

Submission in response to the draft report by Productivity Commission Inquiry into Disability Care and Support

Introduction

Queensland Action for Universal Housing Design (QAUHD) represents industry and community working together towards fair, inclusive, and sustainable communities through the adoption of universal housing design. With the support of over sixty organisations, **QAUHD are calling for regulation for minimum access requirements in the Building Code of Australia for all new and extensively modified housing.** Our Position Statement can be found at www.gauhd.org.

We applaud the key tenets of the recommendations for the NDIS – that is, more and better directed money, a national approach and a shift in decision-making to people with disability and their carers (Productivity Commission, 2011b, p. 5). We support your inclusion of home modifications in the National Disability Insurance Scheme (NDIS) and also agree with your position that the supply of mainstream housing is not within your purview. However, the chronic undersupply of regular housing that is visitable and accessible will prevent the inclusion of people with disability and directly increase pressure on the NDIS; so strategies to increase supply should be considered within your inquiry.

Queensland Action for Universal Housing Design recommends that the Productivity Commission support the regulation of minimum access requirements in all new and extensively modified housing through the Building Code of Australia.

Provision of accessible housing

The provision of housing suitable for people with disability and their families requires a three-fold strategy:

1. Home modification support;
2. Strategies to recycle housing with access features to allow for continued use over the life time of the dwelling.
3. Regulation of minimum access requirements in all new and extensively modified housing.

The first strategy has been considered in your report. The second strategy is connected with the first so that the considerable investment by the NDIS, in particular, can benefit future households who require accessible housing. The third strategy provides the most cost-

effective and important long-term means to build inclusive residential communities. With a reliable supply of accessible housing people with disability can participate and contribute in family life and the lives of their friends and neighbours, and continue to live with their established networks of support as life circumstances change.

Previous advice to mandate access requirements

The Australian Government has received advice from a number of advisory authorities on the need to plan and to regulate to increase the supply of accessible housing in a cost effective and planned manner. The Australian Housing and Urban Research Institute in their study of Australia's housing future recommended "the adoption of universal design principles into the Building Code of Australia [resulting] in a more accessible housing stock for persons affected by disability and their households" (Beer & Faulkner, 2009, p. 210).

The Disability Investment Group was asked by the Australian Government to consider creatively how to attract much needed resources to assist people with disability. Their recommendation regarding accessible housing was unequivocal:

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. Mandatory national building standards are needed, which specify design principles and requirements that accommodate people with disability and facilitate ageing in place. (Disability Investment Group, 2009, p. 41)

The Housing Industry of Australia, in contrast, rejects any intervention through regulation (Housing Industry Australia, 2007). The Productivity Commission's Inquiry into Caring for Older Australians also supports the HIA position stating that "although there are significant benefits from applying these standards, and voluntary adoption should be encouraged, the higher costs mean that mandating their application for all new dwellings is not warranted at this stage [when considering the cohort of older people only]" (Productivity Commission, 2011a, p. 301). It identified the chronic undersupply for accessible housing but considered a voluntary approach through the Livable Housing Design program would work. The report did not cross-reference the housing needs of older people with the housing needs of people with disability.

In 2004, the Productivity Commission also neglected to make any clear recommendation in its report on Reform of Building Regulation (2004) in spite of a number of submissions supporting a national regulatory response within the Building Code of Australia. The explanation was that the Australian Building Codes Board “was conducting research into adaptable housing... [for] governments and industry to plan for the future supply of accessible housing, including the implementation of regulatory or other measures, to stimulate appropriate supply” (p. 131).

At the same time the report recommended national consistency of building regulation whenever possible in part a response to the frustration of the Housing Industry of Australia at the plethora of standards and development approval variations across the States and local councils.

To date the Australian Government has supported a voluntary market-driven approach to increasing supply. This simply has not worked previously in Australia or in other countries. As a rule, regulation with incentives and supported by education, has been shown to provide the most reliable supply of accessible housing (Imrie, 2006; Kose, 2010; Nishita, Liebig, Pynoos, Perelman & Spegal, 2007; Scotts, Saville-Smith & James, 2007).

