



**Response  
to  
Australian Building Codes Board's  
Accessible Housing  
Options Paper**



Australian Network  
for Universal  
Housing Design

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## Contents

<b>Executive summary</b> .....	<b>5</b>
Background .....	7
Australian Network for Universal Housing Design .....	7
ABCB Accessible Housing Project .....	8
<b>Questions raised by ANUHD members</b> .....	<b>9</b>
<b>1. What is the policy that drives the Project?</b> .....	<b>9</b>
Intergovernmental agreement for ABCB .....	9
National Disability Strategy .....	9
Ageing in place .....	10
Excellence in urban design .....	10
<b>2. Who needs accessible housing?</b> .....	<b>10</b>
Most people live in the community in regular housing. ....	11
The presence of disability impacts on the whole household.....	11
Households with a person with disability are likely to be poorer.....	11
Most people rely on informal networks of support.....	11
One in three households are renting .....	11
Most dwellings will need to be accessible .....	12
<b>3. What gets in the way of building accessible housing?</b> .....	<b>12</b>
Lack of action to obtain accurate data on need or demand.....	12
Logics of the housing industry regarding new accessible housing.....	13
The logics of potential buyers of new accessible housing .....	13
Issues in relying on market forces .....	14
Lack of a national housing strategy .....	14
Lack of cross-sector policy collaboration.....	15
<b>4. How urgent is the problem?</b> .....	<b>15</b>
Evidence of the need for regulation.....	15
<b>5. What level of access is necessary?</b> .....	<b>16</b>
“Greatest extent possible” .....	16
“Without need for adaptation” .....	19
<b>Conclusion</b> .....	<b>21</b>
Appendix 1. National Dialogue on Universal Housing Design.....	23
Appendix 2. COAG’s National objective and criteria for capital cities .....	24
Appendix 3. ANUHD’s response to the Options Paper questionnaire .....	26
<b>References</b> .....	<b>33</b>



## Executive summary

The purpose of the ABCB Accessible Housing Project's Options Paper is to provide a preliminary menu of options and costings on the possible inclusion of a minimum accessibility standard for housing in the National Construction Code (NCC). ANUHD welcomes the opportunity to respond to the Options Paper, and does so by responding to the following questions:

1. What is the policy that drives the Project?
2. Who needs accessible housing?
3. What gets in the way of building accessible housing?
4. How urgent is the problem?
5. What level of access is necessary?

A summary of ANUHD's response is as follows:

- Regulation to make new housing accessible for everyone is critical to the achievement of COAG's goal of social inclusion and liveable communities in Australia.
- Given the anticipated demographic changes in the next 30 years, most housing will need to be accessible at some time during its life-cycle to meet the needs of residents and their visitors.
- Despite the lack of comprehensive quantifiable data, there is ample evidence on the need for accessible housing, including the need to mandate it without delay.
- The National Dialogue for Universal Housing Design's agreement in 2010 to provide accessibility in new housing voluntarily failed swiftly and spectacularly.
- The barriers to the voluntary provision of accessible housing cannot be ascribed simply to a lack of demand. The real causes are varied and complex and are inextricably tied to how the current housing market works, and the powerlessness of the people who need accessibility the most.
- Previous cost/benefit analyses in Australia have supported the mandating of accessibility standards to at least the LHDG Silver level. Given the ageing of Australia's population and the decade of delay, further cost benefit analyses, in our view, will support mandating accessibility at the LHDG Gold level (Option 3).
- The Regulatory Impact Assessment for accessible housing should not be confined to quantifiable cost/benefit analyses. It must also follow through on the commitment of successive Australian Governments to social inclusion and liveable communities. Further, examination of the terms "*greatest extent possible*" and "*without need for adaptation*" within the overarching policy concept of universal design necessitates the adoption of Option 3--Gold level.
- Given the ageing Australian population, the lack of progress in the last decade, and the societal cost on multiple levels due to this inaction, the NCC must go beyond the incremental approach that the housing industry might normally expect. Implementation of LHDG Gold level (Option 3) would achieve the practical implementation of COAG's commitment to social inclusion and contemporary world-class urban design and architecture.



## Response to the ABCB Accessible Housing Paper

This paper is the response by Australian Network for Universal Housing Design to the Options Paper as part of the ABCB Accessible Housing Project.

### Background

#### Australian Network for Universal Housing Design

The Australian Network for Universal Housing Design (ANUHD) is a national network of designers, builders, researchers and home occupants who believe that housing is a vital infrastructure which should respond to the Australians' current and future needs.

Since 2002, ANUHD has called for minimum access features for all new and extensively modified housing to be mandated in the National Construction Code. ANUHD considers that the Livable Housing Design Guidelines (LHDG)<sup>1</sup> Gold level should be the minimum level of access.

In 2009, ANUHD joined the National Dialogue on Universal Housing Design (See Appendix 1) in a bid to work collaboratively with the housing industry and community sector toward a voluntary approach. The National Dialogue's "*aspirational target that all new homes will be of an agreed Universal Housing Design standard by 2020 with interim targets to be set within that 10-year period*"<sup>2</sup> was endorsed by the Council of Australian Governments (COAG) as a key commitment in the 2010-2020 National Disability Strategy (NDS)<sup>3</sup>.

The "*agreed Universal Design standard*" was initially considered by the National Dialogue to be the Silver level of what is now known as the Livable Housing Design Guidelines<sup>1</sup>, which has three levels:

- **Silver Level**  
Focuses on the key structural and spatial elements that are critical to ensure future flexibility and adaptability of the home. Incorporating these features would avoid more costly home modification if required at a later date.
- **Gold Level**  
Provides for more generous dimensions for most of the core Livable housing design elements and introduces additional elements in areas such as the kitchen and bedroom.
- **Platinum Level**  
Some further enhanced requirements for the core Livable housing design elements plus all remaining elements.

By 2014, it was clear that the National Dialogue would not reach any of its interim targets. Counter to the recommendation by the National Dialogue for regular progress reviews<sup>2</sup> no action was taken by COAG<sup>4</sup> or the housing industry.

