

Livable Housing Discussion Paper, Canterbury Bankstown meeting 23 June 2020

Follow up to presentation to Council meeting as requested

The Livable Housing Discussion Paper's stated aim is "to deliver housing that is easier to use for all residents including senior, people with temporary injuries, families with young children and people with disabilities and their families. It is also designed to ensure more housing in the Canterbury Bankstown Local Government Area is available to meet the changing needs of its community throughout their lifetime and better enable residents to age in place."

As a result of the feedback from the Discussion Paper, the proposal before Council was as follows:

Development types	Proposed controls
Secondary dwellings and houses	Require all new secondary dwellings and houses to achieve the Silver Standard.
Dual occupancies and semi-detached dwellings	Require one dwelling in new dual occupancies and semi-detached dwellings to achieve the Gold Standard and the second dwelling to achieve the Silver Standard.
Multi dwelling housing and attached dwellings	Require at least 20% of new dwellings to achieve the Silver Standard and further 20% of new dwellings to achieve the Gold Standard.
Apartments and shop top housing	Require at least 20% of new dwellings to achieve the Silver Standard and further 20% of new dwellings to achieve the Gold Standard noting shop top housing will not deliver dwellings at the ground floor as this would contradict the LEP definition. Shop top housing however generally provides lift access to residential floors of development.
Boarding houses	Require at least 20% of boarding rooms in new boarding houses to achieve the Silver Standard.

Preliminary comments:

It has been ten years since Livable Housing Australia proclaimed that all new homes would be to at least Silver level by 2020. As we know, voluntary action cannot work in the construction industry. Consequently we have seen no action by industry or state or federal government.

The responsibility for implementation now falls to local government to meet the needs of diverse and ageing communities and their obligations under the National Disability Strategy. There is no guarantee the Australian Building Codes Board will make changes to the 2022 NCC.

Development Applications and Complying Development Consent

The proposal states silver level will apply to “houses that require a development application”. Given the NSW Government’s aim to accelerate developments through Complying Development Consent (CDC), this might be counter-productive to Council’s aims.

It is my understanding that if a house meets all the requirements of the NCC and all BASIX requirements, and there are no topographic or other constraints such as flood plains then the approval can be accelerated. If new projects go through the CDC process they will miss out on Silver level requirements.

Consequently, the underlying purpose of this proposal to create new homes that are easier to use for all people won’t be achieved.

Gold Level provisions

The proposal states that there must be a bedroom downstairs to achieve Gold level.

The Livable Housing Guidelines state that a habitable room on the entry level that can be turned into a bedroom is required, not specifically a bedroom downstairs.

This can make a big difference to the concept as this makes the space much more flexible, say for a home office – COVID-19 bringing this to the fore.

The cultural diversity of the residents where three generations live in one large home also needs to be considered. Gold level becomes essential where the family wants the grandparents to age at home, not in a facility.

Steep sloping sites

The issue of steep sloping sites has been misunderstood. It is not a matter of too steep therefore no point in making the dwelling accessible. All homes must have access from the street. In this case, level access from a parking area or a garage is sufficient to qualify.

This is not an added extra.

That means a steeply sloping site does not make the whole home exempt from accessibility features. It only means you don’t have to level the site to reduce the grade.

The issue of proportions

The report acknowledges that applying the concept of proportions is problematic. This is because once built, they disappear into the milieu of housing stock. How will anyone know where they are and whether they will be vacant or for sale when they need it?

The proposal is for a total of 40% of dwellings in multi-unit developments to be either silver or gold. This is getting close to critical mass.

I contend that smaller developers in particular find it easier to have one cookie cutter for all dwellings. Tradies who don’t read plans are better supervised when all the dwellings follow the same pattern. Having Silver, Gold and Other makes for three types.

Apartments are in favour with older downsizers who are downsizing their home maintenance, not necessarily their living space. This makes it more important to consider 100% of all apartments. A mix of silver and gold can still be applied.

Concluding comment

We need homes that are fit for purpose – fit for all our lives – this is personal – every one of us lives somewhere and wants the security of a home that works for us.

I am happy to expand on any of these comments.

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Our original submission to the Discussion Paper is attached for reference.

Submission to City of Canterbury Bankstown

Discussion Paper:

Livable Housing Options to make new homes easier to use for everybody, every day, at all stages of life

November 2019

About Centre for Universal Design Australia

Centre for Universal Design Australia (CUDA) is a registered charity and advocates for an inclusive world where everyone can be included everywhere, every time regardless of their background, age or level of capability. The concept of universal design is the means by which to achieve inclusiveness. It is not a special kind of design or product. It is a design thinking process.

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 housing.

We applaud your intentions to make new homes in Canterbury Bankstown universally designed for everyone. We believe a home that is safe, comfortable and easy to use is an essential part of life.

Our recommendation

We support the Gold level of the Livable Housing Design Guidelines as the minimum for all new homes. This level best suits ageing in place as well as family living. Silver level falls short of the general ageing in place requirements as it is based on ideas of our human right to visit another's home. Mix and match proportions have not worked in the past and are unlikely to work in the future. The Adaptable Housing Standard should be discontinued.

