



## Proposal for Standards Development Project

To review

**AS4299-1995 Adaptable housing**  
to align with the  
**2010-2020 National Disability Strategy**  
(Livable Housing Design)

January 2016



# Table of Contents

<b>Proposal.....</b>	<b>5</b>
Proponents Details .....	5
Supporting/Nominating Organisation Details (if applicable) .....	5
Definitions .....	7
Proposal Details .....	9
Summary and Demonstration of Net Benefit.....	12
Harmonisation and Alignment.....	14
Pathway for Standards Development .....	15
Stakeholder Support.....	16
Risks and Dependencies.....	16
Additional Information.....	17
Declaration .....	18
<b>Appendices.....</b>	<b>19</b>
Appendix A: Stakeholder Consultation .....	19
Appendix B: Details of projects within a proposed program of work.....	27
Appendix C: Project Complexity Matrix.....	28
<b>Attachments .....</b>	<b>29</b>
Attachment 1. Net Benefit Case .....	29
Attachment 2. Livable Housing Design Silver Level .....	40
Attachment 3. Victorian standard and RIS Rationale for regulation .....	43
Attachment 4. RIA proposed draft amendments to the NCC/BCA (Volume 1, 2) .....	45
Attachment 5. International and National Policy .....	47
Attachment 6. Reported outputs from the National Dialogue Strategic Plan.....	49
Attachment 7. ANUHD/RIA Position Statement and list of supporters for regulation .	51
<b>References.....</b>	<b>57</b>

## Figures and Tables

Table 1 <i>Costs of minimum accessibility estimated in the Victorian RIS [6. pp. 67-68]....</i>	33
Figure 1 Graph comparing LHA outputs with COAG targets.....	50



# Proposal

**To review AS4299-1995 Adaptable Housing to align with the 2010-2020 National Disability Strategy and for future inclusion in the National Construction Code, because:**

- AS4299-1995 is now 20 years old and no longer aligns with current government policy;
- The COAG endorsed 2010-2020 National Disability Strategy commits to the provision of an agreed “universal design standard” in all new housing by 2020 [1];
- The “universal design standard” is understood to be the Livable Housing Design guideline, Silver level (see Attachment 2);
- There is acknowledgement from industry, community and government that the confusion over guidelines [7-21] causes inefficiencies and risk, and an updated Australian Standard that can be called up in the National Construction Code is required to meet the COAG commitment [2, 31].
- The net benefit of an agreed “universal design standard” in all new housing developed through Standards Australia for future inclusion in the National Construction Code outweighs the cost (**See Attachment 1 for Net Benefit Case**).

Proposal Reference Number	<i>Standards Australia to Complete</i>
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## Proponents Details

<i>Your name</i>	<b>Margaret Ward</b> PSM B Arch, PhD	<b>Michael Fox</b> AM, B Arch, MTCP, FAIA, FAPI
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<i>Web address</i>	<a href="http://www.anuhd.org">www.anuhd.org</a>	<a href="http://www.riaustralia.org">www.riaustralia.org</a>

## Supporting/Nominating Organisation Details (if applicable)

<i>Name of proponent's organisation supporting this proposal</i>	<b>Australian Network for Universal Housing Design (ANUHD)</b> Under the auspices of People with Disability Australia Inc.	<b>Rights &amp; Inclusion Australia (RIA)</b>
<i>Contact officer at organisation</i>	Therese Sands, Chief Executive Officer, People with Disability Australia (PWD)	Michael Fox AM Chair, Rights & Inclusion Australia
<i>Contact details</i>	<a href="mailto:thereses@pwd.org.au">thereses@pwd.org.au</a>	<a href="mailto:reply@riaustralia.org">reply@riaustralia.org</a>



## Definitions

The following terms are used within this proposal to describe housing design:

<b>accessible</b>	Accessible housing design complies with the floor space requirements described in AS 1428.1 (2009) and is able to be approached, entered and used by people with a disability, including those who rely upon a wheelchair [3].
<b>adaptable</b>	<p>Adaptable housing is the term used in AS4299-1995 and refers to design that:</p> <ul style="list-style-type: none"><li>• later alterations to suit individual requirements will be achievable at minimal extra initial cost.</li><li>• it will easily adapt to suit the widest possible range of lifetime needs. This will include the needs of people with physical disabilities (including people who use wheelchairs, people with disabilities who are ambulant, and people with manipulatory disabilities); people with sensory disability (vision, hearing) and people with intellectual disability.</li><li>• it will allow for visitability through an accessible path of travel to the living room and toilet [3].</li></ul>
<b>livable</b>	<p>Livable [<i>sic</i>] design is the term used by the National Dialogue on Universal Housing Design to mean housing that meets the changing needs of occupants across their lifetime.</p> <p>Livable homes include key easy living features that make them easier and safer to use for all occupants including: people with disability, ageing Australians, people with temporary injuries, and families with young children.</p> <p>A livable home is designed to:</p> <ul style="list-style-type: none"><li>• be easy to enter</li><li>• be easy to navigate in and around</li><li>• be capable of easy and cost-effective adaptation, and</li><li>• be responsive to the changing needs of home occupants [4].</li></ul>
<b>liveable</b>	<p>Liveable design is used by the Government of Western Australia to describe housing that is easy to move around in and easy to use. Liveable design offers open-plan to maximise space in key areas of the home [21].</p>
<b>universal</b>	<p>Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design [39].</p> <p>The proposal refers to “agreed universal design standards” which the proposers consider to be Livable Housing Design Guidelines-Silver Level [4, 5].</p>
<b>visitable</b>	Visitable design allows for a dwelling to facilitate the inclusion and participation of all people in family and community activities [52].





## Proposal Details

<b>Proposal title</b>  Please provide the full and correct title of the proposed document(s).	Adaptable housing
<b>Project Scope</b>  Briefly summarise what is being requested within this proposal. Please summarise the scope of the Standard(s) to be produced. Please outline any specific inclusions and exclusions.  For programs of work, please include the scope of each project in sufficient detail at Appendix B.	<p>To review AS4299-1995 Adaptable housing to align with the 2010-2020 National Disability Strategy and for future inclusion in the National Construction Code.</p> <p>It does <u>not</u> include the standard for specialist accessible housing under consideration by ME64 Standards Committee, SA 1428.8 Accessible Housing.</p> <p>It provides a standard for the Council of Australian Government's (COAG's) commitment in the 2010-2020 National Disability Strategy [1] stated below:</p> <p><i>The Australian Government is working with representatives from all levels of government, key stakeholders from the disability, ageing and community support sectors and the residential building and property industry on the National Dialogue on Universal Design (National Dialogue) to ensure that housing is designed and developed to be more accessible and adaptable. An aspirational target that all new homes will be of agreed <b>universal design standards</b> by 2020 has been set, with interim targets and earlier completion dates to be determined' [1. p. 34].</i></p> <p>The current voluntary strategy, through the National Dialogue's strategic plan [5] has failed on two counts [2, 49]:</p> <ol style="list-style-type: none"> <li>1. An array of guidelines (see below) continue to be used in spite of the National Dialogue agreement;</li> <li>2. The COAG commitment has not reached its 2013 (25%) and 2015 (50%) interim targets, and will not reach 5% of the 2020 target. (See Attachment 6.)</li> </ol>
<b>Project or program</b>	Single project

<p>Please specify if this proposal covers a single project or multiple projects. If a program of work is proposed that covers multiple projects, please include details of each project in Appendix B.</p>	<p>This project will inform the development of AS 1428.8 Accessible Housing.</p>
<p><b>Project type</b></p> <p>Please indicate whether the project is a new document, amendment, revision or other. If other, please specify. If applicable, please provide the existing Australian or International Standard number and full title of the standard (e.g. AS, AS/NZS, ISO, IEC or other).</p>	<p>This is a review of AS4299-1995 [3, 51]; and it will be informed by:</p> <ul style="list-style-type: none"> <li>• Livable Housing Design Guidelines (Silver level) [4] developed by the National Dialogue in 2010 [5] and endorsed by COAG within the 2010-2020 National Disability Strategy [1]. (See Attachment 2.)</li> <li>• Proposed standard in the Victorian Government's regulatory impact statement (RIS) on minimum accessibility in housing [6]. (See Attachment 3)</li> </ul>
<p><b>Product type</b></p> <p>Please indicate whether the output of this project is to be a Standard, handbook, or other type of document.</p>	<p>Standard</p>
<p><b>Committee</b></p> <p>Are you aware of an Australian or International technical committee working in this field? Please provide details, including any related committees that may be affected by this proposal.</p>	<p>The National Dialogue developed the Livable Housing Design Guidelines in 2010 [4, 7]. The formal work of the National Dialogue has ceased.</p> <p>ME-064-00-08 Adaptable Housing has ceased.</p> <p>ME64-03 Housing design for people with specific disabilities is on hold. This proposal will act as a foundational document for the future work of the ME64 Standards Committee.</p> <p>To our knowledge, the work by the Victorian Government on their RIS [6] has also ceased.</p>
<p><b>Scale of proposed work</b></p> <p>Please indicate the size/complexity rating of the proposed project/program, taking account of the size of the document, changes required, expected level of comment etc. For further information, please refer to Appendix C to this form.</p>	<p>Medium</p> <p>See Appendix C: Project Complexity Matrix</p>

