no minimum allotment size or density requirements applicable within the above zones. This provides a pathway for co-living to be established in a form that is both substantially out of character with the locality as well as the desired outcomes for these zones.</p> <p>Noting the above, there will be instances where co-living is an appropriate form of development within these zones, however they should be assessed as an all-code assessed development that is not envisaged within the zone (i.e. removed from DTS/DPF 1.1) and undergoes public notification to assist relevant authorities in understanding the local context and potentially unforeseen barriers to the success of the development. General development policies should also be included which require co-living residences to be sited within close proximity to public open space, public transport, and/or other services and amenities.</p> <p>Further to the above, it is considered that additional amendments should be made to the following zones applicable to the City of Salisbury:</p> <ul style="list-style-type: none"> <li>- Suburban Activity Centre Zone</li> <li>- Urban Activity Centre Zone</li> </ul> <p>Co-living should be listed as an envisaged land use within DTS/DPF 1.1 of the above zones. These zones are conducive to supporting co-living arrangements through convenient and walkable access to public transport, retail, employment, as well as other services and amenities. To appropriately facilitate co-living arrangements within these zones (and to ensure the desired outcomes for the zone are preserved), the term co-living should be inserted into PO and DTS/DPF 1.3 and 1.4 of the Suburban Activity Centre Zone and Urban Activity Centre Zone</p>
--	--	---



		<p>respectively. This will reinforce the intent of these zones as having activated streetscapes with commercial land uses whilst permitting residential development to be located above or to the rear of the non-residential land use.</p> <p>Furthermore, co-living should be added to Table 3 – Applicable Policies for Performance Assessed Development and linked to a list of relevant provisions in both the Suburban Activity Centre Zone and Urban Activity Centre Zone to provide greater clarity on the standards needing to be met for proposed co-living arrangements within these zones.</p>
Pg 48-71 – Conditional exclusion from public notification for Significant Retirement Facility and Supported Accommodation Sites	Conditional support with amendments	<p>Where the other amendments identified within this submission are made, the conditional exclusion from public notification for Significant Retirement Facility and Supported Accommodation Sites would be considered appropriate within the following zones within the City of Salisbury:</p> <ul style="list-style-type: none"> <li>- General Neighbourhood Zone</li> <li>- Housing Diversity Neighbourhood Zone</li> <li>- Suburban Neighbourhood Zone</li> </ul> <p>Other zones within the City of Salisbury that envisage retirement and supported accommodation (such as the Urban Neighbourhood Zone) already provide conditional exclusion from public notification for large scale developments.</p> <p>Where the requested amendments in this submission are not made to the draft code amendment, retirement facilities and supported accommodation developments which exceed the building height and building levels ordinarily nominated for the site are requested to require public notification in the above listed zones.</p>
Part 3 – Overlays		
Pg. 73 – Spatial application of proposed <i>Significant Retirement Facility and Supported Accommodation Sites Overlay</i>	Support	<p>Appropriate for the Overlay to be spatially applied to the following Neighbourhood Type Zones within the City of Salisbury:</p> <ul style="list-style-type: none"> <li>- General Neighbourhood Zone</li> <li>- Hills Neighbourhood Zone</li> <li>- Housing Diversity Neighbourhood Zone</li> <li>- Suburban Neighbourhood Zone</li> </ul>

		<p>And not within the following Neighbourhood Type Zones within the City of Salisbury:</p> <ul style="list-style-type: none"> <li>- Rural Shack Settlement Zone</li> </ul>
Pg. 74 – PO 1.1	Drafting amendment	<p>Performance Outcome 1.1 of the Overlay should be amended to “<i>Non-residential activities that are subordinate to, and on association with, retirement facilities and supported accommodation are located and designed to support occupant care and wellbeing and the local community</i>”.</p>
Pg. 74-75 – DTS/DPF 2.1	Conditional support with amendments	<p>Concerns are held that retirement and supported accommodation sites within predominately single storey areas of high amenity could achieve a 6 storey building. Not only is this substantially out of character, but could be designed such that public notification is not required. It is considered that this does not align with the expectations of the community, particularly when the majority of persons will not be aware of this code amendment at its potential impacts. Whilst the need for greater expansion to existing facilities is needed, such substantial departures from prevailing character need to be prevented. It is therefore recommended that the following building heights are prescribed:</p> <ul style="list-style-type: none"> <li>- Where the site is 1 hectare or greater, the building height prescribed by the zone may be exceeded by 1 building level</li> <li>- Where the site is 2 hectares or greater, the building height prescribed by the zone may be exceeded by 2 building levels.</li> </ul>
Pg. 74-75 – PO & DTS/DPF 2.1 and 2.2	Conditional support with amendments	<p>Provisions 2.1 and 2.2 of the Significant Retirement Facility and Supported Accommodation Sites Overlay should be merged into a single provision. Performance Outcome 2.1 identifies that increased development yield is appropriate where off site impacts can be managed. However, DTS/DPF 2.1 speaks specifically to the height of the proposal and does not relate to the mitigation of off site impacts. Therefore the content contained within PO and DTS/DPF 2.2 should be incorporated in to PO and DTS/DPF 2.1.</p> <p>The amended form of PO 2.1 should also identify access to natural light, ventilation, and amenity as impacts needing to be considered.</p> <p>A new PO 2.2 should be included to address the amenity outcomes of occupants on the site, particularly access to natural light and ventilation.</p>

