

SUBMISSION TO THE

Greater Adelaide Regional Plan Discussion Paper

4 November 2024

Submission authorised by

Miranda Starke

Chief Executive

Prepared by:

Tahlia Cua

Research and Engagement Officer

COTA SA

Kaurna Country

Level 1, 85 Hutt Street

Adelaide SA 5000

E cotasa@cotasa.org.au

P 08 8232 0422 1800 182 324 (Country callers)

www.cotasa.org.au

COTA SA welcomes the opportunity to provide a submission to the Greater Adelaide Regional Plan (GARP) following our earlier submission to the GARP discussion paper.

COTA SA is an older people's movement run by, for and with older people. We represent the rights, interests, and futures of around 700,000 older South Australians. We engage widely with older South Australians across the state and the lived experiences of the diverse community of older South Australians shape and inform COTA SA's policy and advocacy work. COTA SA cares deeply about ageing well and is committed to ensuring older South Australians have the opportunity, capacity and ability to navigate the changes of ageing in their place of choice. The Greater Adelaide Regional Plan is an opportunity to deliberately plan to support South Australians to age well, now and into the future.

Our population is ageing. It is projected that by 2066, people aged 65 years and over account for approximately 16% of the Australian population and by 2066 that figure is estimated to increase between 21–23%¹. Our ageing population should be a major trend and driver that will shape the future of planning in South Australia.

We have responded to the draft plan where we feel we can meaningfully contribute to decisions that could improve the quality of life for older South Australians for the next generation.

¹ [Older Australians, About - Australian Institute of Health and Welfare](#)

People Housing and Liveability

COTA SA supports access to safe, secure and affordable housing. Our planning system must enable a variety of housing options suitable for all ages and abilities. Most older people want to age in place and stay in their own homes and chosen communities as they age. To achieve this, housing should be affordable, adaptable, accessible and close to amenities. It is important this does not preclude older people making a choice on the type of housing they can live in. Like older people themselves who are diverse in their lifestyle preferences, incomes, identity, cultural background and relationships, there is no one-size-fits-all model when it comes to our housing needs as we age.

State-Significant Infill Areas (Social Housing)

It is encouraging to see the state significant infill areas as a priority of this plan; however, it is important to note that this must include substantial provision for social housing (public and or community housing) as well as affordable housing. COTA SA advocates that every government-led / Renewal SA residential development must include a proportion of social housing. There are a number of recent government-led / Renewal SA residential developments which do not provide for any social housing. This is a missed opportunity. It is well recognised that the demand for social housing far outweighs the supply. This can be addressed in two ways: grow the public and community housing sector (social housing) and replace or renovate houses that are no longer safe or fit for purpose. SACOSS argues that around 1,000 new social housing dwellings must be built each year to rebuild the stock of social housing. Anything less will merely cover population growth².

Planned consideration must be given to increasing affordable and social housing in sufficient numbers to address housing stress and put downward pressure on the private rental market. Social housing cannot be considered in isolation from the broader planning approach and the relevant legislation must be amended to guarantee this. We welcome affordable housing targets at 15% of new developments and would like to see social housing afforded a similar level of prominence.

Strategic Infill Coordination and Incentives

The Discussion Paper makes a clear case for a master-planned approach to strategic infill that can achieve, *“Incentives to encourage diverse and affordable housing, including build-to-rent and Missing Middle housing options for workers near key employment precincts.”* COTA SA supports strategic infill development and considers it an important consideration in how the greater Adelaide region should accommodate a growing population for workers and for older people.

² [SA's housing needs under spotlight at national cabinet - SACOSS](#)

There are numerous examples of creative approaches to support with strategic infill coordination and incentives and we are pleased to see these have the potential to be addressed through the Planning Commission's Proposal to Initiate an Accommodation Diversity Code Amendment and Future Living Code Amendment. For example:

- Build to Rent (B2R) developments provide a relatively new housing option that gives tenants security of tenure which, in turn, promotes community connection. Recommended in the Improving housing security for older women report, these developments can also provide safe, accessible and adaptable housing which would enable older people to age in their homes and community³. Incentives are needed to attract more private build-to-rent developers to South Australia and commit them to incorporate affordable housing into their private rental developments. The future of Build to Rent in South Australia will be dependent in part on the progress of the Planning Commission's Proposal to Initiate an Accommodation Diversity Code Amendment, which includes incentives for these developments.
- Future Living Code Amendment as one of the number of infill strategies to help drive up density and enable right-size model without placing pressure to leave community. It is encouraging to see that the Amendment includes Alexandrina Council, and (where appropriate, in terms of existing infrastructure and housing typology) COTA SA advocates for other regional councils to be supported to take on the principles contained within of the Amendment.

