



Submission
to
**Australia's Combined Second and Third
Periodic Report under the Convention on
the Rights of Persons with Disabilities**



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Abbreviations

ABCB	Australian Building Codes Board
ANUHD	Australian Network for Universal Housing Design
COAG	Council of Australian Governments
National Dialogue	National Dialogue on Universal Housing Design
NCC	National Construction Code
RI Australia	Rights and Inclusion Australia
RIA	Regulatory Impact Assessment
UNCPRD	United Nations' Convention on the Rights of Persons with Disabilities

Contact details

Dr Margaret Ward PSM

Mr David Brant

Australian Network for Universal Housing Design

PO Box 666 STRAWBERRY HILLS NSW 2012

Website: www.anuhd.org

Email: anuhd@anuhd.org

Executive Summary

Australian Network for Universal Housing Design (ANUHD) disputes the findings under Issue 11—Targets for Universal Housing Design in Australia's Combined Second and Third Periodic Report under the Convention on the Rights of Persons with Disabilities (UNCRPD).

As a member of the National Dialogue on Universal Housing Design, ANUHD has monitored the commitment within the National Disability Strategy to work to ensure that housing is designed and developed to be more accessible and adaptable. An aspirational target that all new homes will be of agreed universal design standards by 2020 has been set with interim targets and earlier completion dates to be determined.

Counter to the findings under Issue 11, ANUHD's research shows that:

- Less than 5% of the 2020 target will be reached with the National Dialogue's Strategic Plan;
- Livable Housing Australia is no longer driving the National Dialogue's Strategic Plan;
- Mandating access in all new housing construction through the NCC will be required to improve the supply of accessible housing to ensure inclusion of all people;
- The process for regulation for access in all new housing should have been implemented in 2016 if the 2020 target was to be reached; and
- Due to our persistent advocacy, action is now underway which might allow the National Disability Strategy to reach this target by 2022. This is contingent on the moral leadership of COAG and the housing industry.

ANUHD requests that Australia's Combined Second and Third Periodic Report under the Convention on the Rights of Persons with Disabilities (UNCRPD) be amended to reflect accurately the current status of the National Disability Strategy commitment to:

work with representatives from all levels of government, key stakeholders from the disability, ageing and community support sectors and the residential building and property industry on the National Dialogue on Universal Design to ensure that housing is designed and developed to be more accessible and adaptable.

An aspirational target that all new homes will be of agreed universal design standards by 2020 has been set with interim targets and earlier completion dates to be determined.

Introduction

Australian Network for Universal Housing Design

Australian Network for Universal Housing Design (ANUHD) is a network of people and organisations that believe the homes we build for today should be fit for all of tomorrow's Australians.

ANUHD considers it is necessary to regulate **for minimum access features in the National Construction Code for all new and extensively modified housing**. This should be supported by education and training for the housing industry. ANUHD was a member of the National Dialogue on Universal Housing Design, whose strategic plan¹ was included in the National Disability Strategy².

Our submission

Our submission focusses on Issue 11—Targets for Universal Housing Design. The Attorney General's draft Combined Second and Third Periodic Report under the Convention on the Rights of Persons with Disabilities describes the progress below (*in italics*):

Targets for Universal Housing Design

140. *Under the ND Strategy, Commonwealth, state and territory governments have agreed to develop approaches to increase the provision of universal design in public and private housing and improve community awareness of the benefits of universal design.*
141. *In October 2009, a National Dialogue on Universal Housing Design (National Dialogue) was convened by the Australian Government, bringing together representatives from government, the building industry and the ageing and disability advocacy sectors to discuss how housing could be better designed to meet the changing needs of occupants over their lifetime.*
142. *Members agreed to set aspirational targets for public and private housing to be built to meet minimum livable housing design standards by 2020. In July 2010, a strategic plan was released which set out the aspirational targets and the Livable Home Design Guidelines (LHD Guidelines). The LHD Guidelines assist the residential building and property industry and governments build homes that can respond to the changing needs of households.*
143. *In June 2011, National Dialogue members agreed to establish a not-for-profit organisation, Livable Housing Australia to drive the strategic directions identified by the National Dialogue and champion the LHD Guidelines.*
144. *State and territory governments are implementing the LHD Guidelines to help ensure there is an adequate supply of accessible housing for persons with disabilities. For example, the NT Department of Housing and Community Development's Urban Public Housing Design Guidelines require all new urban public housing to meet the silver level rating under the Guidelines.*

ANUHD's Response to Issue 11: Targets for Universal Housing Design

Commonwealth, State and Territory Government agreement

What was promised

COAG agreed to provide accessible and well-designed housing with choice for people with disability about where they live². This was because COAG considered housing as a prerequisite for a happy and stable life:

There is evidence that people with disability experience substantial barriers in finding a place to live, especially in the private market. Barriers are often presented by designs which do not allow the building structure of the home to change without significant expense, to meet the needs of a person who is ageing or who has a disability. The greater the take up of universal design features, the more open the community is to people with disability, including those with age-related disability. This provides greater choice about where to live, but also more social opportunities for visiting friends and family.