Pg. 75 – PO & DTS/DPF 3.1	Not supported	<p>Provisions do not identify the commercial activity as needing to be ancillary to the significant retirement facility and supported accommodation site. The term associated provides broad scope for utilisation of the commercial activity by persons off-site who are not also accessing the retirement or supported accommodation facility. Therefore, commercial activities may occur on the site that operate practically independently and have no requirement to provide appropriate a suitable number of car parks.</p> <p>Ability already exists for mixed use development to share parking under General Development Policies – Transport, Access and Parking PO 5.1.</p>
Part 4 – General Development Policies		
<p>General – <i>Design and Design in Urban Areas</i></p>	Requested amendment	<p>There is substantial discrepancy between the <i>Design</i> and <i>Design in Urban Areas</i> modules of the General Development Policies. Many policies contained within <i>Design in Urban Areas</i> and which are omitted from <i>Design</i> would provide substantial assistance to relevant authorities in obtaining significantly better outcomes. Policies relating to Student Accommodation is a particular example within the existing Code where this occurs.</p> <p>There is also debate regarding when the two modules should be applied:</p> <ul style="list-style-type: none"> <li>- In the view of <i>Design in Urban Areas</i> applying to built up areas, and <i>Design</i> applying to all other areas of the State. There is no clear indication of what constitutes an urban area with some of the following interpretations taking an urban area to comprise:             <ul style="list-style-type: none"> <li>o Any Neighbourhood Type Zone or Activity Centre.</li> <li>o Any land within the Metropolitan Adelaide Area.</li> <li>o Whether the provisions within Table 3 of the Zone reference <i>Design in Urban Areas</i> (however some zones use a mix of <i>Design</i> and <i>Design in Urban Areas</i>).</li> <li>o Zones containing the word “urban or city” (acknowledging that suburban areas are not urban due to be being sub-urban).</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>- The alternate view being that <i>Design</i> applies to all development and <i>Design in Urban Areas</i> applies development in urban areas in addition to the provisions contained within the <i>Design</i> module. This creates its own issues as provisions are not always consistent between the two modules and there is no guidance regarding whether one takes precedence over the other.</li> </ul>
PG. 78 – Design DTS/DPF 22.1/Pg. 86 – Design in Urban Areas DTS/DPF 31.1	Not supported	The proposed code amendment seeks to remove the minimum internal floor area prescribed for group dwellings and residential flats buildings. While residential flat buildings will instead be assessed against a new provision that identifies minimum internal dimensions for rooms, group dwellings have not been identified to be assessed against this replacement provision.
Pg. 79 – Design DTS/DPF 22.5/Pg. 87 – Design in Urban Areas DTS/DPF 31.8	Requested amendment	<p>Given that the scope of the proposed code amendment does not extend to the <i>Planning, Development and Infrastructure (General) Regulations 2017</i>, it is requested that the minimum internal dimensions identified within the provisions are increased until such time as the Regulations can be updated to require that “kitchen/dining space, fixed storage and cupboards” forms mandatory information to be supplied under Schedule 8.</p> <p>In addition to the above, it is also requested that the minimum internal dimension for any bedroom is no less than 3 metres. The table should then be amended to combine “main bed” and “secondary bed” into a single row of “bedroom” for simplicity.</p> <p>It is also requested that the minimum internal dimensions for studio style accommodation for dwellings and co-living is increased. Research suggests a strong correlation between the minimum size of bedrooms in in student accommodation and mental health, with smaller bedrooms often negatively impacting student wellbeing by contributing to feelings of claustrophobia, stress and reduced privacy, potentially leading to increased anxiety and depression. Therefore, ensuring adequate residence spaces in studio style accommodation for dwellings and co-living arrangements, which closely mimics student accommodation, is crucial for promoting mental health.</p>

