

Australian Building Codes Board
GPO Box 2013
CANBERRA ACT 2601
Via email: NCCawareness@abcb.gov.au

Dear Australian Building Codes Board

Accessible Housing

The ACT Council of Social Service (ACTCOSS) strongly supports the calls by the Australian Network on Universal Housing Design (ANUHD) for regulation on accessible housing.

We note that housing is a theme of the National Disability Strategy adopted by Commonwealth, State and Territory governments since 2010 and yet there has been little progress towards consistency and regulation in this area.

We note that the Australian Building Codes Board's consultation assists its role as the regulatory 'gatekeeper', which includes considering alternatives to regulation, such as education and awareness raising activities.

Work to encourage the take up of universal design housing has been occurring on and off for the last two decades in Canberra, starting with the 'Housing for Life' program in the 1990s, but there is little indication of a supply response commensurate to the scale of the issue.

Despite the ACT being the first whole of jurisdiction launch site for the government's National Disability Insurance Scheme (NDIS), people with disabilities experience the dual penalty of a lack of low income housing that is affordable to people in the bottom two income deciles with a continuing lack of suitable built form in the private market.

The scale of national investment in the NDIS is considerable and requires proper and commensurate action under the National Disability Strategy in underpinning areas like housing, to reach its full potential.

We also note the National Dialogue for Universal Housing Design's agreement in 2010 to provide accessibility in new housing voluntarily has failed.

We agree with ANUHD that regulation to make new housing accessible for everyone is critical to the achievement of Council of Australian Governments' (COAG) goal of social inclusion and liveable communities in Australia.

I further note that while the discussion paper canvases some cost issues related to affordable housing, it only covers costs related to construction.

A fuller community cost benefit analysis would provide a very different picture of the costs of failing to provide accessible, visitable and universally designed housing.

These include the risk of falls from people with disabilities and older people in inappropriately designed housing; premature entry into expensive high care settings; social isolation caused by a lack of visitable housing and the impact of a lack of affordable housing and appropriate built form on low income people with disability. It might also consider costs stemming from people being forced to access inappropriate housing, where they are subject to violence and abuse, due to the lack of appropriate compliant built form.

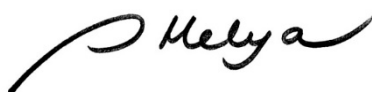
We concur with AHNUD that given the ageing Australian population, the lack of progress in the last decade, and the societal cost on multiple levels due to this inaction, the National Construction Code must go beyond the incremental approach that the housing industry might normally expect.

Implementation of Liveable Housing Design Guidelines Gold Level (Option 3) would achieve the practical implementation of COAG's commitment to social inclusion and contemporary world-class urban design and architecture.

We refer you to the AHNUD submission for more detail on the social costs of a lack of suitable universal design housing and support their recommendations for change.

I note that ACTCOSS has also called for implementation of implementation of a 5 Star energy rating for rental housing to ensure that accessibility is complemented by affordability to maintain temperatures that are comfortable and reduce health risks from extreme heat and cold.

Yours sincerely,

A handwritten signature in black ink that reads "Susan Helyar". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Susan Helyar
Director

Email: director@actcoss.org.au

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