

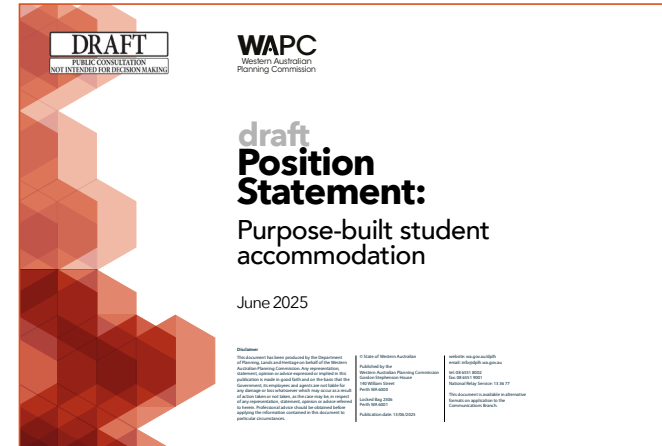


PUBLIC ENGAGEMENT OUTCOMES REPORT

Position Statement:

Purpose-built student accommodation

February 2026



CONTENTS

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1 INTRODUCTION

The purpose of the Public Engagement Outcomes Report (Report) is to provide a high-level summary of the feedback received on the draft Position Statement – Purpose-built student accommodation during the formal public consultation period.

The Report sets out the feedback received on each of the main elements and key themes associated with the draft Position Statement, including a range of issues and concerns raised about the application of proposed provisions.

2 PUBLIC ADVERTISING PERIOD

The Position Statement was prepared to support Western Australia's growing reputation as a destination for international students, providing:

- guidance on design considerations, such as amenity provision and building aesthetics, to ensure high-quality living environments for students, and
- key planning considerations including proximity to educational institutions and transport, carparking and traffic management, the potential for adaptive reuse, and ensuring PBSA developments integrate with their surroundings.

The draft Position Statement was released for public advertising on 13 June 2025 for a 90-day period. Submissions closed on 11 September 2025.

During the consultation period three information sessions were held, including one hosted by WA Local Government Association (WALGA) for local government officers.

Additional meetings were held with stakeholders, including:

- Planning Institute of Australia (WA)
- WALGA
- Property Council of Australia's Student Accommodation Council
- Local Government Professionals WA
- Local Government Planners' Association
- City of Perth
- Department of Local Government, Industry Regulation and Safety
- DevelopmentWA
- South Australian Government Architect's Office
- Department of Health
- Student Accommodation Association
- Study Perth
- Unilodge and
- Centurion.



3 SUBMISSION FEEDBACK

A total of 22 submissions were received from the following stakeholders, as shown in Figure 1 below:

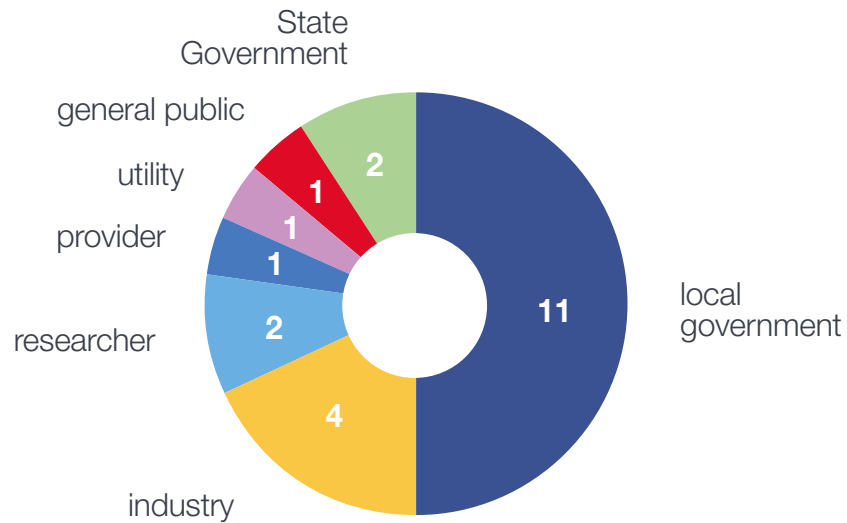


Figure 1: Number of submissions received by stakeholder group

Appendix 1 provides the full list of submitters.

One submission was received a month after the close of the consultation period.

The two forms of submissions (written and online survey) generated 314 individual responses specific to a certain issue or section of the draft Position Statement.