Pg. 79 – Design PO 22.8/Pg. 88 – Design in Urban Areas PO 31.8	Not supported	These provisions provide no additional matters for consideration, noting that shared facilities are required to be provided in order for a development to meet the definition of 'co-living'. Since it has no purpose and achieves no outcome beyond what is required by definition, this policy should be deleted.
Pg 81. – Design DTS/DPF 23.7/Pg. 89-90 – Design in Urban Areas DTS/DPF 32.7	Requested amendment	It is recommended that a minimum dimension for deep soil zones should be set out in DTS/DPF 23.7 to support the operation of the Performance Outcome.
Pg. 81 – Design Table 1 – Private Open Space/Pg. 92-93 – Design in Urban Areas Table 1 – Private Open Space	Drafting amendment	The tables refer to dwellings/accommodation type, whereas co-living has been referenced with respect to residences. Accordingly, to ensure consistency with the rest of the code, use of the term “residences” should be incorporated into the tables for consistency.
Pg. 81 – Design Table 1 – Private Open Space/Pg. 92-93 – Design in Urban Areas Table 1 – Private Open Space	Requested amendment	In small co-living arrangements, which is what would be more likely to be expected in suburban localities, 2.5 square metres of private open space is highly inappropriate in terms of comparative amenity, particularly where there are no planning policies to ensure that they will be located within close proximity to public open space. It is therefore requested that the amount of private open space required to be supplied is dependent on the zone they are located within (increased within suburban environments) and/or distance to usable and meaningful public open space.
Pg. 82 – Design Table 2 – Communal Open Space/Pg. 93 – Design in Urban Areas Table 2 – Communal Open Space	Drafting amendment	The tables refer to dwellings/accommodation type, whereas co-living has been referenced with respect to residences. Accordingly, to ensure consistency with the rest of the code, use of the term “residences” should be incorporated into the tables for consistency.
Pg. 82 – Design Table 2 – Communal Open Space/Pg. 93 – Design in Urban Areas Table 2 – Communal Open Space	Requested amendment	In small co-living arrangements, which is what would be more likely to be expected in suburban localities, 2.5 square metres of communal open space per bedroom is highly inappropriate in terms of comparative amenity, particularly where there are no planning policies to ensure that they will be located within close proximity to public open space. In the case of a co-living arrangement of 6 residences, only a total of 15 square metres of communal open space is required to be supplied. It is therefore requested that the amount of communal open space required to be supplied is dependent on the zone they are located within

		(increased within suburban environments) and/or distance to usable and meaningful public open space.
Pg. 94 – Transport, Access and Parking Table 1 – General Off-Street Car Parking Requirements	Requested amendment	<p>As identified above, Table 1 – General Off-Street Car Parking Requirements identifies co-living developments requiring a car parking rate of 0.5 parks per bedroom. The proposed code amendment seeks to extend to suburban areas which can be significantly isolated from public transport, employment opportunities, healthy food retailers, community services and other amenities. Where co-living is established in poorly serviced areas and used to house some of the most vulnerable in our communities, one of the following outcomes will occur, none of which are considered appropriate:</p> <ul style="list-style-type: none"> <li>- All occupants will have their own vehicle, and with some bedrooms having more than one occupant, more than half of the occupants vehicles will be parked in the street.</li> <li>- Substantial expenses by low income occupants will be dedicated to rideshare or taxi services.</li> <li>- Significant distances will need to be traversed by occupants to access services and amenities. Some occupants may not have the physical ability to traverse such distances and therefore may result on greater demand on support services.</li> </ul> <p>Accordingly, the car parking rate for co-living within poorly serviced suburban areas should be increased with consideration made for visitor parking.</p>
Pg. 94-96 – Transport, Access and Parking Table 2 – Off-Street Car Parking Requirements in Designated Areas	Support	<p>Designated Areas applicable to the City of Salisbury in relation to Table 2 are as follows:</p> <ul style="list-style-type: none"> <li>- Urban Activity Centre Zone when the site is also in a high frequency public transit area.</li> <li>- All land within the Urban Neighbourhood Zone.</li> </ul> <p>The identified car parking rate of 0.25 car parks per bedroom is considered appropriate given the accessibility to public transport, public amenities and services that co-living residents will have in these areas.</p>
Pg. 97 – Transport, Access and Parking Table 3 – Off-Street Bicycle Parking Requirements	Support	<p>Designated Areas applicable to the City of Salisbury in relation to Table 3 are as follows:</p> <ul style="list-style-type: none"> <li>- Strategic Innovation Zone</li> <li>- Suburban Activity Centre Zone</li> </ul>

		<ul style="list-style-type: none"> <li>- Suburban Business Zone</li> <li>- Urban Activity Centre Zone</li> <li>- Urban Neighbourhood Zone.</li> </ul> <p>The identified bike parking rate 1 per co-living residence and 0.1 per co-living residence for visitors is considered appropriate given occupants will have reduced accessibility to car parking.</p>
Pg. 97 – Transport, Access and Parking Table 3 – Off-Street Bicycle Parking Requirements	Requested amendment	Given the limited number of car parks proposed to be supplied for co-living residences within suburban environments, particularly the General Neighbourhood Zone and Suburban Neighbourhood Zone, it is requested that bike parking provisions are identified for co-living and student accommodation in all zones.
Part 5 – Specified Matters and Areas Identified under the Act and Regulations Nil		
Part 6 – Index of Technical and Numeric Variations Nil		
Part 7 – Land Use Definitions Pg. 98 – Definition proposed for <i>Co-living</i>	Conditional support with amendments	<p>Definition is necessary to achieve suitable assessment and pathway for greater diversity in housing provision. However, the following matters should be addressed to assist with the assessment of development applications:</p> <ul style="list-style-type: none"> <li>- Cook tops (or similar term) should be included in list of items comprising a full kitchen.</li> <li>- Clarity of what a full sized fridge is.</li> <li>- Define the term "private residence".</li> <li>- Clarity on whether all items listed in (b) are required to be supplied, or only one.</li> </ul>
Part 8 – Administrative Definitions		