In 2015, ANUHD did its own review<sup>5</sup>, and alerted COAG members (including its Building Ministers' Forum) and the National Dialogue that, without government intervention, less than 5% of the aspirational target would be met.

The planned industry-led voluntary approach to provide accessibility in all new housing, failed swiftly and spectacularly, despite the support by COAG and the National Dialogue’s rhetoric of transparency and accountability.

In 2017, the Building Ministers’ Forum (BMF) directed that “*a national Regulatory Impact Assessment (RIA) be undertaken as soon as possible to consider applying a minimum accessibility standard for private dwellings in Australia*”<sup>6</sup> and “*the RIA will examine the silver and gold performance levels as options for a minimum accessible standard; use a sensitivity approach; and be informed by appropriate case studies*”<sup>7</sup>.

### **ABCB Accessible Housing Project**

The Accessible Housing Project (the Project) is the outcome of this directive. The Project will undertake a Regulatory Impact Assessment (RIA) of options for potential minimum accessibility standards for housing, to be applied through the National Construction Code (NCC).

The Options Paper and consultations are the first step.

#### **Definition of accessibility**

The Options paper defines accessible housing as “*any housing that includes features to enable use by people either with a disability or through their life stages*”. ANUHD endorses ABCB’s intent behind using the term “accessible”. This definition supports the International Organization for Standardization (ISO) definition of accessibility, that is: “*the extent to which products, systems, services, environments and facilities can be used by people from a population with the widest range of user needs, characteristics and capabilities to achieve identified goals in identified contexts of use*”<sup>a</sup>.

The RIA will consider the Livable Housing Design Guidelines (LHDG) Silver and Gold level specifications as possible options for a minimum accessibility standard, and additional options identified through consultation. The LDHG and the NDS use the concept of universal design to define accessibility, that is: “*design that allows everyone, to the greatest extent possible, and regardless of age or disability, to use buildings . . . without the need for specialised or adapted features*”<sup>10</sup>.

#### **Purview of the Options Paper**

The Project will cover Class 1a and Class 2 dwellings.

Currently the NCC does not set any accessibility requirements for Class 1a buildings (houses, townhouses, row houses, etc).

For Class 2 buildings (apartment buildings), the NCC requires an accessible path of travel to the door of each individual apartment on at least one floor, as well as to and within at least one of each type of room or space provided as part of the common areas of the building. Also, where a ramp or passenger lift is installed, the accessible path of travel must reach the entrance door of each apartment and any common areas, served by the lift or ramp. However, there are no accessibility requirements applicable to the entry or internal parts of individual apartments within a Class 2 building<sup>8</sup>.

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<sup>a</sup> Source: ISO 9241-112:2017 3.15



## Questions raised by ANUHD members

ANUHD welcomes the first stage of the Project, the Options Paper, which, in our view, fails to sufficiently answer the following questions:

1. What is the policy that drives the Project?
2. Who needs accessible housing?
3. What gets in the way of building accessible housing?
4. How urgent is the problem?
5. What level of access is necessary?

ANUHD offers its response to the Options Paper by exploring these questions and thereby providing its position.

### 1. What is the policy that drives the Project?

ANUHD considers that the policy drivers for the Options Paper should be fully described.

#### **Intergovernmental agreement for ABCB**

As agreed by the BMF<sup>9</sup>, the Options Paper outlines the policy parameters to be used for the analysis on the potential inclusion of a minimum necessary accessibility standard for all new housing in the NCC as:

1. Safety and health; amenity and accessibility; and sustainability as the primary objectives of the NCC.
2. NCC technical requirements will be the minimum necessary to achieve these objectives.
3. The analysis will also take into consideration other relevant policy objectives, such as the 2010-2020 National Disability Strategy (NDS)<sup>3</sup>, enabling ageing in place, reducing social exclusion and reducing the costs of providing specialist accommodation.
4. The NCC requirements will be capable of being applied to all new dwellings, variations in costings for which will be tested through the Regulation Impact Analysis (RIA) (note: the concept of a quota is a planning construct not regulated through the NCC). Variations in application will also be tested through the analysis.

Point 3 deserves further discussion, as follows:

#### **National Disability Strategy**

The 2010-2020 National Disability Strategy (NDS)<sup>3</sup> provides a clear social policy framework:

##### **Universal design**

An overarching concept in the NDS is universal design<sup>10</sup>: “*The design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or speciali[s]ed design*”<sup>10</sup>. The NDS explains:

*Universal design assists everyone, not just people with disability. For example, wider doorways are better for people with prams . . . As the population ages, the incidence of disability will increase, and universal design will become even more important. (p. 30)*

### **Improved provision of accessible and well-designed housing**

The NDS<sup>3</sup> sets out a ten-year national plan for improving life for Australians with disability, their families and carers. It includes, among other things, policy towards achieving inclusive and accessible communities.

Outcome 1 is “People with disability live in accessible and well-designed communities with opportunity for full inclusion in social, economic, sporting and cultural life”, with Policy Direction 2 as “**Improved accessibility of the built and natural environment through planning and regulatory systems, maximising the participation and inclusion of every member of the community**” and Policy Direction 3 as “**Improved provision of accessible and well-designed housing with choice for people with disability about where they live.**” (p. 34)

Outcome 3 is “People with disability, their families and carers have economic security, enabling them to plan for the future and exercise choice and control over their lives”, with Policy Direction 3 as “**Improve access to housing options that are affordable and provide security of tenure.**”

*The NDS promotes housing design that ensures a more open community for people with disability, greater choice for people about where they live, and who they visit. (p. 45)*

### **Ageing in place**

By 2050, over 3.5 million Australians will access aged care each year with around 80 per cent of the services delivered in people’s homes and local communities<sup>11</sup>. For the last two decades, successive Commonwealth and State governments have pursued a general policy direction of ‘ageing in place’. This and other issues have led to a greater emphasis on keeping elderly and frail people in their home or family settings for as long as possible via the provision of home care services<sup>12</sup>.

