

**SUBMISSION TO THE AUSTRALIAN BUILDING
CODES BOARD**

**ACCESSIBLE HOUSING
OPTIONS PAPER**

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Executive Summary

Shelter WA welcomes the opportunity to provide a submission in response to the Australian Building Codes Board (ABCB) Accessible Housing Project's Option Paper (the Option Paper).

The Option Paper provides a preliminary set of options and cost benefit analyses on the potential introduction and inclusion of a minimum standard for accessible housing enshrined in the National Construction Code (NCC).

Shelter WA welcomes the Options Paper, and the ongoing consultation as a long needed first step towards the regulation of standards for accessible and adaptable housing.

Shelter WA appreciates the effort to progress towards consistent regulatory measures for accessible housing due to the benefit to the society as a whole and urges for a timely implementation of standards that reflect the demographic change and community expectations now and into future.

“Many of the most important and persistent effects of the built environment reflect design, investment and regulation decisions by both the public and private sector many decades earlier”.ⁱ Therefore, the introduction and implementation of standards should go beyond a minimalist approach, as the majority of Australian households require homes that are fit for purpose and designed with safety, amenity, inclusion and accessibility in mind.

Shelter WA

Shelter WA is the independent peak body, based in Perth, Western Australia, that advocates for social and affordable housing and ending homelessness.

Our vision is that all people living in Western Australia have housing that enables them to thrive.

Shelter WA brings together a strong coalition committed to diverse, affordable housing choice for all, with a focus on housing for people on low to moderate incomes and groups that experience housing insecurity.

Shelter WA undertakes research and policy development, engagement, and advocacy to drive solutions to build an effective housing system and alleviate housing-related poverty.

Housing unlocks opportunity, enhances health and well-being, provides access to education and employment options. It enables people to fully participate in community life. We believe housing is a basic human right. Everybody has a right to a place to call home.

Our Vision: All people living in Western Australia have housing that enables them to thrive.

Introduction

The public policy debate on suitable housing for people with disabilities, not only as owners and tenants, but also as visitors has grown over the last couple of years. This is alongside the debate for the need to plan for our growing ageing society, that mostly wish to age in place.

The right to housing is set out in the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and a variety of other legislative measures.

In this respect, Article 25 of the Universal Declaration of Human Rights points out that:

Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or the lack of livelihood in circumstances beyond his control.ⁱⁱ

This approach is also reflected in Article 11 of the International Covenant on Economic, Social and Cultural Rights, which states:

The States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing and to the continuous improvement of living conditions.ⁱⁱⁱ

Urgency of the review of accessible housing

The need for a common approach to accessible housing for everyone in Australia was firstly addressed in 2009, where the National Dialogue on Universal Housing Design attempted to create collaboration with the housing industry and community sector in developing a voluntary approach.

The final target of the National Dialogue “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”^{iv} was further endorsed by the Council of Australian Governments (COAG)^v as a key commitment in the 2010-2020 National Disability Strategy (NDS).

By 2014, it became evident, that the targets set in the National Dialogue would not be met in time, and therefore in 2015, COAG was advised that, if the government does not intervene, less than 5% of the actual target will be met.^{vi}

Therefore, in 2017, the Building Ministers Forum (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”. 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”^{vii}.

The Accessible Housing Project is the outcome of these discussions, and as mentioned the Regulatory Impact Assessment highlights options for potential minimum accessibility standards for housing, to be applied through the National Construction Code (NCC).

The prerequisite for regulation of the provision of accessible housing has also been acknowledged by various research reports highlighting the unmet demand for accessible housing.

In this regard, AHURI (2009) concluded 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” .^{viii}

In addition to this, People with Disability Australia (2010) indicated 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”.^{ix}

Based on these findings, Shelter WA welcomes this Options Paper and the ongoing consultation as a long needed first step towards the regulation of standards for accessible and adaptable housing.

Importance of accessible housing for everyone

In Australia, disability affects 18 per cent of people directly. In addition, 36 per cent of Australian households have a person with a disability living within them.^x

Around 18 per cent of Australian households also accommodate a carer, while another 18 per cent of households, have a person with disabilities living there without a carer.^{xi}

The existence of disability in a household is affecting the level of income of the household, since carers are more likely to have lower paying jobs. In addition to this, only 53 per cent of people with a disability are represented in the workforce.^{xii}

Disability has a strong impact on the concerned household, as 80 per cent of people with a disability are relying on support from their family, friends and neighbours. Only, 20 per cent of people with disabilities and older people receive formal paid services for support.^{xiii}

It is evident then, that only a few people with disabilities actually live by themselves. Most of them live in families and households, which means that all members within that family or household are impacted by inadequate standards for accessible housing. They are all limited in where they can go together, holiday together or socialise together, or at least be able to comfortably live together.

