



**COTA (NSW)**

Council on the Ageing (NSW) Inc  
*Estab. 1956*

## **COMMENTARY TO THE REDFERN-WATERLOO AUTHORITY**

*Urban renewal study and planning for Redfern, Waterloo and South Eveleigh (after BEP2)*

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## TABLE OF CONTENTS

About COTA (NSW).....	3
COTA (NSW)'s commentary .....	3
Consequences of our ageing population for urban renewal .....	4
Mainstreaming the goal of 'age-friendly cities'.....	4
BEP2 for 'planning controls' and Master Planning.....	5
On-site building .....	6
Universal design for accessibility; 'ageing-in-place' and 'ageing-in-region'.....	7
Comments on Planning Framework (04) of BEP2 .....	8
S 4.1 Urban design guiding principles.....	8
Relationship to the neighbourhood and public transport: precinct planning .....	9
Re-opening streets to motor traffic? .....	10
S 4.4 Preliminary Public Domain Strategy (PPDS): Comments on Transport .....	11
UK research and good practice for older people, and other people .....	13
Relations with Commonwealth agencies.....	14
On community consultation.....	14
On submissions .....	15
Conclusions .....	16
References .....	17

COTA (NSW) has been invited by the Sydney Metropolitan Development Authority to input into the urban renewal planning process for Housing NSW ('HNSW') sites in Redfern, Waterloo and South Eveleigh following the close of submissions to the Built Environment Plan Stage 2 ('BEP2').

### ***About COTA (NSW)***

COTA (NSW) is a non-government, consumer organisation advocating for older people. Its work includes a focus on policy issues. Relevantly, the scope of its work includes urban planning and management, including transport and road safety, and thereby seeks to influence the prospect for 'positive ageing' through planning that facilitates 'ageing-in-place' and 'ageing-in-region'. Some of this work is published on: [www.cotansw.com.au/submissions.aspx](http://www.cotansw.com.au/submissions.aspx)

Across policy sectors, COTA (NSW) promotes awareness of the need to respond to the demographic changes in order to prevent age discrimination (& possible negative stereotypes); and reducing potential barriers to the participation of older people in society, and promoting good practice in building design, and precinct planning. This approach is derived from the *Age Discrimination Act 2004* (Cth).

### ***COTA (NSW)'s commentary***

COTA (NSW) **welcomes** the Government's intent for concurrent planning (& implementation) the urban renewal sites, access and mobility and connectivity to public transport, owing to the enormous importance of maintaining mobility, particularly by active travel, for older people.

This commentary aims to raise or emphasise issues relating to older people, and to request that they be considered in "detailed background studies".

Understandably, the documents issued focus on the buildings and building controls. Greater attention is yet to be given to 'people transport/mobility' in its fullest sense: mobility and access for people as well as public transport, and the use of cars. Bringing older people's perspective elevates the importance of the quality ('level of service') of the routes for a 'continuous path of travel' allowing for road safety and connectivity with public transport.

We note that the Draft Plan refers to 'pedestrians' in the technical sense that includes people with mobility aids, including electric wheelchairs also 'mobility scooters' (RTA 2002). We also note that in a number of passages, provision for safe cycling is omitted where it would be appropriate to be explicit. It can be more cost effective to plan concurrently for both modes,

walking and cycling, recognising that in some locations the pathways may overlap or be distinct (see for example COTA (NSW) 2010 submission to Staysafe).

### ***Consequences of our ageing population for urban renewal***

The ageing of the NSW population is the subject of the previous NSW Government's *Towards 2030: Planning for our changing population*. While this time frame is shorter than planning for the built environment, as under BEP2, *Towards 2030* identifies principles relevant for incorporation into the draft "urban design guiding principles" listed in BEP2 Section 4.

The consequences of our ageing population and consequences for policy are also discussed in the proceedings of the COTA (NSW) and Australian Association of Gerontology (NSW) 2010 conference proceedings, *Silver Century*. This conference drew attention to the broad spectrum of expectations of older people, after the age of 50 years whose capacity to continue to work and remaining fully active may continue for many decades – to displace the stereotype that being older equates to frailty/impaired mobility/receiving care. The Department for Ageing, Disability and Home Care (ADHC) submission expressed concern about the dramatic increase in dementia and referenced the new interest in "dementia-friendly neighbourhoods" described in the Dementia Design Guidelines.

