



**Aged & Community Services
SA & NT Inc**

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Mr P Hall
Greater Adelaide Plan
Department of Planning and Local Government
GPO Box 1815
Adelaide 5001

**Aged & Community Services SA & NT
Response: 30 Year Plan for Greater Adelaide**

Aged & Community Services SA & NT (ACS) is pleased to have the opportunity to offer formal feedback on the Draft 30 Year Plan for Greater Adelaide. ACS specifically appreciates the opportunities provided by the Department enabling this office to provide its views regarding the Plan and its impact and relevance to aged people.

Integrated Design

The Plan speaks directly of integrated and high quality design as a founding principle. ACS formally nominate our organization as a relevant peak industry body for ongoing consultation in order to adequately integrate the needs of older and aged South Australians into precinct and structure planning. Our organization is already enabled with a specific Housing Committee comprised of 9 industry people who have access to industry views and information. ACS through its Housing Committee would seek to have regular communication and ongoing consultation with regards to housing issues in aged care.

Whole of Plan

ACS generally endorse the guiding principles of the 30 year Plan for Greater Adelaide. We offer specific comments formatted to match the Draft Policies suggested in the Plan.

DI Creating new transit corridors, growth areas, transit-oriented developments and Centres

- ACS seek policy to specifically ensure the provision of aged care and aged housing within TOD's. Aged specific development incurs greater building costs due to increased circulation space, larger wet areas and greater service provision than other market housing types. To ensure aged

suitable housing provision in TOD's we seek incentives through increased density entitlements and or restrictions on land use to ensure available and affordable aged development opportunities.

- ACS seek structure planning of TOD's and mixed use activity centres which specifically defines the provision of services directly relevant to the support of an ageing population. Such services would include walkable (400m) access to :
 - Post office
 - Hairdresser
 - Food shops (i.e. General Grocer, Fruit and Vegetable)
 - Library and other community facilities / services
 - Allied health (podiatry, physiotherapy, hydrotherapy etc.)

D3 Urban Design

- ACS seek specific urban design guidelines to ensure an aged friendly public realm. Examples of functional infrastructure requirements would include:
 - Paved 1200-1500 wide footpaths.
 - Stepless crossovers and junctions to pedestrian ways.
 - Provision of adequate street lighting for pedestrian ways.
 - Provision of pedestrian shelters, shaded resting areas and road crossing refuge points.
 - Provision of aged accessible open green spaces.
- ACS seek recognition that elderly and aged people prefer and are entitled to aged appropriate accommodation within their existing neighbourhoods. This recognition means that aged living and aged care developments and redevelopments will occur within existing residential areas. ACS seeks that:
 - Existing penetration of aged specific accommodation within existing areas are at least maintained and preferably increased in line with population demographic change.
 - Existing aged living and care sites be entitled to redevelopment of at least equal densities in order to maintain current accommodation provision within existing neighbourhoods.
 - That subjective development control principles such as "character" and "bulk and scale" requirements be realistically defined with regard to aged living and care developments within residential areas. Development plans must acknowledge that such developments require greater scale and servicing than stand alone housing in order to provide requisite care to residents, but that they are undeniably residential buildings which should be located in residential areas.
 - That a specific aged appropriate housing module be included in development plans. ACS endorse the UDIA Housing for Seniors - Better Development Plan Module (attached). This model is similar to SEPP5 already implemented in NSW.

- That a specific aged care development Module be included in development plans based on the housing Module noted above.

D6 Housing

- ACS seek that specific Statewide definitions be provided for:
 - Adaptable but not aged specific living.
 - Aged specific living through a title covenant restriction or similar.
 - Retirement living falling under the Retirement Villages Act.
 - Low Care Places (Hostel) funded through the Commonwealth.
 - High Care Places (Nursing Home) funded through the Commonwealth.
 - Supported Residential Facilities.
 - Semi-dependent Facilities.

Having defined these development types, the plan should then define universal requirements for residential planning controls such as density, open space and car parking requirements which should not be forced to comply with standard housing requirements.

- ACS seek that the Plan include across the board requirements for new housing development to be adaptable for ageing in place residents as well as other physically challenged community members. Such requirements may include appropriate provision of circulation spaces and lifted access to multi storey residential projects.


D7 Housing Affordability

- ACS seek that Housing Affordability include a definition of “ownership affordability” in line with SA Affordable Housing Trust guidelines which will also apply to concessional aged care places.

Our response is focused at a high policy level and only on matters which are relevant to our specific interest and expertise in the provision of accommodation and care for older South Australians.

We look forward to further discussion, through our Housing committee, regarding our proposed policy inclusions and toward more detailed input into the next round at precinct and structure planning.

Yours sincerely



Alan Graham
Chief Executive Officer
Aged and Community Services SA&NT