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AAG response to the ABCB's Accessible Housing Options Paper

28 November 2018

To Whom it May Concern,

The Australian Association of Gerontology (AAG) thanks the Australian Building Codes Board for the opportunity to provide input into a formal Regulatory Impact Statement by providing a response to the Accessible Housing Options Paper.

AAG's purpose is to improve the experience of ageing through connecting research, policy and practice. Its principles are to be evidence informed, multi-disciplinary and holistic, independent, collaborative and fair. AAG has a growing membership of over 1,350 professionals working across every State and Territory in Australia representing all sectors and disciplines in ageing including research, policy, education, aged care, health and allied health, and consumer advocacy. AAG has 18 Collaborating Research Centres which represent all major research in ageing and aged care and is connected internationally as the executive office of both the International Association of Gerontology and Geriatrics Asia Oceania Region and the International Longevity Centre – Australia.

In response to the Options Paper, AAG has developed the Position Paper "[Regulating accessible housing enables all Australians to age in a place of their choosing](#)". In summary, AAG's position is that:

- A minimum accessibility standard should be regulated for all new housing so that all Australians can age in a place of their choosing.
- The Livable Housing Design Guidelines (LHDG) Gold Level specifications should be set as the minimum requirement, with the addition of some Platinum Level features.

The full Position Paper is attached and includes background information and statistics as well as full details regarding the features AAG recommends for inclusion in a minimum standard.

AAG and its members are also grateful for the opportunity to attend many of the public consultation forums held throughout Australia. AAG was pleased to note that you mentioned plans at these public consultations to collaborate with the National Disability Insurance Agency (NDIA). AAG urges the ABCB to also collaborate with the Federal Government regarding intersections with the aged care system, including home modifications available under the Home Support Program (see, for example, [this case study on the My Aged Care website](#)). In addition, the ABCB should consider the State and Territory aids and equipment programmes when considering the economic benefits of regulating minimum accessible housing standards.

Please do not hesitate to contact me if you would like any more information or support from AAG in your work.

Kindest regards,

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AAG POSITION PAPER: REGULATING ACCESSIBLE HOUSING ENABLES ALL AUSTRALIANS TO AGE IN A PLACE OF THEIR CHOOSING

28 November 2018





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CONTRIBUTORS

This Position Paper was developed by Dr Sandra South, Senior Policy and Research Officer at AAG, with input from Tonye Segbedzi, Senior Policy and Research Officer at AAG, Dr Victoria Cornell, Chair of AAG's Housing and Built Environment Special Interest Group (HBESIG), and other members of the HBESIG

SPONSOR

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ACKNOWLEDGEMENT OF COUNTRY

Australian Association of Gerontology (AAG) acknowledges Traditional Owners of Country throughout Australia and recognises the continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders both past and present. For further information see AAG's Aboriginal and Torres Strait Islander Ageing Advisory Group (ATSIAAG).



ACRONYMS

- AAG - Australian Association of Gerontology
- ABCB - Australian Building Codes Board
- BMF - Building Ministers' Forum
- HBESIG - AAG's Housing and Built Environment Special Interest Group
- ICF - International Classification of Functioning, Disability and Health
- LHDG - Livable Housing Design Guidelines
- RIA - Regulation Impact Assessment
- WHO - World Health Organization.

WHY THIS POSITION PAPER WAS DEVELOPED

This Position Paper has been developed in response to the September 2018 Australian Building Codes Board's (ABCB's) Accessible Housing Options Paper (1). The Options Paper was drafted following an agreement by the Building Ministers' Forum to instruct the ABCB to undertake a Regulation Impact Assessment (RIA) on the costs and benefits of applying a minimum accessibility standard to all new residential dwellings in Australia (2). It was also agreed that the RIA would examine the Livable Housing Design Guidelines' (LHDG) (3) Silver and Gold level specifications as a possible minimum accessibility standard; use a sensitivity approach; and be informed by appropriate case studies (2).

