

Queenslanders with Disability Network



Response to

Australian Building Codes Board's

Accessible Housing

Option Paper Nov 2018

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About Queenslanders with Disability Network (QDN)

QDN is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us." QDN operates a state-wide network of members who provide information, feedback and views from a consumer perspective to inform systemic policy feedback to Government and peak bodies. QDN also provides information and referral support to people with disability.

QDN has over 800 members across Queensland. All QDN's voting members are people with disability and 22 members (Housing Champions) are focused on housing as a hot topic of need.

Value Statement on People with Disability

QDN's work in providing feedback and is based upon the organisation's core values and the place of people with disability in an inclusive, Australian society.

QDN believes that:

- All people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are as valued, present, participating and welcomed as members of any dynamic and diverse society.
- The place of people with disability in the community is not just about people with disability having a house in the community. Core to this is that they are welcomed in the community as ordinary citizens where they are genuinely given opportunities to contribute and actively participate. People with disability need to be in communities where their individuality, their talents, and their lived experiences of disability are recognised and acknowledged.
- Culturally and historically, people with disability are not afforded the same value, opportunities or access to community life.
- Any inclusion in community for people with disability is conditional and vulnerable to withdrawal.
- Many people with disability in Queensland are excluded from the most basic experiences of ordinary lives.

- Current exclusionary practices are unacceptable and must be challenged.
- These issues affect not only people with disability but the whole community.
- The responsibility is shared. It lies within government (federal, state and local) and the community at large, to ensure that people with disability have a place and are resourced to belong in community.

QDN's Housing Work - Background

QDN welcomes the opportunity to respond to the first stage of the Accessible Housing Project, Options Paper and looks forward to a more inclusive and accessible building code.

QDN has a strong history of taking leadership on many key issues and policy reforms which impact upon people with disability and accessible housing has consistently been identified as the number one priority amongst QDN's state-wide members.

Queenslanders with Disability Network's (QDN) housing position is clearly- **Going for Gold**: Accessible, Universally Accessible Housing and unapologetically promotes the perspectives of people with disability.

QDN's work in the housing space to date has seen housing identified as the number one priority in QDN's 2015 member survey. Members told us they want homes that are their own private spaces and reflective of their individual personal tastes and choices – a place to truly call home. QDN appointed 22 Housing Policy Champions who have shared their lived experiences and knowledge to enrich QDN's housing work, in particular the content of the above mentioned Position Paper and the prior Issues Paper.

The Going for Gold: 'Accessible, Affordable Housing Now' position paper, containing four key principles and 11 key recommendations followed major consultation with our members and stakeholders in the housing industry. These recommendations have been informed through forums from 2015 and have been fleshed out as this work has progressed.

QDN's Housing Principles

The key principles include;

Rights

People with disability have the same rights to housing assistance as other people and should be supported to exercise those rights. This means:

- Housing is designed to enable family and friends with disability to visit.

Choice

People with disability choose where, how and with whom they live. This means:

- People can afford to live in housing suitable to their needs.
- People can make informed decisions about their housing choices.

Inclusion

Housing enhances the independence and social and economic participation of people in family and community life. This means:

- Housing is non-congregate and encourage a mix of occupants with and without disability in housing developments
- Housing is located within communities close to amenities and services.
- Housing is designed to meet the principles of universal housing design as developed in the Liveable Housing Design Guidelines and incorporates assistive technology as needed.
- Queenslanders are educated and aware of benefits of universal housing design and the need to include people with disability in local communities.

Control

The provision and management of housing is separate from the provision and management of paid support. This means:

- Housing is primarily a person's home, not someone else's workplace.
- A person can change their housing without affecting their support arrangements.

QDN Broader Housing Priorities

QDN sees the way forward is a shared responsibility which requires a collaborative approach across our community, including the three levels of Government, industry peak bodies, the private and community housing and finance sectors, people with disability and their families and carers.

Our key recommendations to drive future actions are:

1. Adopt the Guiding Principles of rights, choice, inclusion and control

2. Enhance partnerships and information sharing
3. Increase the supply of accessible, affordable housing
4. Improve access to affordable private rental housing
5. Improve access to social housing
6. Deliver innovative solutions that lead to greater home ownership
7. Plan and build inclusive residential neighbourhoods
8. Provide priority pathways out of congregate care arrangements
9. Take a national approach to home modifications and assistive technology
10. Deliver housing advocacy services which have a dedicated focus on people with disability
11. Implement specific strategies that address the needs of rural and remote Queenslanders, including people from Aboriginal and Torres Strait Islander backgrounds

See page 7 and 8 Going for Gold.

