

A BETTER PRACTICE FOR THE DEVELOPMENT OF RETIREMENT VILLAGES IN THE SOUTHERN FLEURIEU PENINSULA

FINAL REPORT

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EXECUTIVE SUMMARY

This study has been undertaken by Bell Planning Associates for the City of Victor Harbor on behalf of the Southern Fleurieu councils (including District Council of Yankalilla and Alexandrina). It is an initiative of the Positive Ageing Project through its Taskforce and has been funded by the Department of Human Services 'Moving Ahead' program.

The aim of the study is to explore planning, social planning and design issues associated with the development of retirement housing in the study area. The need for the study has arisen from a growing concern about the relatively high rate of growth in housing for older people in the Fleurieu Peninsula, the quality of planning and design and in places poor access to human services and community facilities.

With a greater incidence of people remaining in their own homes, whether they be original family homes or retirement housing, it is anticipated that the location and design of such housing may not be suited to the specific needs of older people as they age and that the provision of services essential to their remaining at home will not keep pace with the development of new housing.

This study has found that there is a need for changes in the way such housing is designed to be adaptable to the changing needs of residents as they age; the location of retirement housing does not always enable easy access to essential services and that building and planning policies and development assessment process need to be reviewed in order to facilitate this.

Both Commonwealth and State Government have recognised this need and strategies for housing for older people are under preparation. There is a need to achieve across-government collaboration in reviewing relevant government Acts, Regulations and other statutory mechanisms relating to building quality, urban planning, urban design and development assessment of retirement housing.

Local strategic land use planning by local planning authorities should ensure that there is a clear link between housing growth and the timely provision and appropriate location of services and facilities. State and local governments should share the role of awareness raising and information dissemination to the commercial sector.

This report is timely in view of initiatives in housing at the State Government level, the strategic planning recently undertaken at the regional level and the review of Development Plans being undertaken at the local level.

1 INTRODUCTION

The focus of this project is to explore 'Better Practice for the Development of Retirement Villages in the Southern Fleurieu Peninsula Region of South Australia'. This report was prepared for the Southern Fleurieu councils (including District Council of Yankalilla and Alexandrina) as an initiative of the Positive Ageing Taskforce with support from the Fleurieu Alliance.

Bell Planning Associates have been commissioned to undertake the work with the guidance of a sub committee of the Positive Ageing Taskforce and in accordance with the project brief.

1.1 STUDY OBJECTIVES

The overall project aim as defined by the brief is the:

Development and documentation of an integrated social planning model and approval process in relation to retirement villages and other similar developments in the Southern Fleurieu Region in South Australia.

The key objective of the study is to improve inter-agency coordination, planning practices and policies related to the development assessment of residential options for the aged in the Victor Harbor, Alexandrina and Yankalilla Councils. The project objectives are to provide a means of better addressing:

- Issues related to planning approval and the referral and coordination processes between Councils and the Department of Human Services at the assessment/referral stages; and
- Policy gaps in the existing Development Plans for the City of Victor Harbor and Alexandrina and Yankalilla Councils related to social infrastructure requirements.

1.2 BACKGROUND

The Positive Ageing Project is a project being overseen by the Positive Ageing Taskforce, and has arisen out of the Health and Community Services for Older Persons on the Southern Fleurieu Peninsula 10-year plan (Radoslovich and Barnett 1999). The project has several mandates including documenting a coordinated care model for aged care service delivery in the region.

As part of developing a coordinated care model for service delivery, social planning processes in relation to aged care are being explored. A particular local issue with aged care service providers is the increasing number of older persons being attracted to the area specifically by retirement villages and similar ventures. Initially it was suggested that this planning process look specifically at the issue of planning for these retirement villages and like facilities. Unlike the development of facilities based around commonwealth funded high and low care beds, or community aged care packages, these developments rely upon the provision of community services to support residents who may become frail, ill or disabled.

Without the availability of adequate levels of support from the community, including health, social, recreational and cultural, residents often find it impossible to remain in their new chosen accommodation.

This issue has been raised with the Fleurieu Alliance, which has supported the development of a Regional Planning Group to review the planning processes currently in use for residential development approval. In order to facilitate better planning for the whole range of services required by the aging population, this group has recommended that a new integrated social planning process needs to be described and put into place.

In short, concerns have arisen about the rapid growth in retirement housing in the region, in locations and with planning and design features that are not conducive to the longer-term quality of life of their residents and in some instances without access to essential social infrastructure.

1.3 SCOPE / DEFINITIONS

This study is not limited in its scope to Retirement Villages as defined under the Retirement Villages Act 1987, but is rather broader in that it considers all types of development that are aimed at older residents and occupy single, large sites. In other words, it is concerned with 'independent housing'¹ for the ageing who are more likely to rely on car, public transport or pedestrian access to general community services and facilities within a neighbourhood or district.

Independent housing includes:

- Traditional housing types suitable for modification
- Independent living units
- Self-contained units such as those in retirement villages
- Cottage flats
- Elderly persons flat/granny flat.

Such dwellings may be privately owned or administered by a wide range of government, non-government or commercial organizations, for example the South Australian Housing Trust, local government, non-government welfare organisations and commercial developers. This study has been largely prompted by commercial developments, although reference will be made to other developments that may be appropriate.

Various terms used by the commercial sector, include 'Village Life', 'Residential Park', 'Retirement Living' and 'Mobile Home Park'. Where these are aimed at older people, have rules relating to the age of residents, or are marketed for the ageing, they are considered similar to 'Retirement Villages' for the purposes of this study, albeit, not defined as such under the definition of 'retirement villages' in the 'Retirement Villages' Act.

¹ The Office of the Commissioner for the Ageing "*Housing for the Ageing, Planning and Design Guidelines*" 1989.

While such housing is not specifically defined under the Development Act 1993, it may fall within the definitions for:

- Detached dwellings
- Group dwellings
- Residential flat building
- Row dwellings, or
- Multiple dwellings.

Such housing may also require a land division approval and therefore would have to comply with Development Plan provisions relating to land division.

1.3.1 Demographic background

This project is timely in view of the general growth in demand for retirement housing in coastal areas around Australia and on the Fleurieu Peninsula in particular and in the light of the ageing population.

The Draft Terms of Reference for the South Australian 'Ageing at Home; The Development of a Housing Strategy for Older Australians', the following demographic information is relevant to this study:

'The rapid increase of Australia's aged population is resulting in the increasing importance of housing and care issues for older people.....in 1999 people aged 65 and over in South Australia represented 14.4 per cent of the SA population.....by 2009 over 16 percent....

...the aged pension remains the main source of income for over 60 per cent of older people.

..The growing trend in housing and care services for older people over the past three decades has been an emphasis on"ageing in place".....and greater incidence of people remaining in their own homes, whether they be original family homes orRetirement Villages.....

The 'Keeping Pace South Coast Study Report' highlighted that:

'The South Coast region continues to undergo a boom housing cycle which is supported by even more significant key drivers of economic growth; the region is attracting a population with high levels of human capital and with higher income affluence...

There are opportunities for new investment based on population growth alone, especially in the retail sector, but also in retirement accommodation and aged care.'

The report goes on to recommend:

'Strategic Planning

- *that the two Councils continuing to work together on strategic development issues for the South Coast region, and the State Government to formally outline planning policy for the region.'*

Data provided by the Victor Harbor Council show that the population growth rate over the next five years for the local government authority will comprise a 3.4% increase in population and a 4.8% increase in number of dwellings. Their demographic analysis shows that the South Coast (Victor Harbor, Middleton, Pt Elliott and Goolwa) is 322 residential approvals in 2001 is ranked 6th in South Australia for approvals. This rate of growth on the South Coast is expected to continue for the next ten years, requiring robust and comprehensive policies on housing location and planning and on the timely delivery of services.

In conclusion the 'Keeping Pace South Coast Study Report' found that the region featured as the highest in terms of proportion of persons aged 65+ and in terms of rate of population change as shown in the table below drawn from that report.

'Table 1.1

Ranking Within the 14 South Australian Regions, 1999*

Indicator	Fleurieu Region Ranking
<i>Proportion of persons aged 0-14</i>	14
<i>Proportion of persons aged 65+</i>	1
<i>Rate of projected population change</i>	1
<i>Unemployment rate</i>	9
<i>Social Security customers ¾ proportion of persons 15+</i>	11
<i>Proportion of homes fully owned</i>	3

Note: * 1 is the highest rank, 14 lowest ranked.

Source: ABS, Regional Profile 2000.'

2 METHODOLOGY

2.1 INTRODUCTION

The methodology adopted in this project involved:

1. Collection and analysis of material and research relating to housing for the ageing and planning policies and social planning models relating to this;
2. Consultation with key stakeholders and selected residents of retirement housing;
3. Documentation of gaps and issues
4. Draft report of project including recommendations.

2.1.1 Collection and Analysis of material

Policy contained in the Development Plans for Victor Harbor, Alexandrina and Yankalilla Councils was analysed to assess whether appropriate provisions are in place to ensure that aged housing is planned, designed and located to suit the needs of residents and that development is timely in terms of services provision for residents. In addition, selected best practice elsewhere in Australia was reviewed with a view to recommending additional policy provisions for inclusion in the Development Plans if required.

The use of a 'social impact assessment' methodology around Australia was also explored as well as the existence of other 'tool-kits' and/or 'guidelines' and 'checklists' for planners as they assess development.

The respective roles of the Councils as planning authorities, in social infrastructure planning and provision, social planning policy and agency consultation were explored. The roles and initiatives of relevant State and Commonwealth Governments are assessed. These include the South Australian Department of Human Services and the Commonwealth Department of Health and Ageing. The range of stakeholders for future involvement is included in Appendix 1.

2.1.2 Consultation with stakeholders

Consultations occurred with the following organisations and agencies (Refer Appendix 2 for the full list):

- members of the Steering Committee
- key stakeholders representing human services in the region
- staff from the three Councils
- representatives from the Office on the Ageing and the Department of Human Services; Planning SA;
- key peak bodies including ACROD, COTA
- SACHA
- A retirement village manager and selected residents;
- Selected Commonwealth Government staff.