<p><b>Sector</b></p> <p>Please delete any non-relevant sectors. Select one or more from:</p>	<ul style="list-style-type: none"> <li>• Building and Construction</li> <li>• Health and Community Services</li> </ul>
<p><b>Relationship to legislation</b></p> <p>If the document is referenced in legislation in Australia (or New Zealand for joint documents), please provide details here. If so, is this as a primary or secondary reference?</p> <p>Note: If this Standard is a primary or secondary reference in the National Construction Code, please refer to the Protocol for the development of National Construction Code referenced documents available at: <a href="http://www.abcb.gov.au">http://www.abcb.gov.au</a></p>	<p>AS4299-1995 is referenced in:</p> <ul style="list-style-type: none"> <li>• ACT Territory Plan [8]</li> <li>• NSW State Environmental Planning Policy [9]</li> <li>• South Australia's Housing Code [10]</li> </ul> <p>Both AS4299-1995 and Livable Housing Design Guidelines are referenced in Local and State Government housing plans for specific details, including</p> <ul style="list-style-type: none"> <li>• Queensland Government's Design Standard for Dwellings [11]</li> <li>• NSW Government's Apartment Design Guide [12]</li> <li>• Australian Government's National Building Economic Stimulus Plan [13]</li> <li>• Northern Territory's social housing guidelines [48]</li> <li>• National Rental Affordability Scheme Funding round 5 [55]</li> </ul> <p>State and Territory social housing programs use a range of standards, including AS4299-1995, Livable Housing Design Guidelines and their own standards [2].</p> <p>Other guidelines have been produced by New Zealand, State and Territory Governments and housing industry organisations to encourage the private housing industry to provide accessible housing, including:</p> <ul style="list-style-type: none"> <li>• 2001 ACT Housing for Life guidelines [14]</li> <li>• 2001 Queensland's Universal Housing Design guidelines [15]</li> <li>• 2002 BRANZ/Victoria's Building Commission Welcome: design ideas for accessible homes [16]</li> <li>• 2008 New South Wales' Landcom universal housing design guidelines [17]</li> </ul>

	<ul style="list-style-type: none"> <li>• 2008 Queensland's Smart and Sustainable Homes Design Objectives [18]</li> <li>• 2011 New Zealand's Lifemark Design Standards Overview [19]</li> <li>• 2011 Queensland's ULDA Accessible Housing guideline [20]</li> <li>• 2011 Western Australia's Liveable Homes: designs that work for everyone [21]</li> <li>• 2015 Healthabitat: Housing for Health – The Guide [47], Compiled from work in Indigenous communities over 15 years</li> </ul>
<b>Conformity assessment</b>  Does this proposal include any conformity assessment requirements?	No. This is for a review of an existing standard. When included in the National Construction Code it will have the conformity requirements of the housing construction industry.

## Summary and Demonstration of Net Benefit

<b>Need for the proposed work</b>  Please identify and provide evidence of the problem to be addressed, the goals and objectives of the proposed Standard(s), and demonstrate that it is justified and implementation is likely.	<p>AS4299-1995 is 20 years old and is no longer relevant to current housing practice [5], and international and national policy directions (see Attachment 5).</p> <p>The market forces within the Australian housing industry have not responded sufficiently to the current policy directions, in particular, the active participation and inclusion of all people in family and community life [22-24]. The lack of appropriate mainstream housing for older people and people with disability is a major issue for governments and the community sector [1, 5, 25].</p> <p>In 2011, COAG committed to a strategy to provide minimum accessibility in all new housing by 2020 [1]. The industry-preferred voluntary approach has failed [2], with various guidelines being used across Australia, no effective compliance mechanism, and no data collection to measure achievements towards its targets [49].</p> <p>The goal and objectives of the proposed Standard reflect those of the 2010-2020 National Disability Strategy [1]:</p> <p><b>Goal:</b>                    <b>Improved provision of accessible and well-designed housing with choice for people with disability about where they live. [1. Policy</b></p>
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	<p>Direction 3; p. 32]</p> <p><b>Objectives:</b> <b>Greater choice about where to live, and also more social opportunities for visiting friends and family [1. Policy Direction 3; p.32]</b></p> <p><b>All new housing will be of agreed universal design standards by 2020. [1. Policy Direction 3, p. 34]</b></p> <p><b>Action</b> <b>To review AS4299-1995 Adaptable Housing to align with the 2010-2020 National Disability Strategy and for future inclusion in the National Construction Code.</b></p> <p>The proposed review is required because it is a critical step towards meeting COAG's commitment to the 2020 target [1], in a manner which will benefit the housing industry owners, purchasers, renters, visitors and home-based workers.</p>
<p><b>Alignment with national public policy</b></p> <p>Please identify and describe how your proposal fits with issues of current national or public policy interest.</p>	<p>See Attachment 5.</p>
<p><b>Net Benefit</b></p> <p>Please explain any potential positive and negative impacts, and where possible quantify the costs and benefits, of the proposed Standard(s) on different communities of interest in the following areas:</p>	<p>This proposal has referenced the Victorian Government's RIS [6] and other studies into the regulation of minimum accessibility in housing to develop a Net Benefit Case and concludes that:</p> <ul style="list-style-type: none"> <li>• the benefits to the housing industry and society exceed the costs;</li> <li>• the net benefits of the proposed variation are greater than those associated with any practicable alternatives, including the current voluntary strategy;</li> <li>• AS4299-1995 has not restricted competition in the past and the proposed Standard will not restrict competition in the future; and</li> <li>• The proposed Standard, would not lead to a material change in the administrative burden on industry [6. p. 16].</li> </ul> <p>See Attachment 1 for the Net Benefit Case.</p>

## Harmonisation and Alignment

### Related documentation

Please research and list any known industry, domestic, regional, other national or international standards, guides, codes and research related to the proposal.

AS4299-1995 is called up under:

- ACT Territory Plan [8]
- NSW State Environmental Planning Policy [9]
- South Australia's Housing Code [10]

AS4299-1995 and Livable Housing Design Guidelines are referenced in many Local and State Government housing plans for specific details, including

- Queensland Government's Design Standard for Dwellings [11]
- NSW Government's Apartment Design Guide [12]
- Australian Government's National Building Economic Stimulus Plan [13]
- Northern Territory's social housing guidelines [48]
- National Rental Affordability Scheme Funding round 5 [55]

Other guidelines have been produced by State and Territory Governments, and New Zealand to encourage the housing industry to provide accessibility in housing, including:

- 2001 ACT Housing for Life guidelines (no longer used extensively) [14]
- 2001 Queensland's Universal Housing Design guidelines [15]
- 2002 Building Research Association of New Zealand (BRANZ)/Victoria's Building Commission Welcome: design ideas for accessible homes [16]
- 2008 New South Wales' Landcom universal housing design guidelines [17]
- 2008 Queensland's Smart and Sustainable Homes Design Objectives [18]
- 2009 Victorian Building Commission Build for Life website [26]
- 2010 Victorian RIS with proposed standard [6]
- 2011 New Zealand's Lifemark Design Standards Overview [19]
- 2011 Queensland's ULDA Accessible Housing guideline [20]

	<ul style="list-style-type: none"> <li>• 2011 Western Australia's Liveable Homes: designs that work for everyone [21]</li> <li>• 2015 Healthabitat: Housing for Health – The Guide [47], for work in Indigenous communities.</li> </ul> <p>Individual Local Councils, for example, Banyule City Council (Victoria), have also produced their own guidelines.</p> <p>There is also reference to both the Livable Housing and Australian Standards in the National Partnership Agreement on Remote Indigenous Housing policy documents (2013-2018) [48].</p> <p>Overseas examples are:</p> <p>Britain—Part M (Mandated code) [27] and Lifetime Homes, Lifetime Neighbourhoods (voluntary) [28].</p> <p>Sweden—Regulation for minimum access in all housing [50].</p> <p>United States of America's <i>Fair Housing Act</i> has a standard for accessibility [29]. Individual States have guidelines [30].</p>
<p><b>Avoidance of duplication</b></p> <p>How will the proposed document relate to any of the existing material listed above? Please address any apparent or actual duplication between the existing material and the proposed document(s).</p>	<p>There is significant duplication, leading to confusion amongst stakeholders, in particular, the housing industry. AS4299-1995 [3, 51] is considered by legislators and policy writers to be the authoritative standard for access in housing; however, it is significantly outdated and should align with the policy direction of COAG's 2010-2020 National Disability Strategy [1].</p>
<p><b>Alignment with International Standards</b></p> <p>If there is an existing International Standard that covers the scope of this proposal, but is not being adopted, please clarify this position.</p>	<p>There is no international standard that can be directly transferrable to Australian housing market expectations, regulatory mechanisms or policy frameworks.</p>

## Pathway for Standards Development

<p><b>Preferred development pathway</b></p> <p>Please select one. If Other, please provide details of discussions with Standards Australia.</p>	<p>Standards Australia resourced.</p>
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<b>Committee capability and capacity</b>  If there is an existing Standards Australia committee working in this field, please specify their capability and capacity to take on additional projects relating to this proposal, particularly relating to programs of work described at Appendix B.	No, there is not an existing committee.
<b>Standards Australia process to be funded by</b>	Standards Australia

