



## Proposal to include minimum accessibility standards for all housing in the National Construction Code: Response to Consultation Regulatory Impact Statement

Please accept the following submission as a response the consultation RIS, in lieu of individual answers to the consultation questions.

### Summary of submission

Polio Australia supports:

- Option 2: Accessibility standard, broadly reflecting LHDG gold standard, in the NCC applying to all new Class 1a and Class 2 buildings, with the consideration of the addition of
- Option 5: A subsidy program to encourage additional availability of accessible rental properties.

### About Polio Australia

Polio Australia is a peak body organisation representing thousands of Australians with physical disability related to polio and its late effects. There are two main disability groups in the polio community. The first group is those who acquired polio in the twentieth century in Australia and are now ageing with their disability, many also experiencing significant and progressive reductions in mobility and function due to the Late Effects of Polio. The second group is people who acquired polio internationally and now live with some level of disability. These people may be of any age, as there are many parts of the world where polio either still exists or was eliminated only recently. Many of those who are younger now will also have reduced mobility and function later in life.

### Impact on people with mobility limitation

Polio Australia supports the concept of accessible housing for all. It is also important to ensure that housing is not only accessible but also liveable. As per the guidelines from Livable Housing Australia, this means that a home should be easy to enter, move around in and adapt as required, and that it should be able to meet the changing needs of its occupants.

Many people with polio-related disability use wheelchairs or other mobility aids, and many others will require such aids as their disability progresses. Inaccessible housing will provide difficulties for people in this situation, often requiring increased care, expensive retrofitting that could have been eliminated with more appropriate design, or premature relocation to residential care.

The statement in the RIS that home modifications can take up to 7 weeks does not include the long waiting times for a health professional assessment and



recommendations, architect's designs and reports where applicable, obtaining quotations, and funding requests and approvals. We regularly hear from polio survivors in our community about the human cost of making do with sub-standard housing designs as they endure the many impediments to making the necessary adaptations. Additionally, all of these processes have significant financial costs, often at public funding expense. Addressing these issues at the time of housing design would allow savings not only to individuals but also, importantly, to government funding bodies such as the NDIS, My Aged Care and state funding organisations.

Additionally, reduced mobility means that people are isolated from other key people in their lives, such as family members, when these other people's homes are not sufficiently accessible. Again, a universal design that incorporates a minimum standard of accessibility would have a real impact on our polio survivor community's quality of life and ability to participate in social life.

### Recommendations

Polio Australia therefore supports the recommendation of the Australian Network for Universal Housing Design<sup>i</sup> for the Livable Housing Design Guidelines<sup>ii</sup> " **Gold Level** (Option 2) as the minimum standard of accessibility. This is further supported by Dalton and Carter's economic report of August 2020<sup>iii</sup>, which states that the Gold Level is "the most cost-effective of the options that achieve functionality for those in wheelchairs".

In line with the recommendation from the Dalton/Carter Economic Review, Polio Australia also supports further assessment into the addition of **Option 5** as part of a combination of options. This addition will allow for greater availability of housing for potential renters with physical disability.

We thank you for the invitation to participate in this consultation.

Polio Australia

---

<sup>i</sup> Australian Network for Universal Housing Design. (2020). "Let's do it right first time": Response to the Consultation Regulatory Impact Statement. Retrieved from:

<https://aduhdblog.files.wordpress.com/2020/08/anuhd-response-to-the-consultation-ris.pdf>

<sup>ii</sup> Livable Housing Australia. (2017). Livable housing design guidelines version 4. In (2nd ed.). Sydney: Livable Housing Australia. Retrieved from:

[http://www.livablehousingaustralia.org.au/library/SLLHA\\_GuidelinesJuly2017FINAL4.pdf](http://www.livablehousingaustralia.org.au/library/SLLHA_GuidelinesJuly2017FINAL4.pdf)

<sup>iii</sup> Dalton, A., & Carter, R. (2020). Economic advice prepared to assist with responses to the Consultation Regulation Impact Statement on minimum accessibility standards for housing in the National Construction Code. Retrieved from:

[https://disability.unimelb.edu.au/\\_data/assets/pdf\\_file/0010/3469492/DaltonCarter-Economic-Report-v9-18.08.2020.pdf](https://disability.unimelb.edu.au/_data/assets/pdf_file/0010/3469492/DaltonCarter-Economic-Report-v9-18.08.2020.pdf)