

23 November 2017

Ms Deborah Brill

Director, Housing Policy  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Ms Brill,

**RE: Site Compatibility Certificates (SCC) – Seniors Housing SEPP**

The recently proposed changes to the Seniors SEPP note the Government's intention to minimise incremental expansion of seniors' developments.

While appreciating the government's concern to ensure that its policy approach is providing for suitable expansion of seniors housing, our concern is that this amendment is in itself a piecemeal approach to planning for seniors housing and is a retrograde step for the property industry and the Government to meet the growing demands for this type of housing.

The Property Council supports a full and comprehensive review of the Seniors SEPP and stands ready to assist the Department and provide industry input. We thus urge the Department to defer this limited scope amendment and consider the issue more broadly as part of the full Seniors SEPP policy review. This would enable a better understanding of any issues and community concerns arising from new seniors housing and better identify strategic ways of addressing these concerns, rather than a fragmented approach that may have unforeseen consequences if implemented.

This proposed amendment lacks suitable evidence or a research base for making this policy change. The consultation material lacks any statistical or case-based examples to justify the proposed changes which will raise another barrier to meeting the much-needed supply of this type of housing.

A key element of this proposed change is that new seniors' proposals must meet the SEPP's SCC criteria to be granted a Certificate. However, it is of concern that the current criteria for assessing proposals lack clarity and certainty. Interpreting the policy clauses in the applications for a SCC consistently requires legal advice to gauge compliance with the SEPP criteria. This will add onerous and unnecessary red-tape to the process.

The Government's recently released strategic plans for Sydney, including the draft Sydney metropolitan plan and draft district plans, highlight the need to plan and provide for Sydney's rapidly ageing population, with significant growth expected as the baby boomer generation

approaches retirement. We strongly urge the Government to remain consistent in its policy decisions for housing our ageing community.

If you would like to discuss this issue further, please contact Tim Wheeler, Senior Policy Advisor on 02 9033 1909 or [twheeler@propertycouncil.com.au](mailto:twheeler@propertycouncil.com.au).

Sincerely

p.p. 

Jane Fitzgerald

NSW Executive Director