## Stakeholder Support

<b>Consultation process</b>  Provide details on the consultation process undertaken in development of this proposal, including identified stakeholder groups and the outcomes.  Please complete Appendix A: Stakeholder Consultation and provide evidence of stakeholder support.	The consultation had two phases: <ol style="list-style-type: none"> <li>1. In 2012-2014, ANUHD and RIA reviewed the progress of the National Dialogue agreement by surveying State and Territory governments, and National Dialogue member organisations. It held four public consultations from 2012-2014 and reported on LHA anticipated outputs. The method and findings are outlined in the report [2].</li> <li>2. In 2015, ANUHD and RIA reported these findings to a wide range of organisations, representing the housing sector, disability, aged, and women. By December 2015, 177 organisations and individuals had formally given their support for action to be taken to meet the 2020 target through regulation [31]. (See Attachment 7 for full list of supporters and the ANUHD/RIA Position Statement.)</li> </ol>
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## Risks and Dependencies

<b>Risks</b>  Are there any key risks that you know of that may impact this project?  <i>Note: Project risk does <b>not</b> include Standards Australia failing to approve this proposal.</i>	None
<b>Dependencies</b>  Are there any fundamental	None



dependencies on this e.g. changes to legislation, publication or revision of a related Standard or the need to publish concurrently with an Australian or International Standard?	
<b>Indicative timelines</b> Taking into account the risks and dependencies identified above, and an average publication cycle of 12 months, please provide estimates of the duration of key project stages.	Estimated time to complete draft for public comment from project initiation: <b>one year</b> . Estimated time to publication from project initiation: <b>two years</b> .

## Additional Information

<b>Comments</b> Please provide comments (if any) which support this proposal or assist its consideration.	N/A
<b>Supporting documentation</b> Please list (and attach) any information that supports this proposal or assists its consideration. If a working draft of the proposed document is available, please attach to this proposal.	There is no working draft; however, the proposed standard will be informed by AS4299-1995 [3, 51]; the National Dialogue's Livable Housing Design Guideline [4], the Victorian RIS [6] (See Attachment 2 and Attachment 3), and RIA's proposed amendments to the National Construction Code (See Attachment 4).
<b>Funding declaration</b> Are you aware of any direct or indirect funding for this proposed work, other than employer support to attend and participate in meetings?	No

## Declaration

Please check your proposal is complete, read and complete the declaration, then forward this proposal and any attached documents to Standards Australia at [mail@standards.org.au](mailto:mail@standards.org.au). The named proponent is deemed to have approved the information contained within this proposal and this declaration. This is required prior to formal consideration of this proposal.

The information provided in this application is complete, true and accurate to the best of our knowledge. We believe the proposed Standard will result in Net Benefit\* to Australia. We understand the requirements associated with the Standards development pathway selected. We have consulted with, and have the support of, national organisations with a relevant interest in this project.

<b>Name of Proponents</b>	Margaret Ward PSM (ANUHD) Michael Fox AM (RIA)
<b>Name of Nominating Organisation representative (if supported by a suitable national organisation)</b>	<ul style="list-style-type: none"><li>• Australian Network for Universal Housing Design (ANUHD) auspiced by People with Disability Australia Inc.</li><li>• Rights &amp; Inclusion Australia (RIA)</li></ul>
<b>Date</b>	1 February 2016

\* As defined in Standard Australia's Guide to Net Benefit.

## Appendices

### Appendix A: Stakeholder Consultation

#### Response to letter seeking stakeholder support

Organisation Name	Contact name	Position	Email	(Y/N)?
<b>Research</b>				
City Futures UNSW	Professor Bill Randolph	Director	b.randolf@unsw.edu.au	yes
	Dr Katy Bridge	Director - HMIC	c.bridge@unsw.edu.au	yes
<b>Consumer interests</b>				
ANUHD	Dr Margaret Ward Mr David Brant	Convenors	anuhd@anuhd.org	yes
Australian Cross Disability Alliance	Mr Matthew Bowden	Chief Executive Officer	matthewb@pwd.org.au	yes
Rights & Inclusion Australia	Mr Michael Fox AM	Chair	reply@riaustralia.org	yes
COTA Australia	Mr Ian Yates AM	Chief Executive Officer	iyates@cota.org.au	yes
Australian Federation of Disability Organisations	Mr Matthew Wright	Chief Executive Officer	matthew.wright@afdo.org.au	yes
Australian Council of Social Service	Dr Cassandra Goldie	Chief Executive Officer	info@acoss.org.au	yes
Blind Citizens Australia	Ms Leah Van Poppel	Chief Executive Officer	leah.van.poppel@bca.org.au	yes
Children with Disability Australia	Ms Stephanie Gotlib	Chief Executive Officer	StephanieG@cda.org.au	yes
Every Australian Counts	The Hon John Della Bosca	Chief Executive Officer	john.dellabosca@ndis.org.au	yes
National Disability Services	Dr Ken Baker	Chief Executive Officer	Ken.baker@nds.org.au	yes

Organisation Name	Contact name	Position	Email	(Y/N)?
Young People in Nursing Homes National Alliance	Dr Bronwyn Morkham	National Director	bronwyn@ypinh.org.au	yes
Physical Disability Council Australia	Ms Liz Reid	President	manager@pda.org.au	yes
National Ethnic Disability Alliance	Mr Dwayne Cranfield	Chief Executive Officer	rpo@neda.org.au	yes
Economic Security for Women	Ms Sharen Page	Co-ordinator	executiveofficer@security4women.org.au	yes
National Foundation for Australian Women	Dr Mary Crawford	Chief Executive Officer	m.crawford@qut.edu.au	yes
National Rural Women's Coalition	Dr Pat Hamilton	President	pm@nrwc.com.au	yes
Women with Disabilities Australia	Ms Carolyn Frohmader	Executive Director	carolyn@wwda.org.au	yes
National Shelter	Mr Adrian Pisarski	Chief Executive Officer	adrian.pisarski@shelter.org.au	yes
Summer Foundation	Dr Di Winkler	CEO	di.winkler@summerfoundation.org.au	yes
<b>Government</b>				
National Disability Insurance Agency	Mr Bruce Bonyhady AM	Chairperson	Bruce.bonyhady@ndis.gov.au	No response
Department of Industry, Innovation and Science	Dr Anne Byrne	General Manager, Manufacturing and Services Policy	Anne.Byrne@industry.gov.au	cannot respond
Department of Social Services	Mr Craig Flintoft	Branch Manager, Disability and Carers Policy	craig.flintoft@dss.gov.au	No response
Human Rights Commission	The Hon Susan Ryan AO	Age and Disability Discrimination Commissioner	Susan.Ryan@humanrights.gov.au	yes
Australian Local	Adrian Beresford-Wylie	Chief Executive	alga@alga.asn.au	No

Organisation Name	Contact name	Position	Email	(Y/N)?
Government Association				response
Australian Building Codes Board	Mr Neil Savery	General Manager	Neil.Savery@ABCB.gov.au	cannot respond
<b>Professional interests</b>				
Australian Institute of Architects	Mr Richard Barton	Company Secretary/General Counsel	Richard.barton@architecture.com.au	yes
Australian Rehabilitation and Assistive Technology Association	Ms Trina Phuah	President	secretary@arata.org.au	yes
Occupational Therapy Australia	Dr Natasha Layton	National Professional Practice & Standards Manage	standards@otaus.com.au	yes
<b>Industry interests</b>				
Grocon	Mr David Waldren	National Executive Design Manager	DavidWaldren@grocon.com.au	No response
Lendlease	Mr Steve McCann	Group Chief Executive Officer and Managing Director	steve.mccann@lendlease.com	No
Home Modifications Australia	Mr Michael Bleasdale	Chief Executive Officer	ceo@nswhmms.org	yes
ME64 Committee	Ms Angela Roennfeldt	Chairperson	angela.roennfeldt@villamaria.com.au	yes
Housing Industry Association	Ms Kristin Brookfield	Senior Executive Director, Building, Development	k.brookfield@hia.com.au	No
Master Builders Association	Mr Wilhelm Harnisch	Chief Executive Officer	ceo@masterbuilders.com.au	No
Modular Building Industry Association Australia	Mr Anthony Walsh	President	Carolyn.macgill@aigroup.com.au	Yes

Organisation Name	Contact name	Position	Email	(Y/N)?
Livable Housing Australia	Ms Sophie Pickett-Heaps	Chair	Sophie.pickett-heaps@stockland.com.au	No response
Building Designers Association	Mr Ray Brown	President	president@bdaa.com.au	Yes
Property Council of Australia	Mr Nick Proud	Executive Director Residential	Nproud@propertyoz.com.au	No response
Urban Development Institute of Association	Mr Michael Corcoran	President	udia@udia.com.au	No response
Association of Consultants in Access Australia	Mr Terry Osborn	Secretary	secretary@access.asn.au	No
Australian Institute of Building Surveyors	Mr Duncan Wilson	Director and Chair AIBS Technical Committee	ceo@aibs.com.au Duncan.wilson@kalamunda.wa.gov.au	yes
<b>Independent consultants</b>				
Michael Small Consulting	Mr Michael Small	Director	small.consulting@bigpond.com	yes
Eric Martin and Associates	Mr Eric Martin AM	Director	eric@emaa.com.au	yes
Centre for Universal Design Australia	Dr Jane Bringolf	Director	udaustralia@gmail.com	yes
John Deshon Pty Ltd	Mr John Deshon AM	Principal	johndeshon@johndeshon.com	yes
pm&d architects	Mr Geoff Barker	Director	Geoff@pmdwa.com	yes
Home Design for Living	Ms Elizabeth Ainsworth	Director	elizabeth.ainsworth@bigpond.com	yes
Lifemark (New Zealand)	Mr Geoff Penrose	General Manager	Geoff@lifemark.co.nz	yes

## Unsolicited support

Organisation Name	Contact name	Position	Email
Access Australia Planning & Design Pty Ltd	Mr Michael Fox	Principal	accessaustralia@ozemail.com.au
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## Appendix B: Details of projects within a proposed program of work

Where a program has been specified in Section 2, please provide details of projects in order of priority for development. If preferred, details can be provided in a separate file and attached to this proposal.