Figure 2 shows all 314 comments received by response.

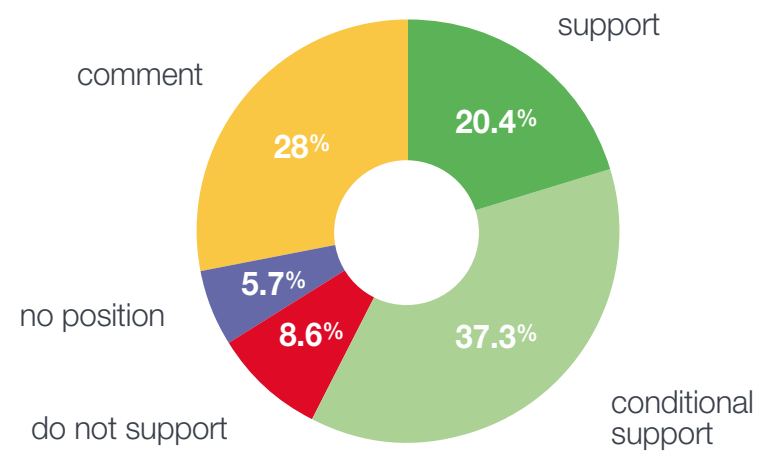


Figure 2: All comments received

The following section outlines the feedback received on the specific questions raised in the feedback form.



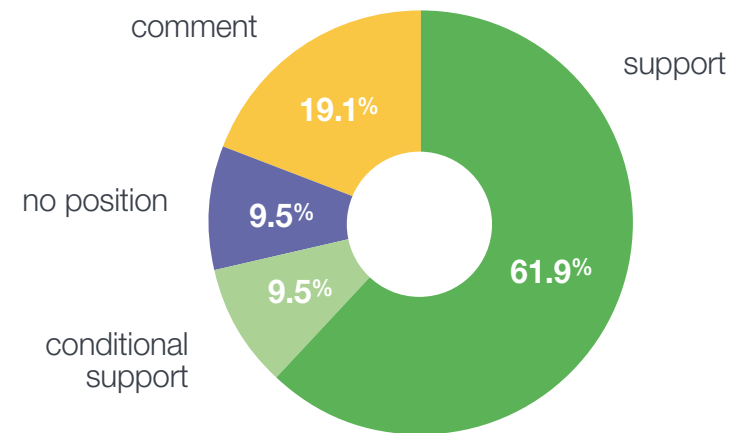
1. Do you think there is a need for purpose-built student accommodation policy guidance to assist decision makers and proponents?

There was strong support, 71.4% (support and conditional support) for the preparation of specific policy guidance for purpose-built student accommodation (PBSA).

The feedback indicates consensus that such guidance is necessary and supported.

Key themes from submissions:

- **Addresses a policy gap:** The guidance fills a gap, as existing frameworks like the Residential Design Codes (R-Codes) are considered inadequate for the unique scale and operational nature of PBSA.
- **Recognises a distinct typology:** It formally acknowledges PBSA as a unique form of accommodation with specific design needs—such as communal and shared living spaces—that are not covered by the R-Codes.
- **Provides certainty and clarity:** It establishes clear and consistent assessment considerations, providing greater certainty and streamlining the process for proponents, operators, and decision-makers.
- **Promotes quality outcomes:** The policy will help to ensure new developments are high-quality, well-located, and provide high amenity for students while integrating effectively with surrounding communities.



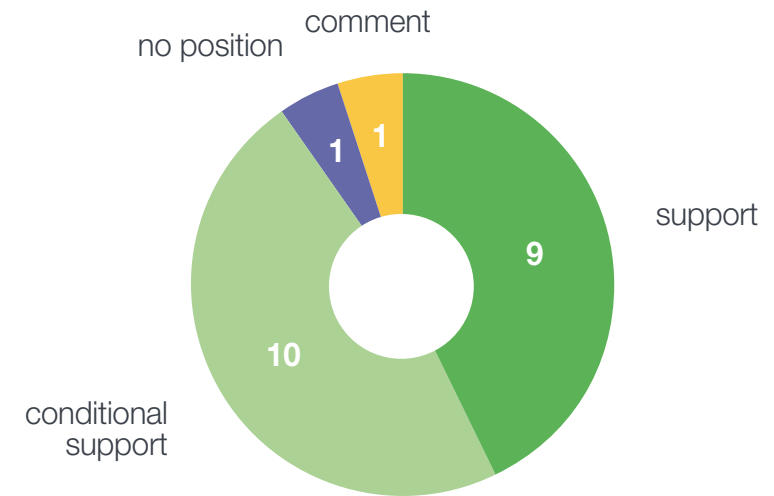


2. Do you support the policy intent?

There was unanimous support for the policy's core intent to deliver high-quality, safe, and well-located PBSA. While the policy intent was endorsed, stakeholders provided several recommendations and considerations to refine the policy's focus, scope, and application.