Greenfield and Township Development: Southern Growth Areas

COTA SA welcomes the focus on our state's oldest demographic region, Victor Harbor and Goolwa. In Victor Harbor and Goolwa, about 60% of the population is aged over 50 and much higher than the state average of 36%. Planning for the Greenfields sites of the future needs to consider how communities can continue to age well. This includes supporting intergenerational living to boost community wellbeing and ensuring housing to support an adequate, stable, local workforce, especially in medical, health, and care services. Through our ongoing engagement with residents in Victor Harbor and Goolwa, we are aware there is a heavy reliance on remote/drive in drive out workers for many services, contributing to cost and access barriers for local residents.

To ensure the sustainable growth of communities like Victor Harbor and Goolwa, it is essential to incorporate social planning that supports intergenerational living. While the Plan emphasises physical infrastructure and water security to manage growth, fostering a socially inclusive environment that attracts diverse age groups will help build resilient communities. By planning for intergenerational housing options, the region can create a more cohesive community, improve access to local services, and reduce the reliance on drive-in/drive-out workers. This approach aligns with the region's lifestyle appeal and enhances its potential as a long-term alternative to living in the Adelaide urban area. Diversifying housing options beyond the retirement village model, will also be important to achieving more natural, intergenerational communities.

³ [Improving Housing Security for older women Recommendation Report](#)

Housing Diversity and Affordability

COTA SA supports the notion that *“Diverse and adaptable housing across the region provides for different needs, incomes, stages of life and lifestyle choices close to existing support networks. With an ageing population there is a focus on providing older people with more opportunities to age-in-community.”* This notion aligns well with the new Aged Care Act and planned, Support at Home model, whose objectives are to support older Australians to remain living independently at home for longer. With shared goals of ageing in place, our cities and housing must be adaptable and future focused to support this shift.

Missing Middle Housing Products

COTA SA agrees with the Plan’s focus on ‘missing middle housing products’ and the need to create more diversity in housing to suit the needs and preferences of a diversity of older people. We understand the importance of maximising opportunities for retirement living and supported accommodation in strategic locations, however we encourage a broad lens be taken when considering what housing may be regarded as desirable or suitable for older people. Around 26,000 older South Australians currently choose to live in a Retirement Village⁴ while a smaller proportion seek out the affordability of a residential park; however, a majority will always prefer to remain in their family home or may consider relocating to a smaller property or apartment in the community. It is important to note there is no ‘one size fits all’. A diversity of options in community should be planned for to enable for right-sizing dwellings, and decision-makers must avoid ageist assumptions that a particular type of dwelling is preferable to another, solely due to someone’s age. Additionally, it is important to point out that an increasing proportion of older people will never own their own home and that rental properties in the Greater Adelaide Regional not only increases in number but also in quality in order to support people to age well in place^{5,6}.

Supported and Retirement Living

Meaningful community engagement is a critical element of ageing well. Strategic design and planning that allows people to age in their home and in their existing, familiar community, leads to positive health and wellbeing outcomes. COTA SA welcomes supported retirement living accommodation options, currently the preferred option for around 26,000 South Australians. We must be careful to avoid age-based assumptions that would lead us to rely on significant proportions of older South Australians preferring this housing option into the future and particularly as we experience generational change over the next thirty years.

From our consultation with older people, we hear that most want to live alongside their children, family members and other members of their community of all ages. Therefore, having a diverse range of housing which supports a diverse type of living needs is important to acknowledge. In this regard, initiatives such as the Future Living Code Amendment facilitate intergenerational living, offering many positive and practical outcomes, socially and financially. It can minimise feelings of social isolation, all while encouraging social connection and wellbeing; and provides a way to pool financial resources and make savings on some household expenses. Intergenerational housing can be made significantly easier with the right home

⁴ [SA Retirement Villages Residents Association | SARVRA](#)

⁵ [Older Australians, Housing and living arrangements - Australian Institute of Health and Welfare](#)

⁶ [Older people’s loss of home ownership and housing precarity | Seniors Card](#)

design and if adopted widely across the Greater Adelaide Region, the Amendment's co-living proposals could provide an ideal design and social solution for connection among families, while also allowing independence for each generation.