<i>Priority</i>	<i>Title</i>	<i>Committee</i>	<i>Pathway</i>	<i>Designation</i>	<i>Complexity Rating</i>	<i>Project type</i>	<i>Product type</i>	<i>Brief project scope and dependencies</i>
1	<i>Adaptable Housing standard</i>	ME-064-00-08	<i>Committee Driven</i>	AS4299-1995	Small	<i>Addition</i>	<i>Standard</i>	<i>Addition of a Class D (Visitable features) for provision for minimum accessibility to all housing in the National Construction Code</i>
2	<i>Adaptable Housing standard</i>	ME-064-00-08	<i>Committee Driven</i>	AS4299-1995	Medium	<i>Revision</i>	<i>Standard</i>	<i>Revision of Classes A,B and C as voluntary standards to align with the policy direction of the National Disability Strategy 2010-2020, specifically, “People with disability live in accessible and well designed communities with opportunity for full inclusion in social, economic, sporting and cultural life” [p. 29].</i>

## Appendix C: Project Complexity Matrix

#	Factor	Rating Number					Rating
		1	2	3	4	5	
1	What is the anticipated duration of the project?	< 3 months	3 - 6 months	6 - 24 months	2 - 3 years	> 3 years	2
2	What overall level of risk (technical risk, political risk and consensus risk) is associated with the project in the context of the committee?	Very Low	Low	Moderate	High	Very High	3
3	What level of overall technical complexity does the project have?	Very Low	Low	Moderate	High	Very High	2
4	What is the size of (the change to) the standard or the consensus document?	1-2 pages	2 - 20 pages	20-100 pages	100 - 300 pages	>300 pages	2
5	What is the expected level of public comment/adverse reaction to the project?	Very Low	Low	Moderate	High	Very High	2
TOTAL							11
COMPLEXITY RATING							Medium

### Complexity Rating

If the total is **5**, apply the **Simple Complexity rating**.

If the total is **6 to 10**, apply the **Small Complexity rating**.

If the total is **11 to 15**, apply the **Medium Complexity rating**.

If the total is **16 to 20**, apply the **Large Complexity rating**.

If the total is **21 to 25**, apply the **Complex Complexity rating**.

### Project Complexity Examples

*Simple* - Adoption, endorsement of an ISO standard with high consensus.

*Small* - Technical report with low complexity, low risk and low profile.

*Medium* - New standard or revision with moderate complexity and risk.

*Large* - New standard or revision with high complexity and risk.

*Complex* - New standard or revision with very high complexity, profile, risk and major references in legislation e.g. Wiring Rules Standard

# Attachments

## Attachment 1. Net Benefit Case

### EXECUTIVE SUMMARY

*Provide a summary of scope of the proposal.*

**To review AS4299 Adaptable Housing to align with the 2010-2020 National Disability Strategy and for future inclusion in the National Construction Code, because:**

- AS4299 is now 20 years old and no longer aligns with current government policy;
- The COAG endorsed 2010-2020 National Disability Strategy commits to the provision of an agreed “universal design standard” in all new housing by 2020 [1];
- The “universal design standard” is understood to be the Livable Housing Design guideline, Silver level (see Attachment 2);
- There is acknowledgement from industry, community and government that the confusion over guidelines [7-21] causes inefficiencies and risk, and an updated Australian Standard that can be called up in the National Construction Code is required to meet the COAG commitment [2, 31].

The Victorian Government’s RIS for minimum accessibility in housing [6], the National Dialogue’s agreed Livable Housing Design Guidelines [4] and RIA’s proposed changes to the NCC inform the proposal on what might be the outcome. (See Attachments 2-4.)

The proposed standard will assist COAG [1] to meet its commitment for “all new housing to be of agreed universal design standards by 2020” [1. p. 34]. As the voluntary approach supported by the National Dialogue [5] has failed to reach the 2013 (25%) and 2015 (50%) interim targets and will not reach 5% of the 2020 (100%) target [2], it is proposed that the standard be considered for future inclusion in the National Construction Code.

### NEED FOR THE STANDARD

*Identify and provide evidence of the problem to be addressed.*

The market forces within the Australian housing industry have not responded adequately to the current policy directions towards the active participation and inclusion of all people [22-24]. A consequence has been the lack of appropriate mainstream housing for older people and people with disability and their carers [1, 5, 25].

The Australian Government’s ratification of the United Nations Convention on the Rights of Persons with Disabilities [32] obliged them to take action so that people with disability have the right to “full and effective participation and inclusion in society [32. Article 3], and should “have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others” [32. Article 19]. The Convention promotes the concept of universal design in the development of standards and guidelines for (in this context) housing in a way that requires “the

minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities” [32. Article 4].

The National Dialogue’s strategy was to develop a voluntary guideline [4] and plan [5], with housing industry and community leaders agreeing to an aspirational target of an agreed universal design standard in all new housing by 2020. The strategy was endorsed by three levels of government through COAG in the 2010-2020 National Disability Strategy [1]. The voluntary agreement has failed to reach the interim targets and is not expected to reach 5% of the 2020 target [2, 49]. (See Attachment 6.)

The housing industry is now required to respond to a vast array of guidelines, standards and codes across States and Territories, Local Councils, and State Development Authorities. The National Construction Code was established to address this sort of confusion within the construction industry, and situations where self-regulation has failed [31]. The Productivity Commission in 2004 identified that “governments sometimes intervene in the market for the social purpose of ensuring certain minimum standards of accommodation (including access to buildings) for all. It is most unlikely that certain building qualities, such as access for people with disabilities, would be delivered widely in the absence of government intervention” [31. p. xxiii].

*Describe the goal, objectives and strategy of the proposed Australian Standard.*

The goal and objectives of the proposed Standard reflect those of the 2010-2020 National Disability Strategy [1]:

Goal:	<b>Improved provision of accessible and well-designed housing with choice for people with disability about where they live.</b> [1. Policy Direction 3; p. 32]
Objectives	<b>Greater choice about where to live, but also more social opportunities for visiting friends and family</b> [1. Policy Direction 3; p.32]  <b>All new homes will be of agreed universal design standards by 2020.</b> [1. Policy Direction 3, p. 34]
Action	<b>To review AS4299-1995 Adaptable housing to align with the 2010-2020 National Disability Strategy and for future inclusion in the National Construction Code.</b>

*Demonstrate that there is wide stakeholder support for development of the Standard and that the implementation of the proposed Standard is likely.*

The National Dialogue that agreed to the aspirational goal of all new housing to be of agreed universal design standards by 2020 [5] were as follows:

- 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 Australian Network for Universal Housing Design and Rights & Inclusion Australia [31] have the support of 177 organisations and individuals (including the following key national organisations) who since have recognised the target will not be reached and support regulation for minimum accessibility in housing in the National Construction Code: See Attachment 7 for the full list of supporters.

*Identify any consequences of not developing the Standard.*

**For the housing industry**, the vast array in guidelines, standards and legislated requirements across Australia will cause confusion and inefficiencies for volume builders through design variations and delays in construction.

**For home owners and renters**, It is estimated that there is a 60% probability that a newly built single-family detached unit will house at least one disabled resident during its expected lifetime. If visitors are taken into account, the figure rises to 91% [34]<sup>1</sup>.

**For individual users**, the costs of modifying their housing to provide these minimum access features is estimated at nineteen times more than having them included at design-stage [6].

**For National and State governments**, there will be lost opportunities to optimise aged, disability and home care spending by keeping people in their own homes with their informal supports [35, 36], to minimise avoidable hospital stays [37] [38] and the need for public and private home modification funding [45, 46].

For the 2010-2020 National Disability Strategy [1], COAG will not meet their commitment to provide minimum access features in all housing by 2020 [1. p. 34].

The successful and cost effective implementation of the National Disability Insurance Scheme and the Commonwealth Aged Care Program rely on the national adoption of minimum accessibility standards in all new homes. This has been acknowledged by the Productivity Commission which has noted that the economic viability of the NDIS and the Aged Care Program will be challenged if there is a failure to secure minimum accessibility in new homes [35, 36].