What happened

Commonwealth, state and territory governments agreed that the way forward was to raise community awareness of the benefits of universal design and thereby let the market decide. Apart from some housing where developers were required to provide access as part of their contractual obligations¹⁸⁻²⁰, universally-designed housing was optional with little incentive or assistance for the housing industry to change their practices, or buyers to consider asking for it.

Commitment to measurable targets

What was promised

The 2010-2020 National Disability Strategy committed to work with representatives from all levels of government, key stakeholders from the disability, ageing and community support sectors and the residential building and property industry on the National Dialogue on Universal Design to ensure that housing is designed and developed to be more accessible and adaptable. An aspirational target that all new homes will be of agreed universal design standards by 2020 has been set with interim targets and earlier completion dates to be determined².

The National Dialogue had previously agreed to the following targets for all new residential housing are:

- 25 per cent to Silver level by 2013
- 50 per cent to Silver level by 2015
- 75 per cent to Silver level by 2018
- 100 per cent to Silver level by 2020

In 2017, ANUHD requested reports on progress towards these from COAG First Ministers³. A summary of their reported achievements is in Appendix 1:

What happened

- The States and Territories have no reliable mechanisms to measure the take-up of universal design in housing in the private sector.
- Some States and Territories have mechanisms to identify the take-up of universal design in social housing.
- Any increase has had little effect as the overall number of social housing tenancies in Australia as decreased to less than 4% of Australia's housing stock⁴.

Commitment to regular reviews

What was promised

The National Dialogue also agreed that progress towards the achievement of the targets should be reviewed in 2013 and every two to three years thereafter¹. In 2013, Livable Housing Australia informed ANUHD that the National Dialogue no longer existed, and Livable Housing Australia would drive the Strategic Plan towards these targets. No review was done by Livable Housing Australia or COAG.

What happened

In response, ANUHD and Rights and Inclusion Australia (RIA), undertook their own review⁵ in 2015.

The ANUHD/RIA report found that the housing industry had failed to show signs of voluntary systemic transformation towards providing access in new housing construction.

A generous estimation in 2015 was the current voluntary approach would achieve less than 5% of the National Dialogue's 2020 target. See Figure 1 for a comparison of the National Dialogue's targets and the actual outputs to 2015.



Figure 1 Comparison of National Dialogue targets and actual outputs

The report was widely distributed through government and community networks.

No member of COAG, the National Dialogue, Livable Housing Australia, or housing industry contested these findings.

The report also found that:

- The National Dialogue agreement, without being tested, was referenced in key policy documents of the Australian Government⁶⁻⁸ as the main accessible housing supply strategy;
- The commitment by the housing industry leaders to the National Dialogue agreement is in question, given their lack of response to ANUHD/RIA's findings;
- Government intervention will be necessary to stimulate industry supply or buyer demand to the extent needed for the National Dialogue's 2020 target to be met.

In the absence of any review process by COAG, the National Disability Strategy Progress Report to the Council of Australian Governments 2014²¹ and the 2015-2017 Implementation Plan²² reported on training initiatives, individual private projects and achievements in social housing, yet, omitted to report against the agreed 2020 target and interim targets.

Establishment of Livable Housing Australia to drive the Strategic Plan

What was promised

In 2012, Livable Housing Australia was established as a company limited by guarantee with funding of one million dollars from the Australian Government. Livable Housing Australia effectively closed its office in December 2014, due to a lack of support through industry sponsorship.

What happened

Livable Housing Australia has a minimal public presence with a website, a list of assessors and a downloadable copy of the Livable Housing Design Guidelines⁹. Livable Housing Australia has not reported any identifiable activity since 2014 towards its object of "help ensure all new homes are of an agreed Universal Housing Design standard by 2020"¹⁰.