The process of ageing is associated with an increased risk of frailty and impaired mobility (Bird 2004): the ABS 2009 Survey of Disability, Ageing and Carers reported 18.5% of the population with a disability; older people were more likely to have a disability, affecting almost nine out of ten (88%) of those aged 90 years and over, compared to only 3.4% of those aged four years and under.

To prevent many chronic conditions and reduce the risk of dementia, it is valuable to develop urban settings that enable people to have active, healthy lives. Maintaining mobility and healthy lifestyles during the transition to retirement and after retirement is invaluable at personal and policy levels.

### **Mainstreaming the goal of 'age-friendly cities'**

A few years ago, COTA Australia endorsed the World Health Organisation's (2007) *Global Age-friendly Cities: a Guide*.

[www.who.int/ageing/publications/Global\\_age\\_friendly\\_cities\\_Guide\\_English.pdf](http://www.who.int/ageing/publications/Global_age_friendly_cities_Guide_English.pdf)

Subsequently, for urban planning and urban renewal, COTA Australia considered the consequences and responses to the demographic shift in its submission on *Our Cities*

(produced by the Major Cities Unit, Commonwealth Department of Infrastructure and Transport). Our intent is to get the principles for people-friendly physical environments put into practice – a goal that would benefit many other people in the population from the very young, to the very old, and to middle-aged adults accompanying children/older people or middle-aged people with impairments (permanent, transient mobility or cognitive).

Many of the desired design features, proposed by health advocates, are included in the existing suite of guidelines for planning (issued by FAHCSIA; Dept of Planning and RTA; Housing NSW) but may need greater attention – whether through implementation, the management of assets (e.g. even footpaths to reduce trip hazards and handrails at road crossings), or even through the revision of technical standards (as recommended in the UK by Bird (2004)).

Characteristics of the ageing population are relevant to the urban renewal of the Housing NSW sites, and warrant **responses** in the planning framework at both strategic and more operational levels. Such responses would be evident in the physical and social infrastructure needs assessments as expected as part of the studies and to accompany future exhibition of the plans.

As we understand it, the NSW Government's statutory planning process for urban renewal of sites owned by Housing NSW is underway, illustrated by the Redfern-Waterloo Authority's diagram (last page FAQ#1 <http://www.redfernwaterloo.nsw.gov.au/other/bep2/faq.pdf>

Further to the planning controls, BEP2 refers also to the production of a Masterplan which could be expected to be supported by associated Development Control Plans, for which various studies would be needed.

The documents state that the selected sites will be subject to RWA planning controls, not the planning controls in the City of Sydney's LEP. With the new NSW government's views about Part 3A, we support the rezoning be incorporated into the draft Sydney LEP and the respective City DCPs be applied so that the area becomes better integrated into the local government area.

### ***BEP2 for 'planning controls' and Master Planning***

We also understand that the purpose of BEP2 is to produce the 'planning framework' for the urban renewal of the sites owned by Housing NSW within the RWA's Operational Area, setting out "planning controls" – notably land use zones, building height and FSRs – and the preliminary strategies for the public domain and transport & movements.

The challenge will be for the unifying goals – once articulated – to flow through from the strategic documents into the controls and advisory guidelines delivering the physical and operational results not only of the built form but also the urban/place management and

mobility/transport outcomes. For example, a key to good practice and good experience of existing and future residents, particularly older people, will include:

- the integration between the site and its surrounding public domain
- the connectivity with the locality/neighbourhood
- the connectivity with public transport services, including the ease of crossing roads for pedestrians and cyclists (COTA (NSW))
- limited spillover effects of increased density – e.g. better management of parking by trip generators (such as by travel demand management/travel plan for Channel 7), and road safety.

Therefore, the success of an urban renewal project will depend not only on good urban planning practices but also place/asset management.

It is unclear whether the Master Plan will include integrated landuse-transport planning, possibly because of the ambiguity as to whether **public domain** in this context includes **road space** i.e. building-line to building line (managed by either the RTA and/or the City of Sydney). Compare the approved North Eveleigh Concept Plan, that includes the upgrade of Redfern Station, that states:

*Overall, around 15% of the site area consists of parks and public domain areas (not including roads) that will be accessible to the public.*

[http://www.redfernwaterloo.nsw.gov.au/development\\_applications/north\\_eveleigh.htm](http://www.redfernwaterloo.nsw.gov.au/development_applications/north_eveleigh.htm)  
[accessed 16/4/2011].

