

SUBMISSION TO THE

Greater Adelaide Regional Plan Discussion Paper

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COTA SA welcomes the opportunity to provide a submission to the *Greater Adelaide Regional Plan (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 (39%) 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, including through our Policy Council, Regional Advisory Groups, LGBTI+ Rainbow Hub and Climate Change Group.

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.

Planning for Ageing Well

In the many models of ageing well, the most common elements that support and empower navigating change are **health** (including physical and mental wellbeing), **security** (including housing and financial security), **purpose** (including volunteering, working and self-actualisation) and **connection** (including having a sense of belonging and social connection). With many of these elements considered in the *Greater Adelaide Regional Plan* (GARP), in particular the Living Local principles, this is a timely and impactful opportunity for ageing well to be factored into urban planning across South Australia. As the oldest state by demographic on mainland Australia South Australia is uniquely placed to lead the way.

Our planning system must design and build an ecosystem that supports an ageing population and supports older people to age well in their place of choice. Such an ecosystem includes public and community transport and active travel, housing (affordable, adaptable, close to amenities), digital accessibility, climate adaptation, green spaces, accessible and safe communities that allow older people to stay active, cool and warm refuges to cope with extreme weather events, health and aged care services and community connection.

COTA SA strongly advocates for a planning system that lays the foundations for communities that are age-friendly, cohesive, inclusive, resilient, adaptable and accessible. Strategic design and planning that allows people to age in their home and in their community, leads to positive health and wellbeing, and minimises cost and disruption to the individual, their community and ultimately, the public health system.

Specifically, we call on the government to:

- Consider our ageing population and the rise in isolation and loneliness as major trends that shape the future of planning and development in South Australia.
- Plan for diverse housing options that meet the diverse needs of the older population, now and into the future, whilst not precluding an older person from being able to choose where or the type of dwelling they live in.
- Build climate-safe, thermally efficient homes in new housing developments and significantly tighten building standards to insulate and seal homes and reduce energy demand.
- Incorporate social housing into every government-led and Renewal SA residential development.
- Plan for infill and medium-density communities that facilitate community connection and accessibility, and maintains or increases tree canopy.

COTA SA has a track record of success connecting with and delivering programs with and for older South Australians. We can bring value as a for-purpose partner to achieve the best outcomes for older people, and can play an active role to ensure our planning system meets

ageing well outcomes. We welcome the opportunity to collaborate with the government to shape the planning system.

Issues

An ageing population and increasing isolation and loneliness are major social trends

Our population is ageing. It is projected that by 2066, our older population will increase from 16% to 23%¹. Our systems must continually evolve to meet the needs of a growing population of older people. Urban planning 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. Our ageing population should be a major trend and driver that will shape the future of planning in South Australia.

Another major trend is the increasing rate of isolation and loneliness. This 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 digital illiteracy. Results of the 2021 HILDA survey² showed that just under 1 in 5 women and just over 1 in 6 men aged 55+ 'often felt very lonely'. 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.

Ensuring that older South Australians can continue to have strong community connections is vital to combating isolation and loneliness. From a planning perspective, this means ensuring that older people have accessible options for living and moving about their local areas so that they can remain active community members for as long as possible.

Building age-friendly communities

COTA SA supports the concept of Living Locally (p84) and acknowledges its great benefits to community building and climate change adaptation. It is important that we plan to build communities that are age-friendly, cohesive, inclusive, resilient, and accessible. Particularly important to ageing well are the following Living Locally principles:

Housing choices at all stages of life

Strategic design and planning that allows people to age in their home and in their community leads to positive health and wellbeing, and minimises cost and disruption to the individual, their

¹ [Older Australians, Demographic profile - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/older-australians-demographic-profile)

² <https://www.aihw.gov.au/reports/australias-welfare/australias-welfare-2023-data-insights/contents/social-isolation-loneliness-and-wellbeing>

community and ultimately, the public health system. Secure housing is fundamental to the health and wellbeing of older South Australians, which is why home and community is one of three strategic priorities in South Australia's Plan for Ageing Well 2020-2025³ - a plan which should not sit in isolation to other state government plans.

A variety of factors mean that secure housing is rapidly moving out of reach for an increasing number of them. Older women are particularly at risk because of a lifetime of lower wages, lower superannuation, and asset losses in separations. Older LGBTI+ people advise that access to housing as they age puts them at particular risk of homelessness.

