



Submission

Proposed Housing SEPP

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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 welcomes the review and consolidation of the: Affordable Rental Housing, 2009 (ARHSEPP), Housing for Seniors and People with a Disability, 2004 (Seniors SEPP) and the Affordable Housing No 70 SEPP into the proposed Housing SEPP.

COTA NSW has long called for a review of these planning instruments and the inclusion of measures that encourage and allow for responsive and innovative solutions for older people in NSW. Given the current significant shortfall in social and affordable housing, the inclusion of a number of measures within this proposed SEPP will enable further investment and development of housing supply in this critical area.

COTA NSW also asserts that that any housing development undertaken under this proposed SEPP that receives planning or tax benefits should also be required to deliver affordable housing options that deliver inclusive communities. We also maintain that in the absence of NSW Government support on the implementation of the silver Livable Housing Design Standards (LHDS) within the National Construction Code (NCC) in NSW, that a minimum level of accessibility design standard should be stipulated within this code. Both the NSW Housing Strategy and the NSW Senior's Strategy exhort the importance of accessible and adaptable housing to allow people of all ages and abilities to continue to live in their homes as they age or develop health or mobility issues. It is vital that new housing, including affordable housing is built to this minimum accessibility standard.

This submission will respond to those amendments and additions relevant to older people within the proposed SEPP, namely: Co-living, boarding house and seniors housing provisions.

Boarding Houses

COTA NSW supports the new provisions within the proposed SEPP, including:

- The requirement to rent the rooms at affordable rates and to be managed by a registered community housing provider in perpetuity;
- The inclusion of minimum standards for communal living and open space;
- The introduction of density bonuses for boarding houses from 20 to 25 per cent.

However, COTA NSW is concerned that as boarding houses will no longer be mandated in the R2 – Low Density Residential zone there may impact supply and provision of affordable housing in many communities in NSW.

Co-living

COTA NSW welcomes a planning system that supports diverse models of housing, including the proposed co-living model. However, we have a number of concerns about the incentives for development on this type of dwelling and the appeal or uptake by potential tenants given that there is no provision within the SEPP for this housing type to be affordable. For this model to be financially appealing to investors there is a likelihood that rents payable for a single room and shared space will be high. This will then put this type of housing out of reach for many, particularly older people on a pension reliant on the private rental market.

Further concerns include:

- Co-living developments are currently eligible for a 10% density bonus until 1 August 2024. COTA NSW contends that any development that is receipt of planning benefits should be required to provide a portion of the development as affordable.
- There should be a formal review of this provision within the SEPP prior to the 2024 expiration date to determine whether the incentive is facilitating investment in this housing type and other unforeseen outcomes of this section of the SEPP.
- For privacy and safety reasons, particularly for older women, COTA NSW supports the proposition by Shelter NSW to include bathrooms within each room.
- The role of the *Manager* is not clear and not defined. Further clarification is required on questions such as:
 - Is the *Manager* the landlord?
 - Could it be a nominated tenant of the dwelling?
 - What powers or responsibilities would they have?

Seniors housing

COTA NSW supports amending the Seniors SEPP to ensure consistency across planning instruments. Furthermore, the provision to allow senior's housing in business zones will deliver more housing choices for older residents and those with a disability with access and support options close to infrastructure and services.

However, we continue to oppose the raising of the age of entry into Seniors Housing from 55 to 60 years within the SEPP. This age change will impact many older people that rely on affordable ILUs that still exist within some retirement village developments in NSW. In many cases inexpensive ILUs available for purchase or rental may be the only affordable housing option that they have (this particularly impacts older women).

COTA NSW notes the provision within the SEPP that specifies the allowance of land that is being used for a registered club to develop Seniors Housing. COTA NSW supports the call by Shelter NSW that when a development receives substantial public benefits such as a Registered Club, there should be requirement to outline how they will deliver affordable options within their developments. In line with this we would like to see a 10% target of affordable housing linked with each development by a registered club.

Vertical villages

COTA NSW supports the incentivisation of the development of vertical villages. When they are built in locations close to shops, medical services and public transport they will provide further opportunities for older people to remain living and connecting in their communities. The SEPP provides a range of floor space bonuses – ranging from 15% to 25% - depending mix within the development of ILUs and residential aged care. COTA NSW would again reiterate the importance of mandating a minimum percentage of affordable housing (such as 5%) within such developments when significant beneficial bonuses are available to the developer.

Conclusion

Thank you for the opportunity to provide feedback on the proposed Housing SEPP. It is essential as our community ages and greater numbers of older people face housing insecurity - that both legislation and housing incentives facilitate the supply of affordable and accessible housing in this state.

COTA NSW looks forward to working with NSW Planning to ensure that the needs and desires of older people continue to be planned for and addressed.