Support by States and Territories' housing programs

What was promised

As part of the National Dialogue's strategic plan the Commonwealth and all state and territory government providers of social housing were to commit to delivering all new social housing to an agreed Universal Housing Design standard. The targets for the Commonwealth and states were more stringent, as follows:

- 100 per cent to Silver level by 2011
- 50 per cent to Gold level by 2014

- 75 per cent to Gold level by 2017
- 100 per cent to Gold level by 2019

As part of the 2015 review of the progress of the National Dialogue's strategic plan⁵, ANUHD and RIA requested States and Territory housing ministers to report their outputs towards their targets for universal design in housing in their affordable and social housing programs. See Appendix 2 for their responses.

What happened

- The reported outputs in 2015 were variable and underwhelming, with no State or Territory reaching the agreed target of 50% to Gold level by 2014¹.
- Each State and Territory had used a different guideline or standard for access, suggesting that the attempt by the National Dialogue and the COAG to have an agreed access standard had failed.

Update on activities

Proposal for Change submitted to the Australian Building Codes Board

In May 2016, ANUHD and RIA submitted a comprehensive Proposal for Change¹¹ to include access in all housing construction. This was timed to be considered for the NCC review in 2019 and allow COAG to meet their 2020 commitment. The Proposal was rejected because it was considered to be a policy matter that needed direction from COAG¹².

Report from The Senate's Community Affairs References Committee

In November 2017, the Senate's Community Affairs References Committee reported on their inquiry into the delivery of outcomes under the National Disability Strategy 2010-2020 to build inclusive and accessible communities. Their reason for the inquiry was that "accessibility is a necessary first step to achieve progress in other reform areas Thus, a lack of progress in achieving accessible and inclusive communities has significant negative flow-on effects to achieving progress across the whole of the Disability Strategy"¹³.

The committee made the following relevant recommendations, which are pertinent to Issue 11:

- Specific measurable goals for implementation of the National Disability Strategy 2010-2020 are created, that these are routinely monitored, and data is collected and reported biannually to the Disability Reform Council, the Office of Disability Strategy (if created) and presented to parliament.
- The revised National Disability Strategy should include development of solutions to the barriers identified to this committee.

In relation to Issue 11 the key barriers identified to the committee were:

- limited well-located stock, low affordability and a lack of physical access;

- lack of accessibility in housing increases social exclusion; and
- an expectation from governments that private industry is responsible for addressing discrimination, which relies on the 'good will' of the industry to provide appropriate housing¹³.

The committee also received a large amount of evidence that “there is an emerging, strong view that mandatory minimum accessibility standards for housing should also be enacted into the Building Code of Australia”; however, “any changes to the code which would introduce targets for private dwelling accessibility would not be available until the 2022 edition”¹³.

A key recommendation to the Committee was:

*Amend the National Construction Code to include access features in all new and extensively modified housing, as specified in Liveable [sic] Housing Australia's Gold level.*¹³

Survey on the provision of Livable Housing Design

Australian Network for Universal Housing Design (ANUHD) ran an on-line survey from October 2017 to February 2018 inviting individuals to share their opinions on how COAG should meet their commitment in the 2010-2020 National Disability Strategy that all new homes will be of agreed universal design standards by 2020. The survey was advertised widely through the ABCB, community groups and housing organisations. It attracted 1329 participants, the majority of whom were home owners and people who needed livable housing for themselves, their family or friends to live in or to visit.

Seventy percent of participants supported regulation to ensure the 2020 target is met. Over fifty percent of the participants also indicated that an education and awareness strategy should go hand in hand with regulation in order that all stakeholders understood its purpose and relevance¹⁴.

Development of a Regulatory Impact Assessment

In April 2017, in recognition that the National Dialogue agreement had failed, and the 2020 target as a commitment within the National Disability Strategy would not be met, the Building Ministers' Forum (BMF) agreed:

*to propose to COAG that a national Regulatory Impact Assessment be undertaken as soon as possible to consider applying a minimum accessibility standard for private dwellings in Australia.*¹⁵

In October 2017, the BMF reported that:

*The BMF, in consultation with Disability Ministers, will undertake a national Regulatory Impact Assessment (RIA) regarding accessible housing for private residences. The RIA will examine the silver and gold performance levels as options for a minimum accessible standard; use a sensitivity approach; and be informed by appropriate case studies.*¹⁶

It is currently planned that the BMF will consider a draft Options paper for approval at their meeting in August 2018. If approved, the ABCB will release the Options Paper for consultation. This will necessitate comprehensive public engagement, including face-to-face meetings across Australia.

The results of this consultation and submissions made on the Options Paper will inform the development of the Regulatory Impact Assessment which is planned for early 2019. The ABCB are committed to a rigorous process in time for any proposed amendments to the NCC review in 2022.

