



## **Submission**

### **A Housing Strategy for NSW – Discussion Paper**

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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

COTA NSW strongly supports the development and implementation of a Housing Strategy that clearly articulates the need for diverse, accessible and sustainable housing options that respond to the changing social, economic and environmental challenges that New South Wales faces now and into the future. It is vital however, that any strategy that is developed must include clear targets and measurable actions to ensure that it maintains relevance and purpose.

COTA NSW also reiterates the need for extensive community and sector consultation to be undertaken by NSW Planning on the proposed Housing Strategy and associated action plans. It is broadly felt across the sector that the consultation period for the discussion paper was inadequate, with little promotion and ability to inform our stakeholders. It is strongly argued that a robust consultation strategy be developed and implemented in the future development of strategic documents such as the Housing Strategy.

In this submission, COTA NSW will respond to those aspects of the Discussion Paper – A Housing Strategy for NSW that have the greatest impact on to older people living in New South Wales and an ageing population, within the themes of:

- Diverse housing for diverse needs
- Housing with improved affordability and stability
- Responsive and resilient housing

Our submission is informed by a human rights-based approach, adhering to the belief that every person has the right to an adequate standard of living that includes the right to adequate housing as espoused within the United Nations *International Covenant on Economic, Social and Cultural Rights (ICESCR)*. The adequacy of housing is determined by a range of factors, including: affordability; availability; accessibility; security of tenure; habitability and cultural adequacy.

COTA NSW urges NSW Planning to recognise that the state's ageing population is not a homogenous group. Older people in NSW differ in their level of mobility and independence, cultural backgrounds and economic circumstances. Housing and support responses, therefore, need to be flexible, creative and able to adapt to people's needs as they age.

Thank you for the opportunity to provide feedback on this discussion paper. COTA NSW looks forward to working with NSW Planning to ensure that the needs and desires of older people are addressed.

## Diverse housing for diverse needs

As outlined within the *discussion paper* the proportion of older people living in NSW will continue to rise for the foreseeable future. This together with other demographic changes requires a responsive and innovative housing strategy that will address the communities' changing needs.

Community engagement is a primary focus of COTA NSW. This is undertaken through a variety of methods, including focus groups and online surveys. The importance of housing choice and the ability to age-in-place has been consistently raised by consumers during our extensive consultation initiatives as an area of concern.

Individuals downsizing intentions was explored in 2018. The COTA Federation conducted a comprehensive national survey of older Australians titled *The State of the (Older) Nation* and asked, among other things, about intentions of respondents to “right” size and “down” size.<sup>1</sup> While 18% of respondents had already downsized, of those who owned their own home, almost half found the idea of downsizing unappealing including because there were few suitable, affordable and available alternatives. For those who were renting, downsizing was not seen as a viable option.

This wish to remain in their existing homes, was reinforced by research led by Professor Bruce Judd (AHURI, 2010) that demonstrated – again - that most older people wished to stay in their existing homes in familiar surroundings.<sup>2</sup> This research also suggested that an older person's security of place becomes more important as they age and that their wellbeing is closely linked to their ability to remain living independently in secure, affordable housing.

Research by COTA NSW and others suggests that the focus of policies for the future housing of the ageing population should be on appropriate housing in the community rather than increasing the provision of segregated and specialised aged-specific housing developments, including retirement villages.

“It is important to be able to stay in your own home as long as you are able. I want to be near my friends and family.” CRG participant – Batemans Bay

However, this desire to ‘age in place’ is often hindered by the inappropriateness of a person's house as they age, including ongoing maintenance and adaptability of the design. There is a recognition that for many older people their current housing design will not be suitable in advancing years. That excessive steps, shower access or narrow doorways will inhibit their ability to remain in their home and in many cases their neighbourhoods as their mobility needs change. COTA NSW conducted an extensive survey in 2014 that explored older peoples' needs and wants in relation to housing.<sup>3</sup> Respondents were asked to rate

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<sup>1</sup> COTA Australia (2018). *State of the older nation 2018*. Retrieved from: <https://www.cota.org.au/policy/state-of-the-older-nation/>

<sup>2</sup> Judd, B., Liu, E., Easthope, H., Davy, L. and Bridge, C. (2014) *Downsizing amongst older Australians*, AHURI Research and Policy Bulletin No. 179, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/research-and-policy-bulletins/179>.