Insecure housing is compounded by ageism, long periods of underemployment prior to age pension eligibility and poor health. Indeed, a recent study found evidence to suggest that, "challenging housing circumstances negatively affect health through faster biological ageing⁴." The study further found that the reversible nature of biological ageing means that there is significant potential for housing policy to improve health outcomes.

The majority of older people want to age in place and stay in their own homes as they age. Enabling this includes housing that is affordable, adaptable, accessible and close to amenities. It is important this does not preclude older people making the choice of 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 not one-size-fits-all model when it comes to our housing needs as we age. Older people want to access a diverse range of housing options including private rental, owner-occupied properties, retirement village living, residential parks, lifestyle villages, social housing and residential aged care. It is crucial that older people can choose the type of housing that is right for their needs. This includes not placing an expectation on older people that they down-size at a particular point in their lives. Our planning system must enable a variety of housing options suitable for all ages and abilities.

This principle could also include housing design to ensure future housing meets livability standards; particularly relating to age-related mobility and accessibility requirements, and also including energy efficiency standards. The National Construction Code is a key mechanism to ensure these standards are being met at a minimum, and new regions are planned in a way that will at least meet if not far exceed these standards.

Public transport options

Access to adequate public and community transport in both the metropolitan area and in regional South Australia is fundamental to ageing well. It enables older people to be active in

³ [South+Australia's+Plan+for+Ageing+Well+2020-2025 WEB.pdf \(sahealth.sa.gov.au\)](#)

⁴ [Are housing circumstances associated with faster epigenetic ageing? | Journal of Epidemiology & Community Health \(bmj.com\)](#)

their communities and to maintain purposeful and independent lives that are connected to family, friends, employment, services and interests.

Quality, accessible and reliable public transport is more likely to be valued by older people who do not drive due to age-related changes, or who are on low and fixed incomes and unable to afford private transport. Making public transport free for Seniors Card holders in 2022 resulted in a 40% increase in usage over the following year, showing that increasing access to public transport results in more older South Australians able to participate in volunteering roles, to commute to their place of employment, to undertake caring roles and to partake in social, economic and recreational activities. These connections are fundamental to ageing well and planning for public transport infrastructure is important.

Equally important is planning for active travel. For example, incorporating bike paths and storage, footpaths and walking paths into the design of neighbourhoods that enables people to be physically active, safely.

Open space and recreation

Planning for open and green spaces that enables active travel, recreational activities, social connection and connection to our natural environment is important for people's health and wellbeing, and contributes to creating meaningful connections and promoting healthy habits as we grow older.

Everyday shopping and services

Access to services is important for older people, in both ensuring services are available and meet community needs, but also easy to physically get to.

Safer streets and spaces

Feeling safe in your own home and community is important for wellbeing and is especially important to consider how this is enabled through the planning of communities, ensuring protective services and technology are planned for and built. Safe streets and spaces are particularly important for communities that disproportionately experience discrimination, including LGBTI+ communities and survivors of domestic violence, including a growing cohort of older women living alone.

Building climate resilient homes and communities

Older South Australians have a deep commitment to reduce the severity and impact of climate change for today's community and for future generations. The adverse effect of climate change on the health of the community is evident in the rising cost of energy, heat and cold-related ill health and extreme weather events. The impacts of climate change are disproportionately felt by those on low and fixed incomes and vulnerable community members, including a substantial

proportion of older people who are renters, as they will have the least capacity to mitigate climate change and adapt to extreme weather conditions.

We note the references to climate change throughout the discussion paper and there is a clear statement of intention to position the future planning of the Greater Adelaide region with mitigation and adaptation to climate change in mind. COTA SA's surveys consistently show that the majority of older South Australians have a real desire to contribute to the prevention of, and adaptation to, climate change⁵. We therefore strongly support the intention for future planning of the Greater Adelaide Region to prioritise climate change mitigation and adaptation through achievement of meaningful, relevant targets.

COTA SA believes that the future impact of climate change on South Australia will highlight the importance of community and social cohesion. 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 search out to help them through the extremes of weather.

Climate-safe, thermally efficient homes must be considered in new housing developments and building standards tightened significantly to insulate and seal homes and reduce energy demand.

