



Response to NSW Housing Strategy Discussion Paper



July 2020

W: <http://universaldesignaustralia.net.au>

E: udaustralia@gmail.com



Table of Contents

Executive Summary	3
Recommendations	3
About Centre for Universal Design Australia (CUDA)	5
Opening Comments	5
Discussion Paper Introduction	6
The Proposed Vision for NSW Housing	7
Livable Housing Design Guidelines	8
Four Themes	8
Housing Supply: In the right place at the right time	8
Diversity: The right type and size in the right locations	10
Affordability: Housing at the right price points	17
Resilience: Safe, comfortable and resistant to climate change	18
Concluding remarks	20

Executive Summary

The Discussion Paper is by definition broad and attempts to capture the elements of what is a complex system of house-building in New South Wales.

Although it is written from the perspective of the house-building industry with little regard for community input, we address each of the four sections as they are presented.

We propose that the Strategy would be greatly enhanced by taking a universal design approach to both planning and delivery of all new housing.

The Discussion Paper includes reference to several national policies, but has omitted reference to the National Disability Strategy (the NDIS is not the same thing), which is Australia's undertaking to meet our obligations under the UN Convention on the Rights of Persons with Disabilities.

The principles of the National Disability Strategy include people of all ages, unlike the NDIS. Referring the housing needs of older people to particular specialised categories and the Ageing Strategy, risks further marginalisation rather than inclusion.

People with disability and older people live in households, in families, and consequently disability is not an individual problem. The whole household is affected. This can relate to all members of the household having the capability to gain and maintain employment, receive an education and participate in community life.

Household statistics show that more than one third (35%) of households have a person with disability. That does not include 22% of people with long term health conditions that are counted separately by the ABS. Conservatively, 40% of households have a need for universal design both now and into the near future.

Reports from the Royal Commission into Aged Care Quality and Safety confirms that most people want to age in their own homes and receive care in their homes rather than a facility.

Recommendations

Supply Recommendations:

- That Government invest in significant social housing infrastructure.
- That policies to support build-to-rent housing meet the demand for private rental housing.
- That both social housing and build-to-rent models include Livable Housing Design for the usability of everyone.
- That the outcomes of the two current Royal Commissions into aged care and people with disability be included in policy decisions.
- That Local Government be given more authority for developer compliance.

Diversity Recommendations:

- That the NSW obligations under the National Disability Strategy be referenced throughout the Housing Strategy.
- That the Housing Strategy be reviewed taking a universal design approach for all housing so that it will be “suitable for all potential residents” as stated in the Discussion Paper.
- That the Livable Housing Design Guidelines, which are underpinned by a universal design approach, be referenced and applied to tangible actions and outcomes.
- That the NSW Government be inclusive of people with diverse needs and backgrounds by having a seat at the discussion table.
- That if the proposed changes to the National Construction Code for accessible housing are not taken up in the 2022 edition, that
 - a. The New South Wales Government adopt the minimum Gold level of Livable Housing Design Guidelines in all new housing, and
 - b. Support councils to implement the Livable Housing Design Guidelines.

Affordability Recommendation

- That a major injection of funds to support increased supply of affordable social housing be made.

Resilience Recommendations

- That the elements of the Livable Housing Design Guidelines be included in the BASIX instrument to encompass a broader definition of resilience for more people.
- That community roundtables be formed to contribute to discussions for including the elements of the Livable Housing Design Guidelines in BASIX or other related instrument.

About Centre for Universal Design Australia (CUDA)

CUDA is a registered charity with the aim of creating a more inclusive world where everyone is included everywhere, every time regardless of their background, age or level of capability. We advocate for the implementation of universal design across all fields of design because it is the means by which to achieve inclusive communities.

Universal design is an approach to designing goods, services, built environments and communications technology so that they include as many people as possible without the need for specialised or separate solutions¹. This includes the design of policies, plans, and in this case, housing.

The most visible beneficiaries of universal design are people with disability, people with chronic health conditions and people who are growing older and less able. However, incorporating universal design principles does not disadvantage any other group in society. Indeed, it improves the convenience and ease of use for everyone. This includes carers, parents with baby strollers and small children, anyone with wheeled devices, removalists, paramedics, and fire and rescue services.

Opening Comments

Housing lies in a complex and contested landscape. While it is important for the industry to make a profit for shareholders, it is also important that they add value to the community from which they draw that profit.

Apart from increased size, Australian housing design has changed little in the last 50 or so years, save for fashionable changes. However, population demographics, community expectations and the way we live our lives, have changed. Now is the time to bring our housing design and related regulations up to date to incorporate current and future housing needs for everyone.