A workshop was held with key stakeholders to seek their views on issues associated with design and location of housing for the ageing.

Telephone discussions were conducted with Planning staff from each Council to ascertain recent and future applications for such housing, whether there is adequate provisions in their development plans, how such developments are defined in terms of assessment, referral processes in place, and the extent of strategic and social planning processes in place to plan for and monitor the provision of essential social infrastructure in the area.

Representatives of state agencies were consulted by interview and telephone conversations to ascertain relevant legislation, guidelines and procedures for defining, assessing and monitoring the quality of housing for the ageing.

A limited consultation occurred at the Rosetta Village in Victor Harbor with the Manager, Community Liaison staff and two residents of the development to ascertain how the village is managed and what the views of residents are about the design of the development and access to services.

The purpose of this stage is to identify gaps in processes and policies of relevance to the project. Consultation will occur with Planning SA to determine the potential for more specific policy provisions relating to such developments.

2.1.3 Documentation of Gaps and issues

The aim of this stage was to assess adequacy of existing policies and procedures, identify gaps and describe issues associated with planning processes and design and location of retirement housing. Issues were derived from consultation, analysis of data and literature and relevant Commonwealth State and local government legislation and responsibilities.

3 CURRENT POLICY AND PRACTICE

3.1 INTRODUCTION

The respective roles of the Commonwealth Government, State Government and local governments in relation to retirement housing are described in summary and assessed with a view to identifying issues associated with achieving optimum location and design of such housing in sequence with the timely provision of essential social infrastructure.

A limited literature search found a general recognition in some states about the need to clarify policies and directions in relation to retirement housing as there appears to have been little progress in the last ten years. The market demand reflects the ageing population, although there are some developments that have caused concern amongst service providers who report a shortfall in service provision to meet residents' needs. In some parts of Australia experiencing rapid urban growth ahead of services provision, (south east Queensland and northern NSW, refer Appendix 3), social impact assessment policies have been adopted by Councils to attempt to ensure that development only occurs when there is likely to be timely provision of infrastructure and services. These are described in outline for the purposes of formulating a modified version of a social impact assessment process for local governments in the region.

A limited literature review of interstate planning instruments revealed little of relevance, although there are provisions in the Victorian and Queensland planning instruments that require more thorough analysis of the impact or setting of development that should be applied to local government in South Australia. Recent recommended changes to residential development provisions in the Development Plan in South Australia include some reference to aged person housing, and adaptable housing initiatives of the South Australian Housing Trust are relevant as are guidelines prepared on Housing for the Ageing (Office of the Commissioner for the Ageing 1988).

3.2 COMMONWEALTH GOVERNMENT AND NATIONAL POLICIES

3.2.1 National Strategies

The federal government does not currently play a major role in relation to planning policy associated with urban development in general or retirement housing in particular. However, the Commonwealth Department of Health and Ageing has prepared a 'National Strategy for an Ageing Australia', which provides an analysis of the situation and challenges facing Australia in terms of the health and other services as the population ages. In response to the draft discussion papers prepared as part of this strategy development, ACROD's National Committee on Ageing and Disability proposed an amendment as follows:

'Promotion of innovative design and modification in housing and community planning.

The Federal Government in conjunction with all State Governments, through the Australian Building Codes Board, is encouraged to call up AS4299 "Adaptable housing" for aged-care housing, including retirement housing, and for a percentage of Class 1 and 2 residences in multi-unit developments.'

The Commonwealth adopted the first suggestion, but with respect to the latter, only South Australia has included a requirement in the Appendix to the Building Code of Australia (BCA) relating to a % of adaptable housing in larger developments. It is understood that the Commonwealth through State Building Code Boards is pursuing the issue of amendment of the Building Code of Australia to require compliance with relevant Australian Standards in relation to housing for the ageing.

The following references to housing and access to services are included in the 'National Strategy for an Ageing Australia:

'Consumers, industry and governments will certainly need to give greater attention to housing design which is suitable to older people - whether it be housing specifically for older people or housing which meets the changing needs of people as they age. The ability of the structure and design of housing to be adapted to support peoples' varying levels of independence will provide future cohorts of older people with more options to remain in their own homes and communities.

Transport is important for enabling access to services, family, friends and it supports greater social interaction. Current transport options include car, public transport, and private transport provided by business or community organisations. Car ownership in the community is very high, with 95 per cent of couple households (with or without children) owning one or more registered motor vehicles.

However, there are groups within the community where car ownership levels are much lower and therefore the need for public transport is greater. Over 40 per cent of lone person households 65 years and over, for example, do not own a motor vehicle. It is likely that the main impact on transport infrastructure will be an increase in the number of older people driving, or needing to use general public transport or specific transport to get them to the doctor or other service. There are likely to be larger numbers of older people using public transport as their main form of transport. ...The availability of transport services, whether public or private will continue to be a key issue for older people in rural and remote areas of Australia. For these people, lack of adequate transport can pose major barriers to participation in the community and to the accessing of necessary services....One service that older people might be looking for is transport - and opportunities certainly exist for individual businesses or groups of businesses, such as those located in shopping malls to consider the benefits to their businesses of providing free or subsidised transport to retail or service centres.

Goal 2

That public, private and community infrastructure is available to support older Australians and their participation in society.

Actions to achieve this goal included:

- *Improving consumer and housing, design and building industry awareness of housing options for older people, and encouraging innovative housing designs;*
- *Increasing the availability of access to transport options that meet older people's needs in terms of timeliness, safety, cost, design and flexibility;*
- *Encouraging business, communities and local government to meet the gaps in transport requirements of older people with flexible, innovative models;...*

3.2.2 Accreditation of Retirement Villages

With respect to the design and siting of retirement housing, there are a limited number of national initiatives directly affecting housing for older people. These are limited to those types of accommodation that receive Commonwealth funding.

The Commonwealth Government through the Department of Health and Aged Care provides a '**Standards and Guidelines for Residential Aged Care Services Manual**' to assist service providers to comply with their obligations under the Aged Care Act 1997. These apply to those facilities and services receiving Commonwealth funding, such as nursing homes and hostels, but do not apply to retirement housing.

These standards or guidelines are not prescriptive, but intended to be supplemented by an Accreditation Manual developed by the Aged Care Standards and Accreditation Agency. To gain accreditation, services will be assessed against five main areas including 'building quality'. These provisions are mainly concerned with the rights of residents and the management of the facilities, and do not provide guidelines on detailed design and location of such villages. Such matters are assumed to be covered by planning policy and building design controls. However, these standards are now applied by peak bodies such as the Retirement Villages Association in the accreditation of its members, although they should be expanded to include standards on planning and design.

With respect to the design and construction of dwellings, the Building Code of Australia (BCA) is the relevant statutory instrument. It is adopted through the Building Act and associated Regulations in each State. There is a classification system which defines building categories which must comply with relevant Australian Standards. There is no requirement for any classification of housing related to ageing to comply with the Australian Standards on 'Access and Mobility' (1428) or 'Adaptable Housing' (4299). However, the South Australian Appendix of the Building Code of Australia introduced in 1990, provides that 1 in 20 houses (where there are 20 or more in a development) should be 'accessible' as defined by the Australian Standard 1428.

Further to this BCA provision, Planning SA provides an Information Book on Adaptable Housing (refer Appendix 4) under the banner of the Good Residential Guide for use in the Building Assessment stage of a development application. This should be more widely distributed and its existence drawn to the attention of local government authorities, as it is understood that there has been limited application of this provision. More rigorous monitoring at the building approval stage would ensure that in large retirement housing developments it is applied or at least be included as a condition of planning approval where it is apparent that avoidance is achieved by staging building approvals for less than 20 units. This should also be the subject of a Council policy on 'Adaptable Housing'.

Several states including Victoria and South Australia are developing an Adaptable Housing Design Guide providing good design advice on the design of housing for accessibility. Early completion should be recommended to Planning SA to allow this important issue to be addressed as a matter of urgency.

There are two Australian Standards published by Standards Australia which apply to the design of retirement housing as follows:

1. 'Adaptable Housing' AS 4229 and
2. 'Design for access and mobility Part 1: General requirements for access- New building work' 1428-2 2001 and Design for access and mobility Part 2: Enhanced and additional requirements- Buildings and facilities" 1428-1, 1992.

The 'Adaptable Housing' Standard is primarily concerned with housing for people with disabilities and while these standards are not mandatory they do provide a guide to designers of retirement villages for housing accessibility. They do not refer to the wider setting or locational criteria for such housing. This rests with the planning policies of State and local governments. These standards should be used by Planning SA as a basis for planning and design guidelines on the subject.

The 'Adaptable Housing' Standard:

'Presents the objectives and principles of adaptable housing. Its purpose is to provide guidelines on adaptable housing to those involved in designing or building new dwelling or renovations, including_

.....

- c) *Developers and designers of specialized housing such as retirement villages...*

....This Standard applies to planning and design of residential accommodation and is intended for reference by designers and specifiers.....and it is intended that housing units that comply with the range of essential features listed in Appendix A be certified as adaptable housing units.....

The following features are included as 'essential' in order for housing to comply with the lowest category of 'adaptable' housing. For higher category classification, a range of first 'priority desirable' and 'desirable features' must also be complied with.

- Provision of drawings showing the housing unit in its pre-adaption and post-adaption stages
- A continuous accessible path of travel from street frontage and vehicle parking to entry complying with AS 1428.1 (Australian Standard on Design for Access and Mobility).
- Letterboxes to be on hard standing area connected to accessible pathway
- Carparking space or garage min, area 6.00 m X 3.8 m
- Accessible entry
- Accessible entry to be level (i.e. max 1:40 slope)
- Threshold to be low-level
- Landing to enable wheelchair manoeuvrability
- Accessible entry door to have 850mm min clearance
- Door level handles and hardware to AS 1428.1
- Internal doors to have 820 mm min clearance
- Internal corridors min width of 1000m
- Provision for compliance with AS 1428.1 for door approaches
- Provision relating to available space within living and dining rooms, kitchen, main bedroom, bathroom, toilet, and laundry and
- Door hardware operable with one hand, located 900-11—mm above floor.