We note the expectation for the Preliminary Master Plan by Housing NSW to include access to infrastructure:

*“public domain areas associated with existing and future public transport”*

We recommend that access by pedestrians and cycling be made overt. In the past, provision for pedestrian and cycling access has often deferred when public transport has been planned and installed (e.g. Parramatta Liverpool T-Way; CBD Metro).

### **On-site building**

We support the concept approach to the actual buildings, with the proviso to check the target for ‘universal design’ (FAHCSIA 2010; National Dialogue; Housing NSW) and its distribution across the proposed blocks, both in private and public ownership.

We like the illustrations of the proposed planning controls for housing types, shown in Figures 29-31. We note that the relationship is between the built forms, and further work will need to be undertaken on how future residents will relate to this neighbourhood and larger sub-region.

The blocks could be placed on site to conserve existing (healthy) trees and unsealed open space to give vegetation with canopy cover, given its contribution to the micro-climate and psychological and aesthetic benefits (These issues would fulfil the obligation for some demonstrable application of Ecologically Sustainable Development, in the forthcoming Masterplan).

COTA(NSW) supports energy efficiency practice:

- conserving buildings & refurbishment for greater efficiency, identified by the City of Sydney as an issue to be addressed in the next phase (City of Sydney p.6)
- installing highly efficient appliances in new (& refurbished) buildings, as recommended by the Department of Environment, Climate Change and Water. COTA (NSW) (2011) has produced a research report on reducing hardship, typically being faced by older people from rising energy bills.

While car parking under buildings is desirable, we suggest that studies estimate the potential uptake for car sharing, provide dedicated car sharing spaces in-building and thereby reduce the level of provision of private car parking spaces and the consequent cost of construction and cost of the dwelling unit.

### **Universal design for accessibility; 'ageing-in-place' and 'ageing-in-region'**

The BEP2 describes Housing NSW's sites as comprising 44% of the total dwellings within the RWA Area. The Government's intent is to increase the housing stock, replace existing housing with new buildings, and alter the mix of private and affordable housing, and while retaining some social housing on site and the balance in other parts of the same local government area, the City of Sydney.

We understand that Housing NSW will be constructing buildings 4-12 storeys high, with a target of 50% 'universal design' although this target is not referenced in the Draft BEP2 documents. 'Universal design' refers to a building to last its occupants' lifetimes so whatever happens, should they get injured or grow old [with reduced mobility], they will still be able to live independently without moving house; such buildings typically have no steps and wide doorways or can be modified at very low cost (unlike retrofitting conventional residential buildings) (FAHCSIA 2010; National Dialogue 2011).

Our **recommendation** is that the proposed social impact studies/‘community facilities review’ to look at the issue i.e. the appropriate target for ‘universal design’ in each of the proposed category of housing/tenancy types (public/affordable (social)/ private. The outstanding questions include:

- Is a 50% universal design target sufficient for this site?
- What is the prevalence of people on low incomes with mobility impairments and older people (preferably by 5 year age intervals to avoid inappropriate aggregation)?
- How could a higher target be funded?
- What influences could result in ‘universal design’ becoming part of:
  - the Building Code of Australia?
  - a control in the NSW Standard LEP or its guidance documents within the life of this urban renewal project (20-25 years)?

From a strategic planning (i.e. land use) perspective, it would also be valuable to check the supply of independent living, hostel and nursing home accommodation within the local catchment of this urban renewal area, and the availability of appropriately zoned land for such tiered accommodation. (COTA Australia 2011)

## ***Comments on Planning Framework (04) of BEP2***

### **S 4.1 Urban design guiding principles**

These principles are expressed in very general terms; there are a few ambiguities that could be resolved by better definition and referencing to standards, beyond the SEPP 65 Residential Flat Development.

We suggest that the principles need strengthening in order to:

- express unifying objectives, as expected through the COAG’s approach to the ‘planning principles’ for planning systems;
- make explicit the application of ‘universal design’
- reference the integration of landuse and transport with the explicit intention of increasing ‘active travel’ (walking, cycling, and in combination with public transport) over car use – in line, for example, with the Ecologically Sustainable Development provisions of the Urban Renewal SEPP.
- align with useful guidance documents issued by NSW Planning or the RTA or Transport NSW, e.g. *Planning Guidelines for Walking and Cycling*.