We are living with designs intended for a different era. All new housing must be fit for purpose now and into the future.

Our submission will address the gaps in the discussion document from the perspective of all households and occupants. Our comments and recommendations will, for the most part, address the design of our homes and how design contributes to all four themes.

To be clear, universal design, is not a special type of design and is not “disability” design or design for “seniors”. It is design for amenity, safety, affordability, resilience, and most of all, inclusion. Universal design is not mutually exclusive to any policy setting. Universal design is both a philosophy (inclusion) and design outcomes (buildings, products, etc.).

The concept of universal design accepts that there will be individuals who will need specialised and custom designs, such as aids and devices to support their independence. These aids include specialist disability accommodation (SDA) which is not mainstream

¹Center for Universal Design, (1997) https://projects.ncsu.edu/ncsu/design/cud/about_ud/about_ud.htm

housing. However, anyone in SDA housing needs a universally designed supportive neighbourhood to participate in everyday life.

In the context of universal design for housing, our comments are underpinned by the Livable Housing Design Guidelines². The initial promise by industry that all new housing will be to the Guidelines by 2020 has not materialised. However, the Guidelines remain a valid and useful document for implementing universal design features in all new homes.

We note that the discussion paper and the questions are biased towards housing industry suppliers. Consequently there are no discussion questions suited to the community or housing advocates that are not involved in supply.

“Housing” is about industry, policy and the buildings, but ultimately they are our homes, the places that underpin our families, our wellbeing and our lives.

Discussion Paper Introduction

The opening statement to the Discussion Paper notes that housing has a profound effect on the lives of everyone and that there are economic and productivity benefits from appropriate housing:

“Housing benefits everyone – from individuals to households, communities and the economy. ... This has mental and physical health benefits.”

“Housing shapes the character of cities [and] creates economic opportunities ... and broader productivity benefits.”

We will keep the opening statement in the Introduction to the Discussion Paper front of mind when addressing the issues.

As the Introduction states, housing must respond to population and other changes: an increase in older people, more children, diverse living arrangements, affordability, and diverse ways of using a home.

We note the objective is to form a cohesive strategy from which actions can be devised that includes other state bodies and local government authorities. The key levers are listed as robust policies, legislation, planning approval pathways, investing in infrastructure, filling gaps caused by market failure, and using data to plan.

Gaining the support of industry is indeed an important element if the market model is to be the main driver of housing stock. Indeed, housing is the largest piece of infrastructure in Australia. Without the voluntary support of industry, policies will not gain sufficient traction and regulation will be required.

In the list of Australian Government policy settings, the National Disability Insurance Scheme (NDIS) is mentioned. However, this is not the same as the National Disability Strategy which is not mentioned. The NDIS is relevant to a very small section of the disability

² Livable Housing Australia, 2017 Livable Housing Design Guidelines v4
http://www.livablehousingaustralia.org.au/library/SLLHA_GuidelinesJuly2017FINAL4.pdf

community aged between 15 and 65 years. From a universal design perspective, Specialised Disability Accommodation (SDA) is the same as providing a specialised aid or device for an individual with high support needs. The NDIS does not cover older people or people with chronic illness or those with lesser support needs.

The National Disability Strategy (NDS)³ stems from Australia's obligations under the UN Convention on the Rights of Persons with Disabilities. It also aligns with the NSW Disability Inclusion Act⁴, and related Disability Inclusion Plan⁵.

The NDS is not age or disability specific. It cites a universal approach to all designs, and the importance of independent living. Homes are the starting point for independence and inclusion. As the NDS states, it is an economic imperative that people with disability, their families and carers are included in society (p 19).

For Discussion

What influence would you or your organisation have in contributing to the joint delivery of the Strategy? What data or insights could you provide to action plans?

What CUDA can do

CUDA can contribute to stakeholder discussions about how to make housing more accessible and inclusive in the same way as we engaged with the Everyone Can Play¹ guide which was developed using universal design goals and principles.

We have a repository of research and practical guides on universal design in housing, and personnel who are experienced in its application.

The Proposed Vision for NSW Housing

“Housing that supports security, comfort and choice for all people at all stages of their lives, achieved through supply that meets the demand for diverse affordable and resilient housing and responds to environmental, cultural, social and economic contexts.”

This vision statement aligns entirely with taking a universal design approach to planning, designing and building our new homes and therefore our homes into the future.

However, all stakeholders, including the property industry, will need to honour this vision for it to turn into action.