### **Excellence in urban design**

In 2011, COAG<sup>13</sup> agreed to undertake reforms in capital city strategic planning systems “to ensure Australian cities are globally competitive, productive, sustainable, liveable and socially inclusive and are well placed to meet future challenges and growth”. There are nine criteria listed in the COAG agreement. Among these are commitments “to encourage world-class urban design and architecture” and to “address nationally-significant policy issues including . . . social inclusion and liveability”. The criteria are listed in Appendix 2 hereto.

The call for regulation of accessibility in new housing is underpinned by several national policies with significant financial investment, which, in turn, support the Australian Government’s commitment to social inclusion.

## **2. Who needs accessible housing?**

Most people live in households in the community. Currently, 36% of households have a person with disability (including older people) yet accessibility is needed by a much broader cohort. Disability impacts on the household, especially carers, who are mainly women and children. Eighty percent of older people and people with disability rely on

informal support from family, friends and neighbours. Pregnant women, parent with prams, toddlers, and people with illness or injuries also need accessible housing.

Not only do we live in our own homes, we change our homes and we visit other people's homes as part of participating in family and community life. This means we must consider the access needs of dwellings throughout their life-cycle, as part of our urban infrastructure, rather than just as an item to build and sell.

### **Most people live in the community in regular housing.**

Of the nearly 23 million people in Australia, 4.1 million people (or 18.5% of the population) identify they have a disability<sup>4</sup>. Forty per cent of people with disability are over 65 years<sup>5</sup>. Most people live in the community with only 184,000 people (0.8% of the population) living in some form of specialist accommodation<sup>14</sup>.

### **The presence of disability impacts on the whole household.**

- Although disability affects 18.5% of people directly, around 36% (or 3.1 million) of households have a person with disability living within them.
- Around half of those households (or 17.5% of all Australian households) also house a carer, with the other half (or 18.5% of all households) where the person with disability lives without a carer<sup>14</sup>.
- Most carers are female and are likely to be partners or parents of the person requiring support. Almost 75,000 carers are aged less than 15 years old. Around one third of primary carers have a disability themselves<sup>5</sup>.

### **Households with a person with disability are likely to be poorer**

- The presence of disability in a household affects the income of both the person with disability and other family members. Carers are more likely than non-carers to have significantly lower household incomes.
- Only about half (53%) of people between 15 and 65 years who have a disability are represented in the workforce; therefore, most are more likely to be chronically poor.
- Many older people own their homes before they acquire a disability and have accumulated other assets which can be used in retirement to support living standards. Most rely on a government pension, so, although they may be asset rich, they are likely to be income poor<sup>32</sup>.

### **Most people rely on informal networks of support**

- Although there are significant reforms for support services for both younger people with disability and older people, only 20% receive formal paid services for support.
- The others (80%) rely on informal networks of support, such as family, friends and neighbours.

### **One in three households are renting**

Limiting the discussion to home-owners is erroneous, because nearly one in three households in rental properties. Most low to middle income households in private tenancies are in housing stress<sup>15</sup>. When renters need access features, they have three

issues to overcome. The first is that most rental housing is inaccessible, the second is that most landlords are reluctant to have their properties modified<sup>16</sup>, even though, by law, they must allow for reasonable modifications<sup>17</sup>; and the third is that the tenant must pay for these modifications and then pay again to have them removed when vacating the property<sup>17</sup>.

Social rental housing goes some way to respond to this housing need; however, social housing stock has not kept pace with growth in either the overall national dwelling stock or the number of households<sup>18</sup>. Thus, many of Australia's most vulnerable and poor households are being forced to live in dwellings that are unsuitable for them with resultant negative impacts on wellbeing, health and independence<sup>19</sup>.

### **Most dwellings will need to be accessible**

Research undertaken in the USA suggests that there is a 60% probability that a newly built single-family detached unit will house at least one person with a disability (defined as mobility impairments) during its expected lifetime. If the needs of visitors are considered, the figure rises to 91%<sup>20,21</sup>. Although there is no equivalent research specific to Australia, our demographic data match those of the USA<sup>22</sup> and suggest these findings should be considered as pertinent and significant to this Options Paper.

Given the current demographics and the anticipated changes in the next 30 years, the vast majority of new housing will need to be accessible during its expected lifetime, if the needs of both residents and visitors through the dwelling's life-cycle are to be taken into account.

## **3. What gets in the way of building accessible housing?**

### **Lack of action to obtain accurate data on need or demand**

ANUHD acknowledges the problem identified in the Options Paper that the lack of the available data suggests that "*current estimates are not necessarily a reliable indicator of the extent of accessible housing availability or underlying unmet demand for accessibility features in housing*" (p. 10)<sup>8</sup>. This problem was recognised by the National Dialogue and COAG since at least 2010<sup>2</sup>, and yet no action was taken.

In 2010 the National Dialogue<sup>2</sup> advised that:

*A series of ongoing reviews be undertaken at two to three-year intervals across the 10-year period. The review should look at the level of voluntary uptake of the Livable Home Design Guidelines by all sectors – residential building and property, aged care, public and social housing - and the level of consumer demand for these features.*

*These reviews, the first of which is recommended to commence in 2013, should identify areas of successful application, any barriers to uptake, and whether there is a need for other incentives or measures to stimulate adoption of Universal Housing Design principles. (p. 7)*

In 2015, ANUHD/RIA's report on the lack of progress of the National Dialogue agreement<sup>5</sup> anticipated that the voluntary approach would achieve less than 5% of the 2020 target. Yet, the NDS implementation plans and reports, *Laying the Groundwork 2011-2014*<sup>4</sup>, *Driving Action 2015-2018*<sup>23</sup> and the Attorney-General's draft Combined Second and Third

Periodic Report in 2018<sup>24</sup> omitted any action to review progress against the National Dialogue’s interim targets. This lack of action serves to question whether *the extent of accessible housing availability or underlying unmet demand for accessibility features in housing*” was in the interests of the National Dialogue, the housing industry or COAG at the time.

### **Logics of the housing industry regarding new accessible housing**

The unreleased report by Jaguar Consulting, referred to in the Options Paper (p. 11), provides a simplistic view on the voluntary provision of accessible housing through market forces. More recent research on the logics of the housing industry by Bringolf<sup>25</sup>, Dalton<sup>26,27</sup> and Ward<sup>28</sup> describe a far more complex and interconnected housing industry over which buyers have little or no influence.