<sup>3</sup> COTA NSW (2014). *50+ Report – How and where older people are living*. Retrieved from: <https://www.cotansw.com.au/MediaPDFs/2014-50-Plus-Report.pdf>

features for a future house purchase. The largest requirement was for a single storey house (62%), with an easy access bathroom and shower rated the 3rd most important. An easy access kitchen & storage and minimal steps into the home were the 5th and 6th most important features.

COTA NSW has long advocated for the introduction of increased minimum design standards of accessibility that will allow older people and the broader community to be able to live in a home that meets their needs as their circumstances change over a life course. COTA NSW supports universal design principles as espoused by Livable Housing Australia that takes 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.

The *discussion paper* notes the use of *State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004* and SDA housing planning documents to respond to the needs of adaptable housing for older people and people with disability. COTA NSW continues to challenge the assumptions underpinning this. The 2016 census found that just under one in five people reported having a disability and of these, almost half were over the age of 65. However, in reality this equates to approximately one in three households including a person with disability. A far more significant proportion of affected homes. These statistics do not include the 45.2% of households that include a person with a long-term health condition. The prevalence of households that have individuals living with disability, long-term health condition or short-term injury reinforces the importance of designing homes and public spaces that strives to incorporate inclusive design practices for people at all life stages and abilities.

For those consumers that have expressed a desire to 'downsize', most commonly in their existing community, many have highlighted the difficulties in weighing up their housing options and realising their goal of ageing in place. Downsizing within one's own community can be hard to achieve, and many consumers report a lack of suitable housing alternatives within their local area. Older people have told us that in some situations, for those that had downsized into a unit, villa or townhouse, the cost of increasing strata fees and unexpected sinking funds had not been fully considered when they had purchased their property and consequently was causing financial hardship to meet these costs. There was also a concern that the costs of moving - including buy/selling fees and stamp duty – were a disincentive to downsizing.

*"I thought about moving into a small place, like a townhouse, but by the time I pay stamp duty and removalists – I won't come out in front financially and there is all the stress of moving to deal with". CRG participant – Rockdale.*

As noted within the *discussion paper*, there is a need to improve the housing options of older people. Depending on personal needs and financial ability, there will continue to be demand for a mix of dwelling types such as: dual occupancy, granny flats, high-density rental developments, assisted living communities and well-located retirement communities and residential parks. In recent years many older people have expressed interest in

innovative housing models such as co-housing. It is important to note that this type of housing is not a panacea for those facing housing stress or homelessness. This type of housing appeals to a small group of people and barriers continue to exist in local government planning regulations that inhibit expansive implementation of this type of model.

For those older people on limited incomes, other housing options such as residential parks and rental units within retirement villages are becoming increasingly limited in supply and availability due to redevelopment.

There has been a marked decrease in the number of residential parks in coastal areas as the land becomes increasingly valuable. The *Report on the NSW Inquiry into Social, Public and Affordable Housing* investigated the role of residential parks in providing affordable housing.<sup>4</sup> According to the report, two common themes emerged; firstly, residents are typically older and/or disadvantaged in some way and secondly some people relocate to parks as a form of temporary accommodation due to urgent housing needs. In other instances, a person may be placed in residential parks by DCJ for example, as a form of crisis accommodation.

These land lease communities are essential component in the fabric of housing options for older people, but the sector is problematic with residents of these sites frequently raising complaints in a number of areas. These include issues of overcharging of electricity, retaliatory conduct of management, interference in home sales and other matters relating to code of conduct. COTA NSW supports the statutory review of the relevant legislation and regulations that will protect the rights of these residents in land lease communities.

The low availability of rental independent living units (ILU's) in retirement villages is another form of affordable housing that does not receive adequate attention amongst policy makers. In 2017, the Department of Families and Community Services commissioned COTA NSW to undertake a review and audit of ILU's in NSW. Between 1954 and 1986, the Commonwealth provided subsidies to not-for-profit organisations such as churches, service organisations, local organisations and local governments for the construction of dwellings for older people under the *Aged Persons Homes Act (APHA) 1954*. These ILUs were also funded from a mix of donations from fund-raising activities, donations of land from local government, donations and loans from incoming residents, as well as from the Commonwealth Government program under the Act.