³ Australian Government, National Disability Strategy 2010-2020. <https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/national-disability-strategy-2010-2020>

⁴ Disability Inclusion Act, 2014, <https://www.legislation.nsw.gov.au/acts/2014-41.pdf>

⁵ NSW Government, Disability Inclusion Plan <https://www.facs.nsw.gov.au/inclusion/disability/overview>

Livable Housing Design Guidelines

Before addressing the four themes we provide a simplified explanation of the three levels of the Guidelines. Each of the levels fulfils a different purpose.

- Silver means most people will be able to enter the home, perhaps stay as a day visitor if they can access the toilet. But they would have difficulty living there. This level is sometimes referred to as “visitability”.
- Gold is good for families. Most people will be able to live there and undertake household tasks, which makes it best for ageing in place. It is most suited to intergenerational households.
- Platinum is best applied in situations where a person has higher level needs, such as that provided by SDA housing, so that it can be customised.

We therefore support the implementation of Gold level because it offers the best value to the community.

Four Themes

Several issues raised in the four themes would benefit from taking a universal design approach to both policy and practice. All four themes will be addressed from a universal design perspective.

Housing Supply: In the right place at the right time

Supply is a complex area due to the control that developers have over supply and where and when they will supply housing. The market is not designed to fulfil a social service and therefore market interventions are needed to provide balance.

The right place is everywhere and the right time is now for implementing universal design principles.

For everyone to have choice at the right time and place, our homes must be designed to flexibly accommodate our diverse population with diverse needs. The classic notion of the “family home” in volume supply does not currently meet our needs because of the way it is designed.

Population growth includes an increasingly ageing population, and more people with disability and their families expecting to participate in community life. Older people also want to remain independent and safe at home. The housing industry is already recognising the need for a downstairs bedroom⁶ and the increase in intergenerational living⁷. Both aspects are covered by Livable Housing Design. However, we cannot rely on market trends to make sure these features are widespread or will endure into the future.

⁶ Eden Brae Homes Blog, <https://edenbraehomes.com.au/blog/three-popular-features-when-building-a-new-home/>

⁷ Eden Brae Homes Blog, <https://edenbraehomes.com.au/blog/intergenerational-living-at-bristol-30/>

While social housing is currently a small percentage of total housing stock, occupants are more likely to have low incomes, be unemployed or receiving a government benefit such as a disability or aged pension. It is important therefore that social housing supply is universally designed to support them through life stages.

Similarly, older people and people with disability who are on waiting lists for social housing are usually renting in the private market. Lower rental rates often means substandard living conditions⁸. The quality of their housing and ability to live independently has an impact on their health and wellbeing.

Landlords are reluctant to allow even basic adaptations such as a grab rail or other modifications. This has flow-on effects to other budgets, such as health, due to a higher risk of falls, for example. Consequently the design of rental supply needs to accommodate our diverse needs into the future.

With the expansion of the NDIS, Aged Care at Home and Hospital at Home, these homes become the workplaces of paid staff, as well as family carers. They need to be designed for everyone's safety as well as amenity and in the right places, which is everywhere.

As more universally designed homes make their way into the housing stock, more people will have choice in where they live and who they live with because there will be more suitable homes available across the state. This includes rental housing, which is the only option for people on low incomes.

There is no evidence that the voluntary Livable Housing Design Guidelines have increased the supply of universally designed homes. Rather, these guidelines have been adapted for specialised housing, namely SDA housing and retirement villages.

Exempt and complying developments allow for local government policies to be bypassed by developers. Therefore caution should be applied to further "streamlining" approval processes. There needs to be a mechanism whereby councils can enforce their local planning policies with developers.

Checks should be made on the validity of industry claims that planning rules are holding up supply.^{9 10} "Landbanking" is a common practice for maximising the sale price.

In brief we recommend:

- That Government should invest in significant social housing infrastructure.
- That policies to support build-to-rent housing meet the demand for private rental housing.

⁸ Morris, Alan 2016. The Australian Dream: Housing Experiences of Older Australians, CSIRO Publishing.

⁹ Murray, C. 2020. Time is money: How landbanking constrains housing supply.

<https://www.sciencedirect.com/science/article/abs/pii/S1051137720300449>

¹⁰ Murray, C. 2020. The truth behind the housing supply nonsense.

<https://www.thefifthestate.com.au/innovation/residential-2/the-truth-behind-the-housing-supply-nonsense/?unapproved=162408&moderation-hash=081a0521e86af8340229800c8b528ab4#comment-162408>

- That both social housing and build-to-rent models include Livable Housing Design for the usability of everyone.
- That the outcomes of the two current Royal Commissions into aged care and people with disability be included in policy decisions.
- That Local Government be given more authority for developer compliance.