<p>Pg. 99 – Definition proposed for <i>Significant Retirement Facility and Supported Accommodation Site</i></p>	<p>Conditional support with amendments</p>	<p>Definition is necessary to achieve the Desired Outcomes of the Significant Retirement Facility and Supported Accommodation Sites Overlay however the following concerns are raised:</p> <ul style="list-style-type: none"> <li>- The definition does not require the allotments to be either contiguous or adjoining each other. Given the intention for the Overlay to provide for additional height on larger allotments where the associated impacts can be mitigated, a fragmented site will prevent this from being achieved. It is therefore recommended that the definition includes “Means a contiguous site of greater than 10,000m<sup>2</sup>...” (or similar).</li> <li>- The use of the word “and” in the term “Significant Retirement Facility and Supported Accommodation Site” (and the corresponding Overlay) should be substituted with the word “or” to provide consistency with the proposed definition.</li> <li>- From the code amendment draft documents, it is not clear whether it is intended to prevent new Significant Retirement Facility and Supported Accommodation Sites from being established. Given the current drafting of the definition, a vacant site of greater than 1ha may exist in a suitable location, however the site can not take benefit of the current definition due to the site not being used primarily for a retirement facility or supported accommodation. However, if a small facility was built on the vacant land, regardless of the period of time it has been used for, it would then gain the benefit of the Significant Retirement Facility and Supported Accommodation Site. If the intention is to prevent significant facilities from being established in new locations, the spatial application of the mapping or the wording of the definition will need to be altered. If the intention is to enable significant sites to be established in new locations, the definition should be amended to “...whether existing or proposed, used primarily for...”. Given the increasing need for retirement and supported accommodation, it is recommended that the definition be amended so that it does not bar new significant sites from being established (or being interpreted as such).</li> </ul>
<p>Part 9 – Referrals</p>		



Nil		
Part 10 – Significant Trees		
Nil		
Part 11 – Heritage Places		
Nil		
Part 12 – Concept Plans		
Nil		
Practice Guideline 3 – Communal Recreation Spaces and Shared Facilities		
Pg. 2-3 – Clause 5 – Background – Land Use Definitions Table	Drafting amendment	Update the land use definitions table to identify that Student Accommodation is excluded from the definition of Co-living and that Co-living is excluded from the definition of Student Accommodation, to ensure consistency with the definitions proposed to be included in Part 7 of the Planning and Design Code.
Pg. 3-6 – Clause 6 – Relevant Policy Provisions – General	Drafting amendment	It requested that the policy guidance refrain from use of the word “should”. The policy guidance is already a guideline and not mandatory, therefore the use of definitive language would assist in the application of the guideline with the assessing officer using their discretion to deviate from the guidance in appropriate circumstances.
Pg. 3-6 – Clause 6 – Relevant Policy Provisions – Column A	Drafting amendment	Column A of the table only identifies the Performance Outcomes listed in the Design in Urban Areas General Development Policies and not the Design General Development Policies. Accordingly, Design PO 22.9 and 22.10 should be listed within the table.  Further to the above, column A only identifies the Performance Outcome numbers and does not identify which number relates to which portion of the Code. According, the Performance Outcome reference should be identified in full.
Pg. 3-4 – Clause 6 – Relevant Provisions –	Requested amendment	Policy guidance is somehow vague and inflexible. Recommended that policy guidance is redrafted for clarity in the assessment of a development application.

<p>Design PO 22.9 and Design in Urban Areas PO 31.9 &amp; 41.3 – Communal Indoor Recreation Space</p>		<p><i>"At least 1 communal indoor recreation space adequately sized to cater for 40% of all co-living residents and 15% of self-contained residents at one time".</i></p> <p>No guidance provided on what should occur in instances where more than one communal indoor recreation space is supplied (what size can it be, can you reduce the size of the first space, do additional spaces also need to cater for 40% of all co-living residents and 15% of self-contained residents?). Policy guidance incentivises having only a single communal indoor recreation space, which in large scale co-living developments may be undesirable. Intent of policy guidance is unclear (i.e. preventing many small meeting spaces, ensuring that at least one large space is provided, or ensuring that sufficient space is provided for the whole site). Additionally, it is requested that guidance is provided for the communal indoor recreation space size requirement per co-living and self-contained bedroom for the site. This would assist in resolving the above uncertainties.</p> <p><i>"If accessible only by stairs, communal indoor recreation space should be no more than 1 floor from co-living residents it services. If accessible by lift, communal indoor recreation space should be no more than 4 floors from the co-living residents it services. Communal indoor recreation space should be co-located with communal dining space and shared kitchen(s). At least one communal indoor recreation space should receive a minimum 3 hours direct solar access to its windows on 21 June."</i></p> <p>Policy guidance needs to identify that the largest communal indoor recreation space needs to both be accessible via wheelchair and receive a minimum 3 hours direct sunlight to its windows on 21 June. The intention being for the greatest number of people being able to access appropriate natural light in the winter months.</p>
<p>Pg. 4-5 – Clause 6 – Relevant Provisions – Design PO 22.10 and</p>	<p>Requested amendment</p>	<p>Similar issues to that raised above for indoor communal recreation spaces. Recommended that policy guidance is redrafted for clarity in the assessment of a development application.</p>

