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**Submission to**

**Inquiry into the Draft Disability (Access to  
Premises – Buildings) Standards**

**March 2009**

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## **Introduction**

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 charities, sector peak organisations, small community services, advocacy groups and individuals in social policy debates.

## **VCOSS Vision**

VCOSS is committed to living out the principles of equity and justice, and acknowledges we live in a society where people are interdependent of one another. VCOSS respects the land we live in and recognises the Indigenous custodians of the country. VCOSS is committed to reconciling all injustices with Indigenous Australians.

The VCOSS vision is one where social well being is a national priority, and:

- Ensures everyone has access to and a fair share of the community's resources and services
- Involves all people as equals, without discrimination; and
- Values and encourages people's participation in decision making about their own lives and their community.

## **Submission to Inquiry into the Draft Disability (Access to Premises – Buildings) Standards**

VCOSS strongly supports the introduction of the Access to Premises Standards. The Standards represent a crucial, and long overdue, step towards aligning the Building Code of Australia with the *Disability Discrimination Act 1992* (DDA), furthering Australia's obligations under the *UN Convention on the Rights of Persons with Disabilities*, and strengthening the social and economic inclusion of people with disability in Australia.

VCOSS endorses submissions made by the Australian Federation of Disability Organisations (AFDO) and the Victorian Equal Opportunity and Human Rights Commission (VEOHRC) to this Inquiry. We particularly endorse the recommendation in both submissions that Class 2 buildings (apartment blocks) be included in the Standards. As VEOHRC notes in its submission, local governments in Victoria lack the power held by councils in other jurisdictions to facilitate the inclusion of Class 2 buildings in planning provisions in order to increase the amount of housing in their local areas that meets a universal design standard. Homes designed to a universal standard are liveable for the majority of the population and accommodate whatever comes along in life easily and inexpensively. This disparity in planning powers in different states means that people with disability in Victoria, as well as older people and those with illness or injury, are disadvantaged in terms of their housing choices compared to other Australians.

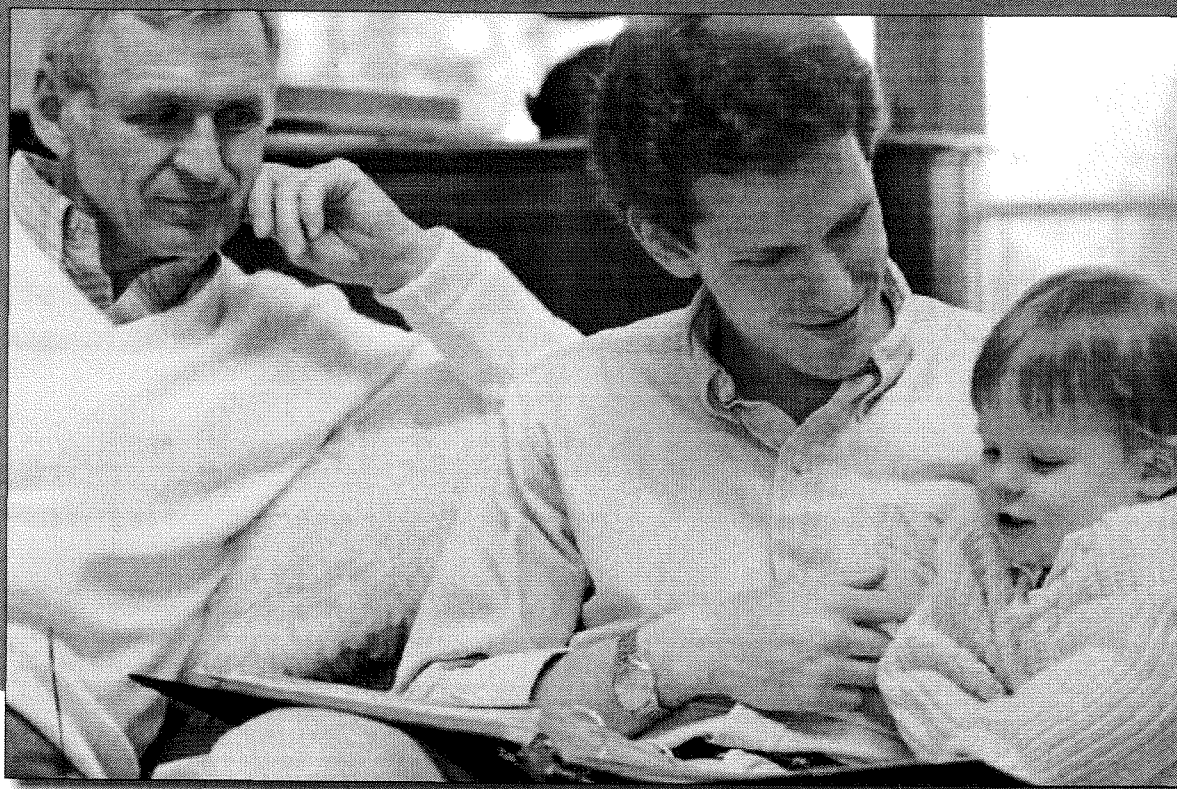
Including Class 2 buildings in the Access to Premises Standards is an important step towards increasing stock of universal housing in Australia. As detailed in the attached VCOSS discussion paper 'Universal Housing, Universal Benefits', population ageing provides a social and economic imperative for Australian governments to take action to address the universal housing requirements of our community. Failing to do so will impose an increasing cost burden on all levels of government, taxpayers, and the growing number of people directly disadvantaged by housing that fails to meet their needs. In recognition of this imperative, VCOSS particularly endorses the