The study found that due to the age of the units, there was a need of significant upgrades, which was often untenable for the village owners. Consequently, there has been a dramatic reduction in the stock of these basic units. In 2017, it was found that there were approximately 3491 units left. With many organisations indicating that these would be demolished and the land repurposed. Some of the larger charitable providers have committed to providing a certain percentage of their new stock in retirement villages as affordable rental properties, however these commitments do not meet the outstanding and

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<sup>4</sup> NSW Parliament, Select Committee on Social, Public and Affordable Housing (2014). *Report on the NSW Inquiry into Social, Public and Affordable Housing*.

growing need. This sector suggested that a government program that provided low cost financing to undertake both remedial works and future investment was necessary to ensure that this type of housing continued to be available to older people with low incomes. There was also a need for a state wide database of available low-cost units that could be searchable by those seeking rental options in retirement villages.

In discussing the housing needs of older people, the *Housing Strategy Discussion Paper* focuses on the physical design and location of housing. These issues are crucial, but equally, we need to pay attention to the support that older people need to access affordable and appropriate housing. Currently, it is very challenging for older people who are homeless, or at risk of homelessness, to navigate the complex housing and aged care systems. A new solution is needed for NSW to solve for this growing issue. An innovation component or fund should be considered within this strategy. Examples of government funding programs that support community led responses to homelessness currently exist in both South Australia and Western Australia.

COTA NSW is a member of the Ageing on the Edge NSW Forum and supports the introduction of the introduction of a specialist seniors housing support service. It is proposed that a trial be established, that working Government, the specialist service would aim to improve housing outcomes for older people so that they can age well in appropriate and affordable housing. The model that is proposed is based on the Home at Last service model in Victoria that continues to demonstrate that better housing outcomes can be achieved for financially disadvantaged older people. It is suitable for adopting and adapting to NSW. Older people in a housing crisis are provided with one-on-one support to access appropriate and affordable housing. Older people are also encouraged to access help earlier and plan for their housing future before reaching crisis point.

Key features essential to the success of this model are:

- One-on-one engagement with clients (including face-to-face) to assist them to understand and navigate the service system and provide them with tools to access the right support.
- Flexible responses in terms of duration and type of support and the ability to provide a continuum of service options that can be tailored to meet individual needs. The model also includes a focus on ensuring that clients are linked with other needed supports such as home care and social support.
- Specialist expertise on the issues that older people face and the housing and aged care service systems.
- Embedding the voice of people with lived experience to deliver a more tailored and relevant program. For example, using peer educators to deliver community information and development sessions.
- Targeted, tailored support and engagement with different groups, such as, Aboriginal, CALD and LGBTI people.

## Recommendations

- Innovate and establish a state-wide housing information and support service for older people to provide a central point of contact for older people at immediate risk of homelessness and those who wish to plan for their retirement housing futures (adopting and adapting the Victorian Home at Last model).
- That NSW Planning supports and encourages Local Government to 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 all spheres of government consider 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.
- 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. 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.
- Notwithstanding possible future changes to the national building standards, COTA NSW continues to assert the need to create a market mechanism that will encourage developers and builders to construct housing to Gold Liveable Housing standard. COTA NSW proposes the introduction of a reduction in stamp duty for people aged 70 and over, on the proviso that they purchase an owner-occupier property that has been constructed to Gold Liveable Housing standard.
- Provide low cost capital (to not-for-profit organisations) from social housing funding streams to allow the upgrade and expansion of affordable ILUs for older people. This could be incorporated into existing schemes such as the National Rental Affordability Scheme and the NSW Government Social and Affordable Housing Fund.
- That a database be developed that allows older people or support services to search for affordable ILUs by local government area in NSW. At present, the individual must contact each village complex to ascertain whether they manage ILUs and the terms of the residency.
- Establish a funding pool for innovative service delivery or housing developments that target at risk groups, including older people experiencing housing stress or at risk of homelessness.

## Housing with improved affordability and stability

For many older Australians, housing security remains elusive. There are increasing numbers of people aged 55-64 who still have mortgage debt and for those without their own home, finding somewhere to rent which is both affordable and appropriate can be difficult and stressful.