<p>Design in Urban Areas PO 31.10 &amp; 41.4 – Shared Kitchen Facilities</p>		<p><i>"At least 1 shared kitchen space that is to be used solely for the preparation of food, adequately sized to cater for 40% of all co-living residents to cook a meal at one time."</i></p> <p>No guidance provided on what should occur in instances where more than one kitchen space is supplied (what size can it be, can you reduce the size of the first space, do additional spaces also need to cater for 40% of all co-living residents and 15% of self-contained residents?). Policy guidance incentivises having only a single kitchen space, which in large scale co-living developments may be undesirable. Intent of policy guidance is unclear (i.e. preventing many small spaces, ensuring that at least one large space is provided, or ensuring that sufficient space is provided for the whole site).</p> <p><i>"Provision of cooking appliances (oven and cooktop) to cater for 10% of co-living residents to use at one time, i.e:"</i></p> <p>Recommend that the draft of this policy guidance be simplified to "Cooking appliances provided at the following rates:" to help prevent confusion.</p> <p><i>"1x full size oven per 10 co-living residents 1x 4 burner cooktop per 10-living residents."</i></p> <p>It is requested that guidance is supplied regarding what is considered a full size oven.</p> <p><i>"Provision of microwave oven to cater for 20% of all co-living residents to use at one time, i.e: 1x microwave per 5 co-living residents."</i></p> <p>Opportunity to simplify to prevent confusion. Recommended that it is included in the above list as: "1x microwave oven per 5 co-living residents."</p> <p><i>"Provision of refrigeration: 100L per co-living resident, provided either in the resident's room or within the communal kitchen servicing the resident."</i></p>
--	--	--

		<p>It is recommended that where refrigeration is provided within all of the co-living residences, a minimum provision of refrigeration be supplied within the communal kitchens.</p> <p><i>"Adequate provision of kitchen sink(s) to cater for the number of residents that the kitchen space is servicing, even in instances where dedicated dishwasher appliances are provided."</i></p> <p>Recommended that guidance document identifies sink provision per co-living resident. Adequate sinks would need to be supplied for both food preparation and washing of dishes. There may be particular requirements to be addressed under the public health act given the preparation of food in a public place.</p> <p><i>"If accessible only by stairs, shared kitchens should be no more than 1 floor from the co-living residents it services. If accessible by lift, shared kitchens should be no more than 4 floors from the co-living residents it services."</i></p> <p>Recommended that kitchen that is located in conjunction with the largest communal indoor recreation space be accessible via wheelchair. Additionally, adequate storage of utensils should be supplied within the kitchen spaces to reduce the amount of equipment that needs to be carried potentially down a flights of stairs.</p> <p><i>"Where more than 1 shared kitchen is provided, at least 1 shared kitchen should be co-located with communal dining space. Shared kitchens should be co-located with communal indoor recreation space."</i></p> <p>It is recommended that the policy guidance is amended to identify that all kitchens are to co-located or adjoining communal dining space. Minimum dining space needs to be detailed (i.e. number of seats per co-living resident). Where dining areas are co-located or adjoining communal indoor recreation space, seat in the communal indoor recreation space can contribute to dining space needs.</p>
Pg. 5 – Clause 6 – Relevant Provisions – Design PO	Drafting amendment	<i>"Shared bathroom facilities, in a low rise development (&lt;=2 storeys), are located no more than 1 floor from the residents it services."</i>

<p>22.10 and Design in Urban Areas PO 31.10 &amp; 41.4 – Shared Bathroom Facilities</p>		<p>In a two storey development, it is impossible to be more than 1 storey away from any other part of the development except where the bathroom facilities are located below ground. It is therefore recommended that bathroom facilities are located on the ground floor in low rise development to improve co-location with ground floor communal indoor recreation spaces and shared kitchen facilities for wheelchair accessibility.</p>
<p>Pg. 5-6 – Clause 6 – Relevant Provisions – Design PO 22.10 and Design in Urban Areas PO 31.10 &amp; 41.4 – Shared Laundries</p>	<p>Requested amendment</p>	<p><i>"Capacity for 10% of residents who do not have private laundry facilities to use shared laundry facilities at one time, i.e.:"</i></p> <p>Opportunity to simplify and prevent confusion in the interpretation of the policy guidance. Suggested that policy guidance is amended to "Laundry facilities provided at the following rates:"</p> <p><i>"1x trough or basin with hot and cold water with plumbed washing machine installed directly adjacent for every 10 or fewer residents without private laundry facilities (co-living and self-contained residents). Either: adjacent or directly accessible to a drying area with clothes line, OR 1x dedicated tumble dryer for every 10 or fewer residents (co-living and self-contained residents)."</i></p> <p>It is requested that the policy guidance identify the amount of drying areas and what form that takes in the case where no tumble dryers are supplied or the proposed development seeks to provide a mix between tumble dryers and clothes lines.</p>





## FACT SHEET

## Updating planning rules to increase accommodation diversity

### About the draft Accommodation Diversity Code Amendment

The State Planning Commission has reviewed the planning rules for apartments, including student accommodation, residential flat buildings, supported accommodation and retirement living.

The draft Accommodation Diversity Code Amendment proposes improvements to enhance housing diversity and provide more flexibility for building apartment-style homes and retirement living across the state.