Key themes from submissions:

- **Focus on outcomes, not prescription:** Several respondents cautioned against making the policy overly prescriptive. They advocated for an outcomes-based approach that encourages innovation and allows flexibility to meet evolving student needs without unnecessarily increasing costs.
- **Clarify scope and application:** Feedback highlighted the need to clarify how the policy will be applied. This includes consideration of on-campus and off-campus developments (as the draft PS was silent on this matter), and whether different geographical contexts, such as metropolitan Perth versus regional WA mattered.
- **Integration with existing frameworks:** It was suggested the policy should supplement, not override, existing frameworks like the R-Codes. Its relationship with the current planning system needs to be clearly defined to avoid conflict or duplication.



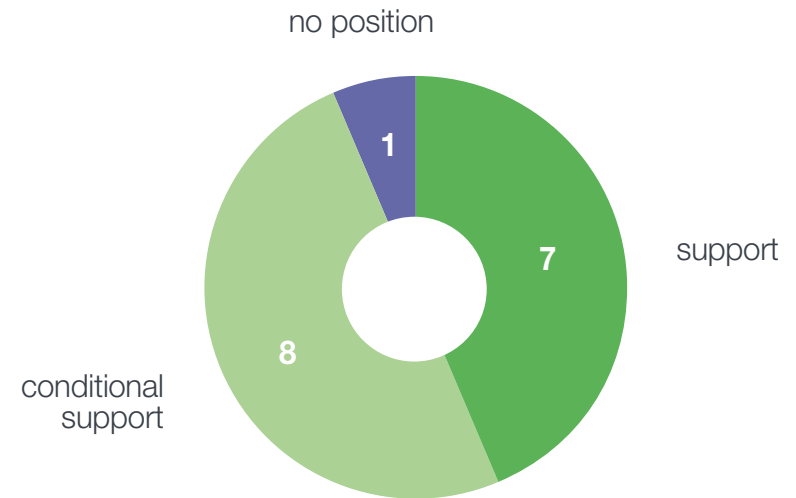


3. Do you support the policy objectives?

There was broad support for the proposed policy objectives. Comments were either supportive or “not opposed” to the objectives in principle. The feedback focused less on the existing objectives and more on recommending additions and refinements to ensure the objectives are comprehensive.

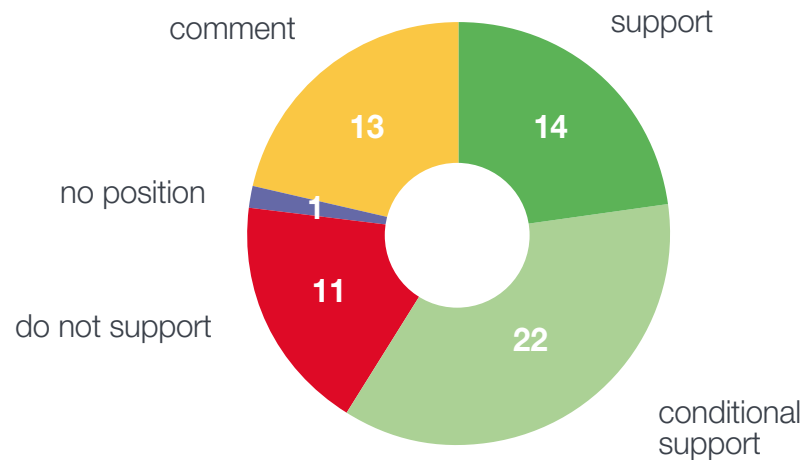
Key themes from submissions:

- **Integration with local context:** A strong, repeated theme was the need for a new objective ensuring that PBSA design is responsive to the local character of the surrounding neighbourhood. This includes considering amenity impacts on adjacent properties and ensuring compatibility with the existing area.
- **Expanded scope beyond PBSA:** Several stakeholders suggested the objectives should be expanded to apply to a wider range of student housing types, including other co-living models, rather than focusing exclusively on purpose-built student accommodation.
- **Adopt a holistic approach:** Feedback recommended a more holistic and integrated approach within the objectives. This would ensure specific consideration is given to key elements like bedroom functionality, communal spaces, parking, and ongoing operational management.
- **Balance requirements with flexibility:** Echoing feedback from the previous question, stakeholders supported objectives that balance clear planning requirements with the flexibility needed to encourage innovation and respond to evolving student demands.