Most Class 2 dwellings and volume-built Class 1a dwellings are designed long before the buyer comes along, and variations beyond minor cosmetic changes are discouraged by exorbitant charges<sup>26</sup>. Most speculative builders cite tight profit margins and understandably avoid one-off changes to the structure or layout that might result in unforeseen costs or time delays. Due to the interconnectedness of the many contractors in residential construction, a seemingly minor change by one contractor can impact on others causing a domino effect of cost and delay<sup>25,27</sup>.

Most features in the Livable Housing Design guidelines are part of current building practice (such as, step-free showers, open living spaces); however, they are rarely provided *reliably or in sequence*—they do not provide a coherent path of travel (for example, a dwelling might have a wide front door but have steps leading up to that doorway, or a dwelling might have an accessible bathroom but with a door to the bathroom that is too narrow to allow wheelchair access to that bathroom)<sup>28</sup>.

From time to time, housing industry leaders identify retrofitting of existing housing as an important growth area in the sector<sup>29</sup>. There is some concern within the industry that building accessible new homes would disadvantage the growing home modifications market. The reality is that bespoke changes will be needed for even the most accessible dwelling, and the better the initial design, the easier and more likely it is that these changes will be made.

One of the Housing Industry’ Association (HIA)’s arguments against regulation is that *“the overwhelming majority of private homes will not be used, now or in the future, by people requiring wheel chairs”*<sup>30</sup>. This is true in the narrow sense that, because nearly all existing private homes are inaccessible, they will not be used by people requiring wheelchairs. The HIA states that there are already accessibility requirements for specialist accommodation, by implication suggesting that those people who use wheelchairs live in specialist accommodation and nowhere else.

### **The logics of potential buyers of new accessible housing**

Older people should be potential buyers of accessible housing, given their high incidence of home-ownership; however, many people wish to remain in their existing housing and communities for as long as possible. As the design of most housing does not cater for the ageing process, investment in modifications is often the preferred solution over buying a new dwelling<sup>31</sup>.

Another potential buyer group, families of younger people with disability, typically move to a new house less frequently than other families. Once these families obtain appropriately-designed housing, with access to suitable transport, employment, and support services, they prefer to “stay put”<sup>32</sup>.

Investors in private rental housing generally do not consider people with disability as preferred tenants, nor are they willing to pay extra for the changes necessary to provide accessibility<sup>32,33</sup>.

Imminent retirees, or “baby-boomers”, typically want to stay in the community, live well and for a long time<sup>34</sup>, but they are yet to show signs of planning for the realities of old age, illness or disability; caring for an ageing or ill partner; or for the costs of home modifications that may be necessary<sup>35</sup>. Noted earlier, this cohort are likely to be asset rich and income poor and therefore limited in their ability to modify when they need to do so.

While buyers generally have been found to accept features for the common good, they want these added features to be included unobtrusively at no extra cost and without fuss, as normal inclusions<sup>36</sup>. Individual buyers balk at taking responsibility for these ‘common good’ features, as added extras, particularly if there are no evident immediate and personal benefits to them.

### **Issues in relying on market forces**

Issues that emerge due to a reliance on market forces, namely, lack of building knowledge by consumers and under supply of “spill-over benefits” are well-known to the Australian Building Codes Board<sup>37</sup> and should be considered in the RIA.

Lack of building knowledge is of particular concern for purchasers of housing. Most people are infrequent buyers and do not build up experience of the market. Without an access standard as part of the NCC requiring certification, the buyer, and indeed later residents, of a dwelling cannot be sure that the building in fact meets the specifications they think they are paying for<sup>37</sup>. Further, these same people have been found to undertake or manage modifications themselves for many reasons; including maintaining control over cost and keeping a personal look in their homes. However, this same lack of information around products and building techniques often leads to poor results<sup>38</sup>.

“Spill-over” benefits refer to features that are included over and above the minimum standard for the common good (in this case, access features). They may not immediately benefit the original buyer but are likely to benefit future residents who do not have to pay for them. As noted above, the speculative housing industry cannot fully recoup their value in the market place and thus, they tend not to provide them.

### **Lack of a national housing strategy**

These logics sit within a broader housing policy vacuum. There has been consistent national policy failure, with a mix of poor leadership, missed opportunities, and lack of vision about the long-term benefits of secure, affordable and appropriate housing. The additional factor of reticence from within the housing industry, has led to efforts at reform, such as the National Dialogue, being piecemeal, short term and generally ineffective. This grim housing policy scenario together with the economic and social disadvantage experienced by people needing accessibility in their housing has led to their over-

representation in social housing, their higher rate of falling out of home-ownership and their suffering greater housing stress than most Australians<sup>39</sup>.

### **Lack of cross-sector policy collaboration**

The significant national policy investment in the social inclusion of people with disability and older people has not been matched by similar policy in the housing sector. This gap is recognised in research<sup>16,40-42</sup> and puts the Accessible Housing Project on notice that cross-sector consultation and collaboration is a priority.

The barriers to the voluntary provision of accessible housing cannot be simplistically ascribed to a lack of demand. The barriers are varied and complex and are inextricably tied to how the current housing market works, and the powerlessness of those people who most need accessibility.

## **4. How urgent is the problem?**

As noted earlier, the NDS has a 10-year timeline from 2010-2020 with a commitment to support the National Dialogue's aspirational target that all new homes will be of agreed universal design standards by 2020<sup>1</sup>. While there is some debate on the term "aspirational", a reasonable assumption can be made that a serious and intentional effort would be made.

Noted earlier, by 2015, COAG was advised that, without government intervention, less than 5% of the aspirational target would be met<sup>5</sup>. In 2017, the BMF agreed that "*a national Regulatory Impact Assessment (RIA) be undertaken as soon as possible to consider applying a minimum accessibility standard for private dwellings in Australia*"<sup>6</sup> and "*the RIA will examine the silver and gold performance levels as options for a minimum accessible standard; use a sensitivity approach; and be informed by appropriate case studies*"<sup>7</sup>.