Key features proposed in the draft code amendment include:

- introducing a new form of 'co-living' accommodation for residences that rely on shared facilities, such as common kitchens or bathrooms
- allowing increased building height up to 4-6 storeys for large retirement villages and supported living developments to provide more accommodation for our ageing population to continue living in their own communities
- more flexibility in apartment design, by focussing on rules that contribute to a comfortable home, such as minimum bedroom and living area dimensions, rather than minimum total floor area
- more guidance on how shared rooms and open spaces are designed, including being conveniently located near residences and having good access to sunlight, appropriate seating, lighting and other features
- providing better guidance on the provision of communal recreation spaces and shared facilities for student accommodation.

We are also seeking feedback on a draft practice guideline for co-living and student accommodation, outlining the features of communal spaces and shared facilities that should be provided to meet residents' needs, such as recreational spaces and kitchen, dining, bathroom and laundry facilities.

The proposed changes aim to make it easier to build much needed housing for South Australians.

Providing greater flexibility and increasing the number of apartment-style homes that can be built is part of the South Australian Government's Housing Roadmap to address the need for more homes for South Australians.

[plan.sa.gov.au](http://plan.sa.gov.au)



Government of South Australia  
Department for Housing  
and Urban Development

## Have your say

You can share your feedback on the draft Code amendment between 5 December 2024 and 27 February 2025.

Submit your feedback by:

- completing the survey on the YourSAy website: [yoursay.sa.gov.au/accommodation-diversity](https://yoursay.sa.gov.au/accommodation-diversity)
- completing the PlanSA online submission form: [plan.sa.gov.au/have\\_your\\_say/code-amendments](https://plan.sa.gov.au/have_your_say/code-amendments)
- emailing: [PlanSAsubmissions@sa.gov.au](mailto:PlanSAsubmissions@sa.gov.au)
- Posting your written submission to:  
Submission: Accommodation Diversity Code Amendment  
Planning and Land Use Services  
Department for Housing and Urban Development  
GPO Box 1815, ADELAIDE, SA 5001

Hard copies of the draft code amendment can be viewed during standard business hours at Level 9, 83 Pirie Street, ADELAIDE SA 5000.

## Next steps

All feedback will be considered in finalising the Code Amendment and all feedback will be captured in an engagement report.

The engagement report will be provided to the State Planning Commission and the Minister for Planning to assist with final decision-making.

Once a decision has been made, the engagement report, including all feedback received during consultation, will be published on the PlanSA website. Names and organisations will be included with published submissions but addresses, email addresses and phone numbers will be redacted.

## More information

For more information about the draft Accommodation Diversity Code Amendment:

- visit the YourSAy website at: [yoursay.sa.gov.au/accommodation-diversity](https://yoursay.sa.gov.au/accommodation-diversity)
- attend an online information session on:
  - 6 February 2025, 10:00 am to 11:00 am
  - 11 February 2025, 5:15 pm to 6:15 pm
- Email PlanSA Help Desk: [plansa@sa.gov.au](mailto:plansa@sa.gov.au)
- Call PlanSA Help Desk: 1800 752 664

[plan.sa.gov.au](https://plan.sa.gov.au)

2



Government of South Australia  
Department for Housing  
and Urban Development



# Frequently Asked Questions



PlanSA



## Accommodation Diversity Code Amendment

### Q – What is a Code Amendment?

**A** – The Planning and Design Code contains the planning rules and policies that guide what can be developed in South Australia. Planning authorities use these planning rules to assess development proposals.

A Code Amendment is a proposal to change the policies, rules or mapping within the Code, which can change the way that future developments are assessed.

### Q – What is the Accommodation Diversity Code Amendment?

**A** – State and local government are responsible for providing diverse housing options in residential areas for different household types, life stages and lifestyle choices. This is embedded in state planning policies and regional plans, including *The 30-Year Plan for Greater Adelaide (2017 Update)*.

To enhance housing diversity and options for South Australia's population, the State Planning Commission has initiated the Accommodation Diversity Code Amendment. This code amendment focuses on planning rules related to apartment-type accommodation to provide additional design flexibility to support and encourage the development of this style of housing.

Key features proposed in the Accommodation Diversity Code Amendment include:

- introducing a new form of 'co-living' accommodation for residences that incorporate shared facilities, such as kitchens or bathrooms
- allowing increased building height up to 4-6 storeys for large retirement villages and supported living developments to provide more accommodation for our ageing population to continue living in their own communities
- more flexibility in apartment design, by focussing on rules that contribute to a comfortable home, such as minimum bedroom and living area dimensions, rather than minimum total floor area.
- more guidance on how shared rooms and open spaces are designed, including being conveniently located near residences and having good access to sunlight, appropriate seating, lighting and other features
- better guidance on the provision of communal space and shared facilities for student accommodation.

### Q – How is co-living accommodation different from conventional residences?

**A** – Co-living is a form of residential accommodation.

However, co-living residences do not have either a full kitchen or full bathroom, and rely on shared kitchen and/or bathroom facilities instead. They feature communal areas and shared facilities, encouraging communal living.

www.plan.sa.gov.au  
PlanSA@sa.gov.au  
PlanSA Service Desk 1800 752 664



Government of South Australia  
Department for Housing  
and Urban Development

Conventional residences, including apartments, are fully self-contained with their own full kitchen and bathroom.

