

27<sup>th</sup> November 2018

Chief Executive Officer  
Australian Building Codes Board  
GPO Box 2013  
Canberra ACT 2601

Dear Sir/Madam,

The Physical Disability Council of NSW (PDCN) appreciates the invitation to provide comment to the Australian Building Codes Board (ABCB) on the Accessible Housing Options Paper as we wholeheartedly support the inclusion of a minimum accessibility standard for housing in the National Construction Code (NCC).

PDCN is the peak body representing people with physical disabilities across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live in metropolitan, rural and regional areas of NSW.

PDCN has observed a substantial level of unmet need for accessible housing, with a lack of housing options and access to accessible homes an issue consistently raised by our members and service users, all of whom are people with disability.

Presently, accessibility features are rarely prioritised in the construction of new housing stock. As mentioned in the ABCB Accessible Housing Options Paper, Livable Housing Australia estimates that less than 5% of new housing is being built to Livable Housing Design Guidelines (LHDG) Silver level specifications or above<sup>1</sup>. This situation is detrimental to people with disability who are frequently excluded and marginalised from social and economic participation in the community due to inadequate physical access to premises.

This is further exacerbated in the rental property market, where 1 in 3 households reside. Despite having the greatest need for accessible housing, the current housing market regularly sees people with disability experience economic barriers to obtaining accessible housing or modifying their current dwelling.

Households containing people with disability tend to be poorer than their able bodied counterparts, yet when requiring access features in their rental dwellings they encounter issues of higher cost – for the installation and removal of accessible features – and in fact, before they can even undertake access modifications, must overcome the reluctance of most landlords to allow modifications to be done.

Increasing the prevalence of accessible housing stock will benefit people with physical disability, who predominantly live in the community rather than specialist disability accommodation.

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<sup>1</sup> ABCB- Accessible Housing Options paper Page 10

PDCN recommends the inclusion of a minimum LHDG Gold performance level be mandated through the NCC to increase access and inclusion for all members of the community.

Furthermore, amendments to the NCC will ensure greater progress in meeting the targets set within the National Disability Strategy (NDS) 2010 – 2020. PDCN believes the NDS target of having all new homes built in accordance with Universal Designs standards by 2020 will not be achieved without government intervention to create a minimum accessible standard.

In addition, Australia's ageing population will see a significant increase in the number of people with disability or a mobility impairment in the near future, in fact is already doing so, and this increased demand will not be met without prompt action to mandate accessibility requirements. PDCN feels significant cost benefits will also be achieved by increasing the number of homes built 'access ready' that allow people to age in place, without major retrofitting and renovation, supporting government policy objectives.

Finally, PDCN would like to endorse the recommendations made by the Australian Network for Universal Housing Design in their response to the Options paper, as we strongly believe the application of mandating to LHDG Gold performance level is necessary to cater to Australia's current and future housing needs, not only for those with disability, but for access for all – the older population, parents with prams and visitors to our homes.

Sincerely

A handwritten signature in black ink, appearing to read 'Serena Ovens', written in a cursive style.

Serena Ovens  
Executive Officer