AAG'S POSITION ON ACCESSIBLE HOUSING

AAG'S POSITION IS THAT:

A minimum accessibility standard should be regulated for all new housing so that all Australians can age in a place of their choosing

The Livable Housing Design Guidelines (LHDG) Gold Level specifications should be set as the minimum requirement, with the addition of some Platinum Level features

BACKGROUND INFORMATION

Why enhanced gold level should be the minimum standard

AAG supports that all houses are universally designed. AAG's position is in line with a cross-sector agreement in 2010 that all new housing should be universally designed "to meet the changing needs of home occupants across their lifetime" (4). A universally designed home should:

- ▶ "Be easy to enter;
- ▶ Be easy to move in and around;
- ▶ Be capable of easy and cost-effective adaptation; and
- ▶ Be designed to anticipate and respond to the changing needs of home occupants." (4)

AAG's position is that the LHDG Gold Level specifications should be set as the minimum requirement, with the addition of some Platinum Level features. The Gold Level structural and spatial elements (see Appendix 1) are required to ensure adaptability of the home and suitability for ageing in place. In addition, some of the Platinum Level specifications should be included in the minimum standard as they would not increase the dimensions or cost of development of a new dwelling, but would significantly improve accessibility for all ages. The Gold and additional Platinum Level specifications AAG recommends as a minimum standard are outlined in Appendix 1.



Australian Government focus on ageing in place

The Australian aged care system has evolved in recent decades to promote ageing in place, and the delivery of aged care services in the community rather than residential settings (5,6). Accessibility and other modifications are required to enable a person to age in a place of their choosing.

Accessibility is something everyone will benefit from as they age

Accessibility is often discussed in terms of the usability of a house or other structure for people with a disability. The biopsychosocial model of disability that the World Health Organization uses as the basis for the International Classification of Functioning, Disability and Health (ICF) defines disability as the interaction between an individual's health condition, environment and personal factors to determine their functioning in terms of body functions and structure, activity and participation (7). That is, a person's level of disability is not only determined by their physical function, but also how the environment interacts with their level of physical function to determine their ability to participate and perform tasks.

Accessible housing has the potential to alleviate or eliminate a person's disability by providing an environment where they can undertake their preferred activities and tasks without limitation.

However, many people do not identify themselves as having a disability, even if they do fit this definition. Many people would not describe themselves as disabled, but instead see a decline in the ability to perform certain tasks, such as gripping a door handle or climbing stairs, as "just part of getting older".

What types of changes happen to our bodies as we age?

There are many different conditions and diseases that we are more likely to experience as we age. Many of these will negatively affect our muscle strength, stamina, and ability to perform tasks around the home such as moving between sitting and standing positions, opening doors, climbing steps, and safely navigating uneven, cluttered or obstructed areas (such as door jams and shower recesses).

Figure 1 shows that over 80 % of Australians aged 65 years and older report having a disability or long-term health condition. Table 1 provides an overview of the proportion of Australians aged 65 years and older who experience common health conditions that would affect a person's ability to function at home. For primary chronic diseases that are likely to affect a person's ability to function at home, 85 – 99 % of Australians aged 65 year and older report having 2 or more other chronic diseases (Table 2).

Not everyone identifies with the term "disability". Changes in our ability to perform certain tasks are something we can all expect as we age. Accessible housing will benefit us all.

It is important to note that the numbers in Figure 1 including health conditions and those presented in Tables 1 and 2 are much higher than the disability-only estimates presented in Figure 1. This confirms that many people do not identify with the term "disability" even if they are experiencing a health condition that limits their physical function.

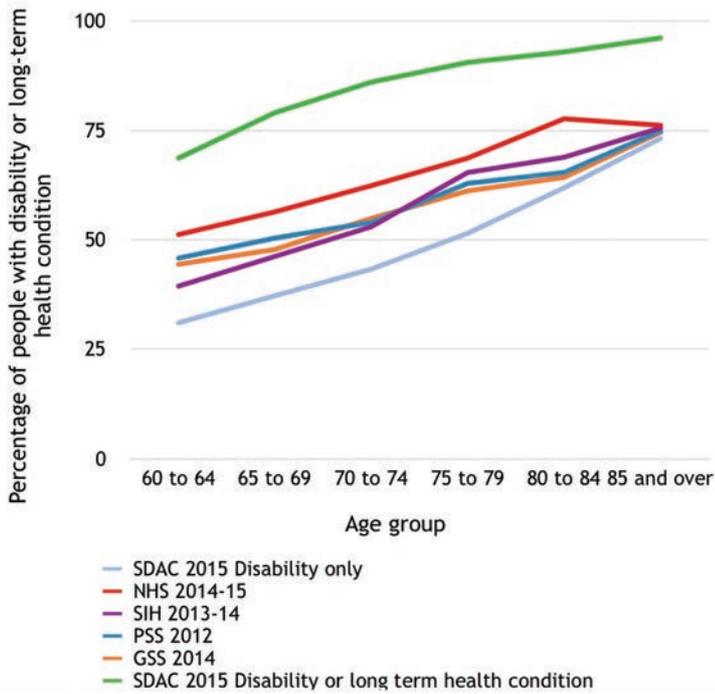


Figure 1. Percentage of people with disability or long-term health condition based on selected Australian surveys for different age groups. SDAC: Survey of Disability, Ageing and Carers. SIH: Survey of Income and Housing. GSS: General Social Survey. NHS: National Health Survey. PSS: Personal Safety Survey.