Productive Economy

COTA SA understands the importance of strategic infill to increase access to services, social connection and to localise workforce through suitable worker housing accommodation and job opportunities. We acknowledge that in South Australia, there are a number of regions of lower density where residents experience barriers to accessing a range of services that might support living and ageing well and hope that the GARP might address these challenges proactively. There is evidence that shows that established areas with medium density housing is linked to higher liveability⁷.

We would consider the future impact of the new Aged Care Act and imminent Support at Home program, which encourages people to age in place in community for as long as possible. To be achievable, this will rely on an increasingly mobile workforce of carers and support workers to older people wherever they live in community. This access to workers and workforce mobility needs to be considered in future developments.

Natural Resources, Environment and Landscapes

Like Australians of all ages, many older people are concerned about climate change, viewing it as a significant and real threat to our national interests and livelihood. COTA SA takes the threat of climate change seriously and our passionate Climate Change Group is focused on the actions that can be taken at a policy, organisational and personal level. Our [Statement of Interest](#) on Climate Change outlines our commitments to climate change action.

We would encourage a bolder statement on climate change in the plan, including by inserting "Climate Change" into the headline for this section. This would better reflect the significance of this topic to South Australians and recognise the critical opportunity that we have to mitigate climate damage in our urban design, planning and construction over the next generation.

Climate Change

COTA SA welcomes the intent to: "Encourage carbon-efficient living environments through a more compact urban form that supports Living Locally and active travel, walkability and the use of public transport." This must be balanced, however, with the reality that many older people will remain reliant on private vehicle travel. In particular, COTA SA has found that private vehicle is the dominant mode of transport when attending medical and specialist appointments, due largely to the unreliability of other modes of transport. Once again, an overlap with the State's Transport Strategy will be necessary to ensure that the GARP is able to achieve its infrastructure, social and climate change goals.

⁷ [Place Score housing survey: Data shows density key to community vibe | The Advertiser \(adelaidenow.com.au\)](#)

Urban Greening and Cooling

We are pleased to see references to cool and warm community refuges as strategies to redeploy public spaces to mitigate the impact of extreme weather events; this is something that COTA SA has advocated for⁸.

Provision for community-building activities and projects such as community gardens, cool/warm refuges in days of extreme heat or cold (such as being explored currently by the City of Campbelltown), community batteries for solar electricity, and community virtual power plants we expect will be the sorts of activities that South Australians will rely on increasingly to help them through the extremes of weather, while also becoming opportunities for social connection and cost-of-living (home energy cost) relief for vulnerable groups.

Tree Canopy

Enhancing the tree canopy through the initiatives in the plan is something we agree with and welcome. Tree canopy and green spaces are important not only for their cooling effects, but to provide environments that enable active travel and connection to nature. Promotion of tree canopies also enables promotion of walkability and promotion of exercise encouraging an active lifestyle. We join with other peak bodies in encouraging an increased emphasis on active living (including active transportation) in line with the government's health in all policy approach.

Transport and Infrastructure

Adequate transport is fundamental for older people to be active in their communities and to maintain purposeful and independent lives connected to family, friends, services, and other interests. However, in many regional towns there are inadequate, inappropriate, and expensive transport options to enable this independence and older residents in these regions tell us consistently that transport is their top challenge. COTA SA has been invited to contribute as a key stakeholder to the State Transport Strategy to share the transport challenges facing older people across our state and particularly, outside metropolitan Adelaide.

The plan acknowledges *'Servicing growing communities on the outskirts of the city and in our regional cities and towns remains a challenge, as delivering public transport in lower density areas costs more per capita.'* The Plan must do more to provision for increased public transport, community transport, and alternatives to private vehicle, including active transport to keep our communities connected. We also note that as our ageing population grows and increasingly, remains living in community, the number of mobile care workers must also grow also, along with the infrastructure to support these activities.

Social Infrastructure

COTA SA is pleased to see the impact technological advancements has on vulnerable groups outlined within the discussion paper as below:

'Our growing and ageing population, increasing migration and advancements in technology will increase demand and change the expectations that people have for the variety, quality and accessibility of social infrastructure services and assets. Ease of access to and quality of social

⁸ [Submission to South Australia's 20-Year State Infrastructure Strategy Discussion Paper • COTA SA](#)

infrastructure varies for different types of social infrastructure, particularly for vulnerable groups. The planning and delivery of social infrastructure often lags behind the increased demand in growing infill and greenfield areas.'