The thermal efficiency of existing dwellings must also be improved, particularly in social housing and private rental properties. For example, in jurisdictions such as the United Kingdom, proposals are being put forward to improve the quality of existing houses⁶ to make them more comfortable in extreme weather.

Opportunities for master-planned developments that support housing security and climate adaptation

The Discussion Paper is clear that Infill can be done better (on Page 10) and makes the case for a master-planned approach for strategic infill development that can achieve, "higher densities that offer diverse and affordable housing close to businesses and industry."

COTA SA supports infill development and considers it an important consideration in how the greater Adelaide region should accommodate a growing population. Indeed, there is evidence that shows that established areas with medium density housing is linked to higher liveability⁷.

⁵ [Climate Change • COTA SA](#)

⁶ <https://demos.co.uk/research/home-improvement-a-triple-dividend-part-one-boosting-the-british-economy/>

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

Our key recommendations for master-planned developments and urban infill include:

- Every government-led / Renewal SA residential development must include a proportion of social housing. There are a number of government-led / Renewal SA residential developments underway currently 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 growth⁸. 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.
- Urban Corridor Development (see p137) must include tree canopy provision and climate-resilient homes. There are many examples along corridors such as Anzac Highway (referenced in the GARP Discussion paper) that have little tree canopy or show evidence of climate-safe housing.
- Small-scale infill (see p142) has resulted in almost no tree canopy in the subsequent developments. The Discussion paper acknowledges community concerns about this form of development but offers no solutions.

There are numerous examples of creative approaches to medium-density housing which could be considered. For example:

- the Bowden development provides medium-density accommodation as part of a well-planned development⁹.
- Nightingale Housing¹⁰ builds smaller cooperative-style medium-density developments. These are mainly in Victoria but is commencing in South Australia. Its underlying focus is, “building apartments that are socially, financially and environmentally sustainable....homes should be built for people, not profit”.

Each of these approaches has governance and financial challenges however, they are valuable in illustrating alternative models of development.

Given that there may be a shortage of parcels of land which can be developed for medium-density housing in some locations, a further suggestion is to explore the possibility of redeveloping suburban and regional shopping centres. Most are either one or two storey

⁸ [SA's housing needs under spotlight at national cabinet | SACOSS](#)

⁹ <https://renewalsa.sa.gov.au/projects/bowden/>

¹⁰ https://www.nightingalehousing.org/?gclid=EAlaIQobChMIjfWG8oec_wIVVTdyCh2--QRzEAAYASAAEglv3vD_BwE

complexes, often with large expanses of asphalt for car parking and frequently located close to bus routes. If the sites are redeveloped fully to a medium density (say, five storeys), the development could include extensive solar cells and green roofs, eliminate the heat effect of the asphalt, address housing shortages and lack of variety in housing options, address transport needs, and incorporate design features which foster community connection.

Increasing tree canopy and green spaces

We note the commentary on tree canopy and green spaces including on Page 45 of the discussion paper¹¹. Green spaces are important for ageing well, and many local government areas have developed tree strategies which all refer to their cooling effects and helping communities adapt to climate change.

One of the goals of the planning system is for urban green cover to be increased by 20% in metropolitan Adelaide by 2045 (p164). Our concern is that the Planning and Design Code – an important part of the hierarchy of planning documents in South Australia – is not fit for purpose to achieve the goal of an expansion in tree canopy. This is largely due to the ongoing loss of existing tree canopy, particularly in new developments. For example, in PO 13.2 and DTS/DPF 13.2 under the *Design in Urban Areas* section of the Code, the minimum coverage of tree canopy is only between 2 and 10%, depending on the size of the block, which can result in a substantial **reduction** in tree canopy. For the most part, each development is treated in isolation in the development assessment phase, and as subdivisions take place, most existing trees on private land for which development is planned are lost.

Although the loss of tree canopy is acknowledged in the discussion paper, we are concerned the current planning rules don't do enough to reduce that loss.

For further information and discussion

COTA SA looks forward to participating in the engagement on the draft GARP in 2024. We would be pleased to meet with the Commission to discuss our submission. Please contact 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.

¹¹ https://livingadelaide.sa.gov.au/_data/assets/pdf_file/0003/278265/Target-5.pdf.