An apartment building could contain both co-living residences and conventional residences. Co-living can also occur in other building forms, an adapted large house or boarding house.

The requirements for co-living residences are slightly different compared to conventional residences. For instance, there are lower minimum living and bedroom area dimensions because communal recreation spaces and shared facilities are provided.

**Q – What is the difference between co-living accommodation and co-located housing?**

**A –** Co-living and co-located housing, despite having similar names, are quite different. Both are important new housing types that will enable housing diversity and choice.

Co-located housing is a new class of housing proposed through the draft Future Living Code Amendment that refers to a group of two or more homes that share gardens and some amenities. It always includes an existing established home that forms part of the co-located housing development and encourages 'adaptive re-use' to modify the existing housing and incorporate it into the co-located housing design.

Co-located housing is proposed in established suburbs where standard infill housing isn't appropriate. It must complement existing neighbourhood character, including protecting historic and character values, and incorporate high-quality design.

The result is high-quality designed homes surrounding communal open space. Mature vegetation is retained, and existing streetscape character preserved, while providing a range of smaller housing options.

Co-located housing can be self-contained, unlike co-living which relies on shared facilities.

Co-located housing must provide communal open space for shared use, while co-living doesn't necessarily need to provide communal open space, if sufficient private open space is provided.

Further information on co-located housing and the Future Living Code Amendment can be found at [yoursay.sa.gov.au/future-living](http://yoursay.sa.gov.au/future-living).

**Q – How is purpose-built student accommodation different from co-living and apartments in a residential flat building?**

**A –** Purpose-built student accommodation differs from co-living and apartments in a residential flat building because it is specifically for temporary occupation by students.

Requirements for student accommodation differ from other forms of accommodation because they are tailored to meet the needs of students. For instance, student accommodation can be either self-contained or not self-contained, has no minimum room size, requires less storage space and must include communal facilities and spaces to encourage social interaction.

To help provide appropriate communal facilities and shared spaces for student accommodation, new planning rules are proposed to be included in the Planning and Design Code, and a new practice guideline for communal recreation areas and shared facilities has been drafted. The planning rules and guidelines mirror those for co-living developments. This includes being conveniently located near residences and having good access to sunlight, appropriate seating, lighting and other features, as well as providing guidance on facility size and capacity.

If a purpose-built student accommodation building is proposed to be used as either co-living or conventional apartments, a development application would be required for a change in land use. The proposal would be assessed against requirements in the Planning and Design Code.

**Q – What changes to apartment size criteria are proposed to provide more flexibility for building apartment-style homes?**

**A –** The current minimum floor area criteria for apartments are proposed to be removed and replaced with minimum dimensions for living rooms and bedrooms.

This focuses requirements on areas of the apartment that are most important for comfortable living, and avoids arbitrary overall apartment size, which does not necessarily achieve good internal floor layout or design.

It therefore enables potentially smaller, well-designed apartments that still achieve comfortable living to be provided.

**Q – What changes to communal open space policy are proposed to provide more flexibility for building apartment-style homes?**

**A –** Planning rules are proposed to be revised to clarify that communal open space, such as rooftop gardens, can be provided instead of private open space, such as private balconies. The rate at which communal open space is provided has been reduced compared to private open space.

The new communal open space rate ensures there is a suitable amount of usable space initially, after which there is a gradual increase based on the number of homes (up to a maximum area of 250 m<sup>2</sup>). The proposed communal open space for a residential flat building with multiple stories would include:

- the equivalent private open space rate for the five largest dwellings
- an additional 4 m<sup>2</sup> (equivalent to the private open space rate for a studio apartment) for each additional dwelling until a total of 250 m<sup>2</sup> is reached.

A communal open space rate of 2.5 m<sup>2</sup> per residence is prescribed for co-living and student accommodation, lower than the rate for private open space, which applies per bedroom not per residence.

These new communal open space rates work with the new planning rules guiding design of communal open space, such as solar access, planting areas, seating, lighting and other facilities.

This provides more flexibility for providing open space in an apartment development, either through providing a single large communal open space or smaller individual balconies for each apartment.

**Q – What is the difference between retirement living and supported accommodation?**

**A –** Retirement living facilities, often called 'retirement villages', provide homes for retired people who want to live independently. Retirement living developments often include shared facilities such as activity spaces. They operate under the *Retirement Villages Act 2016*.

Supported accommodation is residential accommodation for people requiring regular personal care or medical assistance, such as a nursing home.

**Q – How does the draft Code Amendment support providing accommodation for older people in the community?**

**A –** The draft Code Amendment supports opportunities for retirement living facilities and supported accommodation development on large sites. Changes are proposed to respond to the limited availability of retirement and aged care accommodation and increasing demand due to our ageing population.

A new “Significant Retirement Facility and Supported Accommodation Site Overlay” is proposed, which will allow additional building height on sites more than 1 hectare in area:

- on sites between 1 and 2 hectares in area, building height up to 4 storeys
- on sites above 2 hectares in area, building height up to 6 storeys.