- Reference cycling. In relation to the City's Sustainability Strategy and hence Cycling Strategy, we note a cycling mode share target is 10% for incorporation into the next studies and plans. From an older people's perspective, the availability of safe cycling conditions is major asset for health (including dementia risk reduction), affordability, and social inclusion. COTA (NSW) is collaborating with the City of Sydney on a social inclusion and cycling project, modelled after successful programs in other world cities.

### **Relationship to the neighbourhood and public transport: precinct planning**

COTA(NSW) supports the preparation of a Social Infrastructure Needs Assessment, being underpinned by physical infrastructure, such as streets and road crossings, as part of a comprehensive precinct plan.

COTA (NSW) also concurs with the submission from Transport NSW adding that more work will be needed for Pedestrian Access & Mobility Planning, Safe Cycling, and Traffic Calming (assuming that is not part of the Arup Study). Owing to the incomplete studies on transport and the need for a systems-approach and the injection of user perspectives, we suggest that a group of stakeholders be convened on the mobility/transport planning, to support the detailed studies and the development of the Masterplan and associated guidelines. We also note some best practice developments in bicycle design and facilities, cycling and pedestrian road safety, since the publication of the suite of guidelines by NSW Department of Planning, the RTA and Transport NSW through collaboration between Marrickville Council and the City of Sydney Council.

We also note ARUP (2008)'s previous work for connectivity to North Eveleigh.

Given the submission from Transport NSW, we raise the possibility that detailed studies may include:

- a Transport Mobility and Access Plan (TMAP), centred around agreed mode share targets, as undertaken previously for Green Square and St Marys-Werrington urban redevelopments/renewal
- development control plans covering best practice in car parking and bicycle parking (noting the revision of Marrickville Council's DCP)
- the potential for trip-generating facilities to adopt Transport Demand Management measures, by producing and using Transport Access Guides and adopting Travel Plans.

Community members have also raised with COTA (NSW) a request for studies to include:

- drop-off kerbside parking areas at entrances & the City of Sydney’s “visitor parking” policy to allow residents to have multiple visitors concurrently (e.g. for events, or for overlapping shifts of carers)
- the Village-to-Village bus services
- Community Transport services for people with mobility impairments, not confined to the purpose of ‘non-emergency health related transport’ (NEHRT).

### **Re-opening streets to motor traffic?**

On the **urban street pattern**, we query the basis for listing re-opening road closures as a principle wherever improvements would be achieved on any one of five criteria (not defined), particularly in the absence of a Transport Management and Access Plan (‘TMAP’). By strengthening the principles, the proposed Preliminary Public Domain Strategy (PPDS) would need adjustment, outlined in the next section.

The criteria do not include:

- increased walkability and cyclability (or whether re-opening may deter people from using the street other than in motor vehicles) – compatible goals for mobility/transport, health and social inclusion and Ecologically Sustainable Development (as in SEPP Urban Renewal); or,
- an expression of a planning objective to reduce motor traffic, particularly through motor traffic on the streets – noting the City Council’s commitment “minimising car growth in the area.” (City of Sydney Draft Submission p.36)

Two of the nominated criteria – ‘safety and security’ – have, in the past, rested upon the flawed assumption that passing motor vehicles give “passive surveillance” whereas more recent evidence demonstrates the value of ‘active streets’ i.e. people on the street as pedestrians or cyclists but not cocooned in cars.

However, a preliminary step would be to review why these streets were closed previously and evidently with support of some local residents and the local council. The Shelter NSW Submission also refers to reviewing this local knowledge especially as the area faces higher levels of car use with the joint effects of densification and rise in economic profile of the inhabitants.

Community members have raised with COTA (NSW) some concerns about the risk of increased motor traffic volumes and speeds where the road-openings to be used for “rat-running” rather than merely local access.

From a public health and amenity perspective, we note a new report from the World Health Organisation on transport and the environment that has shown:

*“Traffic noise alone is harming the health of almost every third person in the WHO European Region. One in five Europeans is regularly exposed to sound levels at night that could significantly damage health.”*

<http://www.euro.who.int/en/what-we-do/health-topics/environmental-health/noise> [accessed 27.4.2011]

Therefore, the criteria of amenity in such assessment could factor in traffic noise in order to protect health and prevent traffic noise causing sleep disturbance, and in turn a contributor to ill-health.