For Discussion

What data are able to be collected or held by the NSW Government could help you deliver new housing?

How could Government help to enable a greater supply of new housing in both Greater Sydney and Regional NSW?

How can Government better facilitate housing in regional communities?

What role can you play as a member of industry, council or community to deliver additional housing supply? How can the NSW Government support you to do this?

We make these two observations:

- Councils need to be empowered with state planning policies to control housing developments to suit their local area.
- While developers are in the business of making a profit, that profit should not come at the expense of our health and wellbeing. The industry does not view itself as a service industry.
- The house-building industry in Australia is fragmented and relies on regulations to keep the system functioning efficiently¹¹. Goodwill is insufficient to hold the housing system together¹². Consequently voluntary guidelines or piecemeal approaches will not and cannot work because of the structure of the house-building system.

Diversity: The right type and size in the right locations

The key point in the Discussion Paper is that homes “are often not designed to be accessible and are not easily adapted”.

In terms of what is already underway, the Discussion Paper takes a specialised housing approach to both people with disability and older people. It is not sufficient or expedient to dismiss them to the NSW Ageing Strategy and disability-appropriate housing.

In dismissing them to other policies further marginalises these two diverse groups. This runs against other NSW and Australian policies on inclusion. The underpinning principle of the

¹¹ Bringolf, J. 2011. "Barriers to universal design in housing." *Urban Research Centre, College of Health and Science*. <https://researchdirect.westernsydney.edu.au/islandora/object/uws:11184>

¹² Bringolf, J. 2011. “Barriers to Universal Design in Australian Housing”, <http://universaldesignaustralia.net.au/barriers-to-universal-design-in-australian-housing/>

National Disability Strategy and the NSW Disability Inclusion Act, is to include everyone, everywhere, every time. Inclusion is not inclusion if it is by exception.

National Disability Strategy

In the 2011 edition of the National Disability Strategy (p.29) three of the five policy directions relate directly to housing:

Policy Direction 1: increased participation of people with disability, their families, and carers in the social, cultural, religious, recreational and sporting life of the community.

Policy Direction 2: improved accessibility of the built and natural environment through planning and regulatory systems, maximising the participation and inclusion of every member of the community.

Policy Direction 3: improved provision of accessible and well-designed housing with choice for people with disability about where they live”.

As the Discussion Paper states, most people with disability live in the community – as they should. The National Disability Strategy supports living in the community rather than an institution. Well placed SDA housing which is mixed within developments and not grouped or segregated, increases neighbourhood inclusion for occupants.

The NDIS goes some way to helping a minority of people with high support needs, especially bringing younger people out of aged care facilities. This does not solve the situation for the majority who do not have such high support needs. The NDIS is not designed for the majority of people with disability, people with long term illness or people aged over 65 years.

The National Disability Strategy recognises that the NDIS requires a whole of community change effort to remove barriers to inclusion. The NDIS is therefore only a partial response – a necessary but insufficient condition for inclusion. Those not included in the NDIS are reliant on their fellow community members to remove barriers to inclusion. That includes people who design and build our homes.

SDA housing is a fringe product, but its very existence leads some to believe it is a problem solved. The Australian Government is providing \$700m¹³ each year for SDA housing which is being delivered by specialised housing organisations such as Summer Housing. Other developers are working in this space because it is heavily subsidised.

The NDIS and SDA housing are well organised. The housing strategy needs to account for them, but extra incentives are not required. However, supportive planning rules will help with timely supply and location.

¹³NDIS Media Release 8 February 2019. <https://www.ndis.gov.au/news/1448-governments-take-action-increase-specialist-disability-accommodation>

Current national policy discussions

The Australian Building Codes Board has released a Consultation Regulation Impact Statement for Accessible Housing (RIS). However, any changes that might result from this change to the National Construction Code (NCC) will not be enacted until the 2022 edition.

The proposed changes to the NCC would apply to all new housing. Regardless of the outcome of the RIS, the NSW Government and local government authorities should be prepared for changes.

Some Statistics

Some important statistics help provide a broader picture. Housing is about households, and this is the economic measure used by the ABS¹⁴ for income and family structure.

While approximately 18 per cent of individuals reported a disability for the 2016 ABS Census, an additional 22 per cent reported a long term health condition. This is not double counting as the ABS chart¹⁵ in Table 1 shows. This makes a total of at least 40% of the population, probably more.

When we look at households, disability is present in more than one third of households (35.9%). It is important to measure households rather than individuals because all household members are affected when disability is present. Households where a long term health condition, that is, a condition that is not getting better, is almost half (45.2%). See Table 2.