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<sup>1</sup> This US study is referenced due to the lack of equivalent research in Australia. The prevalence of disability and the patterns of housing transitions in Australia are similar enough to consider these findings to be informative.

## HARMONISATION AND ALIGNMENT

*Identify any relevant codes, information, guidelines or Standards currently used or produced in Australia or other countries to address the problem.*

AS4299-1995 is called up under:

- ACT Territory Plan [8]
- NSW State Environmental Planning Policy [9]
- South Australia's Housing Code [10]

AS4299-1995 and Livable Housing Design Guidelines are referenced in many Local and State Government housing plans for specific details, including

- Queensland Government's Design Standard for Dwellings [11]
- NSW Government's Apartment Design Guide [12]
- Australian Government's National Building Economic Stimulus Plan [13]
- Northern Territory's social housing guidelines [48]
- National Rental Affordability Scheme Funding round 5 [55].

Other guidelines have been produced by New Zealand, State and Territory Governments to encourage the housing industry to provide accessibility in housing, including:

- 2001 ACT Housing for Life guidelines [14]
- 2001 Queensland's Universal Housing Design guidelines [15]
- 2002 Building Research Association of New Zealand (BRANZ)/Victoria's Building Commission Welcome: design ideas for accessible homes [16]
- 2008 New South Wales' Landcom universal housing design guidelines [17]
- 2008 Queensland's Smart and Sustainable Homes Design Objectives [18]
- 2009 Victorian Building Commission Build for Life website [26]
- 2010 Victorian RIS with proposed standard [6]
- 2011 New Zealand's Lifemark Design Standards Overview [19]
- 2011 Queensland's ULDA Accessible Housing guideline [20]
- 2011 Western Australia's Liveable Homes: designs that work for everyone [21]

Individual Local Councils have also produced their own guidelines, for example, Banyule City Council (Victoria).

Overseas examples are:

- Britain—Part M (Mandated code) [27] and Lifetime Homes, Lifetime Neighbourhoods (voluntary) [28].
- Sweden—Regulation for minimum access in all housing [50].
- United States of America's *Fair Housing Act* has a standard for accessibility [29]. Individual States have guidelines [30].

*Review and/or justify any apparent duplication with an Australian Standard or International Standard*

The vast array of guidelines, standards and codes are confusing for the housing industry and justify the development of a national standard from Standards Australia



with the rigour and authority that AS4299-1995 provided in 1995. The policy context has changed significantly since AS4299-1995, and a review would encompass the National Dialogue's agreement [5], called up in COAG's 2010-2020 National Disability Strategy [1] and will require a regulatory response through the National Construction Code if the 2020 targets are to be met.

*Consider any existing or proposed International Standard or International Standard development project and justify active participation, adoption/non-adoption or modification.*

The project would consider the international work on the universal design principles for housing by the Center for Universal Design [39] and the later development of universal design goals [40].

## SUMMARY AND DEMONSTRATION OF NET BENEFIT

The most recent study on net benefit was done by the Victorian Government in the regulatory impact statement (RIS) [6] for minimum accessibility in housing (See Attachment 3) as an amendment to the Victorian *Building Act 1993*. The RIS recommends the following four features to be mandated for all new housing:

1. a clear path from the street (or car set down/park) to a level entry;
2. wider doorways and passages;
3. a toilet suitable for people with limited mobility on the entry level; and
4. reinforced bathroom walls to allow grab rails to be fitted inexpensively if they are needed later [6. p. 134]. (See Attachment 3 for full description)

In 2015 Rights & Inclusion Australia proposed changes to the current National Construction Code with the purpose of a similar outcome [2]. (See Attachment 4) This proposal uses these findings.

*Demonstrate that the potential impacts of the proposed Standard are understood, including the costs and benefits of implementation.*

The principal types of relevant economic and financial costs and benefits are summarised in the following Table 1. The options are not expected to have any significant environmental impacts<sup>2</sup> [6. p. 64].

**Table 1 Costs of minimum accessibility estimated in the Victorian RIS [6. pp. 67-68]<sup>3</sup>.**

Features	Cost Per Single House (Class 1)	Cost per unit: Class 2: Low rise, no lift	Cost per unit: Class 2: High-rise, with lift
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<sup>2</sup> A small environmental benefit may arise from people moving house less often.

<sup>3</sup> These costs were calculated in 2010 and did not consider the later access requirements of the Access to Premises Standard for Class 2 dwellings in the NCC.

Features	Cost Per Single House (Class 1)	Cost per unit: Class 2: Low rise, no lift	Cost per unit: Class 2: High-rise, with lift
<b>1. Path of travel to entrance</b>	\$120	\$20	N/A
1.1 Minimum clear width of 1metre (Class 1) 1.2 metres (Class 2) continuous, slip resistant, traversable path of travel is required from the street boundary or, private car parking. (An exemption applies for Class 1 dwellings and Class 2 building on allotments whose average natural slope is steeper than 1 in 14). A ramp is required from any required accessible car park building (Class 7 a) associated with a Class 2 building.	(earth fill to grade path. Path included in total unit cost)	(earth fill to grade path. Path included in total unit cost)	
1.2 For the path of travel referred to in 1.1, pathways must not have a slope steeper than 1 in 20.			
1.3 For the path of travel referred to in 1.1, ramp grades must be between 1 in 14 and 1 in 20.	N/A	N/A	\$170 (car park pedestrian ramp)
1.4 For high-rise (Class 2) lifts must be accessible and passing/turning spaces must be provided in common corridors at 20 metre intervals.	N/A	N/A	\$700 (passing/turning spaces) \$0 Lifts (current building standards apply)
1.5 Water inundation at the entrance threshold is prevented. (achieved with door seal)	\$200	\$40	\$0
<b>2. Doorways and passage and common corridor width</b>	\$300	\$40	\$60
2.1 Minimum clear opening of 820mm.*			
2.2 Minimum passage width of 1metre between walls and no change of level between required doors.	\$0	\$0	\$0
<b>3. Toilet access</b>	\$200	\$70	\$50 (Sliding door.
3.1 A toilet area suitable for people with limited mobility must be included on entry level (Class 1).	(Sliding door. Replan walls and	(Sliding door. Replan walls and	Replan walls and toilet location at
3.2 A toilet compartment in a dwelling must have 1.2			

Features	Cost Per Single House (Class 1)	Cost per unit: Class 2: Low rise, no lift	Cost per unit: Class 2: High-rise, with lift
metres between the front of the pan and any part of a swing door and 900mm between walls. 3.3 For a toilet located in a bathroom it must be in a corner.	toilet location at no cost)	toilet location at no cost)	no cost
3.4 For Class 2, if sanitary facilities are provided in common areas, one sanitary facility in each type of space for use in common by residents, must be accessible.	N/A	N/A	N/A Included in common areas.
<b>4. Reinforced bathroom and toilet walls</b>	\$50	\$20	\$20
4.1 Noggings must be installed above finished floor level for the future fitting of grab rails to the walls of the entry level toilet, a shower and bath.**			
<b>Total Extra Over Cost of Features (Items 1-4)</b>	<b>\$870</b>	<b>\$190</b>	<b>\$1,000</b>
Total Unit Cost	\$370,000 (includes land, paths and driveway)	\$250,000 (includes ground floor unit, path and on-grade parking)	\$330,000 (includes lifts and basement car park)
<b>Extra Over Cost of Features as a % of Total Unit Cost</b>	<b>0.2%</b>	<b>0.1%</b>	<b>0.3%</b>

The low cost of designing the four features in up-front is crucial to the rationale for the intervention. The four features entail low costs because they involve incremental up-front design changes [6. p. 69]. (See Attachment 3.)

The RIS [6] outlines four principal types of benefit of the four accessibility features. A summary of the 2010 findings are outlined below<sup>4</sup>:

#### 1. Improved safety and reduced falls hazards

Injuries from falls are associated with healthcare costs. According to the *AIHW Hospital Statistics 2006–07*, the average length of stay for all patients in public acute hospital is 3.6 days; in private hospitals it was 2.5 days (private hospitals account for 33 per cent of hospital beds). Of these patients the average length of stay per case for fall injuries in 2004–05 was longer: 6.1

<sup>4</sup>The RIS refers to the State of Victoria only.

days. In addition, there are expected to be unquantified benefits from preventing deaths and injuries from emergency personnel being unable to achieve timely access or people with mobility restrictions being unable to achieve egress due to the lack of accessibility features [6. p. 72].

## **2. Reduced costs of future adaptations**

The cost of including the features in an existing home is estimated to be 19 times more than providing for them at design stage. The annual savings from avoiding the cost of retrofitting the four features into the extensively modified homes depends on whether the modifications are made predominantly in new homes (with the four features) or predominantly in existing homes. In addition to these benefits, there are expected to be unquantified benefits from savings in private expenditure on home modifications for the share of people who are using independent resources to modify their properties [6. p. 75-76].