Being on 'the wrong side' of the digital divide can have a number of negative consequences for older south Australians. Social infrastructure that supports the evolution of these systems to ensure communities are physically designed to allow and optimise access to social supports, services, spaces and opportunities that enable people to age well and age in their communities.

Digital connectivity can also mitigate the experiences of isolation and loneliness. Social Isolation affects population groups of all ages and older Australians present a high-risk group for social isolation due to a number of life stage factors which are associated with ageing: living alone, no longer having a partner/spouse, chronic illness, mobility issues, loss of friends and family, physical isolation, transport challenges and low digital literacy. Results of the 2021 HILDA survey showed that just under 1 in 5 women and just over 1 in 6 men aged 55+ 'often felt very lonely'⁹. Loneliness can increase the risk of severe health conditions, including stroke and heart disease, and can increase the chance of early death by 26%. This places significant strain on our public health system and our care systems.

Digital inclusion initiatives have been shown to actively reduce social isolation and increase connectedness¹⁰. People aged 55 years and over have less digital ability than the average, with those aged 65-74 and 75+ scoring significantly lower than the national average when it comes to digital inclusion¹¹. South Australia is one of the least digitally included states and some of our oldest demographic regions significantly lag behind. For these regional areas, access to technology and devices and having the ability to use them is fundamental to digital inclusion. Australian Digital Inclusion Index (ADII) measures the extent of digital inclusion in Australia. In 2021 the ADII results displayed that South Australia lags behind the national average for digital inclusion by 2.1 points. Regional South Australia significantly lags behind by 8 points, scoring 63.1 in comparison to Greater Adelaide (71.1)^{12,13}. COTA SA advocates that the State's Digital Connectivity Strategy must include action to close the digital divide through structured and ongoing support, addressing prohibitive costs and building infrastructure that provides reliable digital connectivity to support people – including older people – to use it as an essential service.

Health Services

Older Australians are significant and growing users of acute health services, and we are pleased to see this is acknowledged in the discussion paper: *'Our growing and ageing population places increased pressures on health systems. Our health infrastructure faces challenges due to its scale, age, complexity and fragmented nature.'* In Australia in 2017-18, people aged 65 and over (who make up about 15% of the population) accounted for 42% of separations (episodes of

⁹ [Australia's welfare 2023 data insights](#)

¹⁰ [DigiNation Report Final \(goodthingsfoundation.org.au\)](#)

¹¹ [Key findings and next steps - Australian Digital Inclusion Index](#)

¹² [Key findings and next steps - Australian Digital Inclusion Index](#)

¹³ [Digital Inclusion Regional SA.pdf \(sacoss.org.au\)](#)

care) and 49% of patient days¹⁴. In 2014-15, almost 49% of potentially preventable admissions to hospital involved people aged over 65 years¹⁵.

The 2023 COTA State of the Older Nation (SOTON) report outlines how over a fifth of older Australians (22%) had experienced a high level of difficulty in accessing needed medical services over the previous year, which was significantly higher than 14% reported in 2021¹⁶. Our ongoing engagement with older South Australians suggests this is an ongoing challenge, and one which must be addressed through integrated infrastructure and service design and planning. We are pleased to see that this is a focus in the great Adelaide regional plan, and this should be a clear focus to ensure that all older south Australians have access to healthcare services in both metro and regional locations.

Delivery and implementation

COTA SA recognises the importance of ongoing consultation and development over the near 30 years to drive meaningful change in our South Australian communities. We welcome the opportunity to have an ongoing commitment to contribute to the plan and ongoing code amendments and planning. We would be pleased to meet with the Commission to discuss our submission. Please contact Chief Executive, Miranda Starke in the first instance.

Acknowledgement of Country

COTA SA acknowledges and respects Aboriginal people as the traditional custodians of the land of South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to First Nations Elders past, present and emerging and extend that respect to all Aboriginal people.

¹⁴ [Admitted patient care 2017–18, Summary - Australian Institute of Health and Welfare](#)

¹⁵ [6.17 Health care use by older Australians \(Australia's health 2016\) \(AIHW\)](#)

¹⁶ [SOTON-2023-Summary-Report.pdf](#)