



Council on the Ageing New South Wales

Submission

Draft Greater Sydney Region Plan Greater Sydney Commission

Council on the Ageing (COTA NSW)
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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 Greater Sydney Region Plan 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 objectives that include strategies to address the issue of housing affordability, diversity of housing options and liveable communities.

Summary of Recommendations

- Strengthen the proposed metric for *Housing the city* to include targets by date, participation and implementation.
- Support and advocate for the introduction of community wellbeing indicators at a local government level and reported through the Integrated Planning and Reporting Framework that better demonstrate outcomes of the Plan.
- Support the review and modification of existing regulations to mandate the adherence to Livable Housing Australia 'silver living' criteria for all new dwellings in the Greater Sydney Region.
- Implement a publically available dashboard for ongoing monitoring and measurement of the actions and strategies contained within the Plan.
- That the Plan acknowledges and considers international frameworks such as the World Health Organisation's (WHO) Global Age Friendly Cities Guide when designing public spaces.
- Promote and support councils to develop Pedestrian Mobility Access Plans (PAMPs) to facilitate improved walkability and access measures.
- Include an affordable rental housing target across all new developments on government land and amend the SEPP 70 to name all local government areas in Greater Sydney as having a need for affordable housing.
- Adopt a standardised metric to measure walkability, such as the tools currently being trialled by the Centre for Urban Research at RMIT University.
- Include an additional metric for *Public open space is accessible protected and enhanced* that measures the success of this objective.
- Advocate for the adoption of the *NSW Climate Change Fund Draft Strategic Plan* to support the objectives and actions contained within the Plan.

Liveability

The inclusion of liveability as a key theme with the draft plan is commendable - highlighting the importance of access to services, housing choice and vibrant places that will contribute to improved quality of life for the residents of Greater Sydney.

Whilst acknowledging that the draft plan is not government policy and that the Commissions' role will be primarily of influencer and collaborator, it suggested that the proposed metric for *Housing the city* be strengthened. The two metrics utilise a numerical count of number of councils on track to deliver housing targets and number of councils with schemes that implement Affordable Rental Housing Targets. True success of these outcomes would be better demonstrated, for example, with the inclusion of specific targets by timeframe, participation and implementation.

COTA NSW has advocated for the introduction of community wellbeing indicators at the local government level that are incorporated into the Integrated Planning and Reporting Framework. The proposed annual community sentiment survey as a metric for *A city for people* is useful and could become a key data source if such a framework was implemented.

A City for people

Objective 6: Services and infrastructure meet communities' changing needs

COTA NSW supports the objective that Councils, the Commission and other planning authorities give due consideration to 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.

This objective recognises the importance of providing accessible services and design in our communities to facilitate ageing and place, provide equity and enhance liveability. COTA NSW reiterates the need to review and modify existing regulations (such as SEPP and DCP's) to include accessible housing design in all new dwellings and comply with the Livable Housing Australia 'silver level' criteria as a minimum and that the 'gold level' as an aspirational target. 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. As the Plan documents, building new homes that adhere to these design principles translates to significant savings to the Australian health system, but also supports diverse neighbourhoods where people of all abilities and ages can live and participate in community life.

Objective 7: Communities are healthy, resilient and socially connected

Whilst the draft plan acknowledges the required elements that support socially connected and active communities, the addition of further actions and metrics to strengthen the outcomes that are sought from this objective are required.

As per our previous submission to the Draft District Plans, COTA NSW recommends the adoption of the Liveability Framework. This guiding framework, developed by Department of Planning & Environment NSW and the Sydney Commission, is of particular relevance in the areas of monitoring and measurement of outcomes. As already mentioned, the development and implementation of standardised robust community wellbeing indicators at a local government level, available via a publicly available dashboard, is essential to assess the success of strategies and actions in the Plan. These indicators should include baseline and trend data, and could utilise existing health and planning data and as the Plan suggests, the inclusion of quantitative feedback from the community via a survey. Clear metrics would ensure that consideration of health and wellbeing outcomes would be embedded within planning processes and project and infrastructure delivery across the four pillars.

It is noted that the draft plan lists existing related government initiatives for consideration, such as the NSW Healthy Built Environment Checklist. This is a positive acknowledgement of the importance of our built environment and its impact on health. The inclusion of international frameworks, such as the World Health Organisation's (WHO) Global Age-Friendly cities Guide, as a guiding document would recognise the importance of the urban environment on the healthy ageing of older people. This 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. The framework is well known within local government, with many Councils striving for accreditation as a WHO Age Friendly City and Community. COTA NSW in partnership with Local Government NSW has developed extensive resources to assist council's in creating age-friendly communities.

COTA supports strategy 7.1 to 'provide walkable places with active street life and a human scale'. 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 safe 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 recommends further promotion and support to councils to develop Pedestrian Mobility Access Plans incorporating measures of walkability and strategies to improve: footpath infrastructure, way finding, connectivity and safety would be an important action to contribute to this strategy.