COTA (NSW) takes the view that on the information in BEP2, it is premature to proceed with re-opening roads to motor traffic. Despite the agreement to this proposal by the City of Sydney, it would be prudent to have presented the tests for the 5 criteria (City of Sydney p.19). Other transport issues are discussed below.

#### **S 4.4 Preliminary Public Domain Strategy (PPDS): Comments on Transport**

Although the PPDS refers to a study commissioned from Arup Pty Ltd about the proposed opening, Arup’s analysis is not presented and submissions from the RTA and the City of Sydney (p.36-37) raise concerns about assumptions (on generated motor traffic by the new development) in the Transport Study (Appendix B).

COTA (NSW) recognises that a positive response to the ageing of the population would plan and provide for the physical infrastructure and services for older people, particularly, to maintain their mobility through active travel (walking, cycling and public transport) and to have access to car sharing and demand-responsive motor transport. Such expectations would call for the application of principles of connectivity in the continuous paths of travel, safe road crossings, and high levels of service of footways and cycling routes – suited to urban renewals that are effectively Transit-oriented-Developments.

The Transport study appended to Draft BEP(2) focussed on generation of traffic (motor) resulting from the preferred development option, and sought to establish an appropriate mode share target for the BEP2 area and suggest parking strategies – *the Redfern and Waterloo*

*Traffic and Transport Context* ('the PB study'). The RWA had commissioned Arup to conduct a separate study on accessibility and forecasts of travel demand by active travel, i.e. walking, cycling and in combination with public transport, although this study was not complete or included in the exhibition.

The key findings of the PB study are predicated on the locational advantages of the site and highlight the opportunities to improve conditions for all pedestrians and cyclists (e.g. pram ramps on desire lines). However, access to Redfern Station is severed by the one-way major roads, an observation made at the recent Urban Renewal forum by Dept of Planning. Bus stops are not located adjacent to Redfern station on Gibbons Street, but around the corner in Redfern Street requiring bus users to cross two major roads at signalised intersections with no scrambled crossings. Some further opportunities exist for:

- building out pedestrian and cycling facilities so that their movements are safer and less intimidated by heavy, fast moving motor traffic; and
- resolving barriers to safe cycling, as noted by Transport NSW in its submission.

We suggest a detailed study of the walking and cycling catchment of Redfern Station, in collaboration with the City of Sydney, perhaps as part of a precinct plan or even a Transport Accessibility and Mobility Plan (TMAP). Such a study (such as *Pedestrian Access and Mobility Plan*, with cycling) could really fill the expectation alluded to in the FAQ #2:

*Q: What is happening about pedestrian access in and around the station and also cycleways?*

*A: Pedestrian access in and around the station will be linked to the redevelopment of Redfern Station(see above). The design of the station will include options for pedestrian and cyclists to traverse the railway corridor near Redfern Station.*

On **Redfern Station** itself, such as the installation of a lift, the PB Study helpfully refers to the NSW Infrastructure Plan as the source for planned upgrade of passenger facilities.

In relation to Redfern Station and its catchment, therefore, COTA (NSW) suggests that the existing studies be consolidated together with the Infrastructure Plan, and reviewed by the SMDA in collaboration with the City of Sydney.

Potential exists to consider a light rail station/stop at Waterloo to service the denser development, as outlined in the City of Sydney submission. Light rail services in Sydney are generally easier to use for people with mobility impairments than either rail or bus services.

On **car parking**, local residents have raised concerns about the spillover of parking from the Australian Technology Park, particularly the Channel 7 building. It is unclear what Travel Demand Management measures, if any, were applied to that commercial development or what estimates of motor traffic generation were made. However, we note that the City of Sydney expressed misgivings about the traffic modelling in the PB study and its conservative assumptions about the perpetuation of low car use/ownership given the planned shift in the socio-economic profile of the neighbourhood.

We also suggest that the transport studies include options for making **car sharing** (distinct from car pooling) available in this local area, noting the potential for interest-free loans to low income residents to be eligible for casual, low use packages offered by the car sharing companies. The studies could include targets for car sharing that would reduce dependency on car use and reduce the space taken by parked vehicles, both in-building and in the public domain (including street space). Car sharing is particularly beneficial to older people who live in single households, in being both more affordable and motivating for short trips to be made as pedestrians or by cycling.