recommendation by AFDO that the Federal Government commit to a plan of action regarding accessible housing in Australia as part of furthering the Access to Premises Standards in the future.

Authorised by Cath Smith, CEO, Victorian Council of Social Service

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# Universal Housing Universal Benefits



A VCOSS discussion paper on universal housing regulation in Victoria

Victorian Council of Social Service



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## Executive Summary

***Universal Housing, Universal Benefits*** is about the provision of appropriate, whole-of-life housing that is accessible to and meets the future needs of all Victorians.

Universal housing is housing designed to be used by all people to the greatest extent possible. Homes designed to a universal standard are liveable for the majority of the population and accommodate whatever comes along in life easily and inexpensively.

Given challenges such as Victoria's ageing population, together with the varying needs across the whole community including those experienced by people with disabilities, families with young children and those suffering chronic illness or short term injury there are social and economic imperatives for the Victorian Government to act now to address universal housing requirements.

International experience shows the most effective strategies for increasing universal housing stock include the adoption of elements of universal design into planning and building codes and strongly enforced building regulations.

International and Australian experience also indicates that if regulation were implemented, the costs of the mandated (universal housing) features would decrease with competition and bulk purchasing as they became standard across the construction industry. Standardisation across designers and architects would also reduce costs.

In addition to the relatively moderate direct costs of mandating universal design features in future housing, there are significant social and economic benefits:

### *Social*

- **Houses with universal design features are liveable, visitable and more user-friendly for everyone, regardless of age, family needs, or the changes a person may experience during their entire lifetime. Housing that is adequate for health and wellbeing is an essential element of sustainable, socially inclusive and liveable communities. It is also a basic human right.**

### *Economic*

- **Increasing universal housing stock in Victoria could save the Victorian Government over \$70 million each year solely on the basis of savings in home care, residential aged care and hospital costs based on the ageing population.**

The cost of not acting is increasing annually, with the ongoing financial and social burden being carried by taxpayers.

The Victorian Government can no longer drag its feet on this issue. It must act now.

***Universal Housing, Universal Benefits***, researched and written by VCOSS and supported by the Victorian Universal Housing Alliance, calls on the Victorian Government to implement the following recommendations as a matter of urgency:

1. That the Government adopts a target of at least 25 per cent of housing in Victoria meeting a universal design standard by 2031, within a broader objective of making the majority of Victoria's housing compliant with this standard.
2. That the Government develop a Universal Housing Standard which includes, at minimum, the following features:
  - a. A clear pathway to a step-free well-lit entry with access to street/ carparking
  - b. Appropriate lighting evenly distributed throughout the house
  - c. Identifiable light switches, controls and handles in easy-to-reach places for someone sitting or standing
  - d. Reinforced walls in the bathroom, shower and toilet
  - e. Wide doorways and corridors
  - f. A straight staircase adjacent to a load-bearing wall
  - g. Slip-resistant flooring
  - h. Open-plan kitchen, lounge and bathroom with step-free shower
  - i. Open-plan room on entry level that can be used as a bedroom
  - j. Accessible toilet and bathroom on entry level
3. That in developing this Standard, the Government draw on the expertise of local councils and of public and private housing providers in Victoria, elsewhere in Australia, and overseas in order for the Standard to be flexible, cost-effective and applicable to a range of dwelling types and sites;
4. That the Government implement regulatory measures applying the Standard to all new housing in Victoria as soon as possible;
5. That the Government progressively implement regulatory measures applying the appropriate elements of the Standard to renovations affecting at least 50 per cent of a home;
6. That in conducting a cost-benefit analysis of universal housing regulation, the Government take into account the public interest considerations and the range of population groups detailed in this paper who would gain benefit from universal housing.

## Introduction

I miss Leigh. I hate coming up the stairs and seeing the third-floor landing bare. All that remains of her luxuriant potted garden are the dirt stains on the terrazzo. I no longer see the cats hanging out in her flat. I even miss having to get the papers for her in the morning. She used to do it for me when she could still walk. It feels empty coming home now, knowing she's gone.