## **3. Lower aged care and healthcare costs, and reduced cost of moving to more suitable accommodation**

The data from the RIS [6] identifies the following net benefits:

- savings in relocation costs from not having to move to more suitable accommodation;
- greater health and wellbeing from ageing in place;
- savings against the current respective budgets for aged care and home and community care programs
- delay entry into hostels, or nursing homes and other types of supported accommodation [6. p. 76].

## **4. Participation in community life**

The RIS [6] identified the net benefit here the fulfilment of the Victorian Government's policy commitment that people with a disability or other type of mobility impairment will not be excluded from key aspects of participation in community life [6. p. 95].

In summary, the total quantified benefit is calculated at 5.4. There are also unquantifiable benefits including greater safety and amenity, better quality homes and ageing in place (preventing injuries and deaths, reducing private expenditure on modifications and care, assisting carers, reducing public expenditure on crisis accommodation and non-quantified shorter stays in acute and sub-acute hospital care.

## **PUBLIC HEALTH AND SAFETY**

*Describe how the Standard will improve public and/or workplace health or safety.*

The Standard, when included in the National Construction Code would ensure the reliable provision of accessibility and for both paid and unpaid home care workers.

*Demonstrate that the Standard is the most appropriate method to improve health or safety.*

The provision of access features in housing is currently voluntary. Although there are a vast array of guidelines, standards and codes this has not led to a measurable change in practice to provide health and safety in housing [2, 41]. The lack of voluntary response by the housing industry demonstrates that an updated AS 4299 included in the National Construction Code would be the most appropriate method to improve health and safety in housing.

*Summarise the overall health and safety impact of the Standard.*

Greater accessibility of housing will positively impact on the health and safety of older people, people with disability, children, their families and paid support staff [38, 42].

## **SOCIAL AND COMMUNITY IMPACT**

*Consider the social and community impact of the Standard including 'intangible' costs and benefits borne by different sectors of the community, including the most vulnerable consumers or end users (such as better information; improvements to products and services; more reliable outcomes).*

The wider amenity benefits of accessible housing [6], including.

- more timely access by emergency personnel and egress by people with mobility restrictions;
- cost savings to private expenditure on home modifications, home care and aged care services;
- the ageing in place health benefits and cost savings to private expenditure of not having to move, or being able to move to more suitable accommodation nearby;
- the beneficial impact on unpaid carers; and
- the ability for people with mobility restricting conditions to return home earlier from acute care or from sub-acute care or rehabilitation because their home had the four accessibility features [6. p. 96].

*Summarise the overall social and community impact of the Standard.*

The overall social and community impact of the Standard, when included in the National Construction Code, would be in the form of lower social costs through safer and more suitable housing; greater equity, dignity and participation for people with a disability or mobility limitation; and greater amenity for people who are raising small children, recovering from an injury, and undertaking a range of day-to-day activities [6. p. 63-64].

## **ENVIRONMENTAL IMPACT**

*Consider the environmental impact of the Standard, including 'intangible' costs and benefits (e.g. noise; pollution; amenity).*

There is no environmental impact of the Standard.

## COMPETITION

*Describe how the Standard enables international alignment in global markets.*

There are no international alignment issues with global markets.

*Identify potential competition restrictions or improvements that may result from the Standard.*

The Victorian RIS [6] estimates there are no competition restrictions for the housing industry if the Standard is called up under the National Construction Code. Adoption of uniform rules should increase competition. The impact on business costs is expected to be negligible if it is mandated; the proposed minimum standards would not affect the ability of businesses to innovate; and the proposal entails a small, incremental change to the nature of products offered in the market [6. p. 119].

*Identify potential impacts upon innovation.*

The current voluntary guidelines have had minimal effect on innovation. The proposed Standard either voluntary or mandated also would not have any adverse impact upon innovation.

*Detail how the Standard can enable most widely used technology and/or supports international interoperability (demonstrate if applicable).*

The building technology required to meet the Standard is currently available and currently widely used across Australia [41].

*Summarise the overall impacts on competition.*

The impact on business costs is expected to be negligible [6]; the proposed minimum standard would not affect the ability of businesses to compete; the proposal entails small changes to dwelling designs, utilising readily available products and designs offered in the market [6. p. 15].

## ECONOMIC IMPACT

*Consider the economic impact of the Standard over its life on different sectors of the community, such as consumers, manufacturers, small business, suppliers etc.*

If the Standard remains voluntary, there will be increased costs to housing industry, government and individual citizens [6]. If the Standard is referenced in the National Construction Code:

- the benefits to society will exceed the costs;
- the net benefits will be greater than those associated with any practicable alternatives such as the voluntary guidelines;
- it will not restrict competition; and
- it will not lead to a material change in the administrative burden on industry [6. p. 16].

## STANDARDS AND LEGISLATION

The Standard will need to be included in the National Construction Code if COAG's commitment to the 2020 target is to be kept [1, 5]. This has been taken into account when developing the above Net Benefit Case.

The Chair and the General Manager of the Australian Building Codes Board is aware of the widespread support for regulation of minimum access features in housing in the National Construction Code from disability, aged, and women's sectors and socially responsible housing providers [31]. This proposal is a necessary first step towards this change.

#### **DECLARATION**

We declare that the information in this proposal will result in an overall Net Benefit to the housing industry, people with disability and older people, government and the community as a whole, when it is included in the National Construction Code.

## **Attachment 2. Livable Housing Design Silver Level**

### **1. Dwelling access**

#### **Performance Statement:**

**There is a safe and continuous pathway from the street entrance and/or parking area to a dwelling entrance that is level.**

- a) A safe and continuous pathway from:
  - i. the front boundary of the allotment: or
  - ii. a car parking space, where provided, which may include the driveway on the allotment, to an entrance that is level as specified in Element 2.

This provision does not apply where the average slope of the ground where the path would feature is steeper than 1:14.

- b) The path-of-travel as referred to in (a) should have a minimum clear width of 1000mm and—
  - i. an even, firm, slip-resistant surface;
  - ii. a cross-fall of not more than 1:40;
  - iii. a maximum pathway slope of 1:14. (Landings are to be provided at intervals as detailed in AS1428.1 (2009) for gradients between 1:20—1:14)
  - iv. a step ramp compliant with AS1428.1 (2009) may be incorporated, with a landing at its head and foot where there is a change in height of 190mm or less. The landings must have a length of at least 1200mm exclusive of the swing of the door or gate that opens onto them.

### **2. Dwelling entrance**

#### **Performance statement:**

**There is at least one level entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.**

- a) The dwelling should provide an entrance door with:
  - i. a minimum clear opening width of 820mm;
  - ii. a level transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled); and
  - iii. reasonable shelter from the weather.
- b) A level landing area of 1200mm x 1200mm should be provided at the level entrance door.
- c) Where the threshold at the entrance exceeds 5mm a ramped threshold of up to 56mm compliant with AS1428.1 (2001) may be provided.
- d) The level entrance should be connected to the safe and continuous pathway as specified in Element 1.

Note: The entrance must incorporate waterproofing and termite management requirements as specified in the NCC.



### **3. Car parking (where part of the dwelling access)**

**Performance statement:**

**Where the parking space is part of the dwelling access it should allow a person to open their car doors fully and easily move around the vehicle.**

- a) Where the parking area forms part of the access pathway into the dwelling the space should incorporate:
  - i. minimum dimensions of at least 3200mm (width) x 5400mm (length);
  - ii. an even, firm and slip-resistant surface; and
  - iii. a level surface (1:40 maximum gradient, 1:33 maximum gradient for bitumen).

### **4. Internal doors and corridors**

**Performance statement:**

**Internal doors and corridors facilitate comfortable and unimpeded movement between spaces.**

- 1. Doorways to rooms on the entry-level used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide:
  - i. a minimum clear opening width of 820mm; and
  - ii. a level transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled).
- 2. Internal corridors/passageways to the doorways referred to in (a) should provide a minimum clear width of 1000mm.

### **5. Toilet**

**Performance statement:**

**The ground (or entry) level has a toilet to support easy access for home occupants and visitors.**

- a) Dwellings should have a toilet on the ground (or entry) level that provides:
  - i. a minimum clear width of 900mm between the walls of the bathroom if located in a separate room; and
  - ii. a minimum 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door.
- b) If the toilet is located within the ground (or entry) level bathroom, the toilet pan should be located in the corner of the room to enable the installation of grab-rails.

### **6. Shower**

**Performance Statement:**

**The bathroom and shower is designed for easy and independent access for all home occupants.**

- a) One bathroom should feature a slip-resistant, hobless (step-free) shower recess. Shower-screens are permitted provided they can be removed at a later date.
- b) The shower recess should be located in the corner of the room to enable the installation of grab-rails at a future date.

## **7. Reinforcement of bathroom and toilet walls**

### **Performance statement:**

**The bathroom and toilet walls are built to enable grab-rails to be safely and economically installed.**

- a) Except for walls constructed of solid masonry or concrete, the walls around the shower, bath (if provided) and toilet should be reinforced to provide a fixing surface for the safe installation of grab-rails.
- b) The fastenings, wall reinforcement and grab-rails combined must be able to withstand 1100N of force applied in any position and in any direction.
- c) The walls around the toilet are to be reinforced by installing:
  - i. noggings with a thickness of at least 25mm; or
  - ii. sheeting with a thickness of at least 12mm
- d) The walls around the bath are to be reinforced by installing:
  - i. noggings with a thickness of at least 25mm; or
  - ii. sheeting with a thickness of at least 12mm.
- e) The walls around the hobless (step-free) shower recess are to be reinforced by installing:
  - i. noggings with a thickness of at least 25mm; or
  - ii. sheeting with a thickness of at least 12mm.