Whilst 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>5</sup>, NSW is witnessing a steady increase in the number of older, non-homeowners. In 2011, 12% of over-65s lived in rental accommodation, with most living in private rental.<sup>6</sup>

Older people are typically on low incomes, with over half of +65 households living on incomes below \$30,000 per annum.<sup>7</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>8</sup>

Of concern is the growing number of older people becoming homeless for the first time in later life. From 2011 to 2016, the number of people aged 55 and over experiencing homelessness in NSW increased by 42% (from 4,529 to 6,411). The incidence of housing stress and homelessness among older people is expected to increase over time due to an ageing population and declining rates of home ownership.

Older people who have experienced long term socio-economic disadvantage or intermittent periods of paid employment, and individuals who have experienced physical or mental health issues, are more likely to enter older age without having obtained secure housing. It is increasingly difficult, if not impossible, for older people on JobSeeker or the Aged Pension to find and secure and appropriate private rental accommodation. The waiting list for social housing remains worryingly long, with no priority for older people under the age of 80.

Consequently, many older people are facing ongoing housing stress or homelessness. This issue impacts older people across the state – not just in metropolitan areas. Some regional areas, where the perceived lifestyle benefits often attract retirees, also experience high rates of homelessness, particularly amongst older women. Together with a lack of affordable rental properties there are long waiting lists for social housing and insufficient community housing. This results in many older people sleeping in cars or couch surfing with family and friends.

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<sup>5</sup> ABS (2011) 'Census of Population & Housing'

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> Judith Stubbs & Associates (2014).



*“I slept in my car in Byron Bay for 7 years; then moved back to Sydney in Sept 2016 - stay in backpacker hostels and occasionally with friends and family (usually visiting out of Sydney) - usually during peak rate season when backpacker bed rate is too expensive and sometimes not available.”*

60-64 Female COTA NSW survey respondent

Homelessness, poor housing and/or stress around one’s housing circumstances has profound adverse impacts on the health and wellbeing of older people. The cumulative effect of homelessness, poverty and disadvantage over long periods may result in people experiencing age-related health conditions from as early as 45 years of age. Older people who are homeless are also particularly vulnerable to social isolation, violence and crime. This highlights the importance of timely support to prevent homelessness, or to enable rapid rehousing, to prevent social and health problems escalating.

The provision of adequate social housing is an essential component in the housing affordability policy mix. For these older Australians and others on fixed incomes and currently in the private rental market; the need for subsidised social housing is acute. Currently the NSW government has no strategy related to affordable housing for people over the age of 65 and no priority access for older people to public housing. In NSW, the limited supply of public housing combined with the policy of prioritising applicants with complex needs, make it more difficult for older people to access public housing. Older people dependent on the age pension may be approved for housing assistance as an elderly client only when they turn 80 and Indigenous Australians when they turn 55.

COTA NSW supports the call of the Ageing on the Edge NSW forum to lower the age for priority social housing from 80 years. The Victorian Government has changed their policies to ensure that people 55 and over are eligible for priority social housing, which recognises the severe impact that homelessness has on older people. They also calculated that their seniors housing has a higher turnover of tenancies (and therefore vacancies) compared to other stock due to older people passing away or moving into residential aged care. The policy has assisted many older people to be housed quickly with less ‘red-tape’ required to complete applications. The policy approach has not ‘opened the flood gates’ because older people seeking housing in higher demand areas may still need to be approved for other priority categories (under a points system).

**Case study:** *Betty 82, Tweed Heads – is currently living with relatives who are renting, she has no superannuation or savings – and also owns a dog. She has attempted to secure private rental but has been advised that owners or real-estate agents won’t approve her due to the dog. She is currently in the NSW Housing Pathways Program, but no progress has been made. The current situation is precarious as her relative’s rental situation is also tenuous. The option of renting a van in a Residential Park has become harder as they live in a tourist focused region and many sites are being redeveloped. Betty has also been on the NSW social housing waiting list for 5 years.*

The waiting list for public housing in NSW now surpasses 55,000 people. Given that there continues to be an increasing demand for social housing, which will only increase in this current economic downturn, it is evident that the current investment in social housing is inadequate. Whilst COTA NSW acknowledges the commitment to build an additional 3400 social and affordable dwellings through the Social and Affordable Housing Fund (SAHF), this will do little to address current and future demand for this type of housing.

