

31 August 2020

Australian Building Codes Board  
abcbris@abcb.gov.au

Dear Madam/Sir,

**Re: Consultation Regulation Impact Statement (RIS):**

**Proposal to include minimum accessibility standards for housing in the National Construction Code (NCC)**

Spinal Life Australia represents people with spinal cord injury and other physical spinal damage. We value the opportunity to make a Submission about the RIS Proposal to include minimum accessibility standards for housing in the National Construction Code (NCC) and do so in the hope it can foster a more equitable, integrated, inclusive Australia.

Yours sincerely,



John Mayo  
Chief Advisor – Government



# Submission by Spinal Life Australia

## Consultation Regulation Impact Statement (RIS) Proposal to include minimum accessibility standards for housing in the National Construction Code (NCC)

Established in 1960, Spinal Life Australia is a leading provider of advocacy, therapy and supports for people with spinal cord damage and related physical disabilities. Our members have been seeking and participating in processes to achieve accessible housing throughout those years. We are pleased to comment as follows.

### **The RIS opportunity:**

We see the RIS as the stepping stone opportunity for government to acknowledge Australians who need accessible housing - and show leadership and guidance to support them to have **a fair go** and acknowledge the social and economic benefits that will occur.

### **What is Accessible Housing:**

Economic Development Queensland has summed it up through its three Principles of Accessible Housing:

#### *Principle one: Equitable use*

The dwelling provides an easy and convenient living environment for all levels of mobility and health in a potential occupant.

#### *Principle two: Flexibility in use*

The dwelling provides for potential changes in the mobility and health of the occupant.

#### *Principle three: Simple and intuitive use*

The layout of the dwelling and its fixtures are easy to understand, regardless of an occupant's experience, knowledge, language skills or concentration level.

### **Who needs accessible housing:**

#### *People with disability*

In order to participate in their community as Australians without disability do.

#### *The Over 60s*

To manage diminishing functionality associated with aging; to age in place - and to maintain their local relationships through peers and family with diminished functionality being able to visit them.



### *People with a medical condition*

(Comprising four sub sets: illness, muscular, respiratory, cognitive)

To manage diminished functionality associated with their medical condition and aging, to age in place – and to maintain their local relationships through peers and family with diminished functionality being able to visit them.

### *Young families*

Couples looking to raise families will seek ‘accessibility’ in order that aging grandparents (and their peers) can participate in the lives of their children and contribute in supporting their family.

## **Self-regulation v Regulation:**

Recent history leads us to believe Regulation is imperative – and Self-regulation will likely lead to continued in-action.

The Kirribilli Agreement 2010-2020 was an Agreement for self-regulation to provide accessible housing using a Guideline. In 2009, all the key players connected to the Housing Industry put their hands on their heart and signed the Agreement that required meeting incremental targets in delivering the minimum Silver level of design in new housing over a 10 year period.

It created great hope for the thousands of Australians who require accessible housing but as at 31 August 2020 not a single (incremental) target has been met.

In the circumstances, the Kirribilli Agreement is considered redundant, and moving forward, Regulation is critical.

## **What our members say...**

We surveyed our members asking what it is like ‘Living with a disability in inaccessible housing’. The survey noted the Australian government is currently considering introducing legislation and asked: What would you like to tell the Australian government about the need for such legislation? The survey data and their comments are provided in the attached report.

The survey indicates a significant impact connecting inaccessible housing and employment. The question was asked: Has a lack of accessible housing ever....

Prevented you taking a job?	30%
Reduced your hours of work?	28.33%
Reduced your productivity at work?	25%
Led to losing or giving up a job?	<u>16.67%</u>
Total:	100%

## **What we support:**

Of the Options presented in the RIS, Spinal Life Australia supports Option 2 — **"Let's do it right first time"** — which provides the accessibility standard that meets the objective of the RIS. Option 2 is what Australians want: a home where they can feel safe and included, and where they can age in place and be visited by people who require accessibility.



Spinal Life Australia supports the **Dalton Carter economic report** (attached) that recommends a further assessment of a combination of options, namely, combining Regulation with Option 5. This will further increase the benefit/cost ratio at little cost.

**Conclusion:**

Since evolution, it is accepted that of all the necessities of life, the cave came first and has remained first, though its name has changed to house, dwelling and home. In the past 75 years, by the hand of government, industry and business, Australians have been offered significant modernisation, facility and amenity in housing. All Australians that is, except those who require accessible housing.

This is un-Australian. It has to be addressed for social and economic reasons in addition to the discrimination. It needs to occur for private dwellings and social housing – and Tourism too.

The time is now because nothing impedes a nation more than legislation and regulation that is not inclusive and thereby only supports some sections of its community. We cannot maximise our social and economic performance as a nation until it does.