<https://qdn.org.au/wp-content/uploads/2018/06/QDN-Going-for-gold-position-paper.pdf>

Disability context within broader housing crisis

Queenslanders, including 830,000 people with disability in this state, are currently experiencing critical housing issues, like the broader Australian community. Additionally, Queenslanders with disability face extra barriers in securing a home that is affordable and accessible.

Currently, 36% of households have a person with disability (including older people) yet accessibility is needed by a much broader cohort. Disability impacts on the household, especially carers, who are mainly women and children. Eighty percent of older people and people with disability rely on others to support their daily needs and lives.

Accessibility and affordability affects many other population groups, including:

- People affected by another's disability, spouses, family, friends
- Seniors
- Parents with infant/ young children
- Care providers and support worker, nursing staff, allied health workers
- Injured and sick people recovering from surgeries /illness
- Taxpayers funding NDIS modifications through levies
- Emerging services that provide assistance to people with a disability

Critical factors impacting upon the need for housing accessibility

Housing is a fundamental need and human right and key to enabling people with disability and our ageing population to be included in community and family life and to participate fully as citizens within Australian society. This includes the ability of persons with a disability to visit the homes of family, friends and neighbours and that these houses have the facilities to welcome them in. In everyone's life there will be some time when we are incapacitated temporarily or permanently. Disability is a common thread in society. Almost everyone is temporarily or permanently impaired at some point in life and those who survive to old age will experience increasing difficulties in functioning. Disability is a complex, dynamic, multidimensional issue and housing accessibility affects many cohorts, such as pregnant women, parent with prams, toddlers, and people with illness or injuries such as broken limbs, knee and hip replacements, seniors. We all need accessible housing at different times in our lives.

Not only do we live in our own homes, we change our homes, we move during our lives and we visit other people's homes as part of participating in family and community life. This means we must consider the access needs of dwellings throughout people's life-cycle, as part of our urban infrastructure, rather than just as an item to build and sell.

Ageing in Place

By 2050, over 3.5 million Australians will access aged care each year with around 80 per cent of the services delivered in people's homes and local communities. For the last two decades, successive Commonwealth and State governments have pursued a general policy direction of 'ageing in place'. This and other issues have led to a greater emphasis on keeping elderly and frail people in their home or family settings for as long as possible via the provision of home care services. Accessible housing is the key to the success and sustainability of this initiative.

Financial Barriers

Financial barriers also impact upon the access and affordability of housing for people with disability. People with a disability are more likely to have lower incomes than the general population and as a result experience an increase in housing stress. The lack of accessible private and public housing; the delay of the building industry in adopting universal housing design; the inability

to afford modified housing; assumptions about the need for institutional and congregate care: difficulty negotiating and advocating within the housing system, particularly for those with complex needs are all barriers to people living a reasonable life.

Costs will accrue and increase due to accidents at home and hospital intakes, delayed hospital discharges, extra community services that result from unsafe and poorly designed housing. These costs are shouldered mostly by the public health system. People not eligible for National Disability Insurance Scheme (NDIS) or other funding assistance are required to bear these costs directly. This is a heavy impost that many will not be able to afford and this will have many psychosocial impacts that come with other associated costs.

Costs associated with accessible modifications are often highlighted as a reason not to implement these reforms. However, small changes to design can have minimal impacts on the long term returns of not having to retrofit and make modifications, as well as the return on investment in terms of health, and wellbeing.

Broader Policy Context

Australia is a country signatory to United Nations Convention on the Rights of Persons with Disability and the Commonwealth and State Government have committed to the National Disability Strategy, Disability Discrimination Act, the National Disability Insurance Scheme legislation and implementation. These conventions and policies provide obligations and clarity for our Government to uphold the rights of people with disability.