4. In general, do you support the guidance provided in Table 1 – Assessment Criteria of the draft Position Statement?

Respondents were generally supportive of the intent of having specific assessment criteria for PBSA. However, this support was highly conditional, with the feedback indicating that Table 1 requires revision to be practical and effective.



Key themes from submissions:

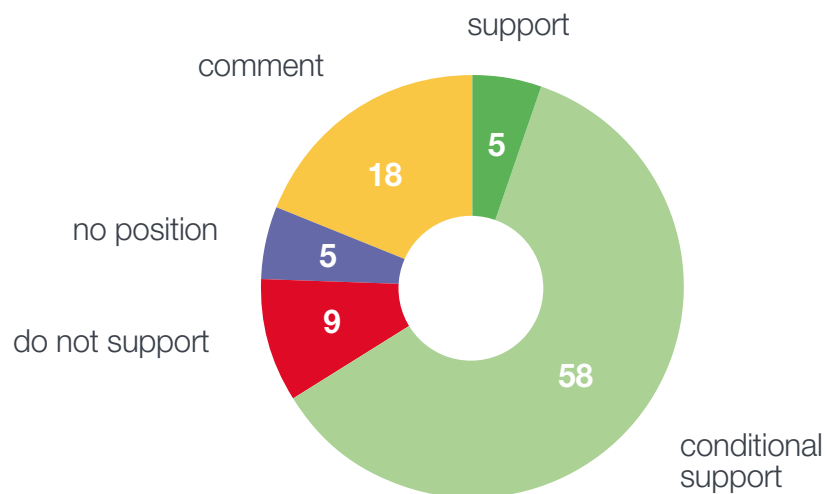
- **Avoid duplication of the R-Codes:** This was the most frequent theme. Stakeholders strongly advised that the criteria must not duplicate or conflict with the R-Codes. The guidance should only focus on matters unique to PBSA and should simply reference the R-Codes for all standard residential requirements.
- **Support an outcomes-based approach:** There was a clear preference for outcomes-focused criteria over overly prescriptive rules. Respondents highlighted that rigid standards (e.g., fixed room dimensions) could stifle design innovation, unnecessarily increase costs, and fail to adapt to future needs.
- **Refine and clarify specific criteria:** While the topics covered were considered relevant, many individual criteria require more detail. Key areas mentioned for refinement include:
 - **Management plans:** Support for requiring these was high, but respondents want the policy to specify the key elements they must contain (e.g., student wellbeing, security, community engagement).
 - **Communal space:** A need for clearer guidance on the required quantity and quality of communal areas, potentially linked to the number of residents.
 - **Parking:** more flexible and evidence-based approach to parking was suggested, acknowledging the lower car ownership rates of students.
- **Improve wording and clarity:** Numerous submissions provided detailed feedback on the current wording to remove ambiguity, improve legal standing, and ensure the criteria are clear for all users.
- **Rationale for non-support:** The feedback from those who did not support the assessment criteria consistently focused on its prescriptive nature. Specifically citing mandatory minimums for bedroom sizes and dimensions, onsite car parking, health and wellbeing provisions and adaptive reuse, and arguing that such rigid requirements would stifle design innovation and fail to cater to a diverse range of student needs.



5. Comments on the specific draft policy provisions

Respondents provided extensive, detailed, and technical feedback on most provisions within the draft policy.

This indicates a high level of engagement and a collective view on the need to improve clarity, legal standing, and practical application within the position statement before it is finalised.