The ABCB have already met with senior officials in Department of Social Services and the Disability Discrimination Commissioner.

Liaison with Disability Reform Council:

The ABCB has been requested by the Building Ministers' Forum to consult with the Disability Reform Council (DRC) in the development of the RIA. The DRC has delegated this matter to their Senior Officials' Working Group.

Key cohorts in aged, disability and women's' sectors ready for consultation

ANUHD forwarded a list of contacts who were interested in contributing to the consultation process. They represented the interests of older people, people with disability and women, and included researchers in, and providers of housing, home-based support, family services and human rights protection.

Engagement by Disability Discrimination Commissioner

In June 2018, at the recent UNCRPD Conference of States Parties at the United Nations, Commissioner McEwin released a press statement that improving housing accessibility is critical to ensuring that no one is left behind through the full implementation of the Convention on the Rights of Persons with Disabilities.

The commissioner stated that he wanted to see people with disability live in our communities where they like and with whom they like and to live in housing that is accessible in the community. To achieve this, he is working with the government, the private sector and community stakeholders to encourage the development of new housing is accessible to all people¹⁷.

Conclusion

This submission raises concerns about Australia's draft Combined Second and Third Periodic Report under the Convention on the Rights of Persons with Disabilities. At best, this draft report serves to question what, if any, consultation was done both inside and outside of government. At worst, it perpetrates the denial of COAG's failure to reach the agreed targets for Universal Housing Design, and emboldens people with disability to report directly to the UN through the Optional Protocol.

References

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Appendices

Appendix 1. Summary of achievements reported by COAG First Ministers 2017

State	
WA	Advice from industry suggested that in their view there is no market failure and that there should be no mandatory provisions for accessible housing in the National Construction Code. Industry was unable to provide any statistical data.
SA	<p>The Planning, Development and Infrastructure Act 2016 requires the development of a specific design policy with respect to the universal design of buildings and places to promote best practice in access and inclusion planning.</p> <p>The South Australian Housing Trust builds 75 per cent of new social housing in accordance with universal design principles.</p> <p>The 1000 houses in 1000 days scheme, requires 10 per cent of housing be built to the National Liveable Housing Design Guidelines.</p> <p>South Australia has mandated that 5 per cent of new housing must meet minimum access standards.</p>
NSW	<p>Of all new housing built and managed by the NSW Land and Housing Corporation, 50 per cent must have 'Gold Level' accessible housing features.</p> <p>All new private, affordable and social housing dwellings delivered under the 'Communities Plus' initiative should meet 'Silver Level' accessible housing standards. 'Communities Plus' projects are housing developments that are delivered in partnership with the private, non-government and community housing sectors.</p> <p>The development of 2,200 social and affordable dwellings through Phase 1 of the Social and Affordable Housing Fund initiative. Through this initiative all new dwellings will meet the 'Silver Level' accessible housing standards.</p>
VIC	Since the Building Ministers' Forum in April 2017, [Minister Wynne] has written to the Premier to advocate to the Prime Minister for a national Regulatory Impact Assessment which would consider the costs and benefits of applying national minimum accessible standards to public and private dwellings.

TAS Tasmania has actively promoted the Universal Access Standard over the past 12 months, including conducting specific industry forums to demonstrate the use of the principles. The forums focus was to encouraging builders and designers to consider approaches that support the needs of all people, not only now but into the future.

QLD Liveable housing design was included as a key theme in the Queensland Building Plan (QBP) discussion paper

In 2016-17, the Department of Housing and Public Works set a target of 50 per cent of newly constructed social housing dwellings to meet the 'Gold' or 'Platinum' *Livable Housing Design Guidelines* standard. The department now mainly delivers multi-unit projects, with a smaller number of new detached houses.

Within its priority development areas, Economic Development Queensland requires their accessibility standard to be met in at least 10 per cent of all dwellings.

Figures are not available for the private housing sector.

ACT In 2008, the ACT Government parties committed to introduce minimum universal design guidelines (UDG) for new ACT houses. . .

In 2009, UDG targets were included in Phase II of the ACT *Affordable Housing Action Plan*. The initial target was for at least 20 per cent of new ACT houses to be required to comply by the end of 2010, ramping up until 100 per cent compliance by the end of 2020.

NT The houses commissioned by the Northern Territory Government adopt universal housing design principles for new urban and remote public housing projects. These totalled 108 new houses over the period, and in terms of new houses commissioned by the private sector, there is currently no mechanism to measure the extent to which the Silver standard is adopted.

Appendix 2. Activity in Social Housing reported by Housing Ministers 2014.