## **8. Less than 5mm transition between internal spaces**

### **Performance statement:**

**Internal doors and corridors facilitate comfortable and unimpeded movement between spaces.**

- i. (Internal spaces) on the entry-level used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide a level transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or bevelled).

### Attachment 3. Victorian standard and RIS Rationale for regulation

In 2010, the Victorian Government [6] proposed four features to be mandatory in all new housing. They are:

1. **Clear path from the street (or car set-down/park) to a level entry:** (1 metre wide path or ramp with no handrails, from the street or car parking, exemption for sites with an average slope steeper than 1 in 14);
2. **Wider doorways and passages:** a minimum clear opening width of 820mm to required doors (based on approximately an 870 wide door leaf) and a minimum clear opening width of 1000mm to halls;
3. **A toilet suitable for people with limited mobility on entry level:** achieved with a toilet compartment measuring 900mm wide and 1200mm from the front of the pan to the nearest part of a doorway, or for a toilet located in a bathroom it must be in the corner; and
4. **Reinforced bathroom walls to allow grab rails to be fitted inexpensively if they are needed later:** required to two sides of the entry level toilet, a bath and one side of a shower for a certain extent.

Taken from the Victorian Government's RIS on minimum accessibility in housing:

- A pathway that is at least 1 metre wide, slip-resistant and firm from the street or, car parking, is a minimal incremental design requirement. Most pathways are already this wide and are firm and flat. To achieve slip resistance, a variety of surface types would be acceptable. Importantly, the requirement would only apply where a path of travel can be achieved on a natural slope less than 1 in 14.
- The requirement to have no steps on the pathway from the allotment boundary or driveway to the front door would have limited application: it would only apply 'where reasonably practicable', and only to flat or nearly flat allotments (i.e. natural slope less than 1 in 14). The need to adopt additional measures to prevent water inundation would be of limited application as most porches have weather protection;
- The clear opening width of 820mm for doorways translates into the standard door width of 870mm, which is marginally wider (5cm) than the current standard width of 820mm;
- The requirement that there be no changes in level between the entrance-level living, dining, bedroom, bathroom, kitchen, laundry and toilet areas would have limited impact as most houses do not have a change of level on the entry level;
- The required passageway widths would be equivalent to current standard widths in many cases, and only incrementally wider in all other cases;
- The location of a toilet between walls a minimum of 900mm apart is a minimal requirement that can be achieved by the relocation of minor walls at the design stage;

- Locating a toilet in the corner of a room is a minimal requirement that can be achieved in the layout of the bathroom at the design stage; and
- The reinforcement in the toilet and bathroom walls is typically in lengths of 600mm. It would be located between studs, which are part of the building framing. Framing off-cuts can be used for the reinforcing material [6, p. 69].

The four proposed features would not require changes to the size of homes. The four features can be accommodated without changing the overall size of homes. The reasons behind this conclusion are the following:

- the dimensions of the proposed features are close to the dimensions used as industry standards, such as the width of doorways (820mm), passages (1 metre front and 900mm rear) and the width and breadth of toilet compartments (900mm wide by 1.5 metres long);
- most hallways already meet the standard width of 1 metre, so would not need to change
- widening hallways that are narrower than 1 metre would have a minimal impact on the size of adjoining rooms. For example, widening a hallway by 5 cm would reduce the size of an adjoining 3 metres by 3.5 metres room by approximately 1.7 per cent, with no material impact on space or amenity;
- widening a doorway by 5 cm could be accommodated in the design of the doorframe and adjacent walls, and would make no material difference to adjacent room sizes;
- the bathroom and toilet space requirements can be achieved through the design of the layout of the bathroom and toilet, and via decisions about the position of walls and type of doors and pans, for example; and
- with regard to Class 2 high-rise and medium density dwellings, the requirements would only apply to a specified subset of dwellings. The impact on individual dwelling designs could be accommodated in the overall design of the building.

Based on consultation, DPCD estimates that the total impact on dwelling size would be no more than half a square metre. This impact can be accommodated through design changes that do not affect the overall size of the building, but it may limit the alternative use of space in some areas within homes.

## Attachment 4. RIA proposed draft amendments to the NCC/BCA (Volume 1, 2)



*Proposed by Rights & Inclusion Australia (ABN 60 149 775 100)*

26 June 2014

### Proposed APS / BCA (Vol 1, 2) amendment to include accessible housing

Existing NCC extracts – and *recommended APS / BCA amendments*

**Class 1** – one or more buildings which in association constitute –

- (a) Class 1a – a single dwelling being
  - (i) a detached house; or
  - (ii) one of a group of two or more attached dwellings, each being a building, separated by a fire-resisting wall, including a row house, terrace house, town house or villa unit;

**Class 2** – a building containing 2 or more sole-occupancy units each being a separate dwelling.

#### D3.1 General building access requirements

Buildings and parts of buildings must be *accessible* as *required* by Table D3.1, unless exempted by D3.4.

**Table D3.1 REQUIREMENTS FOR ACCESS FOR PEOPLE WITH A  
DISABILITY**

Class of building	Access requirements
<i>Class 1a</i>	<i>To and within at least one floor normally used by the occupants</i>
<b>Class 1b</b> A boarding house, bed & breakfast, guest house, hostel or the like	To and within ...  etc
<b>Class 2</b> <del>Common areas</del>	From a pedestrian entrance required to be accessible to at least 1 floor containing sole-occupancy units and to <i>and within</i> <del>the entrance doorway of</del> each sole-occupancy unit located on that level.

### D3.2 Access to buildings

- (a) An accessway must be provided to a building *required* to be *accessible* –
- (i) *From* the main points of a pedestrian entry at the allotment boundary; and
  - (ii) from another *accessible* building connected by a pedestrian link; and
  - (iii) from any *required accessible* car parking space on the allotment (Ref. AS2890.6)

### D3.4 Exemptions

The following areas are not *required* to be *accessible*:

- (a) An area where access would be inappropriate because of the particular purpose for which the area is used.
- (b) An area that would pose a health or safety risk for people with a disability.
- (c) Any path of travel providing access only to an area exempted by (a) or (b).

**Table D3.5 CAR PARKING SPACES FOR PEOPLE WITH A DISABILITY**

Class of building to which the car park or car parking area is associated	Number of accessible car parking spaces required
<i>Class 1a</i> <i>Class 2</i>	<i>1 space for every single dwelling or 1 space for every 5 attached dwellings or sole-occupancy units.</i>  <i>ISA use is optional</i>
<b>Class 1B and 3</b>	To be calculated by multiplying ... etc

**Table F2.4 (a) ACCESSIBLE UNISEX SANITARY COMPARTMENTS**

Class of building	Minimum accessible unisex sanitary compartments to be provided
<i>Class 1a</i>	<i>Not less than 1 adaptable bathroom for every single dwelling, with reinforced wall areas (Ref: AS4299-1995)</i>
<b>Class 1b</b>	Not less than 1 .... etc
<b>Class 2</b>	<i>Not less than 1 adaptable bathroom for each sole-occupancy unit, with reinforced wall areas (Ref: AS4299-1995)</i>  <del>Where sanitary compartments are provided in common areas, not less than 1.</del>

**Note** – these recommendations are subject to modifications of other related BCA clauses, including Section D Access & Egress: Objective, Functional Statements and Performance Requirements as applicable.

## Attachment 5. International and National Policy

The **World Health Organization's** recent World Report on Ageing and Health [43] identifies international market failure with regard to housing design for older people and acknowledges the role of regulation:

***It is cheaper to build new housing that is accessible and energy efficient than it is to retrofit housing. In many countries, laws and standards on disability and accessibility stipulate the need to provide access to all people. Even if the renewal rates for housing stock are low and a focus on building new housing is not feasible in the short term, it is important to ensure that state-supported housing adheres to universal design principles, is energy efficient and is capable of harnessing innovations in housing design that can support people as they age. Building codes that require accessible features can also be used to ensure that developers of market-rate houses build more age-friendly homes and arrange for age-friendly renovations*** [43. p. 169].

The **United Nations Convention on the Rights of Persons with Disabilities** [32], to which Australia is a signatory, not only directs how housing assistance is offered but also how housing should be designed, as follows:

1. **Article 9** brings a particular focus to the broadly accepted **right to social inclusion**, by promoting the right for people with disability to **access all aspects of the physical and social environment on an equal basis with others**.
2. **Article 19** calls on signatories to the present Convention to recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community, including having the **right to choose their place of residence and where and with whom they live on an equal basis with others**;
3. **Article 2** supports universal design as the design of . . . **environments, . . . [should] be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design**".
4. **Article 4 (f)** adds that there is an obligation to undertake or promote research and development of universally designed goods, services, equipment and facilities, (as defined in Article 2), which should require the minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities, to promote their availability and use, and to **promote universal design in the development of standards and guidelines**.