A range of such provisions amongst others is included in planning and design guidelines prepared by the then Office of the Commissioner for the Ageing in 1989².

It would be appropriate for a proportion of all housing in retirement complexes to adopt such provisions, by inclusion of them in planning and design guidelines prepared by State or local government for advice to developers prior to the lodgement of development applications and for inclusion in the Development Plan in summary form.

The South Australian Housing Trust (SAHT) has adopted some of these adaptable housing features in their program of modification. Such standards³ provide for 90% of all newbuild houses to include features required for people as they age including:

- Stepless entries
- Wider doorways (920mm)
- A stepless shower
- No bath
- Lever door handles throughout
- A wall oven set into a bench
- Generous spaces in the central hallway and around the beds.

Where considered essential (i.e. to enable continued use of a home and independence from additional services) the following are also provided:

- Grabrails
- Renewed toilet pans
- Non-slip floor surfaces
- Removal of baths
- Appropriate and discreet ramps for wheelchair users.

It would be appropriate for housing within retirement housing complexes to adopt the above features.

The Australian Standard on the Design for Access and Mobility is aimed at housing and facilities for people with disabilities rather than older people. However, many of the provisions are appropriate guidelines for housing for older people as they become more frail and should be drawn upon in the preparation of guidelines for housing for older people.

In summary, there are national instruments in the form of an overarching policy on the ageing, Australian Standards for the siting and design of dwellings, and the Building Code of Australia covering the design of dwellings. However, there are gaps in the BCA in its referencing of Australian Standards of relevance to housing for older people and a lack of urban planning guidance for states and local governments in planning for housing and older people.

² The Office of the Commissioner for the Ageing, 1989, *Housing for the Ageing, Planning and Design Guidelines*.

³ Fulcher, H. 2001 *SA Housing Trust Accessibility Policy*.

3.3 STATE GOVERNMENT

3.3.1 Introduction

This section covers the various roles of the State Government in relation to planning for housing for older people and human services planning and delivery. It outlines the roles and initiatives relating to housing and service delivery for the ageing within the Department of Human Services. It also gives an overview of the policy and practice of Planning SA within the Department of Transport Urban Planning and the Arts.

3.3.2 Ageing and Housing

The South Australian State Government plays a number of roles in relation to retirement housing through retirement village legislation, planning legislation and the functions of the Department of Human Services.

In 1996, the State Government released a document '**Ageing, a Ten Year Plan for South Australia**, in which the relevant housing reference is:

'The Office for the Ageing will establish a planning process to develop linkages across government and with the non-government and private sectors to improve planning and set priorities for housing and care support services.....

In particular, attention will be given to:

.....

reviewing and updating policy advice to planning authorities on the planning and design of aged housing including the implementation of a housing standard for adaptations.'

It is understood that this policy is being implemented through the recent State Government's '**Moving Ahead**' Strategy which reflects Departmental policy shifts in the past 5 years. This is an across-government initiative and has been the funding source of this project. As part of this initiative, the terms of reference for a '**Housing Strategy for Older Australians**' have been prepared subject to the endorsement of the new South Australian Government with a view to completion of the strategy by the end of June 2002.

Having regard to the Labor Party policies relating to the ageing, (**Labor's Plan for Older Australians 2002**) the following statement is likely to ensure that the above project is continued:

'A Rann Labor Government will:

- formulate a comprehensive housing plan in consultation with industry and organisations in both the private, and public arena to include a strategy for housing older South Australians.'
- ..will create new partnerships with community organisations, the non-government sector, and local government in developing initiatives that support the care for older South Australians in the community.

The proposed '**Housing Strategy for Older Australians**' is being undertaken within the Strategic Planning and Policy Division of the Department of Human Services and in the context of the current '*Housing South Australians*' project and '*Moving Ahead: Strategic Plan for Health and Community Services for Older People.*'

Issues associated with retirement villages and urban planning amongst others, will be addressed by the strategy. It will include a strategic framework for planning housing and related services:

- *'Principles for the development of a strategic basis for the planning for housing and associated support programs, over the medium to long term (up to two decades);*
- *Models and strategic planning processes for linking or integrating housing and care services, in relation to private housing, public rental and community housing tenures in particular, but also investigation the scope for private rental...*

This study is timely in that it should provide input to the above strategy and provide regional experience of issues surrounding human services delivery and possible initiatives for Planning SA and local governments.

The **'Retirement Villages Act 1987, the Retirement Villages (Miscellaneous) Amendment Act 2001** and the **Regulations Under the Retirement Villages Act 1987**, primarily cover matters relating to the management of villages and the rights of residents. Any amendments to this legislation are unlikely to include guidelines on physical design or location, as it is concerned primarily with the management of retirement villages. Schedule 2 of the Act provides a check list for prospective residents suggesting they inquire about a number of matters including access to public, private or village transport, accessibility to and adequacy of local shops, access to other services and the accessibility of the dwelling in the event that the resident becomes disabled. This provision therefore places the onus on the resident to ensure that their needs will be met rather than requiring the developer in association with local government to meet the requirements of the various standards and guidelines on planning and design.

While some retirement housing falls within these provisions, others do not and there is no statutory requirement for all retirement housing to comply.

There is also an apparent trend for developments to be defined, operated, managed and described in other ways, thereby avoiding compliance with this Act and Regulations. An example of this is the most recent application by the Rosetta Village to extend their complex at Victor Harbor and their new development proposed at Goolwa.

The State Department of Human Services through Ageing and Community Care also provides information kits for residents and others interested in Retirement Villages. While these refer prospective residents to consideration of the location of services, there is no detailed reference to access to services and facilities in the wider setting. In summary, a housing strategy for the ageing is being prepared. However, there is a gap at the state level in statutory or readily available information and it would be timely for Planning SA to prepare advisory design and location guidelines and a Planning Bulletin to guide the planning, design and assessment of retirement housing.

3.3.3 Urban Planning and Design

The State Government Department of Transport Urban Planning, and the Arts through Planning SA oversees planning legislation and policy for the state. The relevant legislation is the Development Act 1993 and Regulations under this Act. There is no specific reference of direct relevance in the Act, while the definitions in the Regulations are relevant. There are no definitions covering retirement housing or any other housing for the ageing, although there are provisions within some Development Plans relating to such housing. These are explored in more detail in the following section on local government.

The State Government guides and approves the content of the Development Plans prepared by each local government authority and provides Plan Amendments Reports as appropriate. The State Government also provides the metropolitan policy of relevance and this becomes part of the Metropolitan provisions in each part of the Development Plan. Within these provisions, there is no specific reference to aged housing or retirement villages, although there are general references to:

Objective 1: Orderly and economic development.

New housing and other urban development should be continuous with and form compact extensions of existing built-up areas. Orderly development will achieve economy in the provision of public utilities, be conducive to the creation of a safe, convenient and pleasant environment in which to live,

Objective 3: The proper location of public and community facilities by the reservation of suitable land in advance of need.

It is prudent to ensure that land required for public purposes should be available in the right place at the right time by reserving such land for future acquisition before it is used for other purposes.

Other provisions include reference to access and parking although the more detailed provision relating to these and the above are included in the Council-wide and zone provisions in each Development Plan.

These provisions are also advisory but provide a good basis on which to assess applications for retirement housing. While these provisions do not specifically refer to housing for the ageing, or retirement villages, they are clear in their intent and rely on rigorous application by Councils in their roles as planning authorities. However, they do imply that each Council has undertaken local strategic planning which includes assessing the need for such facilities and ensuring that land is available when needed.

One of the dilemmas facing Councils experiencing housing growth is that the wider strategic planning work has often not been undertaken. There does not appear to have been any recent strategic planning work undertaken by any of the three local governments in this study area although Victor Harbor and Yankalilla are currently preparing PARs which should include more detailed provision on housing for the ageing, using the Planning Bulletin on Residential Policy as a guide. It is timely for a strategic land use planning exercise to be undertaken in the region. Further consideration of strategic planning is contained in section 3.4.3.

Planning SA has also prepared the **Planning Bulletin on Residential Policy (Edition 2 – July 2001)** which includes specific provisions for Residential Accommodation for Older People and People with Disabilities and for Dependent Accommodation as referred to previously. These provisions are advisory only and are recommended for inclusion in part or whole in Council Development Plans. They broadly cover the location of and access to housing development and car parking and open space serving the development.

The three Councils should amend their Development Plans to include such provisions and others relating to adaptable and accessible housing design as detailed in the Australian Standards and existing design guidelines. Some metropolitan Councils have already adopted such provisions (refer Appendix 5) and there is an opportunity for the three Councils in the Fleurieu Peninsula to make such amendments to their Development Plans.

There is also a further role for Planning SA by the provision of a Planning Bulletin on the Planning and Design of Housing for Older People and more detailed guidelines for housing for the ageing for information to Councils and developers or for inclusion in the Development Plan, drawing up the existing guides referred to elsewhere in this report.

Planning SA through its Building Control Body is collaborating with its Victorian equivalent on the preparation of a **Design Guide for Adaptable Housing** based on a New Zealand model. This will be an advisory document and should lead to a Ministerial PAR to amend all Development Plans in the future. Such a guide would be important for advising on the design of retirement dwellings to provide for adaptable designs or accommodate changes as residents age to enable them to remain as long as possible in their homes.

In conclusion, there are a number of initiatives which should be undertaken by the State Government in terms of planning and design guidance and encouragement of Councils to undertake local strategic planning to ensure that there will be timely provision of social infrastructure and that housing is well located in relation to human services and community facilities.

3.3.4 Social Infrastructure Planning

The State Government no longer has a formal and comprehensive approach to social infrastructure planning as previously undertaken by the South Australian Urban Land Trust until the mid 1990s. During the operations of this body, a document on the 'Social Policy Aspects of Urban Development' was prepared as a guide for local and state government planning authorities, developer, planners and social services agencies. In amending their Development Plans, the three Councils should give consideration to inclusion of the relevant ones.

The following are of relevance to issue of planning for housing for the ageing:

HOUSING AND LAND

Housing choice

Objective 2:

Development of accommodation which is designed and located to meet the specific needs of the aged and people with disabilities.