While many people with long term health conditions might not need universal design features now, they will likely need them in the near future. Many such health conditions are related to obesity and this group will develop chronic illnesses earlier rather than later in life.

The important point is that at least 40 per cent of the population isn't going to recover from their ailment and it affects the whole household. People experiencing a sudden major health event find that this is not the time to think about moving or modifying the home. This is when they are least able to do so.

Needless to say, these statistics cover all other groups including people from diverse backgrounds and First Nations people.

¹⁴ ABS Quickstats 2016,
https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/036

¹⁵ ABS 4430. Disability, Ageing and Carers, Summary of Findings, 2015.
<https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/4430.0main+features202015>

Table1: All persons by disability status 2015

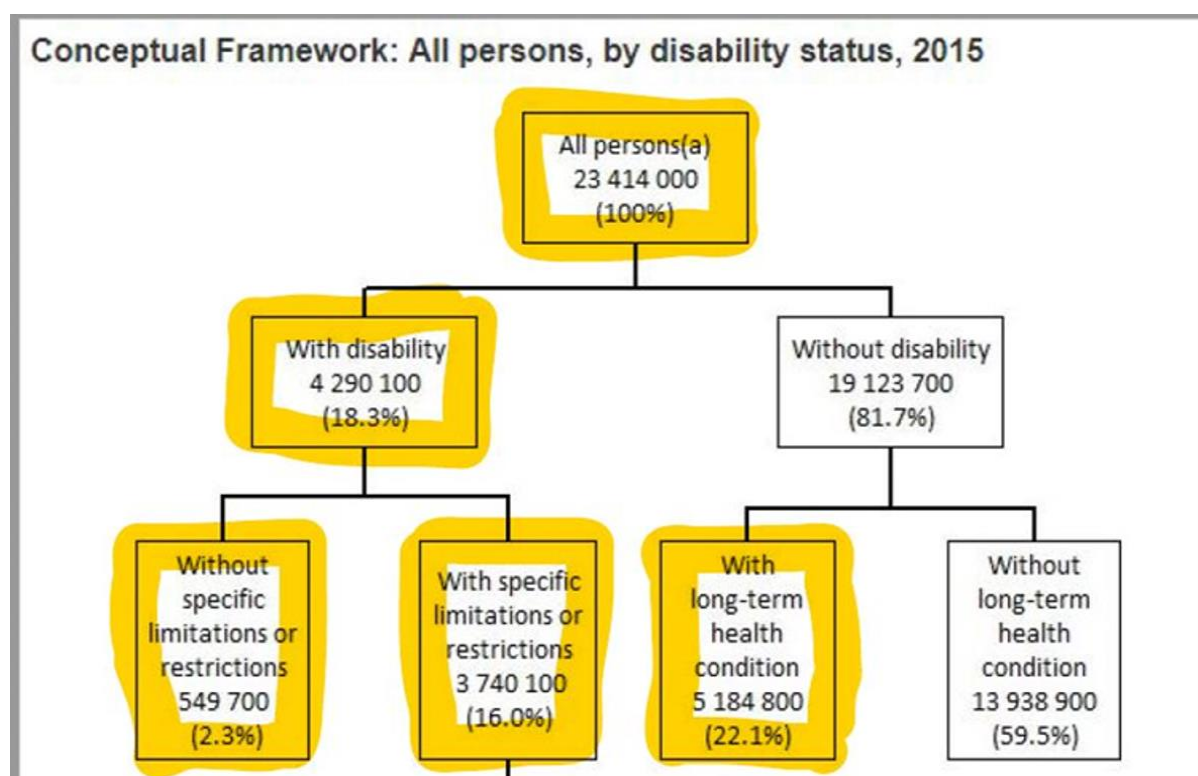


Table 2: Comparison of individuals and households

	Individuals	Households
People with disability	18.3%	35.9%
People with long term health condition	22.1%	45.2%
TOTAL	40.4% (no overlap)	81.1% (some overlap)

No matter what type of dwelling either by size or type, in a metropolitan or rural setting, single occupant or three generations, universal design features should be applied. It is future proofing homes to be fit for purpose across our life span and those yet to come.

However, the notion of having a home that suits our lifestyle for longer is contrary to the housing industry's quest for making us move around, build a new home, or make renovations. Or to move to their specialised products - segregated living arrangements such as retirement villages.

NSW Ageing Strategy

The Executive Summary of the Royal Commission into Aged Care Report¹⁶ clearly indicates that most people do not want to go to residential aged care – they want their care at home.