Consequences of inadequate supply of housing with access features

The consequences of not providing a reliable supply of accessible housing are well known. Saugeres (2010), in her Victorian based study of housing and support needs of people with disability observed that the serious and entrenched shortage of accessible housing exacerbated “their marginalization and dependency on carers, support agencies and the State” (p. 1). The implications of slip, trip and fall injuries for health and community services in buildings are also of concern. The report by Ozanne-Smith, Guy, Kelly, & Clapperton (2008) commissioned by the Australian Building Codes Board, the mechanism responsible for building regulatory matters, found that most building related accidents happen in the home environment and affect mainly vulnerable people, in particular, older women. The report concludes that, even considering non-structural factors which may contribute to these injuries, substantial blame can be directed at ill-considered housing design.

Both the Australian Government and state jurisdictions understand they are funding avoidable hospital stays, placements in specialist residential care and community services as a direct consequence of poor housing design (Office of the Public Advocate, 2005). Current government funded home modification assistance programs have been found to be

piecemeal, variable in quality, with long wait-times (Jones, de Jonge & Phillips, 2008) and the already stretched public housing system has a disproportionate clientele of people who need accessible housing (Beer & Faulkner, 2007).

An analysis of the long-term benefits to the community at large of a regulatory regime ensuring a reliable supply of accessible housing is more difficult to provide, however, the advice to the Victorian Government (2010) on the long-term value of systemic change through regulation was positive and unambiguous, anticipating significant value to the community through “enhanced safety and amenity, greater social inclusion and social capital, and higher quality housing” (p. 6).

Lack of demand for new accessible housing

In response to the chronic undersupply of accessible housing, the Australian Government urged national housing industry representatives in October 2009 to commit to a voluntary strategy. The resultant Livable Housing Design initiative has developed a national guideline and aspirational goals leading to all new housing providing minimum access features by 2020. The Livable Housing Design program’s main strategy is twofold: first to inform home-buyers of the value of including minimum access features, thereby increasing demand at the point of new sale and second, to train the housing industry so that they will respond in a skilled and informed manner.

The study in the United States of America by Smith, S., Rayer, S., & Smith, E. (2008) raises a significant concern for the initiative. The found that in spite of the huge need for accessible housing, the demand for it at the point of sale of a new dwelling is negligible and this lack of demand may be difficult to overcome. The situation in Australia is comparable. Karol (2008) observes in her Western Australian study of the provision of access features in new private housing, “There are no signs that the market place is demanding universal design in the home to meet the needs of home occupants over successive generations” (p. 83). This does not bode well for a voluntary approach to meet the need.

While it is understandable that the industry does not want regulation when the demand from buyers of new housing is minimal, Smith et al. (2008) make the important point that given the increasing aged and disabled population and the number of households that use a dwelling over its lifetime, most housing will require access features. It is from this logic and the fact that the cost is minimal compared to the cost of modification that Queensland Action for Universal Housing Design calls for regulation.

Cost of accessible housing

The estimated cost of providing minimum access features in new housing has been variable. The Victorian Government's Regulatory Impact Statement (2010), investigating possible regulation of access features similar to the Livable Housing Design's silver level, provide the most objective figures to date, given their purpose. Table 1 compares the costs for access features of a number of housing types at design stage and Table 2 provides the average cost of retrofitting the same features into a standard house design.

Table.1. *Costs for Access Features at Design Stage*

Cost of access at design stage	Single house	Low-rise unit	High-rise unit (elevator)
Cost of dwelling	\$870	\$190	\$1000
Percentage of cost	\$370,000	\$250,000	\$330,000
	0.2%	0.1%	0.3%

Table 2. *Cost of Retrofitting the Same Features in Table 1*

Cost of retrofitting	\$19,400
Cost of dwelling	\$320,000
Percentage of cost	6%

The added cost of access features at design stage is an average of 0.2% of the housing cost compared with added cost later of 6% for retrofitting these same features. The Housing Industry of Australia anticipates the added cost of silver level features of the Livable Housing Design program to be in the vicinity of \$5,000 (ABC, 2010 para. 22). This figure although inflated compared to that of the Victorian Government's Regulatory Impact Statement is minimal to the cost of retrofitting the same features.

Conclusion

Queensland Action for Universal Housing Design recommends that the Productivity Commission support the regulation of minimum access requirements in all new and extensively modified housing through the Building Code of Australia.

In the light of current research, the Productivity Commission has no grounds to anticipate a reliable supply of accessible housing through voluntary approaches within market forces or through modification, or that the public housing system can meet the needs. The estimated additional cost of including access features in new construction is minimal, in relation to the costs of modifications and the burgeoning costs of alternative residential and community care for people with disability and older people.

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