The crisis we are now experiencing due to the COVID-19 coronavirus, with high unemployment, low job security and continued demand for social and affordable housing provides a critical opportunity for government to increase investment in this sector to address both the dramatic waiting list for social housing and to stimulate the construction sector - resulting in both social and economic benefits.

NCOSS engaged Equity Economics to examine the benefits to the NSW economy if there was an increase in investment in housing. These included: additional investment in more social and affordable stock, fast-tracking the repair and maintenance of existing stock and acquiring existing empty housing stock. Equity Economics estimated that the construction of an additional 5000 social and affordable units would support 18,000 construction jobs across NSW. Furthermore, an injection of \$500 million to respond to the backlog of repairs and maintenance in existing stock would support approximately 4200 jobs. To ensure that rough sleepers that have been temporarily housed in hotels, do not return to homelessness it is recommended that the NSW Government acquires existing housing developments. The purchase by Government of housing stock that may remain unsold in the current economic environment will support housing prices, the stability of the housing market and address the economic and social impacts of homelessness in NSW.<sup>9</sup>

Community housing is a key provider of social housing for older people. It is also a sector that has the ability and opportunity to be more responsive to the needs of older people in the areas of design, support and location. Community housing is 'people centred' and approaches housing issues locally with a strong emphasis on involving tenants in decisions about their housing. Increasingly community housing providers are working in partnership – with support providers, with local government, with public housing providers, and with private sector partners.

The NSW Government can facilitate this responsiveness and innovation through the creation of low-cost funding pools and partnership projects. There are examples in both Australia and internationally of community or affordable housing constructions that incorporate co-design approaches to ensure that the dwellings meet the needs of the residents. Western Australia has recently revealed plans to build a communal housing facility for people who are homeless or at risk of homelessness, with both private and shared spaces and supported by on-site specialist staff. In Fairfield, Housing NSW's innovative Seniors Urban Living model was specifically designed to cater for the needs of older people. The six-storey, 45- unit building includes two dedicated rooms for visiting

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<sup>9</sup> (2020) Equity Economics. *Supporting economic recovery in NSW: investment in social and affordable housing is critical to supporting jobs today and families into the future.*

doctors or aged care nurses bring vital services onsite, and all apartments built to universal design standards.

The development and implementation of an *NSW Housing Strategy* must acknowledge that renting in the private market has become a significant tenure of a significant proportion of people in this state, including those aged over 50 years. Census data indicates that approximately 15% of people aged 50 and over still rent in NSW, with 70% of these doing so in the private market. A survey conducted by COTA NSW in 2018 (7614 respondents) sought to understand the experiences of older renters. At least 55% of respondents spent greater than 41% of their income on rent, they faced housing insecurity and faced a range of accessibility issues.

In 2018, a single Aged Pensioner in the Sydney Metropolitan area would be able to afford 6 properties or less than 1% of all available rentals. For Newstart recipients the situation is dire with no properties affordable. In the North Coast region, only 3 properties were available for a single Aged-Pensioner, and again no properties for Newstart recipients.

*Case Study: Anne, 64. I no longer receive enough income to rent privately. My rent is subsidised by a social housing provider in Redfern. I was in a car accident some 15 years ago and unable to work. I used up my savings and the small amount of superannuation I had trying to survive. After that was gone, I was left on Social Security and had \$16 p.w. to live on. I do not have family to rely on. I was evicted as the real estate raised the rent by \$20 p.w. After about 6 months of moving between homelessness and a number of refuges, I was moved into a rent subsidised unit with this housing provider.*

Although the Residential Tenancies Act 2010, allows for minor adjustments to homes for accessibility purposes, the reality is that approval to undertake home modifications in rental properties continues to be difficult. Landlords often require tenants to return the properties to an original condition on vacating, or risk losing their rental bonds. The cost of undertaking these remedial works is often beyond older renters.

As with all renters, no-grounds evictions continues to contribute to uncertainty and insecurity for those older people in the rental market. COTA NSW supports the review and modification of the NSW Residential Tenancies Act to remove no grounds evictions provisions and make renting more secure for all.