### **UK research and good practice for older people, and other people**

For information on good practice, we note a recent publication from the UK Sustainable Development Commission (SDC 2011) that examined ‘fairness and transport policy’ specifically looking at low income, and other vulnerable groups in society. The SDC research “*finds that vulnerable groups not only travel less than other people, they carry a greater burden of the costs of other people’s travel, including air pollution, noise, traffic danger, injury and crime...*”

Although Sydney has higher car ownership and car access levels than the UK, SDC’s reporting of key impacts for older people (p.31) are similar:

- 1 Older people are more at risk of death or injury on the road in the event of a collision, both as car users and pedestrians. Those over the age of 60 are seven times more likely to be killed if hit by a car at 30 mph and 35 per cent of all pedestrian fatalities are people over the age of 70.*
- 2 Traffic, personal safety fears and problems with the reliability of public transport are all significant barriers to older people maintaining their independence.*
- 3 There is a correlation between lack of access to a private vehicle and multiple social-exclusion for older people – this may be due to the poor choice of satisfactory alternatives available.*

The SDC’s analysis demonstrates that existing transport patterns in the UK contribute to:

*...substantial and persistent inequalities. ....The inequality is two-fold. In general the people experiencing the worst access opportunities also suffer the worst effects of other people's travel. They are both 'less travelled' and 'travelled-upon'.*

*The evidence we present in this report suggests that the central reason for this inequality is society's dependence upon the car as its dominant mode of travel. Put simply, increasing car dependency has led to increasing unfairness.*

*A new approach to transport policy is badly needed – one which accommodates complexity, works intelligently with social and environmental impacts, and takes a system-wide view.*

Therefore, the SDC responded with a sustainable transport hierarchy to improve transport decision-making and appraisal, one incorporating the relative health aspects of transport.

### ***Relations with Commonwealth agencies***

We raise potential relations at the Commonwealth level given their interest in urban renewal, through the Department of Infrastructure and Transport (and its Major Cities Unit) and the COAG Reform Council's interest in criteria for urban planning systems.

In addition, we raise concerns about pavement repairs by utilities as they can constitute a trip hazard and/or deterrence to pedestrians, particularly pedestrians using some form of mobility aid (often described as 'street openings', IPWEA NSW). We suggest that the RWA may be in a position to negotiate a protocol for repairs in the future.

### ***On community consultation***

COTA (NSW) appreciates the extensive consultative process adopted by SMDA. For urban renewal projects, however, where the existing population is to be expanded, it may be desirable to consider different styles of relationships with stakeholders as described variously as collaborative governance/decision-making or deliberative democracy, as illustrated by Australian practitioners generally associated with the International Association for Public Participation Australasia (IAP2 Australasia 2011; Hartz-Kahn at The 21st Century Dialogue; Twyford Consulting). We suggest consideration be given to this method when developing the social impact/community facility studies for the Masterplan (and other urban renewal sites in NSW, such as Granville and Newcastle).

The Planning Process diagram as a timeline is excellent.

In future, planning documents for public comment could be better supported by including:

- a glossary of terms, including include, for example:
  - the categories of housing and/or tenancy types – public, affordable, social, private, and ‘universal design’!
  - technical terms used by (land use) planners – e.g. ‘planning controls’, Masterplan, LEP, DCP, public domain and within that area the roads and road-related areas
- a list of references to the contemporary suite of guidelines and relevant standards, such as issued by Dept Planning, RTA and Transport, and Environment.

It is easy for professional practitioners to overlook terms such as ‘planning controls’ that have been given specialised or technical meanings. As heritage adviser, Amanda Jean (2006) commented to a Productivity Commission’s inquiry (on heritage places), there is often

*...a lack of understanding between fondness of place and planning controls over social value and/or intangible values.*

Some community members, living in the neighbourhood although not on site, have raised with COTA (NSW) spillover parking from the Channel 7 building within the Australian Technology Park. This result undermines confidence in the new plans for Redfern-Waterloo, causing skepticism about future levels of car ownership and use. Some community members have also pursued their interest in what measures still could be taken, such as Channel 7 (& others) adopting a Travel Plan, as commonly undertaken as the result of TMAPs or good practice in other cities.

Communication will be a key factor in the success of this project, with both existing and incoming residents over the decades ahead.