Based on data from: Australian Bureau of Statistics. 2018. Prevalence of disability and or long-term health condition by Age group for selected surveys- G1Disability.



Table 1. Percentage of Australians aged 65 years and over with chronic conditions that are likely to affect a person's ability to function in a home without any accessibility improvements.

Condition	65–74	75–84	85 years and over
Total diseases of the eye and adnexa	93.4	93.7	93.0
Stroke	2.1	6.0	2.3
Total arthritis	48.6	54.6	49.0
Rheumatism	2.5	3.4	4.5
Back problems (dorsopathies)	27.2	26.6	16.7
Osteoporosis	11.9	18.3	15.2
Other diseases of the musculoskeletal system and connective tissue	5.2	4.1	5.7

Based on data from: Australian Bureau of Statistics. 2015. 4364055001DO003_20142015 National Health Survey: First Results, 2014–15 – Australia. Table 3.3 Long-term health conditions(a), Proportion of persons – Persons

Table 2. Percentage of Australians aged 65 and over with multiple chronic diseases that are likely to affect a person's ability to function in home without any accessibility improvements.

Primary chronic disease	1 (primary chronic disease only)	2 or more chronic diseases
Arthritis	14.3	85.6
Asthma	8.3	90.1
Back problems (dorsopathies)	11.2	88.4
Chronic obstructive pulmonary disease	3.5	98.9
Diabetes mellitus	3.5	90.7

Based on data from: Australian Bureau of Statistics. 2015. 4364055001DO019_20142015 National Health Survey: First Results, 2014–15 – Australia. Table 19.3 Comorbidity of chronic diseases(a), Proportion of persons

APPENDIX 1

LIVABLE HOUSING DESIGN GUIDELINES (LHDG) GOLD LEVEL DESIGN ELEMENTS

This appendix is a reproduction of the Livable Housing Design Guidelines (LHDG) (3) Gold Level Design Elements that AAG supports as a minimum standard for accessible housing regulation for new dwellings in Australia, with the addition of the Platinum features highlighted here.

DESIGN ELEMENT 1 – DWELLING ACCESS

Performance Statement: There is a safe, continuous, step-free pathways from the street entrance and/or parking area to a dwelling entrance that is level.

Gold Level

For Class 2 buildings, the Premises Standards require a safe and continuous pathway from the pedestrian entrance to at least one floor containing sole occupancy units and to the entrance of units located on that level. The requirements detailed below therefore do not apply to Class 2 buildings.

For other Building Classes not covered by the Premises Standards the following applies:

- a) Provide a safe and continuous pathway from:
 - i. the front boundary of the allotment; or
 - ii. a car parking space, where provided, which may include the driveway on the allotment, to an entrance that is level (step-free) as specified in Element 2.

This provision does not apply where the average slope of the ground where the path would feature is steeper than 1:14.

- b) The path of travel as referred to in (a) should have a minimum clear width of 1100mm and –
 - i. an even, firm, slip resistant surface;
 - ii. a crossfall of not more than 1:40;
 - iii. a maximum pathway slope of 1:14, with landings provided at no greater than 9m for a 1:14 ramp and no greater than 15m for ramps steeper than 1:20. Landings should be no less than 1200mm in length; and
 - iv. be step-free
- c) A step ramp may be incorporated at an entrance doorway where there is a change in height of 190mm or less. The step ramp should provide:
 - i. a maximum gradient of 1:10
 - ii. a minimum clear width of 1000mm (please note: width should reflect the pathway width)
 - iii. a maximum length of 1900mm

Level landings no less than 1200mm in length, exclusive of the swing of the door or gate than opens onto them, must be provided at the head and foot of the ramp.

Note: The width of the landing will be determined by the adjoining pathway. If the landing directly adjoins the doorway please refer to Element 2 for dimensional requirements.

