

30 November 2018

Accessible Housing
Australian Building Codes Board
GPO Box 2013
Canberra ACT 2601

By email: nccawareness@abcb.gov.au

Response to Accessible Housing Options Paper

As the peak body for health and community services in NSW, the NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage in NSW to make positive change in our communities. For over 80 years we have supported the sector to deliver crucial services that make a difference.

Thank you for the opportunity to respond to the ABCB Accessible Housing Options Paper and to contribute to the discussion on the future of accessible housing in Australia.

NCOSS would like to acknowledge and formally endorse the submission by the Australian Network for Universal Housing Design (ANUHD).

Insufficient accessible housing in NSW

The lack of affordable housing in NSW has emerged as the top priority issue in each of the community consultations NCOSS conducted with our members over the past three years. It is widely acknowledged that there are additional barriers to affordable housing for people with disability, who are more likely to be low income and/or require access features.

NCOSS has called on the incoming NSW Government to implement an affordable housing strategy that commits to deliver 5,000 new social housing dwellings each year until 2026. These dwellings must be accessible for people with a disability and designed with best practice energy efficiency standards.

The NCOSS report, [Way forward to inclusive service system: Challenges for people with disability with closure of ADHC](#), highlights the challenges for Government arising from the closure of Department of Ageing Disability and Homecare (ADHC) in June 2018. The report made recommendations to Government to address the impact of these challenges and make mainstream services accessible for people with disability including

social housing allocations specifically for people with disability;
a NSW Affordable Disability Housing Strategy with a focus on accessibility; and
that all new social housing properties are built to universal design standards.

The adoption of universal design is an essential part of implementing NCOSS recommendations around accessibility. Accordingly, we endorse ANUHD response to this Options Paper which highlights the contextual factors impacting on regulation in this area.

We join ANUHD in Supporting Option 3, Liveable Housing Design Guidelines (LHDG) Gold level for the following reasons.

More people will need accessible housing

Given the anticipated demographic changes in the next 30 years, most housing will need to be accessible at some time during the houses life-cycle, to meet the needs of residents and their visitors. According to the latest Ageing, Disability and Carers Survey, 36% of households in Australia has a person with disability within them.¹

By 2031, more than one in three people in NSW will be aged 50 or over.² US research based on similar demographics suggests there is a 60% likelihood that a newly built dwelling will house a person with a mobility impairment during its expected lifetime.³

Of the new social housing allocated in Australia in 2016-17, 34% of households comprised at least one member with disability.⁴

However, research shows that people with disability tend to access social housing at rates which are lower than their income disadvantage, due partly to lack of accessibility⁵

Market forces are insufficient to create an adequate supply of accessible housing

People who need accessible housing are more likely to be on lower incomes. According to the latest Ageing, Disability and Carers Survey, 33.5% of people with disability in NSW were in the two lowest income quintiles.⁶ Older people relying on the Age Pension are income poor, even if they own their own home.⁷

As emphasised by ANUHD, demand forces will be insufficient to create an adequate supply of accessible housing. An important factor to consider is the powerlessness of those who most need accessible housing.⁸ The social and financial vulnerability experienced by this cohort gives people who require accessible housing less bargaining power to negotiate timely modifications with social housing providers or landlords.

During consultations for the NCOSS report highlighted above, members emphasised that the negotiation of modifications was a significant issue for the people they work with. We heard that lack of timely modifications can mean people are forced to live in accommodation that does not meet their most basic needs (for example the ability to shower).

The lack of accessible housing means people who need it are likely to move house less than average. Accordingly, supply and demand is insufficient to create an accessible housing market, and regulation is required.

¹ Australian Bureau of Statistics (2015) - [Disability, Ageing and Carers, Australia: Summary of Findings](#), 2015, Data Cubes NSW

² NSW Government (2016) [NSW Ageing Strategy 2016-2020](#).

³ ANUHD submission p. 12.

⁴ Australia Institute of Health and Welfare (2018) [Housing Assistance in Australia](#), data tables

⁵ Wiesel et al (2015) [Moving to my home: transitions and outcomes of people with disability](#), AHURI Final Report No. 246 Melbourne p34.

⁶ Australian Bureau of Statistics (2015) - [Disability, Ageing and Carers, Australia: Summary of Findings](#), 2015, Data Cubes NSW

⁷ Beer A, Faulkner D (2009) [21st century housing careers and Australia's housing future](#). AHURI Final Report No. 128, quoted in ANAHUD Submission.

⁸ ANUHD submission p. 15.

Accessible housing facilitates inclusion

Appropriate housing plays a crucial part in creating and maintaining health and wellbeing. As an NCOSS member encapsulated at our 2018 regional consultations: [without housing] *'people are stuck in crisis and can only stay in survival mode.'*

As noted by ANUHD, the National Disability Strategy highlights the importance of accessible housing and universal design to the inclusion of people with disability. The link between accessible housing and inclusion is recognised in NSW policy frameworks for people with disability and older people:

- Disability Inclusion Plan includes “liveable communities” as a focus area. Accessible housing is an essential part of creating an inclusive community for people with disability.
- The NSW Ageing Strategy focus areas include housing choices and inclusive communities, showing the importance of older people being able to access a range of housing which enables them to live in their communities.

Thus, an increase in the amount of accessible housing is a critical enabler to the implementation of these inclusion strategies.

Level of accessibility required

Given contextual factors such as the ageing population and the social cost of inaction, action beyond the incremental level is required. We urge the Building Codes Board to adopt LHDG Gold level as a step towards more decisive action in this area. The higher standard is justified when we consider the costs and benefits to groups other than developers and buyers. Groups that should be considered include:

- **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).
- **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).
- **Australian governments and communities** in normalising the presence of a wider range of people being included and participating in family and community life.

If you require further information in relation to our response, please contact Ya'el Frisch, Project Officer Advocacy on 02 8960 7908 or yael@ncoss.org.au.

Yours sincerely



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