### ***On submissions***

COTA NSW supports consideration for future documentation and consultation:

- Of aspects of **design excellence** not yet covered in the, otherwise fine, Draft Plan:
  - Adoption of a design standard, known as ‘universal design’, such that buildings are designed to be easily adapted to meet the changing needs of tenants, as highlighted by the submission from Shelter NSW and references the *Housing NSW Design Requirements*;

- Design and building standards to optimise residents quiet enjoyment, with visual and acoustic privacy, as suggested by Shelter NSW (p.7); Shelter NSW suggests that the standards may need to be higher than specified by the *Residential Flat Design Code*, and for acoustic amenity, Shelter NSW recommends applying the draft Sydney DCP 2010 on acoustic amenity;
- Of the **built form and curtilage**, we note and support attention to the issues listed by the City of Sydney (submission, s1.4 p.6) for the next planning phase. Of the value of retaining mature trees, and retaining unsealed open space for benefits of aesthetics, micro-climate (and health) we also support the points raised in the submission from the former Department Environment Climate Change and Water. We also would like to see more explicit support for giving effect to the principles of Ecologically Sustainable Development, such as the installation of resource and energy efficient appliances and building materials;
- Of the imaginative, strategic proposal from the City of Sydney to inquire into potential **rail access of Redfern to the airport line** and the construction of a Waterloo rail station, as part of the regional connections with Green Square and further east (massive hospital-university complex at Randwick);
- Of Precinct planning and reducing car dependency, as raised by both Transport NSW and DECCW Submissions, and highlighted by the UK Sustainable Development Commission (SDC 2011) for its relevance to social inclusion for older people, younger people and low income people in communities;
- Of **safe pedestrian and cycling access and mobility**, as raised by Transport NSW;
- Of the rationale for the **mixes of housing tenancy types** and their distribution within buildings; questions about relocation of social housing tenants (Shelter NSW p.3,5); and,
- Of social planning for a **social infrastructure needs assessment**, as raised by the City of Sydney (p.24), for managing the projected increase in the prevalence of dementia (raised by ADHC), and for protecting and promoting the health of the local population as indicated by the Sydney Local Health Network.

## ***Conclusions***

COTA (NSW) supports good planning for urban renewal in areas of high public transport accessibility that responds to the demographic changes of an ageing population, and associated

smaller household sizes – particularly in enabling ‘ageing-in-place’/‘ageing-in-region’. We emphasise that urban-transport planning can make an enormous difference to the quality of life for people over their life course, such that making places ‘age-friendly’ can not only benefit older people, people with mobility or cognitive impairments, but children and young people, and even middle age people in various circumstances (COTA Australia 2011).

In principle, we support the proposed increase in housing stock and diversified mix, consistent with the City of Sydney 2030 plan, with the request from the community to determine the alternative sites for displaced social housing within the Sydney LGA as soon as possible.

Above all, we stress the importance of investigating whether a 50% target for dwelling units to meet ‘universal design’ standards is sufficient (National Dialogue 2011; FAHCSIA 2010; Housing NSW 2010 etc).

Our **key issues** are:

- Planning for more ‘universal design’ in new dwelling units, across housing/tenancy types
- Precinct planning: dealing with the fine-grained details to optimise livability, including mobility and access, connectivity, amenity, and sustainability
- Social infrastructure and services to be aligned with the growing and changing needs of the population.

These issues are addressed throughout our Commentary, with some specific suggestions and recommendations. Further, we identify and highlight issues raised by other organisations that are relevant to achieving good outcomes for the quality of life for older people in this sub-region.

Thank you for this opportunity to comment, we welcome feedback.

## ***References***

### **Age Discrimination 2004 (Commonwealth)**

- **Getting or using services** – at shops, restaurants, banks, theatres, sports and social clubs, public transport, dentists, doctors, superannuation, insurance, credit and government services.
- **Access to premises** – going to public places like entertainment venues, shopping centres, libraries and parks. [http://www.humanrights.gov.au/age/info\\_age.html](http://www.humanrights.gov.au/age/info_age.html)

**Submissions to RWA:**

- Department of Human Services, Ageing & Disability & Home Care
- Department of Environment, Climate Change and Water
- RTA
- Transport NSW
- Sydney Local Health Network
- City of Sydney Council
- Shelter NSW

ABS (2011) *Disability, Ageing and Carers, Australia: Summary of Findings, 2009*, Catalogue 4430.0.

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