“Australia as a ratified signatory to the Convention on the Rights of Persons with Disabilities (CRPWD). ‘Article 9 Accessibility’ commits our States to provide accessible: Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces”

The United Nations Convention on the Rights of Persons with Disabilities stipulates the importance of interventions to improve access to different domains of the environment including buildings and roads, transportation, information and communication. These domains are interconnected – people with disability will not be able to benefit fully from improvements in one domain if the others remain inaccessible. An accessible environment while particularly relevant for people with disabilities has benefits for a broader range of people and will impact everyone’s life,

The targets set by the National Dialogue have not reached the interim targets in 2014. Across jurisdictions, there has been ongoing inaction around measuring and reporting on the progress and reforms in the area of housing affordability and homelessness. While there is a joint agreement that this is a pressing need, QDN observes that progress is challenging, and recommends that COAG take immediate action. QDN recommends that action is needed to create housing with accessibility as a standard in the Australian building code to deliver an adequate supply of affordable, accessible housing to meet the needs of our growing and aging population.

National Disability Strategy (NDS)

The National Disability Strategy supports people with disability to live in accessible and well-designed communities with opportunities for full inclusion in social, economic, sporting and cultural life.

A key initiative of the National Disability Strategy focused on housing is the taking a universal design approach to programs, services and facilities in an effective way to remove barriers that exclude people with disability. Universal design allows everyone, to the greatest extent possible, and regardless of age or disability, to use buildings, transport, products and services without the need for specialised or adapted features.

The NDS also introduces a periodic high-level report using trend data to track national progress for people with disability in Australia, with a reporting frequency every two years. At a national level, the implementation of the National Disability Strategy represents a commitment by all levels of government, industry and community to a unified, national approach to policy and program development that impacts upon the lives of people with disability.

NDIS

The National Disability Strategy clearly articulates the need to act to address the housing needs of people with disability. The current roll out of the NDIS has further highlighted the great unmet need in housing for people with disability in Queensland. The NDIS also encourages greater investment in housing for people. While the NDIS will fund some home modifications for individuals, the cost of accessibility regulation failure will ultimately be borne by the individual or taxpayers. The lack of commitment to considerations for accessibility over the last two decades adds to the current impacts of our

housing crisis and as more of baby boomers retire and their health decreases, this will highlight the lack of accessible housing even more critically.

The current environment offers a unique opportunity for government, industry, business and the community sector to show strong leadership and work collaboratively with people with disability and families/carers to drive reforms that deliver improved housing for Australians with a disability. The collaboration of all invested parties will create these much-needed changes.

QDN Position

In order to achieve inclusion for all people in our communities it is critical that building standards that delivers accessibility that meets current and future needs are a standard foundation and regulation.

Accessibility standards should meet the needs of all people with disability and QDN sees that a mechanism to monitor and evaluate the implementation of accessibility standards, with engagement and membership of people with disability is important.

QDN acknowledges the Queensland Government's initiatives with regards to the adoption of housing principles which reflect QDN's housing principles, based upon inclusion. QDN also supports Regulatory Impact Assessment for accessible housing that goes beyond a quantifiable cost/benefit analysis but is extended to a commitment of successive Australian Governments to social inclusion, and measuring the economic and social benefits of this.

Through the Productivity Commission's current work to review national agreements across all portfolio areas, it will be important that a National Housing Strategy delivers a cohesive vision and framework to deliver on national outcomes, and across jurisdictions.

Given the impact of delays and the different levels of accessibility on our society and our ageing population, QDN recommends that the ABCB go beyond the minimal approach and adopt COAG's commitment to social inclusion and contemporary world-class urban design and architecture and implement Option 3--Gold level.

Appendix 1: lists the gold standard accessibility requirements.

Wendy Lovelace, Queensland Action for Universal Housing Design and QDN Housing Champion

“The adoption of Universal Design standards works for everyone at every life stage. The inclusion of simple and low-cost features at the time of construction is an important part in the process of making homes accessible for everyone.

Consultation Questions

Name: Queenslanders with Disability Network

State / Territory: Queensland

Telephone number: 32528566

Email or postal address: qdn@qdn.org.au

General Questions

1. Are you participating in this consultation as an individual or on behalf of an organisation or business (tick one as appropriate)?

- Individual
 - Organisation
 - Business
-

2. Which of the following best describes your living arrangements (tick one as appropriate)? Our members might be living in any one of the options below.