Position	Response	As built Nos
QLD S	<p>The Department...has committed to adopting and promoting the Livable Housing Design Guidelines. The department's procurement and design requirements for new apartments and houses including houses in remote Indigenous communities, reference the Livable Housing Design Guidelines 'Gold' and 'Platinum' levels.</p> <p>The department requires proposals for apartment projects to maximise the number of ground-floor and lift-served apartments designed to the LHD guidelines. Up to 30% of social housing apartments in new multi-unit projects are required to meet the Platinum level, with all remaining ground-floor and lift-served apartments designed to Gold level. The minimum standard for houses is Gold level, with the Platinum standard specified for projects in response to identified client need.</p>	No figures given
NSW	[We] aim to achieve a minimum of 50 percent of new dwellings designed with liveable housing features. The Liveable Housing standards (<i>sic.</i>) are included in the LAHC Design Standards and exceed "Gold" level of the Livable Housing Australia's <i>Livable Design Guidelines</i> .	No figures given
VIC	I can advise that the Victorian Government has consulted with the Commonwealth concerning the National Dialogue on Universal Housing Design and the Commonwealth Government has been informed of progress.	No figures given
SA	<p>It is estimated that 90% of homes constructed for Housing SA currently meet [SA Universal Housing Design] criteria.</p> <ul style="list-style-type: none"> • Housing SA's current position for newly constructed housing is of a standard comparable with Silver and Gold levels of the NLHDG targets. • Housing SA Disability Housing which is focussed on providing for the specific needs of the occupants, 	No figures given

Position	Response	As built Nos
TAS	<p>almost comprehensively meets the Platinum NDLHDG targets.</p> <p>On 1 April 2012 the Tasmanian Department of Health and Human Services formally adopted a new policy with addressed housing design by setting minimum standards for new social housing developed by Housing Tasmania. This includes, where appropriate, affordable housing projects undertaken by the not for profit sector with Tasmanian Government support.</p> <p>The fifth objective of this policy was to establish the Liveable [sic] Housing Design Guidelines and universal housing design principles as a minimum standard for all new developments.</p> <p>These minimum standards are:</p> <ul style="list-style-type: none"> • New homes constructed to meet the changing needs of residents across their lifetime by ensuring they are easy to enter and move around in, are capable of easy and cost-effective adaptation for the specific needs of aged people and people with disabilities as per guidance from the Liveable [sic] Housing Design Guidelines-generally at the silver level however for kitchen, laundry and bedroom space, at Gold level. • Specialist housing for people with significant disabilities should reach the Gold and if possible the Platinum Level. • The Liveable [sic] Housing Design Guidelines will provide direction when planning for the construction of new residential developments. <p>I am pleased to say this policy has significantly shaped how Housing Tasmania delivers new dwellings. The policy has also been successfully applied to the refurbishment of existing Housing Tasmania properties, where appropriate.</p>	<p>84 new homes.</p> <p>10 existing units modified to Platinum level</p> <p>71 new homes planned.</p>
WA	<p>Western Australia has not committed to the National Dialogue's proposed targets and we will not be</p>	<p>2009-2010 and 2013-2014 more</p>

Position	Response	As built Nos
	<p>reporting to the Australian Network for Universal Housing Design.</p> <p>I am pleased to advise that Western Australia incorporates universal design principles in many of our building and construction programs, reflecting our commitment to the National Disability Strategy 2010-2020.</p> <p>Between 2009-2010 and 2013-2014 more than 2,000 completed dwellings funded through the department have incorporated “substantial elements” of universal housing design</p>	<p>than 2,000 completed dwellings funded through the department have incorporated “substantial elements” of universal housing design</p>
ACT	<p>Housing ACT has constructed 73% of its new properties to a Class C standard [AS4299] with the remaining 27% to Gold Standard under the Liveable [sic] Housing Guidelines”.</p>	<p>No figures given</p>
NT	<p>The Department’s requirements have incorporated universal design features for many years and it promotes core universal design features similar to those described in the Liveable [sic] Housing Design Guidelines.</p> <p>Decision regarding the use of the Australian Standard AS 4299 Adaptable Housing are made on a case by case basis taking into account a range of factors, including the client group to be housed and the available budget. The Department’s requirements include the Australian Standard AS4299 Adaptable House Classification C as a minimum, and Australian Standard AS 1428.1 Design for access and mobility to bathroom and toilet design where required. The high percentage of new public housing construction in the Northern Territory already meeting the guidelines has shown to be sufficient to meet the current need of tenants.</p>	<p>No figures given</p>