



17th March 2025

Mr Hayden David
Acting Policy Manager
Building Commission NSW

Delivered by email c/o HBAreview@customerservice.nsw.gov.au

Dear Mr Hayden David,

Thank you for the opportunity to attend the roundtable on Thursday 20th of February, and to comment on the Liveable Housing Requirements in NSW discussion paper. I am writing to you to provide a written submission on the discussion paper.

About COTA NSW

COTA NSW is the peak body representing the rights and interests of people over 50 in New South Wales. We advocate for policies that enable older Australians to age with dignity, security, and independence, particularly in relation to housing, health, and social inclusion.

Setting the Scene

New South Wales is home to 1.54 million people aged 65 and over, a number projected to rise to 1.74 million by 2029–30—a 13.17% increase in just five yearsⁱ. This rapid demographic shift underscores the urgency of future-proofing housing to support the needs of an ageing population.

Older adults overwhelmingly prefer to age in place (remaining in their own homes and communities for as long as possible). The NSW Government has recognised this priority in its *Ageing Well in NSW* strategyⁱⁱ, which explicitly commits to “supporting ageing in place and growing old in established communities”.

Without widespread adoption of *Liveable Housing Design Standards (LHDS)*, many older adults face premature moves into residential aged care or prolonged hospital stays due to homes that are unsuitable for ageing-related needs.

The financial and systemic consequences of inaction are stark. Every day, more than 550 older adults in NSW hospitals are medically fit for discharge but are unable to return home due to inaccessible housing. These unnecessary hospital stays cost taxpayers approximately \$1,200 per dayⁱⁱⁱ. Investing in accessible housing is not only a

Ageing is a time of possibility, opportunity and influence.



matter of dignity and independence but also a cost-saving measure that alleviates pressure on both the aged care and health systems.

COTA NSW Position

While Option 4 is the ideal scenario, COTA NSW acknowledges the need for flexibility in implementation. We therefore strongly support Option 3; Adopt the Design Standards with exemptions, which provides a balanced approach by ensuring accessibility in most new homes while allowing exemptions for genuine site constraints. This aligns with national efforts to create consistency across jurisdictions, reducing complexity for developers and ensuring NSW keeps pace with other states that have already committed to the Liveable Housing Standards.

NSW should be at the forefront of healthy ageing, ensuring that housing is a key part of enabling people to remain in their communities. The *Ageing Well* strategy supports ageing in place and in communityⁱⁱ but without widespread adoption of accessible housing standards, this goal will remain unachievable.

The building industry has argued that accessibility should be a matter of personal choice. While individual preferences should be respected, housing is not just for single users, it is a shared resource across generations. Regulatory standards exist in all aspects of construction to ensure safety and usability (e.g., requiring licensed electricians). Housing should be no different.

Some developers argue that implementing accessibility requirements will increase construction costs. While there may be minor short-term increases, the long-term savings far outweigh initial costs. Evidence from Homes NSW demonstrates that standardising accessibility requirements leads to cost reductions over time. Additionally, retrofitting inaccessible homes is exponentially more expensive than incorporating accessibility from the outset.

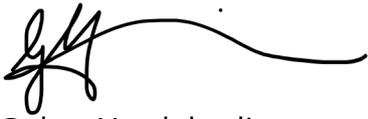
Conclusion

We urge the NSW Government to commit to adopting Option 3, ensuring that all new homes in NSW are designed with accessibility in mind, while allowing exemptions for genuine site constraints. This approach strikes a balance between feasibility and the urgent need to future-proof housing for an ageing population.

Accessible housing is not a niche issue, it is a fundamental requirement for a healthier, more inclusive, and economically sustainable NSW. Without commitment to these changes, we risk undermining the *Ageing Well* strategy and failing the next generation of older Australians.

Thank you for your time and consideration.

Yours sincerely,

A handwritten signature in black ink, consisting of stylized initials 'GY' followed by a long, sweeping horizontal line that ends in a small hook.

Gohar Yazdabadi
Chief Executive Officer
Council on the Ageing NSW

ⁱ Centre for Population 2023, Population Statement: State and Territory Population Projections, 2022-23 to 2033-34, the Australian Government, Canberra.

ⁱⁱ [Ageing well in NSW Action Plan 2023-2024](#)

ⁱⁱⁱ [Scale of Fees for Hospital and Other Health Services](#)