- Living in private rental
 - Living in public housing
 - Owner occupier
 - Living with friend or family
 - Living in specialist housing
-

3. Are you living with a disability (tick one as appropriate)?

- Yes
 - No
 - Prefer not to say
-

4. Are you a carer of someone living with disability (tick one as appropriate)?

Yes

No

5. If you answered 'Yes' to questions 3 or 4, does your disability or that of the person you care for require the home to have accessibility features (tick one as appropriate)?

Yes

No

Our members are people living with diverse abilities who will require a diverse range of accessibility features to live safely in their home or to welcome others that have varied abilities into their home. An accessible home is one that allows people to be fully engaged and included within their community.

Note: only answer questions 8 to 10 if you are responding on behalf of a business or organisation.

8. Which of the following best describes your organisation or business (tick one as appropriate)?

Developer

Building / Construction

Architect / Designer

Disability or accessible housing advocate

Government

Other (please specify) *Click here to enter text.*

Questions about the Objective

Note: the objective is discussed on pages 13-14.

11. The Objective is that people have access to housing with a minimum level of accessibility features necessary, across a greater choice of accommodation options. Do you agree with the Objective? If you do not agree with the Objective, please provide reasons and possible alternatives.

The Objective is too narrow. It needs to consider the four levels of impact, the residents, visitors, allied services and government commitments to inclusion. All need to be taken into account. People with a disability must have the same access to appropriate housing as everyone else. To be totally inclusive Platinum levels are necessary.

12. The 'Objective' section of the Options Paper described three considerations as relevant to the setting of an accessibility standard. To what extent do you agree or disagree that each of these considerations is relevant

Tick one box in each row in the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

Statement	1	2	3	4	5
That a clear definition of 'accessibility' is agreed upon at an early stage.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
That any specification adopted addresses accessibility features that are essential, not just desirable or best practice, to meet that agreed definition.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
That such a specification is applied in a way that achieves a positive cost benefit to home buyers and the community.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. What other considerations do you consider relevant to the Objective (if any)?

An independent authority be established to monitor the implementation and enforcement of this code.

14. The Building Ministers' Forum (BMF) has provided direction that the Liveable Housing Design Guidelines (LHDG) Silver and Gold Levels be considered as the basis for a minimum accessibility standard. To what extent do you agree or disagree that the LHDG are appropriate to meet the Objective?

Statement	1	2	3	4	5
The LHDG are appropriate to meet the Objective.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

15. What other options might meet the Objective more effectively or efficiently?

An new purpose created independent guide needs to be developed that has a single set of criteria to minimise confusion of working between the existing Liveable Housing Design Guidelines (LHDG)

16. To what extent do you agree or disagree that the primary focus should be on addressing mobility-related issues?

Tick one box in the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

Statement	1	2	3	4	5
The primary focus should be on addressing mobility-related issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Based on lived experience of our members, "If you can't get into the dwelling and go to the bathroom safely, nothing else matters".

17. What issues other than mobility should be in-scope (if any)?

Psychosocial, auditory, visual impairment, sensory impairments. Some recommendations to include within the building code to respond to the diversity of need.

Questions about the Options

Note: some possible options for an accessibility standard for housing are discussed in the section titled '**Possible Options for NCC Amendment**'.

18. The Options Paper described three possible options for National Construction Code (NCC) amendment. Which of these, if any, is your preferred option as a minimum standard for new residential housing (tick one as appropriate)?

Option 1 – LHDG Silver Level (5 Elements)

Option 2 – LHDG Silver Level (7 Elements)

Option 3 – LHDG Gold Level (12 Elements)

Other (please specify): *Click here to enter text.*

No change to the NCC

19. Please expand on the reason for your answer to question 18.

QDN members believe that the LHDG Gold Level (12 Elements) are the minimum required to make it a home for living in rather than just visiting.

20. The Options Paper discussed 12 Performance Requirements from the LHDG. Please indicate whether you agree or disagree that these requirements should be the minimum standard for all new residential housing?

Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

Performance Requirement	1	2	3	4	5
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A safe, continuous, step-free pathway from the street entrance and/or parking area to a dwelling entrance that is level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
At least one level (step-free) entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Internal doors and corridors that facilitate comfortable and unimpeded movement between spaces.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The ground (or entry) level has a toilet to support easy access for home occupants and visitors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The bathroom and shower is designed for easy and independent access for all home occupants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bathroom and toilet walls are built to enable grabrails to be safely and economically installed (immediately or in the future).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Where installed, stairways are designed to reduce the likelihood of injury and also enable a safe pathway.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There is a space on the ground (or entry) level that can be used as a bedroom.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Light switches are located at heights that are easy to reach for all home occupants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Occupants are able to easily and independently open and close doors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

21. What other Performance Requirements should be considered (if any)?

Queensland houses, responding to our climate, rely on verandahs, patios and covered outdoor living areas to provide a diversity of living spaces. Therefore access to private recreational external spaces at entry level is a key criteria for liveability. Window fittings and controls need to be easy to reach.

22: To what proportion of Class 1 (houses) and Class 2 (apartments) buildings should these features apply?

Building Class	None	Some	Half	Most	All
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Class 1a buildings (houses)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Class 2 buildings (apartments)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

23. To what extent do you agree or disagree that the NCC should be modified to include minimum standards for accessible housing?

Statement	1	2	3	4	5
The primary focus should be on addressing mobility-related issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Questions about the Potential Benefits of Accessible Housing

These questions are about the potential benefits of setting a minimum accessibility standard for housing.

24. Please refer to your response at questions 20 and 21. If your response to that question was implemented, to what extent do you agree or disagree that the following benefits would be realised?

Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

Potential Benefit	1	2	3	4	5
Avoiding later costs of adaptation for occupants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reduced social isolation / increased 'visitability'	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to stay / age in home and community longer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Delayed / reduced use of specialist housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A greater choice of accommodation options	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

25. What other benefits, if any, would be realised from an increase in accessible housing?

Reduction in costs associated with home accidents, hospitalisation, carer and allied health supports. Qualitative benefits include, happiness, liveability, more social inclusion and connections, individual choice and control extended or improved

26. Over what time period would each of these benefits be realised?

Tick one box in each row of the table below.

Potential Benefit	Short term (1-10 years)	Medium term (11-20 years)	Long term (more than 20 years)	Never
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Avoiding later costs of adaptation for occupants	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reduced social isolation / increased 'visit-ability'	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Ability to stay / age in home and community longer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Delayed / reduced use of specialist housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A greater choice of accommodation options	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

27. What factors may influence whether these benefits are realised?

Awareness and enforcement of the building industry to incorporate the new codes for accessibility. Government policy and funding aimed at social inclusion and ageing in place.

Question about the Preliminary Costings

These questions are about the preliminary cost estimates for accessible housing. These estimates are detail in the section titled '**Preliminary Costings—New Buildings**'.

28. Overall, in your opinion, how much do you agree or disagree that with the statements below?

Statement	1	2	3	4	5
The methodology for estimating costs is appropriate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The estimated costs for each option are accurate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

29. Please expand on your responses to question 28?

Depending on the quality of materials and fittings used then the cost will vary greatly. The benefits must be balanced against the life and social benefits of people. The methodology is not properly explained. Without a clear understanding of what is included in the costs and benefits, this is difficult to answer.

30. What factors may influence if these costs will be realised?

31. For each of the three Options, to what extent do you agree or disagree that the benefits of requiring an accessible housing standard outweigh the additional costs?

Option	1	2	3	4	5
Option 1 – LHDG Silver Level (5 Elements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Option 2 – LHDG Silver Level (7 Elements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Option 3 – LHDG Gold Level (12 Elements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Appendix 1.

Performance requirements of Option 3 (LHD Gold level) Option 3 (LHD Gold Level) has the following twelve Performance Requirements:

1. A safe, continuous, step-free pathway from the street entrance and/or parking area to a dwelling entrance that is level.
2. At least one level (step-free) entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.
3. Internal doors and corridors that facilitate comfortable and unimpeded movement between spaces.
4. The ground (or entry) level has a toilet to support easy access for home occupants and visitors.
5. The bathroom and shower are designed for easy and independent access for all home occupants.
6. Bathroom and toilet walls are built to enable grab rails to be safely and economically installed (immediately or in the future).
7. Where installed, stairways are designed to reduce the likelihood of injury and enable a safe pathway.
8. The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.
9. The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.
10. There is a space on the ground (or entry) level that can be used as a bedroom.
11. Light switches are located at heights that are easy to reach for all home occupants.
12. Occupants can easily and independently open and close doors.