

VCOSS
Submission to the Visitable and
Adaptable Housing Features
Regulatory Impact Statement
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Authorised by: Cath Smith, Chief Executive Officer

**For further information regarding this submission,
contact: Kate Colvin**

T: 9654 5050 E: kate.colvin@vcoss.org.au



The Victorian Council of Social Service (VCOSS) is the peak body of the social and community sector in Victoria. VCOSS works to ensure that all Victorians have access to and a fair share of the community's resources and services, through advocating for the development of a sustainable, fair and equitable society. VCOSS members reflect a wide diversity, with members ranging from large welfare organisations, sector peak organisations, small community services, advocacy groups and individuals involved in social policy debates.

Increasing the numbers of homes in Victoria with accessible features is critical for supporting people's health and wellbeing throughout their life cycle. Accessible homes provide safer environments for children and families, and are essential through episodes of frailty, disability and temporary impairment.

Consequently, VCOSS strongly welcomes this RIS and the Government ongoing commitment it signals to building a stronger and fairer community. The following comments respond to the specific questions identified in the RIS. In addition to these responses, VCOSS endorses the submission of the Victorian Universal Housing Alliance, of which VCOSS is an auspicing member.

Question 1 – The proposed accessibility features

The four proposed features are essential as a minimum requirement to achieve the visitability of homes. This is a critical and important step as social engagement in the home is one of the primary ways in which people form and maintain the social attachments that underpin mental wellbeing. These features will also enable people with some disabilities or mild frailty to live in their homes, or to modify them to be liveable at low cost.

However, these features are not of themselves sufficient to ensure the liveability of homes for many people with temporary or permanent disabilities. As many of the benefits both to individuals, families and the community and government accrue from people being able to remain in their home through periods of impairment; to age in place and to be discharged from hospital to home, VCOSS proposes the strengthening of the proposed accessibility features in the following ways:

1. Proposal for level entry showers to be added as an additional minimum requirement

The inclusion of a level entry shower is an important safety feature for a very broad number of people, and can be achieved at low cost. A shower is also an essential feature to enable people to remain in their home or to visit overnight.

The RIS report estimates that one in four users of personal care services provided by the Home and Community Care (HACC) program may be able to shower unaided if a step-free walk-in shower was available in their home.

2. Proposal to increase door clearance and passage width

The proposed 820mm door width and 1000mm passage width, while an improvement on current standards, are inadequate to enable entry and manoeuvrability of people using wheelchairs. VCOSS proposes increasing these widths to 850mm and 1200mm respectively to achieve enhanced accessibility for people using wheelchairs. This is an important gap to address as increasing the width of doors and passage ways has been identified as the most costly area for retrofitting.¹

3. Proposal to modify the automatic exemption for steeper sites

VCOSS is concerned that some opportunities to achieve enhanced accessibility on sites where the natural ground slope along the possible paths to Class 1 and 2 buildings is steeper than one in 14 will be missed with the granting of an automatic exemption. We propose this exemption be modified to include some reduced requirement for accessible entry to encourage clever positioning of the dwelling and entrances.

Question 3 - Application of any mandatory standards on Victoria's new dwellings

The very limited availability of homes with accessible features, in combination with the rapid ageing of the population makes it urgent to increase accessible housing supply as quickly as possible. In order to meet the housing needs of a diversity of people across income groups, this newly accessible supply must include multiple housing types. Consequently, VCOSS supports the proposals to require:

- **Class 1a dwellings** to meet minimum accessibility requirements – as these are the most common form of new housing construction, and so will most quickly increase the proportion of homes in Victoria with accessibility features.
- **Class 1b dwellings** to meet minimum accessibility requirements – as boarding houses are the only housing option that is affordable to many people on low incomes.
- **Class 2 dwellings (medium density)** to meet minimum accessibility requirements for all ground floor dwellings in buildings without a lift – as this is a very common form of housing construction, particularly in infill areas, where accessible housing supply shortages will escalate as the population ages.
- **Class 4 dwellings** to meet minimum accessibility requirements – as this less common form of housing includes some very affordable and important housing stock, including accommodation linked with a business.

However, VCOSS proposes increasing the proposed requirement for **Class 2 dwellings (high rise)** to meet minimum accessibility requirements in only 20 per cent of apartments to a requirement to meet minimum accessibility requirements in 40 per cent of apartments.

High rise living is an increasingly important housing form for both families and 'empty nesters', in addition to its traditional market of singles and couple without children. Increasing the requirement on this dwelling type would enable more rapid expansion of

urgently needed supply for these groups. As in many areas, high rise apartments provide relatively affordable housing in both home ownership and rental markets, this would be particularly important for low to middle income households.

In addition, VCOSS proposes that door way clearance in common areas of Class 2 buildings be increased to 850mm.

Concluding comments

Without regulation, progress on accessibility in Victoria has been slow, with an estimated 96 per cent of new homes still lacking accessibility features.² As our community ages, and the number and proportion of people with temporary and permanent disabilities grows, this slow progress will result in sky-rocketing costs to government, and isolation and ill health for people trapped into – or out of – appropriate housing unless action is taken.

Strong leadership to progress these minimum requirements, and strengthen them in the areas VCOSS has identified as a clear benefit in excess of cost, will result in homes that are safer, more functional and more adaptable to the needs of the varied households that will occupy them over time.

This leadership will also result in direct cost savings to government: through reduced spending on HACC services, reduced hospital admissions from injuries in the home, shorter hospital stays where patients can be discharged to their homes, and through reduced spending on supported accommodation.

Leadership will also achieve enhanced community wellbeing, by enabling the social contact in people's homes that is so critical to achieving a rich life filled with family and friends.

Contact details

For further information regarding the VCOSS submission to the VISIBLE and ADAPTABLE Housing Features Regulatory Impact Statement, contact:

Kate Colvin
T: 03 9654 5050
E: kate.colvin@vcoss.org.au

Endnotes

¹ Department of Planning and Community Development, 2009, *Adaptable Features in Housing, Regulatory Impact Statement*, Melbourne, p98 Table 4.10

² *Ibid*, p51