

Submission: Draft Design and Place SEPP

Council of the Ageing (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 the media to ensure the views and voices of older people are heard and acted on.

Our work is to:

- inform
- educate
- engage
- advocate

We work with:

- the community
- service & product providers
- government
- the media

COTA NSW has launched some of the State's most important initiatives for older people, including NSW Meals on Wheels, Carers NSW, and the Retirement Village Residents Association.

Currently COTA NSW delivers a range of services to older people in NSW, including an Aged Care Navigation service, the Legal Pathways program and Strength for Life.

Acknowledgement of Country

COTA NSW acknowledges the unique status of Australia's First Peoples as the original people of this land. We recognise their cultures, histories and ongoing relationship and obligations to the land, sky and waterways.

In the spirit of reconciliation, COTA NSW acknowledges all traditional custodians of the lands we today know as New South Wales.

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Introduction

COTA NSW welcomes the development of the *Draft Design and Place SEPP* and associated urban and apartment design guides. This legislation and the design guides are critical in creating a framework that will support population growth and a changing demographic mix (including an ageing population) - within the wider context of a changing climate and the challenges that this will bring.

COTA NSW commends the NSW Department of Planning, Industry and Environment and NSW Government Architect in recognising the broader impacts of climate change on public health, amenity and safety. Older people are particularly vulnerable to the effects of extreme temperatures and weather events. Ensuring that there is adequate shade, places to rest and well-designed buildings will allow older people to remain active in their local communities and to remain more comfortable in their homes.

It is however disappointing that the opportunity to mandate Silver Livable Housing design minimum accessibility standards for all new apartments in line with the National Construction Code (NCC) has not been included within the SEPP or design guide. Whilst it is noted that a consideration of universal design methodology is included within the *Draft Apartment Design Guide*, with a guide that 20% of apartments should incorporate these design standards – COTA NSW contests that all new housing should be designed and built to the new NCC standards.

COTA NSW acknowledges that due to the NSW Government decision to not implement the new minimum accessibility standards contained in the NCC, inclusion within the SEPP and design guides would contradict this decision. Whilst COTA NSW strongly disagrees with this decision, we raise the issue that although a portion of new apartment builds will voluntarily meet Silver Livable Housing design standards, there is no way at present for potential buyers - such as older people downsizing - to know where these apartments are. For the benefits of universal housing to be able to be accessed by those that need it the most and to measure the occurrence of these dwellings in overall housing stock – then a methodology must be created to capture this information and make it publicly available.

This submission will focus on the design guidance contained within the *Draft Apartment Design Guide* and the *Draft Urban Design Guide*.

Draft Apartment Design Guide (ADG)

Underpinning any discussion of housing is the importance of design. 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 *Draft Apartment Design Guide* provides guidance for apartments to be designed with consideration to universal design principles in relation to:

- access to ground floor units,
- common areas e.g. lobbies, open space etc,
- corridors,
- apartment mix,
- transition from interior to exterior spaces and
- access to waste chutes.

Whilst, it is encouraging that NSW Planning recognises the importance of universal design principles in these areas of apartment design and construction, COTA NSW contends that all new apartment builds should be built to Silver Livable Housing design minimum accessibility standard.

The inclusion of minimum accessibility features such as a step-free entry, wider corridors and doorways and a shower and toilet that are easy to use will enable people of all ages and abilities greater choice in where they live. It will also enable older people to age in their own home safely and comfortably and provide a level of surety to increasing numbers of people that rent.

COTA NSW supports the inclusion of design elements, such as glazing, consideration of aspect and cross ventilation, that will improve the energy efficiency of new apartments. The application of these measures in affordable housing, for example, will improve liveability and reduce energy costs for low-income households. NSW Planning should also be commended on the recognition of the impacts that climate change will have on our communities and the inclusion of future technologies within the building such as battery charging and adequate bike storage.

The importance of green space for an individual’s well-being, its value to visual attractiveness and contribution to micro-environments is acknowledged within the design

principles and explicitly within the design guide. It is critical that these elements; that will create more sustainable and amenable neighbourhoods are retained in the finalised version of the guide.

The emphasis on walkable access to public transport, public open space and close proximity to town centres should also be commended. For apartments to appeal to older owners or renters, this community infrastructure is essential for social connection and their health and wellbeing. Easy access to these facilities will support older people to age in place.

Draft Urban Design Guide (UDG)

COTA NSW broadly supports the principles that underpin the *Draft Urban Design Guide*. COTA encourages a holistic approach to urban design that ensures that our communities are inclusive for all groups and abilities. 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.

COTA NSW strongly supports the two objectives: *5. Walkable neighbourhoods are vibrant and productive* and *7. Walking and cycling is prioritised, safe and comfortable for people of all abilities*. This is supported by outcome *13.4. Create streets which are safe, walkable, and accessible*. A target of homes within a 15-to-20-minute walk of local infrastructure will ensure that these goals will be more easily met. The inclusion of further actions under *13.5 Design active and defined streets* that recommend the incorporation of awnings in high foot areas to shield pedestrians from rain, wind or sun is also important to the comfort and safety of older people.

A consistent theme that is raised with COTA by older people is that a significant impediment to community involvement is the lack of footpaths and/or poor footpath maintenance. In some locations where there are no footpaths, people are forced to walk on the roads. Pedestrian-friendly footpaths has been regularly highlighted as a much-needed amenity that most participants believed would improve their ability to get around, particularly enhancing their ability to walk for leisure and exercise and to get to and from shopping and public transport hubs. Older people have also expressed a lack of confidence about walking safely in their neighbourhoods without paths and this influenced their willingness to leave their homes and contributed to a feeling of social isolation.

The recognition within the guide of the heat island effect, the importance of green space and canopy and linkages to human health are to be commended. Older people are particularly vulnerable to extremes of heat, and climate change will result in increased prevalence of heat waves – particularly in parts of Sydney and regional and rural NSW. The

two objectives: 9. *Landscape features and microclimates enhance human health and biodiversity* and 10. *Tree canopy supports sustainable, liveable and cool neighbourhoods* and the supporting actions are crucial to create a safer and more liveable communities.

We endorse the following areas of concern raised by Western Sydney Regional Organisation of Councils (WSROC):

- The roles of trees are well articulated with strong principles in their roles in reducing urban heat, however further measures could be included that also improve microclimates, such as street orientation, cool materials. Although briefly mentioned these measures are not supported by strong principles, guidance, targets or a clear approach to assessment.
- There is a need for additional guidance within the UDG on estimation of mature tree canopy spread. There is a risk that poor species selection, poor installation and poor establishment could all contribute to actual canopy cover much lower than estimates made at the design stage. The inclusion of rigorous methodology to enable future canopy cover estimation would be advantageous.
- Consider developing more robust targets to form part of the assessment process, suggestions include:
 - Requirements for total pervious and/or total landscaped area,
 - Requirements for shade (e.g. a minimum % shade cover) in high-activity public spaces,
 - Requirements for irrigation (e.g., a minimum % irrigated area) in certain situations (both private common areas and high-activity public spaces),
 - A quantitative target for the amount of water to be retained in the landscape (a % reduction in mean annual runoff could be a simple measure that aligns well with other quantitative WSUD objectives).

Conclusion

Thank you for the opportunity to provide feedback on the *Draft Design and Place SEPP* and associated design guides. These design guides address a number of issues that COTA NSW has long advocated for, such as walkable neighbourhoods, energy affordability and accessibility of community infrastructure. As outlined within this submission, we are disappointed by the lack of stronger targets for Silver Livable Design standards and will continue to advocate for the inclusion of this standard in future regulation in New South Wales.

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