Housing the City

Objective 11: Housing is more diverse and affordable

We commend the Commission's recognition of the need to provide diverse and affordable housing in Greater Sydney. Rental stress impacts a growing cohort of older people. There has been a steady increase in the number of older, non-home owners in NSW. The 2016 Census found that 22.6% of lone people aged 65 and over rented¹. Older people are typically on low incomes, with over half of +65 households living on incomes below \$30,000 per annum. 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 20,825 low-income older renter households in housing stress (where they pay more than 30% of household income on housing costs) in NSW.²

Whilst the Plan acknowledges the need to develop affordable rental housing targets and to work closely with the NSW Department of Planning and Environment to streamline the implementation of programs relating to Policy No 70 – Affordable Housing; the details of this action and the metrics to measure its success require strengthening. The inclusion of the variable 'subject to viability' on the proposed 5-10% target of affordable rental housing target in nominated precincts across Greater Sydney will ensure that this will be unlikely to be met, and place further onus on councils to justify the areas in need of affordable housing. The Q2 2017 rental affordability index found that no properties were affordable for a couple on the aged pension in Greater Sydney, demonstrating the need for affordable rental housing across the city.³ COTA NSW supports the Shelter NSW recommendation to include an affordable rental housing target across all new developments on government land and the amendment of the SEPP 70 to name all local government areas in Greater Sydney as having a need for affordable housing.

The current metric 'Number of councils with schemes that implement Affordable Rental Housing Targets' is inadequate. The indicator would be improved with the inclusion of specific targets and timelines. This could be expressed as the percentage of local government areas within Greater Sydney that have implemented affordable housing measures. Trend data would easily demonstrate the ongoing success of strategies and actions to implement this key objective.

¹ ABS 2016. 2071.0 Census of Population and Housing 2016. *Australia wide.

² Fiedler, J & Faulkner, D. (2017) The Older I Get the Scarier it Becomes - Older people at risk of homelessness in New South Wales. <https://www.olderrenters.org.au/sites/default/files/older-i-get-scarier-it-becomes-291117.pdf>

³ National Shelter, Community Sector Banking & SGS (2017) Rental Affordability Index.

A city of great places

Objective 12: Great places that bring people together

The principles upon which the Plan defines this objective are comprehensive and considered. It states the components that contribute to great places in our communities that are inclusive, accessible and vibrant.

COTA reiterates the importance of community engagement and collaboration during the planning and implementation phase of infrastructure projects. We contend that adherence to universal design guidelines should also be a key requirement when designing public spaces and social infrastructure. This includes ensuring that 'walkable' spaces are also accessible places where wheelchair and scooter users can also utilise facilities and infrastructure to enable participation in public life.

The proposed metrics for this strategy are a useful measure to demonstrate walkability of communities. Again the data sourced for these indicators should be included within a dashboard. It should be noted that the Australian Urban Research Infrastructure Network (AURIN) have developed a range of walkability tools that can be used to measure walkability utilising existing data and improve local planning through priority allocation. The Centre for Urban Research at RMIT University is currently using this tool to map the accessibility and walkability of greater Melbourne. COTA NSW would suggest that the use of a standardised metric is advisable to allow for future comparison of walkability regionally and nationally.

Sustainability

The inclusion of sustainability as a key pillar of the Plan recognises the need to have a healthy environment for the residents of Sydney to achieve liveability. Older people are particularly vulnerable to changes within their local environment due to climate change. These risks include severe weather events, such as bushfires and floods, the health impacts of heat waves such as heat exhaustion and increased morbidity; higher food prices and its consequent impact on nutrition and changes in the production of air borne allergens and effect on respiratory diseases. Older people may also be more vulnerable due to the quality of social networks, transport infrastructure and availability of health services. COTA NSW supports strategies and actions that contribute to the mitigation and adaption of these risks.

A city in its landscape

Objective 31: Public open space is accessible protected and enhanced

The recognition of the importance of well-designed and accessible public spaces within the Plan is to be commended. The provision of well-designed and accessible infrastructure within public spaces is vital to ensure usage by not only older people but the whole community. Older people have told us of the importance of having adequate shade in public spaces, seating, toilet facilities and water fountains. These components are stipulated within the WHO Age-Friendly Cities Guide, with a checklist included to assist councils, planners and designs include those elements to ensure public spaces are age-friendly and accessible.

It is suggested that an additional metric be included within the Plan to measure the success of this objective such as 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.

Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths

The provision of a city wide green grid is an important action to contribution to mitigating the effects of the heat island effect. Western Sydney is particularly susceptible to extreme heat events, with older people at increased risk of morbidity and mortality from these weather occurrences. An increase in the tree canopy and linkages between parks, open space, bushland and walking spaces will keep these regions cooler; provide a network of shade and protection from sun exposure and heat, as well as the beautification of the local environs for the enjoyment of all.

A resilient city

Objective 36: People and places adapt to climate change and future shocks and stresses

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Objective 38: Heatwaves and extreme heat are managed

The Plan recognises the importance of climate change adaptation to support improved resilience to future environmental and climate stresses and shocks. As outlined previously, older people are particularly vulnerable to the impacts of a changing climate. The implementation of adaptation strategies and programs in local communities is a vital step in improving resilience and preparedness. Extensive work has been undertaken on the *NSW Climate Change Fund Draft Strategic Plan*, COTA NSW calls on the Greater Sydney Commission to advocate for the adoption of this Plan which includes comprehensive actions that will provide assistance to empower local communities to commence adaptive measures tailored to the needs of their residents.