

Department of Planning, Transport and Infrastructure
Via email: DPTI.planningreform@sa.gov.au

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To whom it may concern

Comments on the draft Planning and design Code for Phase Three (urban areas)

We thank you for the opportunity to provide comment on the proposed Planning and Design Code (P&D Code). As an owner, developer and operator of 15 retirement villages in South Australia we wish to make the following comments on the P&D Code.

1. Land use definition

The proposed definition for a 'retirement facility' is '*a facility operating under the regulatory framework of the Retirement Villages Act 2016*'. We would like to propose an alternative way of describing a retirement facility (or preferably a 'retirement village') as below:

Means land comprising a single building or a group of buildings that include dwellings for people over the age of 55 years old and that operates under the regulatory framework of the Retirement Village Act 2016. The use may also include one or more of the following secondary activities which operate and constitute one integrated facility where on-site facilities, systems and processes, car parking and access and egress are all shared:

- *Personal or domestic services establishment; and/or*
- *A shop with a gross leasable area of no more than 50 sqm; and/or*
- *An office used for administration purposes associated with the management of the retirement facility; and/or*
- *Consulting rooms used in the practice of a profession by medical or allied health practitioner for use by residents and visitors to the facility; and/or*
- *An indoor recreation facility such as a gymnasium or indoor therapy pool for primary use by residents and visitors; and/or*
- *A restaurant used for the primary consumption of meals by residents and visitors to the facility.*

We believe it is important to include reference to the secondary activities given a key component to any retirement village is the community facilities that typically include hairdresser, gymnasium, café, administration offices, allied health consulting rooms and in some cases, restaurants.

There is no definition for 'Residential Aged Care Facility (RACF)' or 'nursing home' even though there is reference to these land uses within the Code. Although a RACF could fall under the

definition of ‘Supported Accommodation’, given the future need for additional aged care places and the unique complex nature of an RACF, we believe the Code should incorporate a specific definition for a RACF. Suggested definition is below.

A building or a group of buildings used to provide accommodation and residential care as defined under the Aged Care Act 1997. The use may also include one or more of the following secondary activities, which operate and constitute one integrated facility where on-site facilities, systems and processes, car parking and access and egress are all shared:

- *Personal or domestic services establishment; and/or*
- *A shop with a gross leasable area of no more than 50 sqm; and/or*
- *An office used for administration purposes relating to the aged care operation; and/or*
- *Consulting rooms used in the practice of a profession by medical or allied health practitioner for use by residents and visitors to the facility; and/or*
- *An indoor recreation facility such as a gymnasium or indoor therapy pool for primary use by residents and visitors; and/or*
- *A restaurant used for the primary consumption of meals by residents and visitors to the facility.*

2. Design in Urban Areas – External materials

DTS/DPF 9.5 specifies certain materials and finishes to be used on built form in order for it to be deemed to satisfy. We believe materials and finishes should be selected by relevant design consultants and that the planning system should not be influencing the selection of materials as this has the potential to stifle innovative architectural solutions.

3. Design in Urban Areas Policy – Residential Development – 4 or more building levels (including serviced apartments)

Policy 29.1 seeks to achieve a range of dwellings sizes and types for developments in excess of 10 dwellings. Encouraging dwelling diversity is supported however not to the extent where the Code specifies a minimum for each dwelling type including studio and one bedroom dwellings. In our opinion, the dwelling mix should be based on market demands and needs and not specified by the Code.

4. Design in Urban Areas Policy – Common Areas

DTS/DPF 30.1 specifies that common corridor should provide access to no more than 8 dwellings to be deemed to satisfy. Limiting the number of dwellings off a common corridor should not be a planning consideration.

5. Building Heights and Storeys

There are a number of sites where the maximum height and storeys are inconsistent with the current Development Plan zoning provisions. It is understood that the Code should be adopting heights that are ‘like-for-like’. The table below summaries two of our villages where the height restrictions are inconsistent with the current zoning parameters.

Aveo Village	Development Plan height restrictions	Proposed Design and Planning Code
Aveo Ackland Park 631 South Road, Everard Park	Maximum 3 storey	Two storeys and 9m high
Aveo Gulf Point 2 Falie Drive, North Haven	Not to exceed 15.5m AHD.	Two storeys and 9m high
Aveo Glynde Lodge 10 Davis Road, Glynde	Maximum 3 storeys	Two storeys and 9m high

Please don't hesitate to contact me should you wish to discuss the above matters.

Yours sincerely,



Rebecca Grundy
Development Manager
Aveo Group Limited

T: [REDACTED]

E: [REDACTED]

W: www.aveo.com.au