Background

Safe and appropriate housing is a basic need. The Housing Industry Association in their 2015 Housing Affordability paper agrees: "Access to shelter is a basic human need and is critical to allow all Australians to participate in society to their full economic and social potential"².

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

² Housing Industry Association, Housing Affordability (2015) <https://hia.com.au/-/media/HIA-Website/Files/Media-Centre/Policies/housing-affordability.ashx>

This basic need is emphasised in the recent WHO Housing and Health Guidelines where accessibility is listed as one of the five key areas for attention and improvement and is linked with home safety and injury prevention, another of the key areas (pp 65-74)³.

Apart from increased size, Australian housing design has changed little in the last 50 or so years, save for cosmetic aspects. 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.

With population ageing, taking inclusive and universal design approach to housing design is a policy imperative. 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 parents with baby strollers and small children, anyone with wheeled devices, paramedics, and fire and rescue services.

We are living with designs intended for a different era. All new housing must be fit for purpose now and into the future. Taking a universal design approach, which underpins the Livable Housing Design Guidelines, will help achieve this.

The house-building industry in Australia is fragmented and relies on regulations to hold the system together⁴. This is an opportunity for an organised industry-wide change that could not and cannot be achieved through voluntary measures. Local government is in a position to lead industry through the required changes to current practices.

Response to the discussion paper

In the discussion paper three options are outlined: apply a minimum standard for all new homes at Silver level; apply a mix of Silver, Gold and Platinum; or continue with applying the Adaptable Housing Standard to apartments, town houses and villas.

CUDA recommends the application of Gold level across all new dwellings as this is the most workable and suitable for ageing in place, and for most people who have or will have a disability at some stage in their life. It will also provide a safer workplace for home support staff. It also keeps the regulation simple with only one level to adopt and adapt to.

The terms Silver, Gold and Platinum should not be confused with terms used in marketing. One is not superior to another – they serve different purposes.

³ World Health Organization (2018) WHO Housing and Health Guidelines <http://www.who.int/sustainable-development/publications/housing-health-guidelines/en/>

⁴ Bringolf, J. *Barriers to Universal Design in Housing*, University of Western Sydney, 2011. <https://researchdirect.westernsydney.edu.au/islandora/object/uws:11184>

Silver level does not guarantee that a person can age in place. However, with a step free entry it does allow for visitors with disability to enter, and is helpful to emergency personnel and others. However, once inside, the circulation spaces are minimal.

CUDA's view is that Platinum level is for people with high or complex needs. The home needs to be designed around their family situation and their level of ability to undertake tasks or to have assistance. In most cases, the NDIS Specialist Disability Accommodation will fill this gap. Platinum is a specialised design and not universal design. It is required by a very small proportion of the population.

The Adaptable Housing Standard (1995) is outdated and no longer appropriate. It is also more expensive to apply than Gold level. CUDA recommends discontinuing the application of this standard.

CUDA does not support a proportion approach as this has proven to be unsuccessful. There is no record of which homes are Silver, Gold or Platinum. Even if a list was kept the likelihood of a home being available when and where it is needed it is highly unlikely.

Using conservative economic estimates, research undertaken in the USA⁵ found that a new home built today has a 60% chance of housing a person with disability during the home's lifespan. If you include visitors, this rises to 91% (Smith, Rayer & Smith, 2008). Consideration must, therefore, be given to the design of our housing infrastructure so that it is fit for purpose now and into the future and for future generations.

CUDA's position is supported by both demographics and policies. We have obligations under the United Nations Convention on the Rights of Persons with Disability, which is enshrined in Australia's National Disability Strategy. Aged Care Reforms are also a policy imperative to consider. Industry functions best with a level playing field where all players in the house-building system act together as one⁶. This requires regulation.

In conclusion

Universal design features are not "disability design". As the term implies, it is for everyone – no-one is disadvantaged with these features. Universal design is good design because it is good for everyone – it delivers for a broad cohort that includes emergency service personnel, furniture deliverers, parents with prams and strollers and people with shopping trolleys.

A minimalist approach, such as Silver level, is appropriate if the design requirements are only suited to a very small proportion of the population. However, this is not the case. When

⁵ Smith S, Rayer S, Smith E. Aging and disability: Implications for the housing industry and housing policy in the United States. *Journal of the American Planning Association*. 2008;74(3):289-306.

⁶ Bringolf, J. Barriers to Universal Design in Australian Housing. *Festival in International Conferences on Caregiving, Disability, Ageing and Technology*, Toronto, Canada, June 2011.
<https://udeworld.com/presentations/papers/Bringolf%20UD%20Housing%20FICCDAT.pdf>

more than one third of Australian households⁷ 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 can be achieved with Gold level.

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On behalf of Centre for Universal Design Australia

November 2019

⁷ Australian Bureau of Statistics. Disability, ageing and carers, Australia: Summary of findings. 2010; [http://www.ausstats.abs.gov.au/ausstats/subscriber.nsf/0/9C2B94626F0FAC62CA2577FA0011C431/\\$file/44300_2009.pdf](http://www.ausstats.abs.gov.au/ausstats/subscriber.nsf/0/9C2B94626F0FAC62CA2577FA0011C431/$file/44300_2009.pdf).