DESIGN ELEMENT 2 – DWELLING ENTRANCE

Performance Statement: There is at least one level (step-free) entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.

Gold Level

- a) The dwelling should provide an entrance door with –
 - i. a minimum clear opening width of 850mm;
 - ii. a level (step-free) transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or beveled); and
 - iii. reasonable shelter from the weather.
- b) A level landing area of 1350mm x 1350mm should be provided at the level (step-free) entrance door.
- c) Where the threshold at the entrance exceeds 5mm and is less than 56mm, a ramped threshold may be provided.
- d) The level (step-free) entrance should be connected to the safe and continuous pathway as specified in Element 1.

Note: The entrance must incorporate waterproofing and termite management requirements as specified in the NCC.

DESIGN ELEMENT 3 – CAR PARKING

Performance Statement: Where the parking space is part of the dwelling access it should allow a person to open their car doors fully and easily move around the vehicle.

Gold Level

- a) Where the parking area forms part of the dwelling access the space should incorporate:
 - i. minimum dimensions of at least 3200mm (width) x 5400mm (length);
 - ii. an even, firm and slip resistant surface; and
 - iii. a level surface (1:40 maximum gradient, 1:33 maximum gradient for bitumen).

And, for Class 1a dwellings:

- iv. a vertical clearance over the parking space of 2500mm; and
- v. a covered parking space to ensure protection from the weather.

DESIGN ELEMENT 4 – INTERNAL DOORS AND CORRIDORS

Performance Statement: Internal doors and corridors facilitate comfortable and unimpeded movement between spaces.

Gold Level

- a) Doorways to rooms on the entry level used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide:
 - i. a minimum clear opening width of 850mm; and
 - ii. a level transition and threshold (maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or beveled).
- b) internal corridors/passageways to the doorways referred to in (a) should provide a minimum clear width of 1200mm

DESIGN ELEMENT 5 – TOILET

Performance Statement: The ground (or entry) level has a toilet to support easy access for home occupants and visitors.

Gold Level

- a) Dwellings should have a toilet on the ground (or entry) level that provides:
 - i. a minimum clear width of 1200mm between the walls of the bathroom if located in a separate room or between amenities if located in a combined bathroom; and
 - ii. a minimum 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door.
- b) if the toilet is located within the ground (or entry) level bathroom, the toilet pan should be located in the corner of the room to enable the installation of grabrails.

DESIGN ELEMENT 6 – SHOWER

Performance Statement: The bathroom and shower is designed for easy and independent access for all home occupants.

Gold Level

- a) One bathroom should feature a slip resistant, hobless (step-free) shower recess. Shower screens are permitted provided they can be easily removed at a later date.
- b) The shower recess should be located in the corner of the room to enable the installation of grabrails at a future date.
- c) The hobless (step-free) shower recess described in (a) should:
 - i. be located in a bathroom on the ground (or entry) level;
 - ii. provide dimensions of 900mm (width) x 900mm (length); and
 - iii. provide a clear space of 1200mm (width) x 1200mm (length) forward of the shower recess entry.

DESIGN ELEMENT 7 – REINFORCEMENT OF BATHROOM & TOILET WALLS

Performance Statement: The bathroom and toilet walls are built to enable grabrails to be safely and economically installed.

Gold Level

- a) Except for walls constructed of solid masonry or concrete, the walls around the shower, bath (if provided) and toilet should be reinforced to provide a fixing surface for the safe installation of grabrails.
- b) The fastenings, wall reinforcement and grabrails combined must be able to withstand 1100N of force applied in any position and in any direction.
- c) The walls around the toilet are to be reinforced by installing:
 - i. noggings with a thickness of at least 25mm; or
 - ii. sheeting with a thickness of at least 12mm.
- d) The walls around the bath are to be reinforced by installing:
 - i. noggings with a thickness of at least 25mm; or
 - ii. sheeting with a thickness of at least 12mm.
- e) The walls around the hobless (step-free) shower recess are to be reinforced by installing:
 - i. noggings with a thickness of at least 25mm; or
 - ii. sheeting with a thickness of at least 12mm.

DESIGN ELEMENT 8 – INTERNAL STAIRWAYS

Performance Statement: Where installed, stairways are designed to reduce the likelihood of injury and also enable future adaptation.

Gold Level

- a) Stairways in dwellings must feature:
 - i. a continuous handrail on one side of the stairway where there is a rise of more than 1m;
 - ii. a minimum clear width of 1000mm;
 - iii. be straight in design; and
 - iv. be positioned adjoining a load bearing wall.

