



**Council on the Ageing New South Wales**

**Submission**

**Draft District Plans**

**Greater Sydney Commission**

Council on the Ageing (COTA NSW)  
Lisa Langley  
Co-Acting CEO & Policy Manager  
(02) 9287 3860  
Level 6, 280 Pitt Street  
Sydney, NSW 2000

Email: [Lisa.Langley@cotansw.com.au](mailto:Lisa.Langley@cotansw.com.au)

## **COTA NSW**

COTA NSW is the peak body representing people over 50 in NSW. We're an independent, non-partisan, consumer-based non-government organisation. We work with politicians, policy makers, service and product providers as well as media representatives to make sure our constituents' views are heard and their needs met.

### **The focus of the COTA NSW submission**

In this submission, COTA NSW will respond to those aspects of the Draft District Plans that have the greatest impact on to older people living in greater Sydney and an ageing population. Of particular relevance are the Liveability and Sustainability priorities and actions, which include strategies to address the issue of housing affordability, diversity of housing options and liveable communities.

## **Improving Housing Affordability and Diversity (4.4)**

The NSW Department of Planning and Environment estimates that there will be a 55% increase in the number of people aged 50 and over - in the period from 2016 to 2036 - living in the Sydney metropolitan area. This demographic shift requires the development of innovative models of affordable housing for older people and a recognition that the majority of older people wish to age in place, in areas that are well located and close to services and transport. Dual occupancy, granny flats, high-density rental developments, assisted living communities and well located retirement communities and residential parks, should all be considered as a suite of alternative housing models available to meet the diverse needs of the ageing population.

Additionally, good design is integral to the concept of housing affordability as it has the potential to increase flexible adaptation of use and reduce community care and other costs. Research shows that the continued wellbeing of people as they age is linked closely to their housing and neighbourhood. There is an overwhelming desire for older home owners to remain in their own homes for as long as possible.<sup>1</sup>

### **4.4.1 – Plan for Housing Diversity**

We commend the Commission’s recognition of the need to provide a range of different types of housing suited to older people, such as smaller homes, group homes and aged care facilities to allow them to age in place.

#### **Recommendations**

That the proposed toolkit that will support the preparation of local housing strategies emphasises the need for local councils to:

- Conduct community engagement activities that enables the capture of trend data to guide the development of local housing strategies that reflects the needs of older people
- That councils give consideration to the inclusion of lower cost housing that may suit the needs of older people on fixed incomes, such as studio apartments, bedsits with access to common areas and development of secondary dwellings on existing land.
- That councils give consideration to the broader needs of older residents during the planning process, such as access to care and support services, transportation and social connectivity within their community.

Additionally, it is recommended that the Greater Sydney Commission participates in the *Housing Choices Review* that is listed as a key action within the NSW Ageing Strategy 2016-2020 Implementation Plan. This review will investigate what changes to NSW Government planning and regulatory responses are required to create more housing choice for older people.

---

<sup>1</sup> Judd, B., Olsberg, D., Quinn, J., Groenhart, L., Demirbilek, O. (2010) *Dwelling, land and neighbourhood use by older home owners*, AHURI Final Report No. 144, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/144>.

#### 4.4.2 – Support planning for adaptable housing and aged care

These draft plans - whilst acknowledging the importance of adaptable housing to enable ageing in place and improved accessibility for people with disability – require specific targets to ensure that minimum standards are included in future council Development Control Plans (DCP's). It is important to note, that universal design principles as espoused by Livable Housing Australia, take a 'whole of life' approach; that is inclusive, regardless of age, ability or background. Taken in this context, universal design should not solely be considered in the realm of 'adaptable' or 'accessible' housing but as a design standard to ensure liveable communities for all.

#### Recommendations

- That all new medium-density developments, apartments, and single-storey and 2-storey dwellings comply with the Livable Housing Australia 'silver level' criteria. The silver level criteria are a minimum level of design to ensure that - as a signatory of the UN Convention of the Rights of Persons with Disabilities - we adhere to the guiding principle of accessibility and the right to live independently.
- COTA NSW encourages a review and modification of existing regulation (such as SEPP and DCP's) to include accessible housing design in all new dwellings as a minimum and that the 'gold level' of the Livable Housing Australia Design Guidelines as an aspirational target.
- That the Commission includes an action to advocate for a review of the planning laws in NSW to include the principles of universal design as shown in silver and gold levels specified by Livable Housing Australia.