But the need for accessible housing goes further, than just for people with a disability. Pregnant women, parents with prams, young children, older people, as well as people with illness or injuries benefit from accessible housing immensely.

In addition to this, we visit other people’s homes and have people visiting our homes as part of participating in family and community life. This means that we must not only consider the current needs of people, but also their impending need, the people that we potentially exclude from our homes through the lack of accessibility.

Accessible housing is an important factor in the discussion around ageing in place. Dementia is the single greatest cause of disability in older Australians (aged 65 years or older) and the third leading cause of the disability burden overall.^{xiv}

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.^{xv} People with dementia account for 52 per cent of all residents in residential aged care facilities.^{xvi}

In addition to this, the current Aged Care Reforms are focussing on the wellbeing of Australia’s older people, encouraging their independence, giving them a choice and retaining their community connections.^{xvii}



If there was appropriate accessible housing in place, paired with support mechanisms, people in Australia could age at home and it would be a key cost saving strategy for the Australian and State governments.

The cost of caring for of an older person at home is between 15 per cent and 23 per cent less than caring for an older person in an institutional setting.^{xviii}

Following Bridge et al. (2010) research “as government bears a significant proportion of residential care costs, there are significant savings for government if they can help people stay in their own homes longer.”^{xix}

So, the focus must be on taking into the consideration the needs and demands of people. Dwellings cannot just be viewed as a product that is built and sold, it needs to consider the life-cycles of people in our community.

Having adequate regulatory measures for accessible housing in place is not only important for potential future home buyers, but it is also crucial for households that rent in the private rental market, as nearly one in three households in Australia rent. When renters need accessible housing, they face various obstacles in the ability to modify properties. Firstly, there is a severe lack of accessible rental properties, and secondly many landlords are hesitant about permitting to have their property modified. Finally, these modifications come with an enormous cost, as renters will have to pay not only for the modifications but also for the removal of the modifications, once they vacate the property.

So, many households currently are forced to live in dwellings that are unsuitable and inadequate for their needs, which impacts negatively on their health and wellbeing.

Shelter WA Recommendations

Shelter WA urges for mandating for accessible housing at the Gold level of the Liveable Housing Design Guidelines (LHDG), hence moving forward with Option 3, as presented in the Options paper.

Many of the features at the Gold level, over and above the Silver level are cost neutral. However, they could benefit the occupant of the home whether they have a disability now or in the future. These are items such as lever handles or the placement of switches and power outlets at heights that are convenient for everyone.

Providing these kinds of design features, that potentially can suit more people over a long-life cycle will not only be valuable to society, but they can be incorporated at minimal cost according to the 2008 Landcom Universal Housing Design Guidelines, “if the Key Design Features are considered and designed up front”.^{xx}

This argument is supported by AHURI, pointing out that “it is far more cost effective to include these features at the time of construction than modify a conventionally designed dwelling to have these features at a later date”.^{xxi}

So far, there has been a consistent national policy failure to address the issue of accessible housing, missed opportunities and a lack of vision about regulating accessible housing. In addition to this, this

paper presented the broad impact that accessible housing has on society and the impending demographic changes we will face.

Shelter WA commends that the focus of the Risk Impact Assessment should not only focus on the costs, that are easy to measure, but also consider opportunities for savings for social service and social welfare budgets, savings for health budgets, as well as externalities such as the negative spill-over implications on the environment from retro-fits and unnecessary home modifications in the future.

Therefore, Shelter WA recommends that the “costs and benefits are valued in terms of the economy and society as a whole” and not from the “vantage point of an individual, a firm, an organisation or a group.”^{xxii}

Conclusion

The term ‘accessible’ is currently used in building legislation specifically for people with a disability in the public domain. Similar assumptions are underpinning the proposed review of accessible housing by the ABCB, it is simply focused on people with a disability.

The Options Paper is discussing the issues in terms of a problem that might or might not be resolved rather than a community need with benefits for everyone.

There is a strong community need for accessible housing that will benefit everyone in the long term and that can be supported by research undertaken by Smith et al. (2008).

Smith et al. (2008) suggest there is a 60 per cent probability that a newly built single-family detached unit will house at least one person with a disability during its expected lifetime. If visitors are also considered, the figure rises to 91%.^{xxiii}

Our home is where we pass on family values and traditions, raise children, provide support to each other and solve everyday problems. Everyone has something important to contribute.

Therefore, when discussing and regulating accessible housing we need to ask ourselves the following questions: Who can come? Who can stay? Who does our home exclude today?

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