NEIGHBOURHOOD AND RESIDENTIAL AMENITY

Community Identity

Objective 1:

Planning and Design of Neighbourhoods to facilitate social interaction and provide a focus for community participation and activity.

Objective 3:

Encouraging integration between neighbourhoods through the shared use of spaces and facilities.

Range of uses and activities

Objective 1:

Land division which sets aside suitable sites for shopping, open space, employment, education, recreation, human services and community facilities.

HUMAN SERVICES AND COMMUNITY FACILITIES

Human Services and Facilities

Objective 1:

Provision of a range of human services and facilities which are appropriate to the community they are to serve.

Objective 2:

Timely provision of a range of human services and community facilities to cater for existing and future demand.

Location and accessibility

Objective 1:

Appropriate location of services and facilities.

CENTRES

Access

Objective 1:

Centres which are accessible by public. Private and community transport and linked to adjoining areas by clearly defined and safe pedestrian paths and cycle routes.

RECREATION AND OPEN SPACE

Location and distribution

Objective 2:

Recreational opportunities which are accessible to the communities they serve.

ACCESS AND MOBILITY

Public Transport

Objective 1:

Urban development which facilitates the early and efficient operation of public transport services.

Pedestrian paths and cycle routes

Objective 1:

Pedestrian paths and cycle routes constructed and maintained to facilitate safe and easy movement providing links between residences, centres and community facilities.

The above-recommended Objectives should be incorporated into the three Development Plans along with the associated Principles of Development Control provided in the document to ensure that there is sufficient policy to allow for the assessment of development applications for retirement housing.

The achievement and implementation of these policies relies on the various roles of government and the development sector. Many of the objectives refer to land uses outside the sites of retirement housing with implications for local governments in particular and for human services agencies in general. The coordination of such planning and delivery of human services, facilities and public works is part of the social planning section of this report.

Where such provision is not feasible outside the development site, land management agreements or other partnerships should be entered into to ensure that adequate provision occurs on the site. This principle has been widely applied in the various Adelaide growth areas such as Seaford, Regent Gardens and Golden Grove. However they do rely on formal arrangements or partnerships between the developer, State Government, service providers and the local authority. There is no reason why such processes should not be established for retirement housing development.

Other strategies for improved human services delivery will be explored in the proposed State Government's 'Housing Strategy for Older Australians' and have been covered in the Ten Year Strategic Plan for 'Health and Community Services for Older Persons on the Southern Fleurieu Peninsula (Radoslovich, H. and Barnett, K. 1999).

The proposed actions referred to in that report are:

- Establishment of a Taskforce on Positive Ageing
- Appointment of a Positive Ageing Development Officer
- Development of a model of collaborative and coordinated service relevant to this region
- Quality and workforce development
- Role of local governments including forming partnerships, providing information, and adopting a housing development strategy for older people
- Involving consumers and service provider
- Involving general practitioners
- Information and education strategies

A range of local partnerships for planning and delivery of human services as well as other social planning strategies are explored in later sections.

3.4 LOCAL GOVERNMENT

3.4.1 Introduction

Local Government plays the following roles in relation to the planning for, location and design of retirement housing;

- Data collection and analysis
- Strategic planning, Planning policy and Development Assessment as part of role as planning authority
- Information for developers and the community
- Housing provider
- Social planning including the coordination of the planning for human services and facilities in the local area, the monitoring and assessment of impact and provision of some services and facilities
- Development of the public realm in the form of roads, pedestrian and cycle paths

The planning, location and design of retirement housing can be controlled and guided by their role as planning authorities through Strategic Planning, statutory policy in the Development Plan and in the provision of guidance to developers and in the procedures for assessment of development. Local governments also play a role in the provision of housing particularly where the private sector is unlikely to fill a gap.

In their role as the manager and provider of public assets such as recreation facilities, roads, pedestrian and cycle paths, they can affect the accessibility of retirement housing to services and facilities.

They can also play a key role in the planning for human services and community facilities through research, monitoring and coordination role.

3.4.2 Local Governments as Planning Authorities

Strategic Planning

In their role as planning authorities some reference is made in the section above on the State's planning role. Firstly, Councils have a responsibility for strategic land use planning to ensure that the spatial arrangements of current and future land uses are such that communities achieve a high quality of life and amenity. Strategic planning is a land use and spatial planning process that enables an integrated approach to urban development. A strategic approach to the whole local government area and beyond to the wider region in view of the market pressure for the development of retirement housing in the region would be preferable. The Fleurieu Regional Alliance would be a good avenue for this to occur.

Such strategic planning has been undertaken by the State Government in the Planning Strategy for the metropolitan area and for sub-regions within it. The 'Keeping Pace' project⁴ provides relevant data for a sub-regional strategic planning process as there has been little progress made in local strategic planning for individual local authorities although there are some examples now in place within South Australia (Onkaparinga and Salisbury) and due to be evaluated as part of a strategic planning review by the Royal Australian Planning Institute.

⁴ South Australian Centre for Economic Studies, 2001 '

In view of the gap in strategic planning in the region, it would be appropriate for the Councils in any current PAR to refer to their intent to undertake this work with a view to a future PAR for the Council as a whole. Meanwhile, it may be necessary to refuse developments that do not meet the requirements of their current policy.

This would also provide a context for the review of residential policy in relation to the location of housing for older people and the timely provision of accessible human services and community facilities. This would lead to a single or several Plan Amendment Reports (PARs) on Residential Development and Access to Services and Facilities. However, in the meantime the current PARs being undertaken by Alexandrina and Victor Harbor should incorporate the relevant provisions referred to previously, pending the preparation of a Planning Bulletin by Planning SA on Housing for the Ageing as a longer term initiative.

Planning Policy

Local governments are also required to periodically amend their Development Plans to bring them up to date with State Government planning policy. Previous State Governments have provided sufficient policy relating to the social aspects of planning and although current state policy does not fully cover the issues associated with housing for the ageing as referred to in the previous section, there is adequate policy available for inclusion in Development Plans and good examples in other Development Plans (refer Appendix 5).

In their development assessment role, it is the responsibility of Councils to rigorously apply the current provisions of their plans in relation to retirement and other aged housing, and provide adequate information on the intent of policy to developers prior to their applications being lodged. The pre-application stage of development assessment is critical in achieving a good outcome. Information provided at this stage on the expectations of councils in terms of location, accessibility and human services and community services provision is important. A modified impact assessment process would also highlight any services, public works and facilities to be provided by Councils to enable them to budget for them in time for completion of the development if approved.

This study has considered the following aspects of the Council's Development Plans:

- Definitions of Aged Housing
- Provisions relating to strategic planning
- Council wide provisions on Residential Development, timely provision of and access community facilities, specific provisions relating to housing for the ageing and social impact assessment references.
- Zoning analysis

Definitions

None of the three Development Plans include a separate definition for housing for the ageing or retired persons. Accordingly, such housing is defined as one of the housing types in the below table and is treated as would be any housing development. This is appropriate if the provisions relating to general residential development, access and parking and provision of community facilities are strictly adhered to. There are ample provisions relating to these issues, but it seems that retirement housing, although defined as one of the normal housing types, is treated differently due to various myths about retired persons. To counter these myths consideration should be given to the fact that:

- A high proportion of retired people own cars and therefore have the same requirements for parking, visitor parking and access as any other housing type;
- People prefer to stay in their own home as they age and there require adaptable housing to meet their changing needs for accessibility as they age;
- Older people need more than one bedroom for visitors and for use as a study in the same way as other single people;
- Older people are generally mobile and need to be within easy walking distance of services including public transport stops in the inevitable event of reliance on walking or mobility aids as they age.

There are several retirement housing complexes in the region that do not comply with the normal provisions that would be applied to other housing, such as car parking, open space provision, permeability and integration with adjoining housing.

In addition, they are not within easy walking distance of essential services such as local shops, doctor's and dentists, public transport or a regular community transport service.

Council Wide Provisions

The current Development Plans provide some good policies on residential development in general and should be applied more rigorously where applications do not comply. However, there are gaps in this policy and reference should be made to the Planning Bulletin (2001), the SAHT Social Aspects of Planning, and the Planning and Design Guidelines on Housing for the Ageing (1989) in the preparation of PARs for each Council.

For those Councils such as Alexandrina and Victor Harbor where growth in retirement housing is more apparent, a social impact assessment process should also be referred to in the Development Plan and in the information required of developers in the preparation of development applications and should also be the subject of a separate Council Policy. This will require an awareness raising process for elected members, staff and the development sector.

Council's intention to be involved in the planning for social infrastructure should also be referred to in the Development Plans and should also be the subject of a separate Council Policy.

Residential provisions

In summary, the lack of definition of housing for the ageing and specific provisions in the Development Plans for such housing, means that there are a number of zones or parts of zones which are located away from services and facilities where it is currently encouraged. It is therefore important that either a definition of such housing is included in the Development Plan and its status considered in each zone, and separate provisions relating to housing for the ageing are included, or existing residential and related provisions adhered to more strictly.

Policy relating to timely provision of and access community facilities

There are provisions in all of the Development Plans relating to access to community facilities. However, there should be additional provisions particularly relating to housing for older people as recommended by the Planning Bulletin and additional wording in some instances about:

- Timely provision of community facilities
- Easy walking from community facilities
- The design of a proportion of the housing as adaptable to changing needs as people age
- Provision of resting places and adequate seating, lighting on pedestrian routes

Specific provisions relating to housing for the ageing

There are no specific provisions relating to housing for older people in any of the Development Plans in the study area. There are several examples of Councils in metropolitan Adelaide where these have been included (refer Appendix 5) and a guide in the Planning Bulletin Residential Policy. It would be appropriate for the Councils to undertake PARs to include such provisions.

Provisions relating to social impact assessment

None of the three Councils' Development Plans or general policies include a Social Impact Assessment Policy or modified version of such. A literature search of local governments around Australia has revealed two good examples of such policy (refer to Appendix 5). These are Brisbane City Council in Queensland and the Tweed Shire in NSW. Both these states have a history of State government initiated social impact assessment processes. Such a policy is necessary where there is a high rate of development, development that is out of sequence with essential human services or where Councils are unclear about the short and long-term impact of approving development that is non-compliant with planning policy or where there is inadequate planning policy.