#### 4.4.4 – Deliver Affordable Rental Housing

While a majority of older people (those aged 65 and over) own their own home or are in the process of owning their home (65.3%)<sup>2</sup>, NSW is witnessing a steady increase in the number of older, non-home owners. In 2011, 12% of over-65s lived in rental accommodation, with most living in private rental.<sup>3</sup>

Older people are typically on low incomes, with over half of +65 households living on incomes below \$30,000 per annum.<sup>4</sup> This has implications for non-homeowners, particularly those renting in the private market because of the lack of affordable private rentals. It is estimated that there are 35,000 low-income older renter households in housing stress (where they pay more than 30% of household income on housing costs) in NSW. This is expected to increase to 70,000 by 2036.<sup>5</sup>

The evidence suggests that older, low-income private renters are the worst-off group in terms of housing stress. The NSW Ageing Strategy acknowledges the precarious and

---

<sup>2</sup> ABS (2011) 'Census of Population & Housing'

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Judith Stubbs & Associates (2014).

financial implications of renting for older people can have negative impacts on health and quality of life. This is supported by a tenancy survey conducted by COTA NSW that found that many aged pensioners living in Sydney are forced to spend over half of their income on rent. In many cases this is leading to older people becoming homeless, with an increasing prevalence of older women experiencing homelessness due to low superannuation, family breakdown or rising rental costs. The implementation of a range of policy measures to address this growing need - including the proposed Affordable Housing Target scheme based on inclusionary zoning - is to be commended.

### **Recommendations**

We support Shelter NSW, the peak agency for greater housing equity in NSW, in recommending that the Affordable Rental Housing Target and associated scheme be amended by:

- Applying the target to the *total* floor area of the development after upzoning,
- Increasing the target to 15 percent of the total floor area, in the case of privately owned land,
- Increasing the target to 30 percent of the total floor area, in the case of government owned land, and
- Requiring rents to tenants to be charged below a rate above which their household would be in housing stress, using the maximum 30 per cent of household income rule, and
- Ensuring that the provision of affordable rental housing is in perpetuity and not subject to a sunset clause.

Further, we support the Shelter NSW view that the District Plans should give stronger backing to support councils to achieve additional affordable housing, by:

- Amending SEPP 70 and naming all local government areas in Greater Sydney as having a need for affordable housing,
- Encouraging all local councils in Greater Sydney to prepare local inclusionary-housing schemes and to amend their local environmental plans to operationalise these, and
- Agreeing to councils' planning proposals for local inclusionary-housing schemes, under the *Environmental Planning and Assessment Act* (section 94F).

#### **4.4.5 – Support social housing**

The provision of adequate social housing is an essential component in the housing affordability policy mix. The 2011 Census estimated that in NSW, 16.2% of people experiencing homelessness were aged 55 and older.<sup>6</sup> For these older Australians and others on fixed incomes and currently in the private rental market; the need for subsidised social

---

<sup>6</sup> Australian Bureau of Statistics, *Census of Population and Housing: Estimating Homelessness*, 2012

housing is acute. COTA NSW contends that increases to social housing stock must target areas where there are the greatest shortfalls and in locations with increasing, low-income older populations.

The draft Plans primary strategy to increase social housing provision appears to be focused on the amendment of land use controls on existing social house sites that will increase density and height uplift. The resulting site would then contain a mix of social, affordable and privately owned dwellings. COTA NSW supports the integration of communities through mixed housing but is concerned that it is not explicit in how a net increase in social housing will be achieved. The selection of redevelopment sites is also an important consideration, so that future social housing is located in areas with adequate community infrastructure, public transport and well-designed public open spaces that fosters social inclusion and improved health and wellbeing outcomes for residents.

### **Recommendations**

- District Plans to be required to map existing social housing assets and set this as a minimum baseline to be maintained within the district.
- Include specific action/s under Liveability Priority 4 that indicates how a net increase in social housing will be achieved across each district.
- In partnership with NSW Housing specify social housing targets for each district, with appropriate indicators in the implementation and monitoring plan.
- That the Commission encourage increased social housing provision by working with the Land and Housing Corporation and community housing providers to develop social-housing dwellings that exhibit and showcase design excellence. This includes adhering to the principles of Crime prevention through environmental design (CPTED) and sustainable home design.

#### **4.6.2 – Plan for safe and healthy places**

COTA NSW endorses the inclusion of the Liveability Framework as a guiding principle in planning and infrastructure delivery that considers people’s needs at all stages of life, their health and wellbeing and the natural environment in which they live. By the very nature of its ethos Liveable communities are designed to be inclusive. Both the NSW Ageing Strategy and Disability Inclusion Plan recognise the importance of creating ‘age friendly or liveable’ communities that are accessible, adaptable and affordable for everyone.

It is suggested that additional consideration be given to the World Health Organisation’s (WHO) Global Age-Friendly Cities Guide<sup>7</sup> that emphasises the impacts of the urban environment on the healthy ageing of older people. The framework highlights the importance of providing the right environment, both physically and metaphorically that allows people to age well across all life stages and includes detailed information on the design of outdoor spaces, buildings, housing and transportation. COTA NSW in partnership with Local Government NSW has developed extensive resources to assist council’s in creating age-friendly communities, integrating specific strategies into the Community

---

<sup>7</sup> World Health Organisation, 2007. ‘Global Age-Friendly Cities: A guide’

Strategic Plan and educating all areas of council on identifying and addressing the needs of an ageing population.<sup>8</sup>

Research indicates that older people identify the inclusion of key design elements in public space that will improve useability, comfort and reduce safety concerns. Some of these include: variety and quantity of seating; hand rails; drinking fountains and shade; plentiful and clean public toilets and pedestrian amenity.<sup>9</sup>