Key themes from submissions:

- **Definitions and land use classification:** A primary theme was the need for clearer and more robust definitions for key terms (e.g., “student,” “PBSA,” etc.). A strong, repeated suggestion was to formally classify PBSA as a distinct land use within planning schemes to provide greater certainty and avoid ambiguity.
- **Clarify relationship with R-Codes:** Reinforcing earlier feedback, stakeholders insisted the policy must explicitly state its relationship with the R-Codes. The overwhelming consensus is that the policy should defer to the R-Codes for all standard residential matters and only introduce provisions for aspects genuinely unique to PBSA.
- **Parking and transport integration:** Provisions for vehicle parking were a major focus. The feedback called for a more nuanced and flexible approach, with many advocating for reduced car parking rates where developments have direct access to public transport. Some suggestions were to link these requirements to Activity Centres. This should be coupled with and acknowledge requirements for bicycle parking, end-of-trip facilities, and car share models.
- **Strengthen management and amenity provisions:** There was strong support for requiring comprehensive Operational Management Plans as a condition of approval. Stakeholders also provided detailed comments aimed at improving provisions for both internal amenity (room size, light, ventilation) and managing external impacts (noise, overlooking) on neighbouring properties.
- **Rationale for non-support:** The primary reasons for non-support was a fundamental disagreement with classifying PBSA as a ‘Residential Building’ rather than its own unique land use. Objections were also raised to overly prescriptive requirements, such as the narrow definition of “student”, inflexible lease lengths, and that the location criteria was subjective. These concerns were viewed as being misaligned with market realities and operational needs.



6. Do you have any additional comments or feedback on the draft purpose-built student accommodation position statement

The additional comments reinforced the key technical themes raised in previous questions while also suggesting broader, strategic feedback. Stakeholders are generally supportive of the WAPC's initiative but highlighted that the final document must be robust, clear, and flexible to be effective in practice.

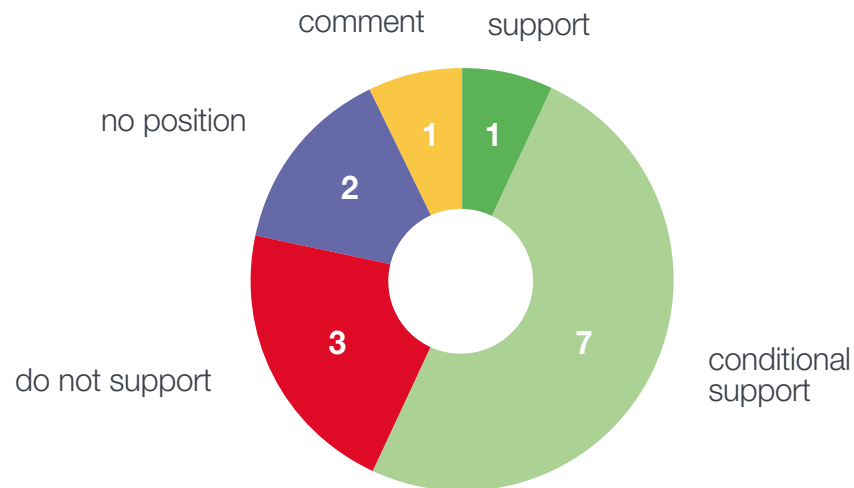
Key themes from submissions:

- **Reiteration of core technical issues:** Respondents used this opportunity to re-emphasise earlier feedback. These included the need to definitively clarify the position statement's relationship with the R-Codes, properly define PBSA as a distinct land use, and ensure the criteria take a flexible, performance or outcomes-based approach.
- **Emphasis on student wellbeing:** There was a strong focus on ensuring the outcomes are focused on genuine student wellbeing, not just the provision of rooms. This involves prioritising high-quality communal spaces and requiring operational management plans that actively support student mental health and social connection.
- **Recognition of strategic importance:** Submitters highlighted the broader strategic importance of PBSA, impact on the state's economy by supporting the international education sector, and its potential to ease pressure on the wider private rental market.



7. Do you think the existing land use of 'residential building', is broad enough to include purpose-built student accommodation

Feedback on this question was divided. There was no clear consensus, with stakeholders split between those who believe the existing 'Residential building' classification is a workable starting point (with conditions) and those who do not support it, arguing strongly for a new, dedicated land use definition.