Where a social impact assessment process is adopted it provides the following benefits:

- Raises awareness of adverse as well as beneficial impacts
- Provides forewarning to service providers of human services requirements
- Alerts local governments to the need for strategic planning, social infrastructure planning and the provision of services such as public transport and community facilities
- Gives Councils substantial grounds on which to refuse a development and the necessary documentation in the event of an appeal to the Environment Resources and Development Court
- Requires the developer to carefully plan a development, document needs and requirements and provide adequate information on which to assess an application.

It would be appropriate for Councils to adopt a modified social impact assessment process

Zoning Analysis

The following is a summary of the analysis of the relevant zoning for housing in each local government area (refer Appendix 6 for Table of Zones).

The table illustrates the extent to which retirement housing is encouraged or discouraged in all zones within the Council areas. Within the zones, land uses are complying, non-complying or require the consent of Council. Where a development is a complying use, a development application is required for building consent, but a planning consent is automatic.

Retirement housing is variously described as:

- **Group dwellings**
- **Multiple housing**
- **Detached housing**
- **Semi-detached dwellings**
- **Row dwellings**

In some instances, where the development involves a license between the operator and the resident who purchases their property on a separate plot, a land division application is required. All land division applications are considered by the Development Assessment Commission as the planning authority with the concurrence of Council.

As previously mentioned there is no separate definition in the Regulations under the Development Act 1993 for retirement or aged housing.

The definition of '**Group Dwelling**' applies when it is one of a group of two or more detached buildings, each of which is used as a dwelling and one or more of which has a site without a frontage to the public road or to a road proposed in a plan of land division that is subject of a current development authorisation. This applies to Retirement Villages where the houses are located on one allotment and not subject to a license between the operator and residents who purchase their dwellings on separate plots within the allotment.

'**Multiple dwelling**' means one dwelling occupied by more than five persons who live independently of on another and share common facilities within that dwelling. This definition would apply to the existing 44 bed sit unit development in Goolwa with an onsite manager. This usually refers to semi-independent housing.

'**Detached dwelling**' means a detached building comprising one dwelling on a site that is held exclusively with dwelling and has a frontage to a public road, or to a road proposed in a plan of land division that is the subject of a current development authorisation. This definition is the one that has been applied to the latest extension to the Rosetta Village at Victor Harbor, by virtue of the fact that a license is entered into between the operator and owner of each dwelling, thereby requiring that the overall development is the subject of a land division application as well as a development application.

'**Semi-detached dwellings**' and '**row dwellings**' should also conceivably be included in Retirement Villages or similar to the above Rosetta Village development.

The above demonstrates that there are several definitions within which retirement housing may fall and it is therefore of interest to note where such housing is encouraged or discouraged. Suffice to say, as residential development, it should comply with all the provisions relating to residential development in the development plan, as there is no specific distinction made between housing for retired persons and housing for the general public. If specific provisions are included, special consideration can then be made to the specific needs of older people, such as access to facilities and services, layout etc.

The following is a summary of the table of zones relating to retirement housing:

- There are no zones where such housing is complying (except detached dwellings in several instances);
- There are a number of zones in all Council areas where retirement housing when defined as one of the above housing types would be inappropriately located away from residential areas close to centres and facilities if it were defined as a type of dwelling which is a consent use.

Examples in Alexandrina include:

- Light industrial
- Future urban
- Industrial
- Rural Fringe
- Rural (deferred Urban)
- Rural Living
- Water Protection

In Victor Harbor:

- Future residential
- Light Industrial
- Rural Living 1,2,3,4
- General Farming
- Rural coastal

In Yankalilla:

- Commercial
- Wirrina
- Tourist Accommodation
- Urban (deferred)
- Watershed) Protection

In these instances it is particularly important to apply the provisions relating to access to services and facilities as many of these areas are not within easy walking distance of the range of services and facilities that are required by older people.

In all centre and country township zones, all residential land uses are consent which encourages housing for older people where land is available.

In some residential zones, some residential land uses such as multiple dwelling and residential flat building are non-complying. However their definitions are unlikely to apply to retirement housing but may apply to semi-independent and dependent housing and should perhaps be reviewed.

In summary, the zoning provisions do require review in terms of inappropriate location for consent uses where these apply to retirement housing.

Development Assessment

Development assessment procedures relating to housing for the ageing are currently similar to the assessment of other housing types. There are opportunities for referral to other agencies for comment prior to the assessment decision.

There are a number of stages in the development assessment process where special consideration should be given to matters associated with housing for the ageing. The following is a table which illustrates these stage.

STAGE	ACTION RELATING TO HOUSING
Pre-application	<ul style="list-style-type: none"> • Consultation with developer and Council and relevant communities • Advisory booklets and guidelines for developers • Planning Bulletins and planning information for staff • Procedural manuals and checklists for staff • Terms of reference of Community Impact Assessment Report
Application	<ul style="list-style-type: none"> • The design of development application forms to include information of relevance to Community Impact Assessment and housing for the ageing • Information lodged to be sufficient to assess against the development plan and specific criteria and performance standards relating to housing for the ageing
Referral to State agencies and others	<ul style="list-style-type: none"> • Opportunity for agencies to comment on application in terms of special expertise in housing for the ageing
Information requests	<ul style="list-style-type: none"> • Initial assessment may conclude that additional information is required in terms of Community Impact Assessment • Notification of requirement for information on specific impacts, additional material may be request of the developer
Advertising and public consultation	<ul style="list-style-type: none"> • Important to ensure that projects that are of a type and scale likely to have community impacts are included in the categories of assessment requiring notification • Opportunity for Council to hold hearings and conduct public consultation or require developer to do so before decision is made
Assessment and decision	<ul style="list-style-type: none"> • Assessment of development against the policy in the Development Plan having regard to the impact assessment report
Conditions of approval	<ul style="list-style-type: none"> • Opportunities to impose conditions specific to housing for the ageing such as Land Management Agreements, timely provision of services and facilities, monitoring of demographic data and other data relating to the mitigation and monitoring of impacts

Source: Bell Planning Associates and Andrew Jones, SIA Resource Kit.

It would be appropriate for Councils to introduce new procedures in accordance with this table to ensure the adequate assessment of housing for the ageing. A greater emphasis should be placed on the pre-assessment stage of the process. A modified Community Impact Assessment process is outlined in section 3.4.6. This would involve a modification to the information requirement for development applications.

3.4.3 Information for developers and the community

There are many sources of information on the design and planning of retirement housing. Much of this information is only used when there is legislative requirement to do so. Many developments do not fall within a defined use such as Retirement Village and even if they do, there is no requirement for them to meet strict design and planning guidelines. The provisions in the Development Plans are advisory and are not always strictly applied and have differing interpretations. Information brochures would also be advisory but should provide clear information about expectations of Council and their interpretation of the Development Plan to alert prospective developers.

There is therefore a need for more explanatory information in the form of brochures and leaflets that will guide the development sector and the community. Such guidelines are available for a range of other uses and it is appropriate that they be prepared for housing for the ageing. It would be appropriate for the State government to provide such guidelines but unless priorities change, this is unlikely to occur in the next few years. Strong representation should be made to Planning SA to prepare such information. Meanwhile it will rest with Councils to provide them with possible funding from the State Government. Existing guidelines should form the basis for such guidelines.

3.4.4 Local Governments as a Housing Provider

There are many examples around Australia where local governments have been involved in facilitating or providing housing where the private market is unlikely to do so and where funding is available. These are housing of a semi-independent or dependant nature and public rental housing but usually do not include independent living such as retirement housing.

However, there may be opportunities where Councils own land in good locations to enter into partnerships with the private sector to provide innovative housing which is subsidised. Such partnerships and arrangements have applied to the provision of medium and higher density development where Councils are aiming to raise awareness of the benefits and where the private sector is unwilling to take the risk. This should be explored as a means of demonstrating good design and planning on a smaller scale, but would require longer-term operation by the commercial sector.

3.4.5 Social Planning Policy and Procedures

For the purposes of this report Social Planning includes:

- Planning for human services and facilities
- Monitoring and assessment of impact and
- Provision of some services and facilities.

Planning for Human Services and Facilities

Councils have traditionally played a major role in the planning for human services and facilities and are in the best position to assess overall requirements of a community. There is no other agency or government level that accepts such a role. State government plays a role through the Department of Human Services in the planning for services for which they or the Commonwealth are responsible on a regional basis. Priority is usually given to areas of highest need in the adoption of such processes eg the Munno Para Social Justice Project.

The new Labor Government plans to introduce a Social Inclusion policy which will undoubtedly continue that focus on areas of highest need. Need is usually based on locational disadvantage and other measures of disadvantage such as income and health. There may be a case for the Southern Fleurieu Peninsula to be proposed as an area of high need in terms of attracting funding and programs to support a process of planning for the timely provision of human services and facilities. The forecast impacts of services provision for older people should be included.

Terms used for such planning processes include Community Plans, Social Infrastructure Plans, Social Plans and Community Facilities Plans. There are many examples of such plans in South Australia. For the purposes of this report, the term Social Infrastructure Plan will be used.

A Community Services Strategic Plan was prepared for the region in 1997. However this plan was not linked to strategic land use planning and it is appropriate that this be rectified in any update. For a Community Impact Assessment process to work, it would be important to have baseline data on human services and facilities against which to assess future changes in demand. Councils should consider the preparation of Social Infrastructure Plans.

Monitoring and assessment of impact

There are a number of adverse impacts that have been reported in relation to housing for the ageing as follows:

- Lack of easy walking access to essential facilities such as shops, doctors, local park etc
- Distance from other facilities such as a range of shopping, health and community services and library
- Lack of public transport with frequent services serving the housing
- Lack of integration with surrounding communities leading to 'fortress housing'
- Distance from recreation facilities such as bowling.
- Poor coordination between buses serving the housing and regional bus services
- Non-compliance with standards of access for people with disability
- Poor access to units for emergency vehicles such as ambulances
- Poor lighting of footpaths within area and linking to services
- Poor visitor parking provision
- Poor internal design of units in terms of reduced mobility of residents, eg toilet door opening out, tap design, toilet design, door width etc
- Poor design for energy efficiency and acoustic control between units
- Poor lighting of immediate house surroundings
- Inability of residents to stay in their homes when frail due to the lack of service delivery and design and development and dwellings.