¹⁶ Royal Commission into Aged Care Quality and Safety, 2020. "Australia's Aged Care System: Assessing the views and preferences of the General Public for quality of Care and Future Funding, https://agedcare.royalcommission.gov.au/sites/default/files/2020-07/research_paper_6_-_australias_aged_care_system_-_assessing_the_views_and_preferences_of_the_general_public_for_quality_of_care_and_future_funding.pdf

Indeed, they are willing to pay for this. However, staying at home requires appropriate design for everyone's safety and amenity.

"It is well documented that the overwhelming preference of the vast majority of Australians when they need aged care is to remain independent and living at home and avoid moving into a residential care facility if at all possible. Consistent with this, 72% of respondents were willing to pay a co-contribution fee to facilitate staying in their own home. The average co-contribution amount these respondents were willing to pay to avoid moving into residential care was \$184 per week (equating to \$9,568 per year)." (p.3)

The Discussion Paper references the NSW Ageing Strategy, which uses the term "housing choices". This is misleading and indicates that people actually have a choice. The Action Plan expects the housing industry and local government to respond to the issues with information and advice for individuals.

By the time someone finds that their current home can't support them, usually because of a major health event, it is too late to go looking. And then where to look? This is usually when family members take over to seek a place in a facility. Often this could be avoided if their loved one could go back to their home from hospital.

The options for older people (section 2.1) begins with relevant information about the supply of housing for older people in supportive neighbourhoods. People of all ages want supportive neighbourhoods in whatever form that is envisaged. Downsizing and upsizing is something that could be needed at any age. We also know that most older people want to age in their existing home¹⁷.

In this section there is a passing reference to universal design "to make housing suitable for all potential residents". It is part of a sentence listing planning provisions for older people as and innovative options to enable people to live independently. The way this is referenced indicates that universal design is interpreted as a specialised design.

Reference should be made to the Livable Housing Design guidelines in section 2.1. This would have also covered section 2.2 on housing for people with disability. Instead, it references the NDIS and SDA housing as a solution. Once again, specialised housing.

Buyer aspirations

Buyer aspirations do not include ageing and disability. The Roy Morgan research¹⁸ shows that younger people do not have a grasp of what older age is about or how it will impact their living arrangements. Consequently, they won't be asking for accessible features.

¹⁷ Royal Commission into Aged Care Quality and Safety, What Australians Think of Ageing and Aged Care, 2020 https://agedcare.royalcommission.gov.au/sites/default/files/2020-07/research_paper_4_-_what_australians_think_of_ageing_and_aged_care.pdf

¹⁸ Royal Commission into Aged Care Quality and Safety, What Australians Think of Ageing and Aged Care, 2020 https://agedcare.royalcommission.gov.au/sites/default/files/2020-07/research_paper_4_-_what_australians_think_of_ageing_and_aged_care.pdf

Studies by AHURI identify reasons for lack of buyer demand¹⁹. Potentially, older people who are current home owners would be in the market to find a more suitably designed home. But it isn't in the mainstream. Consequently they prefer to pay for modifications that might or might not be suitable for anyone else. Or they "make-do".

Families of younger people with disability will stay put if they find a home that is appropriately designed with access to transport, employment and support services²⁰. They will also "stay put".

The proportion argument

Current local government development plans ask for a proportion of homes to be either seniors housing or "disability" housing. This does not solve the problem. The proportion argument is best summed up with a motor vehicle analogy.

Even though we don't plan to have a car accident, we want air bags installed in case we do. To apply air bags only to the proportion of cars that are likely to have an accident defeats the purpose. Which ones will they be and will they be on sale when we want one? We certainly want air bags installed before the accident, and not after the accident.

Taking a holistic and inclusive approach to planning

It is worth noting that the Norwegian Government, in devising their overarching planning document, Norway Universally Designed 2025²¹, took a universal design approach to their plans and planning processes²². They did not focus on the design details. This approach made everyone responsible for inclusion.

Too often, when ageing and disability are mentioned, it is often assumed to be the exclusive purview and responsibility of the "ageing and disability officer". The same has happened with the development of Discussion Paper. Inclusion is not a separate endeavour from the main game. It cannot be tacked on later. Inclusion, by definition, is not by exception.

In Summary

If a universal design approach had been taken to the discussion, for the most part sections 2.1 and 2.2 would be addressed thereby simplifying the implementation at both policy and practice levels.

While retirement living and SDA housing are specific and specialised housing products, and not mainstream, we agree that it needs to be integrated into existing communities.

¹⁹ Judd, B., et al. (2010). Dwelling, land and neighbourhood use by older home owners. [AHURI final report No. 144](#). Melbourne.