The proposed overlay also enables the development of larger compatible non-residential uses, such as cafes or allied health services, on these retirement facilities and supported accommodation sites. Shops, offices and consulting rooms are envisaged up to 450 m<sup>2</sup> in floor area where they support the facility’s residents, workers, visitors and the local community.

**Q – Where would the new Significant Retirement Facility and Supported Accommodation Site Overlay apply?**

**A –** The new Overlay is proposed to apply in suburban neighbourhood-type locations.

The new Overlay is needed because more than 85 per cent of retirement facilities and Australian Government aged care facilities are located in suburban neighbourhood-type zones, where building height is typically limited to two storeys.

This means that an overwhelming majority of facilities are constrained by building height controls and limited in their ability to increase capacity. This poses serious implications for providing age-appropriate accommodation in response to the growing demands of an ageing population.

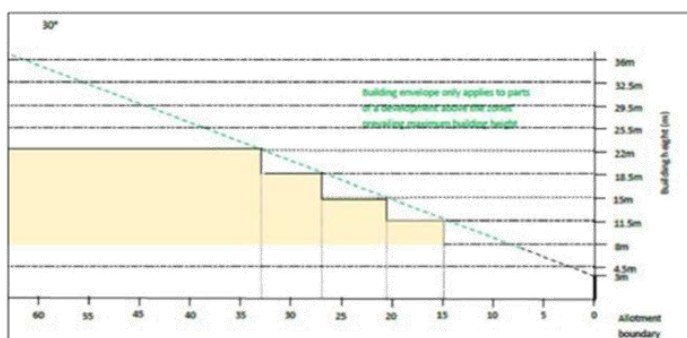
**Q – How would neighbouring properties be protected from the impacts of increased building height in retirement living and supported accommodation facilities?**

**A –** In order to protect adjoining properties, additional building height must be contained within a 30-degree building envelope applying from all allotment boundaries.

This means that buildings next to the boundary would be low level and taller buildings of 4-6 storeys would be located in the centre of the large retirement living or supported accommodation facility.

The zone’s front, side and rear setback policy continues to apply to parts of a development below the zone’s prevailing building height maximum. For instance, in a zone where a two-storey maximum building height applies to an area, the Overlay’s building envelope policy will apply above this level, and the setback requirements for the ground and second storey apply as they do for any development.

The operation of the 30-degree building envelope will mean that, at a minimum, each additional building level would need to be set back further from the allotment boundary than the level below. This concept is illustrated in the image below:



**Q – Were planning rules for build-to-rent accommodation explored as part of investigations to develop the draft code amendment?**

**A –** As part of investigation in developing the draft Code Amendment, the need for a separate land use definition and rules for build-to-rent accommodation were explored.

Following this review, it was determined that other amendments in the draft Code Amendment provide additional flexibility in apartment design that support build-to-rent developments, and that a separate land use definition was not warranted based on whether the apartments are owned or rented, as the Planning and Design Code guides the built form and design rather than tenure of a building.

**Q – How can I have my say on the draft Accommodation Diversity Code Amendment?**

**A –** Community and stakeholder feedback on the draft Accommodation Diversity Code Amendment is important and can help influence the design and nature of apartment-style buildings constructed in South Australia.

Share your feedback from 5 December 2024 until 5:00 pm 27 February 2025.

All feedback is encouraged to be submitted via the YourSAy website at:

- [yoursay.sa.gov.au/accommodation-diversity](https://yoursay.sa.gov.au/accommodation-diversity)

Alternatively, feedback can be provided via:

- [PlanSA online submission form](#)
- Email: [plansasubmissions@sa.gov.au](mailto:plansasubmissions@sa.gov.au)  
(subject: Submission – Accommodation Diversity Code Amendment)
- Post: Attention: State Planning Commission, GPO Box 1815, Adelaide SA 5001.

All feedback will be carefully considered in finalising the Code Amendment and captured in an engagement report.

The engagement report will be provided to the State Planning Commission and the Minister for Planning to assist with final decision-making.

Once a decision has been made, the engagement report, including all feedback received during consultation, will be published on the PlanSA website. Names and organisation details will be included with published submissions, but personal addresses, email addresses and phone numbers will not be published.

**Q – Where can I get more information about the draft Accommodation Diversity Code Amendment?**

**A –** A series of community information sessions will be held online via Zoom to provide further details about the draft Code Amendment and provide the chance the community to ask questions.

For further information about the draft Code Amendment, information sessions and how to share your feedback, visit the YourSAy website at: [yoursay.sa.gov.au/accommodation-diversity](https://yoursay.sa.gov.au/accommodation-diversity).

Hard copies of the draft Code Amendment can also be viewed at PlanSA office at level 9, 83 Pirie Street, Adelaide.

For more information contact PlanSA on:

Telephone: 1800 752 664  
Email: [plansa@sa.gov.au](mailto:plansa@sa.gov.au)  
Visit: [plan.sa.gov.au/en/ca/accommodation-diversity](https://plan.sa.gov.au/en/ca/accommodation-diversity)