Note: The steps must provide a slip resistant finish and suitable non-slip tread as specified in the NCC. Handrails on both sides of the stairway are preferred.

DESIGN ELEMENT 9 – KITCHEN SPACE

Performance Statement: The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.

Gold Level

- a) The kitchen space should be designed to support ease of movement and adaptation with:
 - i. at least 1200mm clearance provided in front of fixed benches and appliances; and
 - ii. slip resistant flooring (as per the NCC).
- b) Where practicable, floor finishes should extend under kitchen cabinetry to enable cupboards to be removed without affecting the flooring.

Platinum Level elements AAG recommends should be included in minimum standard

As for the gold level except that the kitchen space described in (a) should also include:

- iii. Task lighting installed above workspaces.

DESIGN ELEMENT 10 – LAUNDRY SPACE

Performance Statement: The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.

Gold Level

- a) The laundry space should be designed to support ease of movement and adaptation with:
 - i. at least 1200mm clearance provided in front of fixed benches and appliances; and
 - ii. slip resistant flooring (as per the NCC).
- b) Where practicable, floor finishes should extend under laundry cabinetry to enable cupboards to be moved without affecting the flooring.

Platinum Level elements AAG recommends should be included in minimum standard

As for the gold level except that the laundry space described in (a) should also include:

- iii. Task lighting installed above workspaces.

DESIGN ELEMENT 11 – GROUND (OR ENTRY) LEVEL BEDROOM SPACE

Performance Statement: There is a space on the ground (or entry) level that can be used as a bedroom.

Gold Level

- a) The dwelling should feature a space (or room) on the ground (or entry) level that:
 - i. is of at least 10m² with one wall a minimum length of 3m;
 - ii. provides for a minimum path of travel of at least 1000mm on at least one side of the bed.

DESIGN ELEMENT 12 – SWITCHES AND POWERPOINTS

Performance Statement: Light switches and powerpoints are located at heights that are easy to reach for all home occupants.

Gold Level

- a) Light switches should be positioned in a consistent location:
 - i. between 900mm – 1100mm above the finished floor level; and
 - ii. horizontally aligned with the door handle at the entrance to a room.
- b) Powerpoints should be installed not lower than 300mm above the finished floor level.

Platinum Level elements AAG recommends should be included in minimum standard

As for gold level with the following feature:

- c) Light and powerpoint switches should be rocker action, toggle or push pad in design with a recommended width of 35mm.

DESIGN ELEMENT 13 – DOOR AND TAP HARDWARE

Performance Statement: Home occupants are able to easily and independently open and close doors and safely use tap hardware.

Gold Level

- a) Doorways should feature door hardware installed at between 900mm – 1100mm above the finished floor.

Platinum Level elements AAG recommends should be included in minimum standard

As for gold level with the following feature:

- b) Doorways should feature lever or D-pull style door hardware; and
- c) Basins, sinks and tubs should feature lever or capstan style tap hardware with a central spout.

DESIGN ELEMENT 14 – FAMILY/LIVING ROOM SPACE

Performance Statement: The family/living room features clear space to enable the home occupant to move in and around the room with ease.

Gold Level

No requirements.

DESIGN ELEMENT 15 – WINDOW SILLS

Performance Statement: Windows sills are installed at a height that enables home occupants to view the outdoor space from either a seated or standing position.

Gold Level

No requirements.

Platinum Level elements AAG recommends should be included in minimum standard

- a) Window sills on the ground (or entry) level in living areas and bedroom spaces should be positioned no higher than 1000mm above the finished floor level to enable enjoyment of the outlook (a concession is reasonable in kitchen, bathroom and utility spaces)
- b) Window controls should be able to be easy to operate with one hand and located within easy reach from either a seated or standing position

Note: A concession from (a) is reasonable in kitchen, bathroom and utility spaces.

DESIGN ELEMENT 16 – FLOORING

Performance Statement: Floor coverings are slip resistant to reduce the likelihood of slips, trips and falls in the home.

Gold Level

No requirements.

Platinum Level elements AAG recommends should be included in minimum standard

- a) All floor coverings should:
 - i. be firm and even, and
 - ii. feature a level transition between abutting surfaces (a maximum vertical tolerance of 5mm between abutting surfaces is allowable provided the lip is rounded or beveled).

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