²⁰ Beer, A. and D. Faulkner (2009). "21st century housing careers and Australia's housing future." [AHURI Final Report No. 128](#).

²¹ Norwegian Ministry of Children and Equality, "Norway Universally Designed by 2025 ActionPlan." <https://www.regjeringen.no/globalassets/upload/bld/nedsatt-funksjonsevne/norway-universally-designed-by-2025-web.pdf>

²² Bringa, O.R., (2007), "Making Universal Design Work in Zoning and Regional Planning: A Scandinavian Approach." In Universal Design and Visitability: From Accessibility to Zoning, edited by J.L. Nasar, Evans-Cowley, J. Columbus, Ohio: John Glenn School of Public Affairs

New home buyers will not create a demand for universal design and neither will they because ageing and disability are not aspirational.

The Housing Strategy must take a holistic approach to ensure inclusion of everyone in both processes and plans. Inclusion is not an optional extra.

We recommend:

- That the Housing Strategy be reviewed taking a universal design approach for all housing so that it will be “suitable for all potential residents” as stated in the Discussion Paper.
- That the Livable Housing Design Guidelines, which are underpinned by a universal design approach, be referenced and applied to tangible actions and outcomes.
- That the NSW Government be inclusive of people with diverse needs and backgrounds by having a seat at the discussion table.
- That if the proposed changes to the National Construction Code for accessible housing is not taken up in the 2022 edition, that
 - a. The New South Wales Government adopt the minimum Gold level of Livable Housing Design Guidelines in all new housing, and
 - b. Support councils to implement the Livable Housing Design Guidelines.

For Discussion

How can the NSW Government best support councils and industry to deliver housing for people with disability and other complex needs such as mental health, domestic violence and substance abuse?

What additional support could the NSW Government provide to drive innovation in the housing sector, including diverse dwelling types and models?

We make these observations:

First, the underpinning assumption that all people with disability have complex needs is erroneous. Many, including older people, just need to be able to get in and out of their home, the homes of others, and to perform activities of daily living.

Regardless, anyone, with or without complex needs should be integrated into the community. They should not need specialised housing except where short term care or protection is needed.

The best innovation to improve housing stock is to take a universal design approach to all dwelling types and models. This will benefit everyone as the housing stock is renewed over time.

Support local government to implement the Livable Housing Design guidelines at Gold Level as a minimum for all new developments.

Affordability: Housing at the right price points

Affordability is more than the purchase price or the weekly rental payments. For home owners it includes maintenance costs, or strata levies, rates, and insurances. These costs can vary considerably from home to home and place to place. The energy costs of heating and cooling to maintain a healthy living environment are factors in affordability and resilience whether a private home, private rental or social housing.

The need for renovations or modifications because the home isn't suitable now, or in the future, is also a cost to the home owner. If the modifications are carried out under the NDIS or other government funded scheme, some of the cost is shifted to the tax payer.

It is assumed that universal design features and affordability cannot co-exist. Landcom²³ undertook extensive cost modelling on universal design features across many housing types and found that there was little, if any, extra cost if the features we considered at the outset of the design.

The Livable Housing Design Guidelines were based on the Landcom guide. While we recognise that there would be some one-off costs in training trades, we also note that the design features are well-known in the industry because they are needed in specialised housing. Consequently the industry will adapt quickly.

The undersupply of housing is a factor in housing prices, but it is not the only factor. Increased supply has not improved affordability because it is only about 2% of stock each year. Also, the housing market is not like any other. This is because housing is an asset. As the price increases, demand increases, as it encourages investor demand.²⁴ So it's difficult for increased supply to reduce prices. To have lower house prices defies the logic of the housing market.

Developers are not a social service - they are there to make a profit for shareholders. The housing industry is a strong lobby group that tends to provide misleading information to press its case. However, the information in their annual reports varies from their media claims²⁵. The NSW Government should check out these *a priori* claims.²⁶

²³ Landcom, 2008. Universal Housing Design Guidelines <http://universaldesignaustralia.net.au/wp-content/uploads/2015/05/Landcom-Guidelines.pdf>

²⁴ The Conversation, Why housing supply shouldn't be the only policy tool politicians cling to. <https://theconversation.com/why-housing-supply-shouldnt-be-the-only-policy-tool-politicians-cling-to-72586>

²⁵ Murray, C. 2020. Time is money: How landbanking constrains housing supply. <https://www.sciencedirect.com/science/article/abs/pii/S1051137720300449>

²⁶ Phibbs, P. 2018. Australian housing policy – going round in circles. <https://johnmenadue.com/peter-phibbs-australian-housing-policy-going-around-in-circles/>

Homelessness is complex policy area and there is no single solution. People become homeless for a variety of reasons. Older single women are now a high risk group in this category. People with disability are also a high risk group. Helping people out of homelessness requires more than a place to live – it also requires support services.