Key themes from submissions:

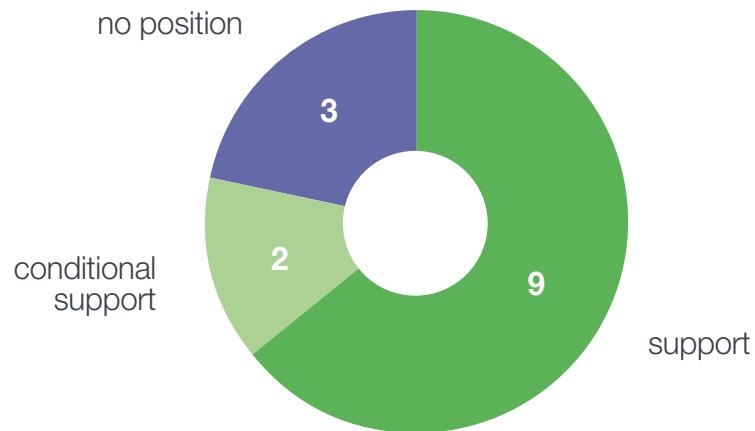
- **Workable with clarification:** Respondents with conditional support felt that the 'Residential building' definition is broad enough to accommodate PBSA. However, they stressed that it would require significant policy clarification to properly address the unique characteristics of student accommodation, such as management, on-site facilities, and tenancy.
- **Rationale for non-support:** The submissions that did not support this approach cited a fundamental mismatch between PBSA and the existing definition. Key reasons included:
 - The current R-Codes definition of 'Residential building' does not adequately cover the specialised and temporary nature of PBSA occupants.
 - Maintaining the status quo by using this classification perpetuates the existing ambiguity and confusion for local governments and proponents.
 - The preference was to create a new, dedicated land use definition for PBSA to provide certainty and clarity.
- **Broader strategic context:** While the feedback on this question appeared divisive, the rationale for a distinct land use is strengthened when considered with other comments. Stakeholders repeatedly noted that a separate classification is essential for the proper strategic consideration of PBSA in higher-level documents, such as Local Planning Strategies, making a strong case for transitioning away from the status quo.



8. Would a new land use definition be more appropriate?

There was overwhelming support for creating a new, distinct land use definition for PBSA.

The vast majority of respondents who commented on this question supported this approach either fully or conditionally, indicating a strong consensus that the status quo is inadequate..



Key themes from submissions:

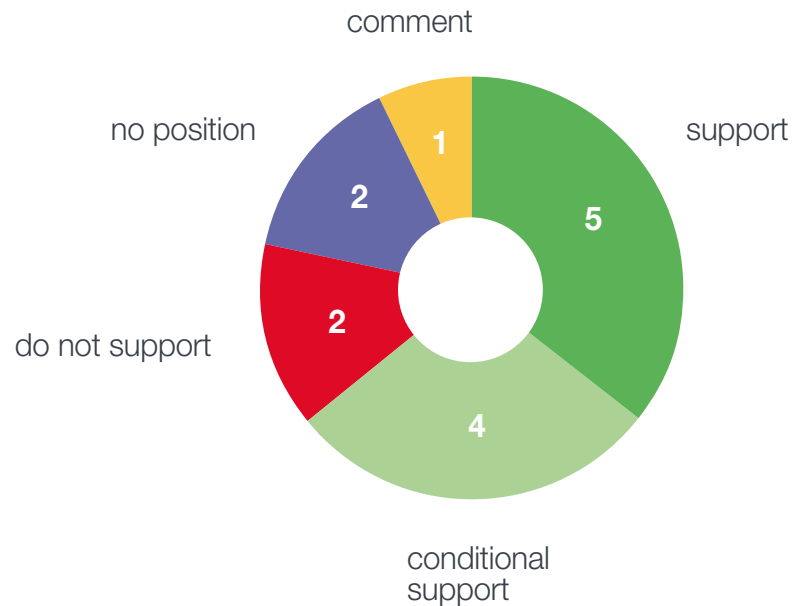
- **Provides clarity and certainty:** This was the most common reason provided. Respondents argued that a specific land use definition would provide much-needed clarity, remove ambiguity, close regulatory loopholes, and create a transparent and consistent planning framework across the state.
- **Acknowledges PBSA's unique nature:** Respondents emphasised that a new definition would better reflect the unique characteristics of PBSA, which differ from standard residential developments. This includes its focus on communal spaces, specific management requirements, and its relationship with other 'co-living' models.
- **Enables better strategic planning:** A dedicated land use would allow for its inclusion as a 'model land use' in local planning schemes. This would ensure PBSA is considered more strategically in terms of location and context.



9. Support for one policy instrument for co-living residential accommodation?

There was broad support for integrating various co-living accommodation types into a single policy instrument.