### **Evidence of the need for regulation**

Before the National Dialogue and the NDS, researchers identified a serious unmet demand for accessible housing, and the need for regulation of accessibility in new housing construction:

- Australian Housing and Urban Research Institute (AHURI)'s 2008 report, 'The role of home maintenance and modification services in achieving health, community care and housing outcomes in later life'<sup>33</sup>, identified that policies designed to require or encourage a universal housing design would, over time, reduce the need for major modifications to accommodate the needs of older people.
- AHURI's 2009 report, '21st century housing careers and Australia's housing future'<sup>32</sup>, concludes that: "*health and wellbeing are now a significant influence on the housing transitions of many Australian households. Importantly, whereas the home was a place for the provision and care of children in the latter part of the 20th Century, in the 21st century it will take on a considerable role in the provision of care for adults*".
- A third of the submissions from people with disability and their families to the 2009 'Shut Out Report: The experience of people with disabilities and their families in Australia'<sup>43</sup>, raised the lack of choice in housing as an issue.

- The Australian Government’s Disability Investment Group’s report, ‘The way forward: A new disability policy framework for Australia’<sup>44</sup> recommended in 2009 “*that regulations for accessible and adaptable housing standards be strengthened*”. It states that urgent government action is needed as voluntary building standards for accessible and adaptable housing have failed to ensure that most new dwellings are suitable for people with disability, despite the predicted rapid increase in the proportion of the population with disability over the next 40 years.
- People with Disability Australia’s 2010 report, ‘Accommodating human rights: a human rights perspective on housing, and housing and support for persons with disability’<sup>45</sup>, noted that “*building regulation has failed to ensure that domestic housing is designed and built in ways that accommodate the accessibility requirements of persons with physical impairments.*”
- The Productivity Commission’s report in 2011, ‘Caring for older Australians’<sup>46</sup> identified the lack of accessible housing as a key barrier for people to remain in their own homes. “*Access standards in building regulations have not been developed specifically for residential dwellings or been based on the characteristics of people 65 and older.*”
- As early as 2012 the Grattan Institute<sup>47</sup> advised that “*the need for accessible housing was great and the voluntary initiative needed to be monitored: Every year that their implementation is delayed tens of thousands of new homes in growth areas will be built without accessibility and adaptability*”. It recommended regulation if the National Dialogue failed.

Despite the lack of comprehensive quantifiable data or the political will to collect them, there is ample evidence on the need for accessible housing, including the need to mandate it without delay.

## 5. What level of access is necessary?

The definition of universal design<sup>10</sup>: “*design that allows everyone, to the greatest extent possible, and regardless of age or disability, to use buildings . . . without the need for specialised or adapted features*”, raises two questions:

1. What do we mean by the “***greatest extent possible***”, when we talk about inclusion of all people?
2. What do we mean by “***without the need for adaptation***”, when there is such a diversity of needs, and these needs change over time?

### “**Greatest extent possible**”

It is useful to consider mandated accessibility in housing as being analogous to mandating seatbelts in cars. We think we will never need them—we forget they are even there. Yet, we are grateful at that moment when we need them—to the extent that they will lessen significant disruption, injury and cost, and even save our lives. The benefits of such safeguarding mechanisms go beyond the individual. It extends to our families and friends, to acute and ongoing health and welfare support, and to the broader economy that retains our continuing participation as tax payers and citizens.



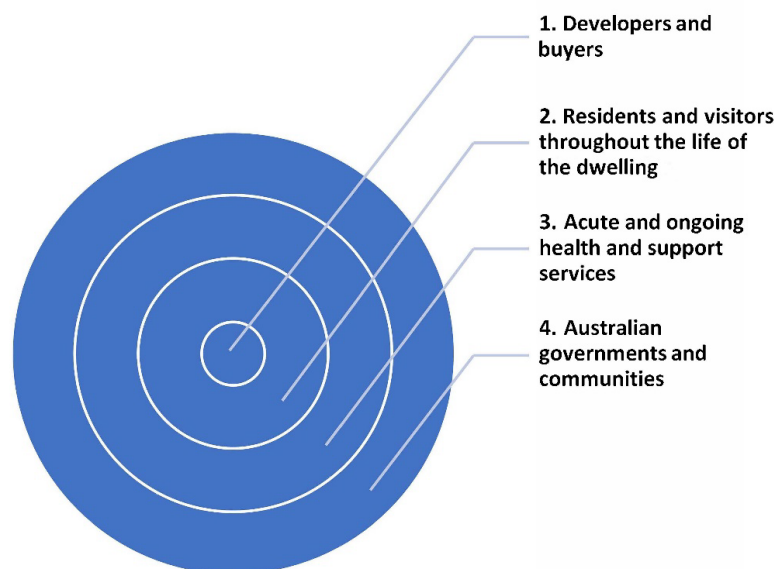
It follows that there is a public interest in the design of housing, typically considered to be a private matter between the developer and the buyer. In this context, there is a public interest in preventing housing which, intentionally or unintentionally:

- excludes and marginalises people, and denies communities of their social and economic participation;
- incurs avoidable costs for future users of health and support services.
- directly increases the demand for government housing assistance, in the form of specialised accommodation, accessible social housing, and home modifications assistance; and
- frustrates the attainment of COAG’s objective to build communities that are *“globally competitive, productive, sustainable, liveable and socially inclusive and are well placed to meet future challenges and growth”*<sup>13</sup>.

ANUHD notes that the preliminary costs outlined in the Options Paper do not form part of any regulatory impact assessment at this stage. This is important as our rationale for LHDG Gold level (Options 3) encompasses much more than the initial cost of access features in a dwelling, as outlined in the Options Paper.