For Discussion

What new or improved measure, subsidies or otherwise could assist first home buyers?

What role can you play to improve affordability?

How can the NSW Government support you in this?

From a marketing perspective, encouraging first home buyers to enter the market appears a reasonable policy. How this is done has to ensure that developers and builders don't benefit directly or indirectly from any grant monies by inflating prices.

The trend is indicating that the rate of home ownership will continue to fall regardless of housing at lower price points. The casualisation of the workforce has an impact here. Mortgage lenders prefer clients with a record of steady employment. Even if renters have saved a deposit and get a mortgage, people with insecure employment can find themselves under mortgage stress.

Social housing has seriously lagged behind demand, but is the most affordable housing available.

We recommend:

- A major injection of funds to support increased supply of affordable social housing.

Resilience: Safe, comfortable and resistant to climate change

Universal design is at the heart of resilience. It speaks to comfort, safety, neighbourhood and environmental impacts. As the Discussion Paper states, "Resilient housing requires us to think about the broader environment and community issues that housing impacts and is impacted by."

However, an energy efficient home is only resilient if it can sustain people across their lifespan, retain and maintain their independence, and they can stay there for as long as they want. This is liveability.

Waste and home modifications

We note that residential construction and demolition comprises 37 per cent of all waste. Consequently, unnecessary renovations and modifications, especially major modifications, could be minimised by building to universal design principles. Apart from the aspect of landfill waste, we also waste the embodied energy that goes into making building materials.

Good design and health

Comfortable housing also has features that make household activities easier. We agree that good design influences physical health and that is not just thermal properties. It is also being able to independently perform household tasks as people age or if they have a disability. Upgrading thermal properties and minimising water and power consumption are also important for everyone.

Lifespan of homes and lifespans of occupants

The longevity of a home should be considered in any policy for resilience. We note that the Discussion Paper mentions a figure of 88 years for the life of a brick home. A home should last at least 60 years according to the Property Registry.²⁷ This means at least four families are likely to live in the one home. If at least one third of households have a person with disability, of those four families, at least one is likely to have a member or two with a disability or long term health condition.

The economic research by Smith, Rayer and Smith (2008, 2011)²⁸ found that a new home built today has a 60% chance of having an occupant with a disability, and a 91% chance of a visitor, or would-be visitor, with a disability. It did not account for those with long term illness.

The important part of this research is that it took both the lifespans of families *and* the lifespan of homes. That is, an infrastructure approach. Taking only individuals with disability today, and a new home today, does not reflect the reality of our lives and the lives of our homes.

If we expect population longevity, the longevity of appropriate housing needs to match. The reality that disability will visit each one of us eventually, unless we meet an untimely death, is not something most people want to think about let alone plan for.

The BASIX is a good tool for sustainability and universal design principles can easily be added to this instrument. Indeed in the early days of the development of the BASIX instrument, accessibility features were initially considered, but later dropped.

For Discussion

What role can you play to improve sustainability, resilience and safety trends?

How can the NSW Government support you in this?

We recommend:

²⁷ Property Registry, 2019. *How Long Will a New Home Last?* <https://propertyregistry.com.au/how-long-will-a-new-house-last/>

²⁸ Smith, Rayer, Smith, 2008. 2011. Smith, S.K., Rayer, S., Smith, E.A. "Aging and Disability - Implications for the Housing Industry and Housing Policy in the United States." *Journal of the American Planning Association* 74, no. 3 (2008): 289-306.

- That the elements of the Livable Housing Design Guidelines be included in the BASIX instrument to encompass a broader definition of resilience for more people.
- That community roundtables be formed to contribute to discussions for including the elements of the Livable Housing Design Guidelines in BASIX or other related instrument.

Concluding remarks

Australia needs housing that is fit for purpose and caters for demographic change and community expectations. The ways in which we utilise our homes today were not considered at the start of current mass market housing era.

The house-building industry in Australia is fragmented and relies on regulations to keep the system functioning efficiently. Good will is insufficient to hold the housing system together. Consequently voluntary guidelines or piecemeal approaches will not and cannot work.

When more than one third of Australian households report an occupant with disability plus a significant proportion with chronic health conditions, homes must be fit for purpose, and designed with inclusion, safety and amenity in mind. This should be the guiding principle.

Jane Bringolf

BSSc, MBA, PhD

Churchill Fellow

On behalf of Centre for Universal Design Australia

July 2020