These adverse impacts of some developments require more careful consideration of proposals at the development assessment stage. Councils should adopt a modified social impact assessment process to ensure that all information on likely impacts is available at the time of assessment to provide Councils with the advice to support refusals if necessary or require conditions of approval to mitigate against impacts and alert Councils to their responsibility to introduce measures or improved services and facilities to avoid negative impacts.

A modified procedure should adopt the steps used in interstate processes such as the Brisbane City Council Community Impact Planning Scheme Policy (refer Appendix 3). If the South Australian Planning system does not readily support such a process, there is no reason why a Council cannot adopt it as a Council policy or procedure as part of the Development Assessment process. The Development Act 1993 allows for councils and other referral agencies to request additional information to assist in assessing a development proposal. The assessment officer should request additional information in the form of a Community Impact Assessment Report as part of a general planning report and/or referral agency to assist in assessing proposals that have the potential for significant community impacts such as:

- those likely to result from a major housing development;
- development that reduces accessibility;
- development that is likely to significantly alter the need for community facilities or services such as special housing, including aged person homes, hostels and services for the ageing.

The following is a recommended outline of the contents of a Community Impact Report:

- Scoping potential community impacts
- Document existing conditions
- Predicting community impacts
- Assessing the likely impacts
- Mitigating, enhancing, managing and monitoring of impacts.

This process, if approved, would require more detailed investigation and supporting material and would require staff time with the capacity to assess the material provided in the report (refer to Brisbane City Council 2000 Appendix 3). This should be the subject of a further investigation and policy report.

Provision of services and facilities

There are some options for improving the equitable access to human services for residents of retirement housing developments:

- Funding for services such as RDNS clinics to recognise the increased efficiencies in servicing a number of people in a retirement village rather than each visit being classified as one visit, as it would elsewhere in the community

Initiatives such as this require a separate study and are outside the scope of this report. However, representation should be made to the Department of Human Services to include these issues in the preparation of the Housing Strategy for Older People and to introduce an equitable process of agency cooperation and coordination in the planning for and provision of human services and facilities, bus stops and access to other transport settings.

3.4.6 Public Realm

Local Government is responsible for the major part of the public realm and the timely provision of streets, footpaths and cycle ways, parks, community facilities and some transport services.

In the strategic planning process the planning for such public works takes account of future development trends. However, local government does not usually consider the impact of a strategic land use planning process on their funding of capital works.

In the assessment of development, the proposed Community Impact Assessment Policy will alert Council to the impact of a development on their capital works program which should provide a staged improvement of public facilities in line with the progress of a new development. This principle should apply equitably to all new developments, although priorities may be made on the basis of need. It is recommended that the need for public works arising from the approval of housing for the ageing be given a high priority in terms of footpath accessibility, public transport services and other associated public works.

3.5 SUMMARY OF ISSUES

Issues arising from the above analysis and assessment of the current situation in relation to housing for the ageing in the region are summarised as follows:

- Definitions/classification of housing for the ageing vary across governments leading to confusion about the specific needs for access, planning and design, due in part to the lack of clear data on the requirements of older people.
- Access to services for residents of retirement housing is constrained by poor strategic planning, location of housing, and lack of human services and facilities planning.
- There are gaps in design and planning advice to developers and councils for housing for the ageing
- Planning policies, procedures and assessment processes do not enable a comprehensive assessment of development of housing for the ageing
- There are inadequate human services and facilities planning processes which ensure a timely provision of services in relation to the residents they serve and link at the local level the planning of human services with the development of retirement villages.

4 STRATEGIES FOR IMPROVEMENT

4.1 DESIGN OF DWELLINGS

The following recommendations relate to the need to improve the quality of design of housing for the ageing.

1. It is recommended that Planning SA make representation to the South Australian State Building Code Board requesting that the Building Code of Australia be modified to require compliance with relevant Australian Standards in relation to housing for the ageing.
2. It is recommended that the Department of Human Services request that in the review of the Retirement Villages Act 1987, additional provision be included regarding the planning, design and location of retirement housing.
3. It is recommended that pending the amendment to the Retirement Villages Act 1987, that the Retirement Villages Association of Australia extend their accreditation criteria to include planning, location and design standards drawn from the relevant Australian Standards.
4. It is recommended that Planning SA promote and more widely distribute the information book on the state policy in the BCA regarding the requirement that 1 in 20 dwellings in a development greater than 20 units be an adaptable design in accordance with the Australian Standard on Adaptable Housing or at least the features adopted by the SAHT.
5. It is recommended that where pursuant to recommendation 4, it is apparent that developers are avoiding this requirement through a building application process, that Councils more rigorously monitor this matter and if necessary include this provision as a condition of planning approval for the total development.
6. It is recommended Planning SA be approached with a view to urging the early completion of the Adaptable Housing Design Guide currently being prepared in association with the Victorian Government.
7. It is recommended that relevant provisions in the Australian Standards on access and mobility and adaptable housing and the earlier guidelines prepared by the Office of the Commissioner on the Ageing, be included in future planning bulletin and guides for local government.

4.2 PLANNING AND URBAN DESIGN POLICY

The following recommendations relate to planning and urban design issues relating to housing for the ageing.

8. It is recommended that this report be forwarded in its final form to the Department of Human Services as input to the proposed State Housing Strategy for Older Australians.

9. It is recommended that the three Councils' planning departments and elected members be urged to more rigorously apply the residential, access and community services and facilities provisions of the Development Plan in relation to housing for the ageing no matter how such developments are defined.
10. It is recommended that Land Management Agreements be entered into between developers of housing for the ageing and the Councils to ensure that the conditions of development approval are adhered to and that design standards of at least the equivalent of those referred to in the Retirement Villages Act are adopted, pending the preparation of other standards.
11. It is recommended that the Department of Human Services amend its information kits for residents to refer to the issues associated with the location and design of villages or similar developments.
12. It is recommended that Planning SA amend the Regulations under the Development Act 1993 to include a definition for housing for the ageing.
13. It is recommended that the local governments in the study area undertake a Strategic Land Use Plan as a matter of urgency.
14. It is recommended that each local government authority review the zoning in their Development Plans to ensure that housing types of relevance to aged person housing are encouraged in appropriate locations close to services and facilities.
15. It is recommended that each local government authority include in current PARs or prepare new ones, to incorporate the provisions referred to in this report in relation to planning and design of housing for the ageing, adaptable housing provisions and access to human services and facilities.
16. It is recommended that Planning SA prepare a Guideline Document on Planning and Design for Housing for the Ageing and Adaptable Housing with a subsequent Planning Bulletin which provides provisions for inclusion in Development Plans.
17. It is recommended that Planning SA advise the Minister of the need for a ministerial PAR on the matter referred to in 15.
18. It is recommended that Councils refuse retirement housing developments that do not clearly comply with the current provisions of the Development Plan.
19. It is recommended that Councils consider the inclusion of a separate definition for housing for the ageing in the current PARs and the proposed new PARs pending Planning SA agreeing to amend the Regulations under the Planning Act.
20. It is recommended that Councils include in new PARs reference to their intention to adopt a Community Impact Assessment Policy, the preparation of a Social Infrastructure Plan and involvement in a partnership for the planning and coordination of services provision.

21. It is recommended that Councils review the current zoning to ensure that retirement housing or similar developments are not encouraged away from centres or outside residential zones.

4.3 DEVELOPMENT APPROVAL PROCESS

22. It is recommended that Councils provide adequate information at the pre-application stage in the form of guidelines and standards to developers of retirement housing.
23. It is recommended that Councils consider the introduction of a modified version of a Community Impact Assessment process, as part of the information requirement process of development applications.
24. It is recommended that Councils include a step in their development assessment process that refers development applications of a type that triggers a Community Impact Assessment to the key stakeholders listed in Appendix 1.
25. It is recommended that Council adopt the development assessment process outlined in this report.

4.4 SOCIAL PLANNING MODEL

26. It is recommended that a range of local partnerships be investigated similar to the Playford Partnership which facilitates the planning for and timely provision of human services and facilities in association with developers of retirement housing.
27. It is recommended that the proposed Community Impact Assessment process be developed in more detail as an integral part of the Social Planning Model.
28. It is recommended that the Steering Committee make appropriate representations for the Southern Fleurieu Peninsula to be considered as a priority project in the new Government's Social Inclusion Policy and as a model for addressing issues associated with housing for the ageing.
29. It is recommended that the three Councils consider the preparation of Social Infrastructure Plans for local government areas of responsibility as part of the Strategic Planning exercise and the review of Development Plans.
30. It is recommended that in order to facilitate the preparation of and monitoring of the Social Infrastructure Plans and to provide adequate information for the Community Impact Assessment Reports, that developers be required as a condition of planning approval to provide demographic data of residents including age, past postcode annually.
31. It is recommended that the information referred to in 29 be monitored by the Positive Ageing Project and forward this to the ABS as part of the annual planning process.

32. It is recommended that the Department of Human Services consider the options for equitable access to services listed in this report.
33. It is recommended that the Steering Committee seek the support of the Department of Human Services in representation to the Commonwealth and State agencies to use more up to date demographic data when providing services for the ageing and the ABS to collect such data during the intercensal period.
34. It is recommended that the three Councils review their procedures for identifying capital works and services priorities to give greater priority to facilities and services for the ageing, such as footpaths and cycle paths, parks and street furniture and lighting to facilitate safe walking links between retirement housing and essential services.
35. It is recommended that in those areas with poor public transport, the Council liaise with a range of stakeholders and facilities such as shopping centres to provide innovative public transport in those areas not already served and restrict the further development of retirement housing until such services are in place.