The **United Nations Principles for Older Persons 1991** [44] support the proposal, in particular:

- **Older persons should be able to live in environments that are safe and adaptable to personal preferences and changing capacities.**
- **Older persons should be able to reside at home for as long as possible.**

The 2010-2020 National Disability Strategy [1] outlines the Australian Government's commitment to the United Nations Convention on the Rights of Persons with Disabilities. The Strategy's first anticipated outcome is "**people with disability live in accessible and well-designed communities** with opportunity for full inclusion in social, economic, sporting and cultural life" (p. 29).

The Strategy's Policy Direction 3 is "**Improved provision of accessible and well-designed housing with choice for people with disability about where they live**" [1. p.32] and commits to:

*working with representatives from all levels of government, key stakeholders from the disability, ageing and community support sectors and the residential building and property industry on the National Dialogue on Universal Design (National Dialogue) to ensure that housing is designed and developed to be more accessible and adaptable. **An aspirational target that all new homes will be of agreed universal design standards by 2020 has been set, with interim targets and earlier completion dates to be determined.*** [1. p.34]

The targets and interim targets were outlined in the National Dialogue's strategic plan [5] and the agreed universal design guideline was described as the "silver" level [4]. The following is an excerpt from the strategic plan:

*National Dialogue members propose a 10-year timeframe for the implementation of this strategic plan, with the aspirational target being that all new homes will be of an agreed Universal Housing Design standard by 2020. The application of the Guidelines is a key element of working toward the aspirational target. Therefore, interim targets for the adoption of the Guidelines are proposed to assist National Dialogue members to gauge the uptake and improvement in awareness of Universal Housing Design over the next 10 years.*

***The agreed interim targets for voluntary uptake of the Guidelines for all new residential housing are:***

- ***25 per cent to Silver Level by 2013***
- ***50 per cent to Silver Level by 2015***
- ***75 per cent to Silver Level by 2018***
- ***100 per cent to Silver Level by 2020***

*National Dialogue members believe that the Commonwealth and all state and territory government providers of social-housing should commit to delivering all new public-housing to an agreed Universal Housing Design standard. The targets proposed for the uptake of the Guidelines by the Commonwealth and states are:*

- *100 per cent to Silver Level by 2011*
- *50 per cent to Gold Level by 2014*
- *75 per cent to Gold Level by 2017*
- *100 per cent to Gold Level by 2019 [5].*



## Attachment 6. Reported outputs from the National Dialogue Strategic Plan

Livable Housing Australia (LHA), the vehicle to implement the voluntary approach of the National Dialogue [5], reported the following outputs to the RIA/Standards Australia Forum on 18 November 2014<sup>5</sup>:

1. LHA have issued over 350 certificates total across Australia for projects (either designed or built) that comply with the Silver, Gold or Platinum Levels outlined in the LHD Guidelines. LHA has issued 55 as-built certificates. 54 of these are Platinum level with one silver level dwelling. There are over 2050 other projects that have registered for certification.
2. 310 projects have been reviewed using the self-assessment portal since it was launched in July 2014.
3. LHA have identified 2600 other dwellings that publicly claim to have been designed or built to at least the Silver level of the LHD Guidelines but are not currently registered for certification from LHA.
4. Approximately 4000 social and affordable dwellings have been identified to date as being built over the last two years to meet at least silver level.

ANUHD and RIA have identified independently a number of activities associated with the work of LHA:

- The National Partnership Agreement on Remote Indigenous Housing (NPARIH) has a set of guidelines that require new housing to be designed to be “adaptable”.
- The National Rental Affordability Scheme (NRAS) (Round 5) [55] committed to give preference to projects providing Gold Level (Livable Housing Australia, 2013a); however, funding for this scheme has ceased.
- The Queensland Government reported to ANUHD that the Commonwealth Games athletes’ village is planned to provide Gold Level features to its apartments and Silver level to its townhouses [email communication].
- The Green Building Council of Australia has referenced the Livable Housing Australia certification in the new version of the pilot Submission Guideline (v0.1) for the Green Star-Communities rating tool in May 2014 [email communication].
- LHA has informed ANUHD that Lendlease and Stockland, both original members of the National Dialogue, have considered including Livable Housing Design in some of their retirement village developments.
- LHA reported on 20 August 2014 that Grocon committed to provide LHA standard (level unknown) in all of its new housing [53]

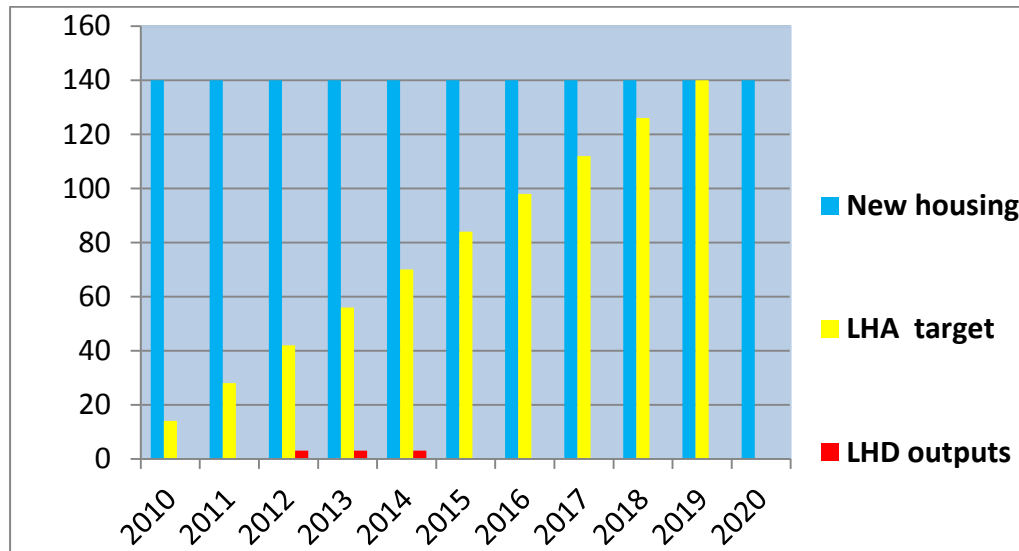
Within the estimated 140,000 approvals per year [54], ANUHD assesses that, if the housing industry met the targets, **approximately 210,000 projects** (built or designed) would be in the housing market by the mid-point of 2015, and **770,000 projects by 2020**.

To date, LHA estimates that approximately **9300 projects** are planned or built with something like LHA silver level or above. Given the difficulties LHA have in accurately

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<sup>5</sup> No further reports on outputs have been available from LHA since November 2014.

assessing the LHD housing and providing up-to-date figures, ANUHD/RIA included all LHA's reported outputs (designed or built) whether verified or not. A **generous estimation is that the current voluntary approach will achieve, at best, 5% of the National Dialogue's 2020 target**. See **Figure 1** below for a comparison of the COAG's National Disability Strategy targets and the LHA reported outputs.



**Figure 1** Graph comparing LHA outputs with COAG targets

The full report [2] is available at [www.anuhd.org](http://www.anuhd.org)

## Attachment 7. ANUHD/RIA Position Statement and list of supporters for regulation

### Position Statement

*Australian Network for Universal Housing Design and Rights and Inclusion Australia* believe that the homes we build for today should be fit for all of tomorrow's Australians.

Please support our call to the Australian Government to regulate **minimum access features in the National Construction Code for all new and extensively modified housing**. This should be supported by education and training for the housing industry.

### *Why?*

- Current housing designs do not work for many people including older people, people recovering from illness or injury, mothers with prams and people who have mobility difficulties.
- Greater accessibility is cheap and easily achieved—with **three simple features**.
- An increased supply of accessible mainstream housing is critical to the success of the National Disability Insurance Scheme and the Aged Care Reforms.
- In 2010, Australian housing industry leaders agreed to provide these three simple features in all new housing by 2020. With a few exceptions, the housing industry has not responded. We anticipate that less than 5% of the 2020 target will be met unless these features are regulated.
- Regulation in the National Construction Code will provide a “level playing field” for the Australian housing industry and cost and production efficiencies for everyone.
- Regulation will lead to more inclusive and sustainable communities now and in the future.
- Regulating these **three simple features** will allow many more people to stay in their homes, and to visit others—regardless of their age, disability or life circumstances.

### *What are these three simple features?*

1. An **accessible path of travel** from the street or parking area **to and within** the entry level of a dwelling.
2. Doors, corridors and living spaces that allow **ease of access for most people on the entry level**.
3. **A bathroom, shower and toilet that can be used by most people**, with reinforced wall areas for grab-rails at a later date.

## Formal supporters of regulation

As of 10 December 2015, the following 177 organisations and individuals formally support the provision of minimum access features in the National Construction Code for all new and extensively modified housing.

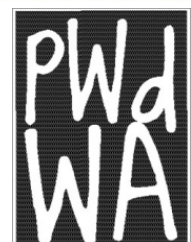








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Stephen Kelly  
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Tanisha Cowell, Occupational Therapist  
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Victoria Jones  
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WSD Access Consultants



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