The majority of respondents saw significant benefits in creating a consistent, overarching framework, although this support was often conditional on the policy being flexible enough to address the distinct needs of each housing type.



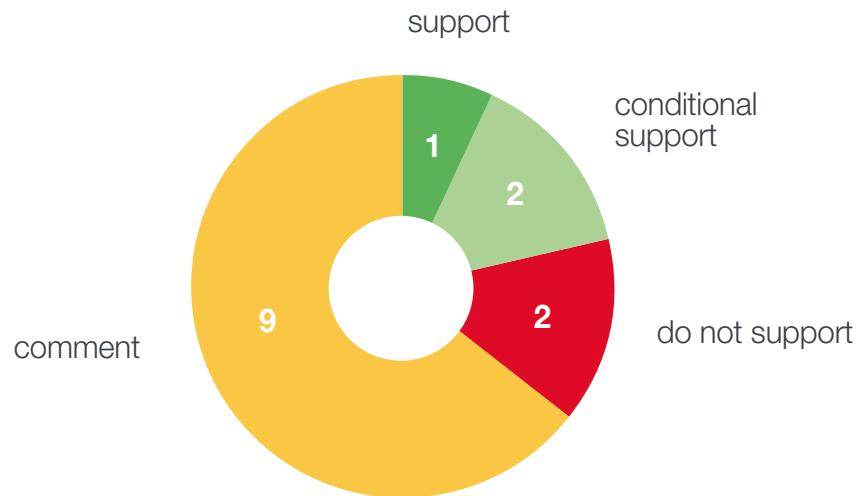
Key themes from submissions:

- **Creates consistency and clarity:** The primary benefit identified is that a single policy instrument would provide greater consistency, clarity, and certainty in the planning system for these emerging housing models.
- **Reflects evolving housing needs:** Respondents noted that this approach acknowledges the increasing demand for diverse and alternative housing options. It provides a framework for assessing developments that don't fit neatly into traditional categories.
- **Streamlines the planning process:** A single, consolidated policy instrument was seen as a way to streamline the assessment process for both proponents and decision-makers, as it would create a single point of reference for all co-living typologies.
- **Rationale for non-support:** The primary concern raised was the risk of a "one-size-fits-all" approach. While a shared framework is good, the specific design principles must cater to the very different design and operational needs of diverse resident groups, such as students versus those in aged care or specialist disability accommodation. The policy instrument must ensure flexibility and avoid generic outcomes.



10. Support for a single, broader definition of 'co-living accommodation' or separate definitions for each accommodation type?

There was a strong preference for creating specific definitions for each accommodation type rather than grouping them all under a single, broad 'co-living' definition. While a few respondents saw merit in a simpler, broader approach, the majority argued that the needs of the different resident groups are too distinct to be covered by one term.



Key themes from submissions:

- **Support for specific definitions (majority view):** The dominant view was that each accommodation type (aged care, specialist disability, PBSA, co-living) should have its own unique definition. This approach was seen as necessary to properly address the distinct needs of each resident group.
- **Rationale not supporting a broad definition:** The primary reason for opposing a single, broad definition was that the various accommodation types are fundamentally different. Stakeholders argued that the unique needs of residents, such as accessibility for aged care, support services for specialist disability housing, or study spaces for PBSA, are too diverse. A single definition would risk oversimplifying these critical requirements and could lead to inappropriate planning outcomes.
- **Support for a broad definition (minority view):** A smaller group of respondents, supported a broader definition. They argued that this approach would keep the planning policy adaptable and simple, avoiding the overcomplication of creating multiple new definitions.



4 NEXT STEPS

The key themes and feedback summarised in this Public Engagement Outcomes Report have assisted in amending the draft Position Statement.

The Position Statement will now be presented to the Western Australian Planning Commission for further consideration.

APPENDIX 1 – LIST OF SUBMITTERS

Local government

- City of Belmont
- City of Canning
- City of Cockburn
- City of Joondalup
- City of Melville
- City of Perth
- City of South Perth
- City of Stirling
- City of Vincent
- City of Wanneroo
- Town of Mosman Park

Industry

- WA Local Government Association
- Property Council
- PIA WA
- Australian Institute of Architects

Researcher

- Shohreh Nematollahi
- One confidential submission

State government

- Department of Health
- Department of Fire and Emergency Services
- Main Roads (late submission)

Provider

- Curtin University

Utility

- Water Corporation

General Public

- Steve Walker