The Office of Best Practice Regulations calls for a regulatory impact assessment cost/benefit analysis to *“involve a systematic evaluation of the impacts of a proposal, accounting for all the effects on the community and economy—not just the immediate or direct effects, financial effects or effects on one group”*<sup>48</sup> (p. 14). When identifying the costs and benefits of a mandated solution to provide access to the greatest extent possible, four levels of cost/benefits should be considered:

1. **Developers and buyers** of new housing construction (the costs and benefits at the point of first sale)
2. **Residents and visitors throughout the life of the dwelling** and the industries providing home modifications and home-based assistive technology (the costs and benefits during the life-cycle of the dwelling)
3. **Acute and ongoing health and support services**, including hospitals, in-home care providers, and providers of alternative specialist residential care (the costs and benefits for allied service providers and their funders as a consequence of inaccessibility in housing)
4. **Australian governments and communities** in normalising the presence of a wider range of people being included and participating in family and community life (the costs for Australian society in the resultant exclusion (such as, increased demand on social housing and income support) or inclusion of households in society and the benefits of their inclusion (more citizens are employed or participating in their local community)). See Figure 1 below.



**Figure 1 Related levels of impact**

The most comprehensive cost/benefit analyses in the last 20 years have been the PDA Hill Adaptable Housing Study for the NSW Government<sup>49</sup> and the Victorian Government Regulatory Impact Statement (RIS)<sup>50</sup>.

The PDA Hill study in 1999 was the first of the two cost/benefit analyses. It conservatively anticipated future government investment in aged and disability support and included costs and benefits in 1, 2 and 3. It also recognised there were unquantifiable impacts:

*Although difficult to measure, the quality of life benefits to someone who finds that he or she can live more independently or comfortably, or who can remain at home longer even if support needs have changed, should not be underestimated. (p. 33)*

In 2009, the Victorian RIS also focused on 1, 2 and 3 and recognised there were unquantifiable benefits. It states:

*This estimate excludes the unquantified benefits of reductions in hospital stays, greater safety and amenity, better quality homes and ageing in place. This estimate also excludes unquantifiable participation benefits. Taking into consideration the unquantified benefits, and in particular the unquantifiable participation and equity benefits. (pp. 6-7)*

Both studies concluded that these benefits would outweigh the costs and recommended mandated a minimum level of access in all new housing through building legislation.

Three policy trends support consideration of a higher level of access due to increased financial commitments and pressures on government:

### **NDIS insurance model**

Replacing the welfare model of funding, the NDIS has adopted an insurance-based approach, informed by actuarial analysis, to the provision and funding of supports for people with disability. This means transforming from short-term welfare thinking to a notion of shared risk, long-term analysis and early intervention<sup>46</sup>. The funding in this area has effectively doubled with more than twice the number of recipients.

### Ageing in place

In 2018, dementia is estimated to cost Australia more than \$15 billion. By 2025, the total cost of dementia is predicted to increase to more than \$18.7 billion in today’s dollars, and by 2056, to more than \$36.8 billion. Dementia is the single greatest cause of disability in older Australians (aged 65 years or older) and the third leading cause of disability overall<sup>b</sup>.

The Aged Care Reforms are focused on the wellbeing of older people, promoting their independence, giving them choice and retaining their community engagement<sup>51</sup>. Maintaining older people at home within their informal networks will be the key cost saving strategy.

### Avoiding hospital stays

Recognising that the current state hospital systems do not have the capacity to meet the demands, particularly of the ageing population, there is an increasing move to meet health care needs by developing admission avoidance, and early discharge models of care. This has been supported by an increasing consumer demand for more choice in health care delivery, coupled with advances in technology and pharmaceuticals that enable alternate care options<sup>52</sup>.

### “Without need for adaptation”

#### Costs of retrofitting

Designing for absolutely everyone is nigh impossible. People are diverse in their needs and these needs change over time. It is useful, therefore, to consider what is cheap to change in existing inaccessible dwellings and what is expensive to retrofit to these dwellings. A dwelling can be considered in three main parts:

Element of the dwelling		Ease of retro-fitting
<b>Priority 1. Structure</b>	Layout of rooms, levels, corridors and doorways	These take large outlays and months to modify
<b>Priority 2. Fit-out</b>	Cupboards, shelves, benches, doorhandles, light switches, grabrails, taps, hand-held showerheads	These can be done in a day
<b>Priority 3. Add-ons</b>	Non-slip mats, shower chairs, brighter lighting	These can be sourced easily and cheaply

It follows that when considering a mandated level of access, **the first priority is the structure of a dwelling**, that is, access to the dwelling, the entry level, stairs, the width of door openings, corridor widths, layouts of essential rooms and reinforcement in walls for grabrails, to allow for anyone to visit and stay.

The **second priority** is the fit-out; that is, cupboards and benches, light switches and grabrails. Many of these can be designed and easily adapted for individual needs and

<sup>b</sup> Figures are from Dementia Australia.

more independent use of the dwelling, and do not prevent a person from living in or visiting the dwelling.

The **third priority** is the add-ins, which can be purchased and installed by the resident.

Clearly, if features in the second or third category contribute to “the safety and health; amenity and accessibility; and sustainability”<sup>9</sup> of a dwelling at no cost (such as, lever handles, switches at 900-1200mm height), their inclusion should be mandated.

ANUHD considers window fittings that are easy to reach, and access to private recreational external spaces at entry level should be added to the features that are prescribed in the Option 3–LHDG Gold level.

### **The context in considering the initial cost in providing access features**

In recent decades, four broad changes in the design of Class1a housing have occurred:

1. Increased average size of houses
2. Smaller lot sizes
3. Increased complexity of house design
4. Increased number of house models in volume builders’ catalogues.

This has occurred as household sizes have decreased<sup>27</sup>. It follows that there are fashion features (such as, butler’s pantries, media rooms and walk-in robes) that are beyond meeting basic housing need. The Options Paper should compare the added cost of these fashion items in relation to the initial cost of access features.

At the other end of the scale, there has been concern by governments about the minimisation of apartment (Class 2) sizes , which has led to decreased liveability. Governments have taken positive steps to define design priorities for the public interest<sup>53,54</sup>.

In Britain, where housing is much smaller, the Lifetime Homes Standards<sup>55</sup> (LHS) can be achieved with a minimal increase to most dwelling sizes<sup>56</sup>. The report concludes that functional requirements of Lifetime Homes Standards are not always easily achievable as an afterthought, however, by designing from first principles, the overall cost and the increase in base area are significantly reduced. Nearly two decades after Britain mandated access features in new housing, the City of London with other constituencies have opted for a higher level of access “*to provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children*”<sup>57</sup> (p. 26).