4.5 IMPLEMENTATION

36. It is recommended that the Planning Education Foundation (PEF) be approached to run training in Community Impact Assessment and issues associated with aged person housing arising from this study.
37. It is recommended that this report be forwarded to the relevant division of the Department of Human Services 'Moving Ahead' project as the funding source.
38. It is recommended that funding be sought through the Regional Alliance from the Department of Human Services 'Moving Forward' project to implement the findings of this study using the region as a pilot study area by the appointment of a project officer.
39. It is recommended that a grant be sought from the Local Government Research and Development Fund to assist in the implementation of this project.
40. It is recommended that a formal Partnership be formed between the councils, developers of retirement housing and the State Government Department of Human Services with a view to ensuring that approvals for development are linked to a program of service delivery.
41. It is recommended that the recommendations relating to State Government responsibilities be forwarded to the Regional Alliance to be directed at Aged and Community Care, State Wide Planning, Community Division and the division responsible for the current Housing Strategy within the Department of Human Services.
42. It is recommended that a briefing for Councils on the findings of this study be combined with one for the 'Keeping Pace' project.

43. It is recommended that the councils of Alexandrina and Victor Harbor approach respondents to their recent survey of vacant landowners, inviting them to an information session on the outcome of this study, promoting the development of suitably located land for housing for older people, disseminating information on adaptable housing and alerting them to the intent of councils to ensure that housing for older people is located close to services and facilities.
44. It is recommended that representation be made to the Department of Human Services to make reference to this report in the terms of reference for the proposed Housing Strategy for Older People.

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Western Australian Planning Commission Livable Neighborhoods Community Design Code 1997

APPENDIX 1 – LIST OF STAKEHOLDERS

1. South Coast District Hospital,
2. Southern Fleurieu Health Service,
3. Southern Communities Transport Scheme,
4. Yankalilla Christian Community Care,
5. Heritage Club (Goolwa),
6. GPs (through Southern Division of General
7. Practice or through individual practices),
8. TAFE,
9. Meals on Wheels,
10. Senior
11. Citizens Clubs, and
12. private providers of health and related services (eg
13. pharmacies, Dial an Angel, physiotherapists etc).

APPENDIX 2 – LIST OF AGENCIES AND INDIVIDUALS CONSULTED

Name	Position	Contact
Ruth Russell	Project Officer – Hills, Mallee & Southern Region, Ageing and Community Care, SA Department of Human Services	82266852
Paula Hales	Retirement Villages Information and Advice Mediation Officer	82266850
Paul Willey	Supported Housing Unit	82266627
Joe Nolan	Acting Manager Policy, SA Community Housing Authority, Department of Human Services	8207 0115
Mark Oliphant	Community Services Officer City of Victor Harbor	85510500
Lisa Sparrow	Positive Ageing Project	85526244
Christine Nolan	Planning SA	
Jim Orken	Manager Rosetta Village, Victor Harbor	
	Officer Rosetta Village Victor Harbor	
	Residents Rosetta Village Victor Harbor	
Mr Brenton Burman	Director Planning Policy Planning SA	
Joe Byrne	Quality Service Manager, Southern Fleurieu Health Service	Participant in stakeholders workshop
Anne Kendall	Clinical Pathways Manager, Southern Fleurieu Health Service	Participant in stakeholders workshop
Sue West	Community Nursing Service, Southern Fleurieu Health Service	Participant in stakeholders workshop
Janice Moon	Dementia Care Coordinator, Southern Fleurieu Health Service	Participant in stakeholders workshop
Chris Procter	Social Worker, Southern Fleurieu Health Service	Participant in stakeholders workshop
Liz Shepherd	Aged Care Assessment Team, Southern Fleurieu Health Service	Participant in stakeholders workshop
ACROD		www.acrod
COTA		www.cota
Andrea Young	Consultant Social Planner Queensland	
Stephanie Knox	Consultant Social Planner Victoria	
Des Comerford	Alexandrina Council	0885557000
Sally Roberts	Planning Officer Alexandrina Council	
Peter Hall	City of Victor Harbor	0885510533
Tim Harrison	Yankalilla Council	0885582048
Allison Cleary	Office for Older Australians,	0262895166

Name	Position	Contact
	Commonwealth Government	
Matthew McDonald	Building Code of Australia	0262137289
Mary Androkovich	Planning SA Building State Control Body	0883030602
Yvonne Noordhuis	Office for Older Australians Certification Section, Commonwealth Government	0262134804
Glenys Raveane	Senior Policy Officer Ageing and Community Care	0882267234
Jane Fletcher	Housing and locational policy	0882266704
Ruth Ambler	Housing Policy for the Ageing	0882266976
Ann Pengelly	Strategic Planning and Policy, Ageing and Community Care	0882266857

APPENDIX 3 – EXAMPLES OF COMMUNITY IMPACT ASSESSMENT POLICIES

APPENDIX 4 – BOOKLET ON ADAPTABLE HOUSING

APPENDIX 5 – EXAMPLES OF DEVELOPMENT PLAN PROVISIONS FOR HOUSING FOR THE AGEING

Extract from the Burnside (City) part of the Development Plan pp 31- 33 Council Wide Principles of Development Control

Accommodation for the Aged

The ageing of the population and the specific needs of aged persons have created substantial demand for purpose built accommodation, often in an aggregated form generally known as retirement villages. This form of development, together with the specific needs of the aged, particularly the very old whose movement and life style may become restricted, creates the need for detailed consideration of the design of aged persons dwellings, their location and immediate environment. These considerations should not ignore the specific social, recreational and life style requirements of the residents of aged persons accommodation.

- 32** Residential development for aged persons should be located in suitable residential areas:
- (a) separated from commercial or industrial land uses which would detract from a pleasant living environment;
 - (b) where reliable frequent public transport is available or can be made available within easy walking distance from the site of the development;
 - (c) where local shops, services and facilities are available within easy walking distance or convenient travel on public transport;
 - (d) in accordance with the long-term needs of the population; and
 - (e) where the slope of the terrain is not likely to restrict the movement of aged persons.
- 33** Retirement villages and other forms of accommodation exclusively for the accommodation of aged persons may be developed at densities higher than those prescribed for dwellings in the zone in which the land is situated where sufficiently justified by one or more of the following:
- (a) the size of the dwellings being developed results in an overall site coverage similar to that prescribed for the zone;
 - (b) the overall bulk, appearance and functions of the development is compatible with the objectives for the zone; and
 - (c) the requirements of garaging, car parks and driveways are less than would be required for the development of dwellings generally providing opportunities for significant landscaping of the development site.
- 34** Retirement villages, hostels and other forms of accommodation for aged persons should be designed:
- (a) to incorporate:
 - (i) communal areas with an interesting and active outlook;
 - (ii) an attractive outlook from personal spaces within the buildings;
 - (iii) usable recreation areas for residents and visitors including children;

- (iv) spaces to accommodate social needs and activities such as gatherings, gardening or the keeping of birds and animals; and
 - (v) use of natural lighting;
 - (b) limit the scale of buildings in close proximity to the boundaries of the site;
 - (c) avoid an institutional style of development;
 - (d) to provide storage areas for items such as boats, trailers and caravans in association with independent living units;
 - (e) to provide security for residents;
 - (f) to provide a balance between communal areas and personal spaces;
 - (g) to provide adequate living space for a private lifestyle with single person rooms being not less than 16 square metres in area with at least some occupancies incorporating a second habitable space for the accommodation of some items of furniture or similar items of personal value to the occupant;
 - (h) to avoid multiple floor levels;
 - (i) to avoid the creation of obscure and poorly lit spaces or paths of travel which would create unsafe conditions; and
 - (j) provide adequate storage spaces for personal and household items for convenience and avoidance of accidents caused by the clutter of spaces.
- 35** Within residential developments for aged persons, driveways, roads, walkways and other paths of travel should:
- (a) provide resting places and opportunity for social interaction with seats and protection from sun, rain and wind;
 - (b) be covered where frequently travelled by pedestrians;
 - (c) roads and walkways should be constructed within minimal gradients not greater than 1-in-20 to facilitate ease of movement for pedestrians or persons confined to a wheelchair with changes in gradient being clearly identified;
 - (d) have a firm and even slip resistant paved surface;
 - (e) not include steps with a tread width of less than 600 millimetres and a rise of less than 80 millimetres, or more than 100 millimetres to facilitate the use of personal mobility aids;
 - (f) be provided with hand-rails where there may be a risk or danger of falling for pedestrians;
 - (g) include dual provision of steps and ramps to facilitate the use of all forms of personal mobility aids; and
 - (h) pedestrian and vehicular traffic should be clearly separated.
- 36** In the development of residential accommodation for the aged vehicle parking areas should:

- (a) be provided on site for residents, staff, service providers and visitors at a rate sufficient to meet the likely demands generated by the development;
- (b) be conveniently located for ease of access and security for residents;
- (c) be designed to minimize the impact on adjoining residential premises due to:
 - (i) visual intrusion; and
 - (ii) the location of driveways and vehicle manoeuvring areas;
- (d) provide covered, secure areas for resident's vehicles;
- (e) be paved with an even slip resistant surface with gradients of not more than 1-in-20;
- (f) provide for the operation and parking of a small bus including a passenger pick-up and set-down area and manoeuvring space; and
- (g) provide resident car parking spaces of dimensions suited to the needs of the aged in respect of:
 - (i) ease of vehicle movements; and
 - (ii) the full opening of vehicle doors for ease of access and egress of aged persons.

37 Within retirement villages, hostels and other forms of accommodation for aged persons;

- (a) roads and walkways should be constructed with minimal gradients not greater than 1-in-20 to facilitate ease of movement for pedestrians or persons confined to a wheelchair, with changes in gradient being clearly identified;
- (b) pedestrian and vehicular traffic should be clearly separated; and
- (c) an area should be provided for the operation of a small bus, including a passenger pick-up and set-down area, and manoeuvring space.

Extract from the Adelaide Hill Council part of the Development Plan. Council Wide provisions.

AGED ACCOMMODATION

- Objective 29:** A wide range of choice of types of housing enabling aged persons to move into accommodation suited to their needs.
- Objective 30:** Housing located where aged persons can be an integral part of the local community and with convenient access to public transport, shops and community services.
- Objective 31:** Housing well distributed, with adequate provision in areas having a large number of aged persons.
- Objective 32:** Housing which is appropriately landscaped to maintain or enhance the amenity of the locality.
- Objective 33:** Housing designed for the comfort, safety, security and well-being of aged persons.