### Recommendations

- We concur with the Heart Foundation’s Healthy Planning Expert Working Group submission that the Framework with its nine outcomes should cover all three domains of *A Productive, Liveable and Sustainable Sydney* and be moved to the introduction. This will reflect its stated intent as a foundational framework for all planning decisions and infrastructure delivery.
- The design of appropriate indicators to measure the effectiveness of actions associated with the Liveability Priorities should be outcome based and will require a range of data sources and methodologies to determine if key health and wellbeing indicators have improved. The inclusion of headline indicators on the proposed dashboard would provide a snapshot on the success of the proposed strategies and actions on the health and wellbeing of the respective district.
- The Victorian Government has well developed community indicators that require data to be collected by local government and government agencies to measure the health and wellbeing of communities in the state. An exploration of this methodology should be undertaken, with the possibility of adaption and implementation in NSW.<sup>10</sup>
- The application of Crime Prevention through Environmental Design (CPTED) is recommended when considering safety and planning for all developments. This is to ensure the fear and incidence of crime is reduced, particularly when attempting to promote physical activity (incidental or intentional) and community cohesiveness.
- That additional consideration be given to the incorporation of the NSW Health Healthy Urban Development checklists within the Liveability Framework to ensure that public health is given due regard during the design phase of future development.

#### 4.6.3 – Enhance walking and cycling connections

People engage with their community in many ways. However, being able to physically move around within one’s community is fundamental to their ability to engage with it effectively. The absence of appropriate transport options and pedestrian access can result in the very real risk of isolation and the negative consequences that are associated with it – depression, poor health and poor quality of life. COTA NSW’s 50+ Report (2015) *with a focus on how people get around and obtain information*, was informed by a range of engagements with

---

<sup>8</sup> <http://www.cotansw.com.au/council-on-the-ageing-nsw-policy-creating-age-friendly-communities>

<sup>9</sup> Buys, L. & Vine, D. (3/10/2017) *Contested spaces: we need to see public space through older eyes too*. The Conversation.

<sup>10</sup> <http://www.communityindicators.net.au/>

older people to identify what was important to them in improving their ability to ‘get around.’ Almost 60% of respondents reported that there were things in the physical/built environment that made getting around difficult. Of these 60% identified ‘no footpaths or uneven, broken footpaths’, was the biggest impediment to their ease of walking in their community. The next most commonly reported barriers were associated with parking, toilets, lighting and seating. These findings illustrate the importance of taking a holistic approach to enhancing the walkability of suburbs, particularly for the needs of older people and people with disability.

### **Recommendations**

- Contribute to the NSW Government’s development of a NSW Walkability Index that will be a standard for designing and measuring walkable communities.
- Require councils to develop a Pedestrian Mobility Access Plan incorporating measures of walkability and strategies to improve: footpath infrastructure, wayfinding, connectivity and safety.
- Include an action for each district in partnership with local councils to develop an Integrated Transport Plan. This plan will create a vision for a transport network that includes consideration of population demographics, existing and planned transport infrastructure and strategies to support/encourage walking and cycling for the benefit of all age groups.

#### **4.8.7 – Plan for health facilities and services**

COTA NSW supports the assertion that due consideration is required of Councils, the Commission and other planning authorities in the utilisation of demographic data, projections and other indicators that illustrate the need to develop health precincts and other infrastructure in areas complimentary to existing residential aged care facilities, transportation and appropriate housing and accommodation.

#### **5.6 – Sustainability Priorities: Protect, enhance and extend urban canopy & Mitigate the Urban heat island effect**

Older people have told us of the importance of having adequate shade in public spaces. The provision of shade through the tree canopy has many benefits, such as beautifying a space. It is also vital in providing protection and comfort from sun exposure, humidity and heat; improving air quality and providing habitat for native wildlife.

Western Sydney is particularly susceptible to extreme heat events and the urban heat island effect. Parramatta, Penrith and Blacktown Councils have commenced mapping urban heat pockets in their LGA’s and introducing strategies to reduce its impact. Collaboration with Council, Universities and the Commission to utilise innovative design, materials and selection of appropriate flora to address this is to be encouraged.

## Recommendations

- Require councils to map existing tree coverage to facilitate the establishment of a minimum benchmark to enable the setting of medium and long term increases in the urban canopy.

Further, COTA NSW endorses the recommendations by the Heart Foundation's Healthy Planning Expert Working Group to:

- Include an additional action to develop funding criteria that prioritises projects in lower SES areas and/or areas of higher need, in relation to Green Grid strategic objectives. (Criteria could be based, for example, on SEIFA and health indices, areas most vulnerable to urban heat island risk, and hotspots of sedentary populations).
- Develop an alternate funding stream for Councils in lower SES areas that cannot match 50 per cent funding for Green Grid projects under the existing funding schemes.
- Include a dashboard indicator that monitors the delivery of new open space, including sporting facilities, so increases in population can be compared with the creation of additional facilities.