In deference to the ABCB process, ANUHD has responded to the Options Paper questionnaire in Appendix 3.

Previous cost/benefit analyses in Australia have concluded that accessibility should be mandated to at least the equivalent of the LHA Silver level. These findings should now be extrapolated to take in Australia’s policy commitments to social inclusion and the significant financial investment that accompanies them. Examination of the terms “greatest extent possible” and “without need for adaptation” within the overarching policy concept of universal design justifies the adoption of Option 3–LHDG Gold level.

## Conclusion

The argument for mandating at the LHDG gold level (Option 3) is compelling. Given the decade of delay, the wide impact that accessibility in housing has on society, and the ageing of Australia, the NCC must go beyond the minimal approach that the housing industry might expect. It must adopt COAG's commitment to social inclusion and contemporary world-class urban design and architecture and implement Option 3.



## Appendix 1. National Dialogue on Universal Housing Design

In late 2009, the former Parliamentary Secretary for Disabilities and Children Services, Bill Shorten, convened the National Dialogue on Universal Housing Design, bringing together representatives from all levels of government, and key stakeholder groups from the ageing, disability and community support sectors and the residential building and property industry.

The members of the National Dialogue are:

- Australian Human Rights Commission
- Australian Institute of Architects
- Australian Local Government Association
- Australian Network for Universal Housing Design
- COTA Australia
- Grocon
- Housing Industry Association
- Lend Lease
- Master Builders Australia
- National People with Disabilities and Carers Council
- office of the Disability Council of NSW
- Property Council of Australia
- Real Estate Institute of Australia
- Stockland

The National Dialogue members recognise that achieving the outcomes set out in this Strategic Plan will rely on the ongoing cooperation and contribution of the members and all levels of government over the next ten years.

Note - the members of the National Dialogue have been provided secretariat supported by the Department of Families, Housing, Community Services and Indigenous Affairs. The Department of Industry, Innovation, Science and Research and the Australian Building Codes Board have acted as observers to the Dialogue given the discussion around developing guidelines. The Department of Planning and Community Development and the Building Commission, Victoria have provided technical advice on the guidelines.

For more information go to the [Commonwealth Department of Social Services website](#).

## Appendix 2. COAG's National objective and criteria for capital cities

### Objective

To ensure Australian cities are globally competitive, productive, sustainable, liveable, socially inclusive and well placed to meet future challenges and growth.

### Criteria

Capital city strategic planning systems should:

1. Be integrated across:
  - a) functions, including land-use and transport planning, economic and infrastructure development, environmental assessment and urban development;
  - b) government agencies.
2. Provide for a consistent hierarchy of future oriented and publicly available plans, including:
  - a) long-term (for example, 15 to 30 years) integrated strategic plans;
  - b) medium-term (for example, five to 15 years) prioritised infrastructure and land-use plans;
  - c) near-term prioritised infrastructure project pipeline backed by appropriately detailed project plans.
3. Provide for nationally-significant economic infrastructure (both new and upgrade of existing) including:
  - a) transport corridors;
  - b) international gateways;
  - c) intermodal connections;
  - d) major communications and utilities infrastructure;
  - e) reservation of appropriate lands to support future expansion.
4. Address nationally-significant policy issues including:
  - a) population growth and demographic change;
  - b) productivity and global competitiveness;
  - c) climate change mitigation and adaptation;
  - d) efficient development and use of existing and new infrastructure and other public assets;
  - e) connectivity of people to jobs and businesses to markets;
  - f) development of major urban corridors;
  - g) social inclusion;
  - h) health, liveability and community wellbeing;
  - i) housing affordability;
  - j) matters of national environmental significance.
5. Consider and strengthen the networks between capital cities and major regional centres, and other important domestic and international connections.
6. Provide for planned, sequenced and evidence-based land release and an appropriate balance of infill and greenfield development.
7. Clearly identify priorities for investment and policy effort by governments, and provide an effective framework for private sector investment and innovation.
8. Encourage world-class urban design and architecture.
9. Provide effective implementation arrangements and supporting mechanisms, including:
  - a) clear accountabilities, timelines and appropriate performance measures;



ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
Response by Australian Network for Universal Housing Design

10. coordination between all three levels of government, with opportunities for Australian Government and Local Government input, and linked, streamlined and efficient approval processes including under the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999*;
- b) evaluation and review cycles that support the need for balance between flexibility and certainty, including trigger points that identify the need for change in policy settings;
- c) appropriate consultation and engagement with external stakeholders, experts and the wider community

### Appendix 3. ANUHD's response to the Options Paper questionnaire

**Name:** Australian Network for Universal Housing Design

**State / Territory:** National

**Telephone number:** 0409 898498

**Email or postal address:** [anuhd@anuhd.org](mailto:anuhd@anuhd.org)

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#### General Questions

1. Are you participating in this consultation as an individual or on behalf of an organisation or business (tick one as appropriate)?

Individual

Organisation

Business

*If you have ticked 'business' or 'organisation' above, please skip to question 8.*

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*Note: only answer questions 8 to 10 if you are responding on behalf of a business or organisation.*

8. Which of the following best describes your organisation or business (tick one as appropriate)?

Developer

Building / Construction

Architect / Designer

Disability or accessible housing advocate

Government

Other (please specify) *Click here to enter text.*

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#### Questions about the Objective

Note: the objective is discussed on pages 13-14.

11. The Objective is that people have access to housing with a minimum level of accessibility features necessary, across a greater choice of accommodation options. Do you agree with the Objective? If you do not agree with the Objective, please provide reasons and possible alternatives.

ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
Response by Australian Network for Universal Housing Design

The Objective is too narrow. It needs to take into account the four levels of impact (see p. 17-18), That is, not just the residents. Visitors, allied services and government commitments to inclusion all need to be taken into account.

12. The 'Objective' section of the Options Paper described three considerations as relevant to the setting of an accessibility standard. To what extent do you agree or disagree that each of these considerations is relevant

*Tick one box in each row in the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.*

Statement	1	2	3	4	5
That a clear definition of 'accessibility' is agreed upon at an early stage.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
That any specification adopted addresses accessibility features that are essential, not just desirable or best practice, to meet that agreed definition.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
That such a specification is applied in a way that achieves a positive cost benefit to home buyers and the community.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. What other considerations do you consider relevant to the Objective (if any)?