Aged persons are a significant and increasing component of the population. The varied characteristics of this stage of life require specific housing and facilities to provide for their care and complementary integration with the wider community.

PRINCIPLES OF DEVELOPMENT CONTROL

- 92** Aged persons dwellings should be located close to other residential development to enable aged persons to be an integral part of the local community.
- 93** Buildings should be set-back from front boundaries of their sites to achieve a satisfactory relationship with adjacent development and the streetscape.
- 94** Buildings should be set-back from side and rear boundaries of an allotment and the set-back distance related to the height of the building, length of its walls and size and location of its openings, to ensure adequate day-light and privacy of adjacent allotments.
- 95** Medium density development should complement the character of the zone and protect its amenity.
- 96** Car parking should be provided in accordance with [Table AdHi/4](#).
- 97** Addition or alteration to existing dwellings for occupation by elderly parents or immediate members of the family should only occur where:
- (a) the allotment is not less than 2000 square metres in area;
 - (b) integral internal access between the main dwelling and the addition being maintained, including ceiling space;
 - (c) the occupiers of the space are close relatives of the family resident; and
 - (d) the addition is designed to blend with and enhance the appearance of the existing building.
- 98** Development designed specifically for aged or disabled persons should:
- (a) be designed for the safety and convenience of people with impaired mobility, eye sight, and hearing and or other disabilities;

- (b) be in locations where there is good access to essential community services and facilities, including public transport, shops, health and welfare centres and meeting halls;
 - (c) not be in locations where convenient movement is likely to be restricted by steep slopes;
 - (d) be provided with on-site services and facilities, living and communal areas, and open space to suit the needs of aged or disabled residents;
 - (e) be designed with human scale and be of a residential character;
 - (f) be designed to ensure services such as group mail boxes and waste disposal areas are placed within easy walking distance of all dwelling units; and
 - (g) not be located on sites of steep gradients.
- 99** Development designed specifically for aged or disabled persons should be clustered together so as to provide suitable private areas of open space, and suitable service areas, and the various groups of buildings should be surrounded by large areas of public or semi-public open space.

APPENDIX 6 – SUMMARY OF ZONE PROVISIONS

Table of zones showing status of Retirement Housing

ALEXANDRINA COUNCIL	Detached Dwelling	Group Dwelling	Multiple Dwelling	Residential Flat Building	Row Dwelling	Semi-detached Dwelling	Welfare Institution	Aged Person's Home
Flood zone	CS ⁵	X		X	X	X	X	X
Future urban	CS	CS	X	X	X	X	CS	CS
General Farming (Hindmarsh Island)	CS	X	X	X	X	X	X	X
General Farming (Port Elliott and Goolwa District)	CS	X	X	X	X	X	X	X
General Farming (Strathalbyn District)	CS	X	X	X	X	X	X	X
Goolwa Historic Area	CS	CS	CS	CS	CS	CS	CS	CS
Grazing Zone	X	X	X	X	X	X	X	X
Hindmarsh Island	CS	X	X	X	CS	X	CS	CS
Historic (conservation) – Coastal	X	CS	X	X	X	X	X	CS
Historic (conservation zone) – residential	CS	X	X	X	CS	X	CS	CS
Historic (conservation) zone – tourist accommodation	CS	X	CS	CS			CS	CS
Historic Waterfront	X	CS	CS	X	X	CS	CS	CS
Holiday house (Hindmarsh Island)	X ⁶	X	X	X	X	X	CS	CS
Home Industry Zone	C	CS	CS	X	X	X	CS	CS
Horticulture (Port Elliott and Goolwa District)	X	CS ⁷	X	X	X	X	X	X
Horticulture (Strathalbyn District)	X	X	X	X	X	X	X	X
Industrial	CS	CS	X	X	X	X	CS	CS
Industry	CS	X	X	X	X	X	X	CS
Landscape (Port Elliott and Goolwa District)	X	CS	CS	CS	CS	CS	X	X
Landscape (Strathalbyn District)	X	CS	X	X	X	X	CS	CS
Light Industrial	CS	CS	X	X	X	X	CS	CS
Local Centre	CS	CS	CS	CS	CS	CS	CS	CS
Residential Zone	C	CS	CS	CS	CS	CS	CS	CS
Residential (Golf Course)	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Hindmarsh)	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Marina) Hindmarsh Island	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Milang)	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Mount Compass)	C	CS	CS	CS	CS	CS	CS	CS
Residential Zone (Goolwa)	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Strathalbyn)	CS	CS	CS	CS	CS	CS	CS	CS
Rural (Currency Creek)	X	X	X	X	X	X	CS	CS
Rural (Deferred Urban)	CS	X	CS	X	X	X	CS	CS
Rural Fringe	CS	X	X	X	X	X	X	X
Rural Living (Port Elliot and Goolwa District)	CS	CS	X	X	X	X	CS	CS
Rural Living (Strathalbyn District)	CS	CS	X	X	X	X	X	CS

⁵ Under certain conditions

⁶ changes to existing or replacement

⁷ Conditions apply

Rural Waterfront	CS	X	X	X	X	X	CS	CS
Tourist Accommodation	CS	CS	CS	CS	CS	CS	CS	CS
Tourist Accommodation (Goolwa)	CS	CS	CS	CS	CS	CS	CS	CS
Tourist Commercial	X	CS	X	X	X	X	CS	CS
Town Centre (Mount Compass)	CS	CS	CS	CS	CS	CS	CS	CS
Urban Waterfront	CS	CS	CS	CS	CS	X	CS	CS
Waterfront	CS	X	X	X	X	X	X	X
Watershed protection	CS	X	X	X	X	X	X	X
Watershed protection 2	CS	X	X	X	X	X	X	X
Water protection (Mount Compass)	CS	CS	X	X	X	X	CS	CS
VICTOR HARBOR (DC)								
District Centre	CS	CS	CS	CS	CS	CS	CS	CS
Shopping Policy Area 1	CS	CS	CS	CS	CS	CS	CS	CS
Shopping Policy Area 2	CS	CS	CS	CS	CS	CS	CS	CS
Tourist Accommodation Area 3	CS	CS	CS	CS	CS	CS	CS	CS
Railway Station (Esplanade) Area 4	CS	CS	CS	CS	CS	CS	CS	CS
Local Centre (Victoria Street)	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Victoria Street)	CS	CS	CS	CS	CS	CS	CS	CS
Residential Foreshore	CS	CS	CS	CS	CS	CS	CS	CS
Foreshore	CS	CS	CS	CS	CS	CS	CS	CS
Residential	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Golf Course)	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Lakeside)	CS	CS	CS	CS	CS	CS	CS	CS
Future Residential	CS	CS	CS	CS	CS	CS	CS	CS
Neighbourhood Centre	CS	CS	CS	CS	CS	CS	CS	CS
Local Centre (Yilki)	CS	CS	CS	CS	CS	CS	CS	CS
Local Centre (Hayborough)	CS	CS	CS	CS	CS	CS	CS	CS
Light Industrial	CS	CS	CS	CS	CS	CS	CS	CS
Industrial	CS	CS	CS	CS	CS	CS	CS	CS
Home Industry	CS	CS	CS	CS	CS	CS	CS	CS
Tourist Accommodation (Inman River)	X	CS	X	CS	CS	CS	CS	CS
Tourist Accommodation (Whalers Inn)	CS	CS	X	CS	CS	CS	CS	CS
Recreation	CS	CS	CS	CS	CS	CS	CS	CS
Recreation/Amusement (Hindmarsh River)	X	X	X	X	X	X	CS	X
Rural Living 1	CS	CS	CS	CS	CS	CS	CS	CS
Rural Living 2	CS	CS	CS	CS	CS	CS	CS	CS
Rural Living 3	CS	CS	CS	CS	CS	CS	CS	CS
Rural Living 4	CS	CS	CS	CS	CS	CS	CS	CS
General Farming	CS	CS	CS	CS	CS	CS	CS	CS
Water Protection	CS	X	X	X	X	X	CS	CS
Rural Coastal	CS	CS	X	X	X	X	X	CS
YANKALILLA								
Residential	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Golf Course)	CS	CS	CS	CS	CS	CS	CS	CS
Centre	CS	CS	CS	CS	CS	CS	CS	CS
Commercial	CS	CS	X	X	X	X	CS	CS
Commercial (Cape Jervis)	X	CS	CS	CS	CS	CS	CS	CS
Extractive Industry	X	CS	X	X	X	X	CS	CS
Extractive Industry (Deferred)	X	CS	X	X	X	X	CS	CS
Community	X	CS	X	X	X	X	CS	CS
Recreation	X	CS	X	X	X	X	CS	CS

Wirrina	CS	CS	CS	CS	CS	CS	CS	CS
Tourist Accommodation (Normanville)	CS	CS	CS	CS	CS	CS	CS	CS
Historic (Conservation) (Rapid Bay)	CS	X	X	X	X	X	CS	CS
Urban Coastal	X	X	X	X	X	X	CS	CS
Urban (Deferred)	CS	X	X	X	X	X	CS	CS
Conservation	X	X	X	X	X	X	CS	CS
General Farming	X	CS	X	X	X	CS	CS	CS
Watershed Protection 1	CS	CS	X	X	X	X	CS	CS
Watershed Protection 2	CS	CS	X	X	X	X	CS	CS
Country Living	CS	CS	X	X	X	X	CS	CS
Country Living (Delamere)	CS	CS	X	X	X	CS	CS	CS
Rural Living	CS	CS	X	X	X	CS	CS	CS
Country Township	CS	CS	CS	CS	CS	CS	CS	CS
Residential (Randalsea)	CS	CS	X	X	CS	CS	CS	CS
Randalsea Historic (Conservation)	CS	CS	CS	CS	CS	CS	CS	CS
Rural Coastal	X	X	X	X	X	CS	CS	CS

X: Non-Complying development
 CS: Development requiring consent
 C: Complying development