## Recommendations

- Encouraging all local councils in Greater Sydney to prepare local inclusionary-housing schemes and to amend their local environmental plans to operationalise these.
- Improve access of older people to appropriate social and affordable housing by lowering the qualifying age for priority social housing from 80 years.
- Provide 5,000 additional social housing dwellings in 2020-21 (as part of a long-term plan to increase social housing stock) including housing tailored to the needs of older

people in terms of design, size and location. The calculation of the build per year should take into account the anticipated shortfall of 76,100 social housing and 24,100 affordable housing by 2036.

- NSW Government to acquire available properties in the private market to find a permanent solution for rough sleepers and others in temporary/crisis accommodation.
- Amend the NSW Residential Tenancies Act to remove “no grounds evictions” and encourage the availability of long-term leases. Allow for tenant home modifications in instances where it would improve the accessibility and functionality for older people when not negatively affecting the value of the property.

## Responsive and resilient housing

As noted within the *Discussion Paper* housing is not a standalone construct but exists within the local environment, that includes interaction with other infrastructure and green spaces, and residents’ feelings of safety and community connection. COTA NSW reiterates the importance of designing the public realm and open spaces to include all those elements that support older people to remain engaged and connected with their local communities such as: safe paths, shade, seating and access to public amenities. It is suggested that additional consideration be given to the World Health Organisation’s (WHO) *Global Age-Friendly Cities Guide* that emphasises the impacts of the urban environment on the healthy ageing of older people.<sup>10</sup> 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.

The utilisation of universal design principles when constructing dwellings and public spaces has beneficial sustainability outcomes. The desire to age in place often requires home modifications to facilitate this; often at a considerable expense. However, there is also an energy and waste cost. When homes become no longer fit for purpose and requires minor or major renovations, new building materials are needed. These come with an associated monetary and carbon expenditure. The obsolete building materials become landfill - resulting in the increased release of methane. A home that can adapt to a households’ changing circumstances over a lifespan (through universal design principles), is the embodiment of the *Discussion Paper’s* desired outcome of: Responsive and resilient housing.

Although the *Discussion Paper* noted the importance of designing housing to withstand extremes of heat and other natural hazards, it was notable that the phrase ‘climate change’ was omitted from the paper. Climate change will have dramatic impacts on the lives of

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<sup>10</sup> World Health Organisation (WHO) 2007. *Global Age-Friendly Cities Guide*. Retrieved from: [https://www.who.int/ageing/publications/Global\\_age\\_friendly\\_cities\\_Guide\\_English.pdf](https://www.who.int/ageing/publications/Global_age_friendly_cities_Guide_English.pdf)

Australians in the term proposed for the Housing Strategy for NSW document. This should be acknowledged in clear terms and not just alluded to as is the case in the *Discussion Paper*.

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. 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.

The summer of 2019/2020 saw temperatures in western Sydney reach 48.9c - the highest temperature recorded in Penrith. These weather extremes are occurring in localities with communities that are particularly vulnerable. Of particular concern are older people living in older homes, with no air-conditioning and inadequate tree canopy to mitigate the effects of the urban heat island effect.

The implementation of housing and public space design, 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 NSW Government to adopt 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.

As outlined within the *discussion paper* transport options must be considered to support improved liveability of our communities. COTA NSW strongly supports the trials of flexible and on-demand responsive services in metropolitan, regional and rural areas and believes that these niche services will form an important component of current and future transport service offerings. COTA NSW reiterates the importance of ensuring that access to book these services is available in a variety of methods to allow older people without smart phones or internet access, the ability to utilise this flexible transport option.

COTA NSW 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.

## Recommendations

- That the strategy acknowledges and considers international frameworks such as the World Health Organisation's (WHO) Global Age Friendly Cities Guide when designing public spaces.

- That the principles of universal design are utilised when planning and developing housing and public infrastructure.
- That state and local governments engage with older people when designing and developing age-friendly communities, and incorporate specific strategies and actions within the Integrated, Planning and Reporting framework.
- That the *NSW Climate Change Fund Draft Strategic Plan* is formerly adopted and implemented.
- Continue to trial on-demand and flexible transport services in NSW.