See the Sections on What is the policy that drives the Project?, Who needs accessible housing?, What gets in the way of building accessible housing?, How urgent is the problem? And What level of access is necessary?

14. The Building Ministers' Forum (BMF) has provided direction that the Liveable Housing Design Guidelines (LHDG) Silver and Gold Levels be considered as the basis for a minimum accessibility standard. To what extent do you agree or disagree that the LHDG are appropriate to meet the Objective?

*Tick one box in the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.*

Statement	1	2	3	4	5
The LHDG are appropriate to meet the Objective.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment: There are added features that should be and could be easily considered. (See Section: What level of access is necessary?)

15. What other options might meet the Objective more effectively or efficiently?

Option 3–Gold level to be regulated within the NCC for all new housing (Class 1a and Class 2).

16. To what extent do you agree or disagree that the primary focus should be on addressing mobility-related issues?

*Tick one box in the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.*

Statement	1	2	3	4	5
The primary focus should be on addressing mobility-related issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment: If you can't get into the dwelling and go to the bathroom safely, nothing else matters.

17. What issues other than mobility should be in-scope (if any)?

See the framework to consider priorities on p. 199

### Questions about the Options

Note: some possible options for an accessibility standard for housing are discussed in the section titled '**Possible Options for NCC Amendment**'.

18. The Options Paper described three possible options for National Construction Code (NCC) amendment. Which of these, if any, is your preferred option as a minimum standard for new residential housing (tick one as appropriate)?

Option 1 – LHDG Silver Level (5 Elements)

Option 2 – LHDG Silver Level (7 Elements)

Option 3 – LHDG Gold Level (12 Elements)

Other (please specify): *Click here to enter text.*

No change to the NCC

19. Please expand on the reason for your answer to question 18.

See our rationale in the Section: What level of access is necessary?

20. The Options Paper discussed 12 Performance Requirements from the LHDG. Please indicate whether you agree or disagree that these requirements should be the minimum standard for all new residential housing?

*Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.*

ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
 Response by Australian Network for Universal Housing Design

Performance Requirement	1	2	3	4	5
A safe, continuous, step-free pathway from the street entrance and/or parking area to a dwelling entrance that is level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
At least one level (step-free) entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Internal doors and corridors that facilitate comfortable and unimpeded movement between spaces.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The ground (or entry) level has a toilet to support easy access for home occupants and visitors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The bathroom and shower are designed for easy and independent access for all home occupants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bathroom and toilet walls are built to enable grabrails to be safely and economically installed (immediately or in the future).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Where installed, stairways are designed to reduce the likelihood of injury and also enable a safe pathway.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There is a space on the ground (or entry) level that can be used as a bedroom.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Light switches are located at heights that are easy to reach for all home occupants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
Response by Australian Network for Universal Housing Design

Performance Requirement	1	2	3	4	5
Occupants are able to easily and independently open and close doors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

21. What other Performance Requirements should be considered (if any)?

Window fittings that are easy to reach, access to private recreational external spaces at entry level

22: To what proportion of Class 1 (houses) and Class 2 (apartments) buildings should these features apply?

*Tick one box in each row of the table below.*

Building Class	None	Some	Half	Most	All
Class 1a buildings (houses)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Class 2 buildings (apartments)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

23. To what extent do you agree or disagree that the NCC should be modified to include minimum standards for accessible housing?

*Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.*

Statement	1	2	3	4	5
The primary focus should be on addressing mobility-related issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Questions about the Potential Benefits of Accessible Housing

These questions are about the potential benefits of setting a minimum accessibility standard for housing.

24. Please refer to your response at questions 20 and 21. If your response to that question was implemented, to what extent do you agree or disagree that the following benefits would be realised?

*Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.*

ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
Response by Australian Network for Universal Housing Design

Potential Benefit	1	2	3	4	5
Avoiding later costs of adaptation for occupants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reduced social isolation / increased 'visitability'	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to stay / age in home and community longer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Delayed / reduced use of specialist housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A greater choice of accommodation options	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

25. What other benefits, if any, would be realised from an increase in accessible housing?

Please refer to Section: What level of access is necessary?

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26. Over what time period would each of these benefits be realised?

*Tick one box in each row of the table below.*

Potential Benefit	Short term (1-10 years)	Medium term (11-20 years)	Long term (more than 20 years)	Never
Avoiding later costs of adaptation for occupants	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reduced social isolation / increased 'visitability'	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Ability to stay / age in home and community longer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Delayed / reduced use of specialist housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A greater choice of accommodation options	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

27. What factors may influence whether these benefits are realised?

Government policy and funding aimed at social inclusion and ageing in place

---

**Question about the Preliminary Costings**

These questions are about the preliminary cost estimates for accessible housing. These estimates are detail in the section titled ‘**Preliminary Costings—New Buildings**’.

28. Overall, in your opinion, how much do you agree or disagree that with the statements below?

*Tick one box in each row of the table below, where ‘1’ means ‘strongly disagree’ and ‘5’ means ‘strongly agree’.*

Statement	1	2	3	4	5
The methodology for estimating costs is appropriate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The estimated costs for each option are accurate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

29. Please expand on your responses to question 28?

The methodology is not properly explained. Without a clear understanding of what is included in the costs and benefits, this is difficult to answer.

30. What factors may influence if these costs will be realised?

*Click here to enter text.*

31. For each of the three Options, to what extent do you agree or disagree that the benefits of requiring an accessible housing standard outweigh the additional costs?

Option	1	2	3	4	5
Option 1 – LHDG Silver Level (5 Elements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Option 2 – LHDG Silver Level (7 Elements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Option 3 – LHDG Gold Level (12 Elements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment: ANUHD takes this position from the results of its survey in 2017-2018<sup>58</sup>.



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ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
Response by Australian Network for Universal Housing Design

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ABCB – ACCESSIBLE HOUSING OPTIONS PAPER – 2018  
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