Over the years we talked and slowly got to know each other. One day, Leigh stumbled on the stairs. Soon, she swapped her walking stick for a wheelchair. Leigh has multiple sclerosis. But that's not what I remember most about her. I remember her strength, her pride in her appearance, her liveliness. She never complained. She led a rich social life and it made me happy to hear her laughter across the security door. Sometimes when I'd go out for a run and she'd see me, I'd feel guilty. "Lucky you," she'd say, but never with envy. And I did feel lucky. So much we take for granted.

Leigh was housebound by now – she could not get her wheelchair down the three flights of stairs. She stayed like this for almost a year, housebound. Finally, it got too much. Leigh put her apartment on the market and had the real estate agent search for a ground floor flat for her to buy. She moved early this month to a new ground-floor apartment in Glenhuntly. I'm glad I wasn't there to see her carried down the stairs.

Access was something I had never stopped to think about. I think about it now that Leigh's gone. I think of it especially in the context of high-density living, a concept that our governments are so intent on selling us. But if we are serious about creating high-density cities, we must also consider the needs of the less able-bodied and of the elderly. In the inner city, new apartments are springing up with more vigor than even Leigh's petunias, but are the developers of these slick new urban homes giving any thought to how someone with a walking stick or frame or wheelchair might make it from the ground floor to the second or third? Shouldn't such matters be considered in the design stage of building?

*Excerpts from article by Gabriella Coslovich,  
staff writer, The Age, 24 December, 2004'*

***Universal Housing, Universal Benefits*** has been written to inform consideration of universal housing regulation in Victoria. Universal housing is housing designed to be used by all people to the greatest extent possible<sup>2</sup> (see Appendix 1 for a definition of universal housing). Homes designed to a universal standard are liveable for the majority of the population and accommodate whatever comes along in life easily and inexpensively.

VCOSS believes such regulation is long overdue.

Most of our current housing stock is inappropriate for much of our population and ill equipped for the demographic challenges Victoria is facing. People with disabilities and many older people are those most affected by badly designed homes.

But common features like narrow doorways, curved staircases and steps to the entrance of the house disadvantage most of the population at some point:

- families with young children in prams or strollers;
- people who've sustained a short or long term injury;
- people with a chronic illness; and
- almost anybody who has ever moved house.

Building houses with universal design features makes them liveable, visitable and more user-friendly for everyone, regardless of age, family needs, or the changes a person may experience during their entire lifetime.

Housing that is adequate for health and wellbeing is an essential element of sustainable, socially inclusive and liveable communities. It is also a basic human right. Yet the design failure of most of Victoria's housing makes our housing stock unsustainable and works against the social inclusion objectives and efforts to enhance Victoria's liveability that have been outlined so clearly in the Victorian Government's umbrella social policy framework, *A Fairer Victoria*.

Badly designed housing also imposes significant personal, economic and social costs on many Victorians, as well as costing governments millions of dollars each year in upstream human services costs. For these reasons, actively promoting action by the Victorian Government to increase stock of universal housing through legislative means has long been a high priority for VCOSS.

In support of this action VCOSS has also been instrumental in establishing the Victorian Universal Housing Alliance (see Appendix 2).

The key driver for increasing Victoria's universal housing stock is population ageing. According to Victorian Government projections, by 2031 around one quarter of Victorians will be over 65.

Many of these people will acquire some sort of mobility impairment, as the likelihood of these increases with age. Most will want to live independently in their own homes, in their communities, for as long as possible.

But the inappropriateness of our housing, particularly for older people, costs both government and individuals millions of dollars each year in hospital admissions, home care, early aged care admissions and expensive modifications. These costs will blow out over coming years if the Victorian Government does not act now to substantially increase the stock of universal housing.

VCOSS strongly believes that regulation is the only way to increase Victoria's stock of universal housing to the extent required to meet the needs of our population. The housing market has failed to provide enough universally-designed housing to meet the needs of Victoria's current population and cannot by itself provide sufficient universal housing to account for future demographic change.

In recognition of this, other countries including the USA, Japan and the Netherlands, which face a similar degree of population ageing, have acted to introduce a universal design standard into their planning or building codes. The United Kingdom is the latest to do so. **The UK "Lifetime Homes, Lifetime Neighbourhoods" Strategy announced in 2008 includes the Lifetime Homes Standard (a universal housing standard) in its Code for Sustainable Homes and sets out a plan for all public and private housing to be built to the Standard by 2013.**

A major report for the New Zealand government on the effectiveness of a range of strategies adopted by various countries to increase universal housing stock found the most effective included the adoption of elements of universal design into planning and building codes and strongly enforced building regulations.

**The least successful strategies were found to be voluntary guidelines, branding of universal designs and information campaigns.** The report also noted that in societies where populations are ageing faster, regulations which apply to new housing are more likely to be compulsory and to apply to private as well as public sector housing<sup>3</sup>.

In Victoria the Government has been considering implementing universal housing provisions through regulatory means for much of the last decade:

- In **2003** the Accessible Built Environment Working Group, convened by the Building Commission in **2001**, advised the Government that the state of access to the existing built environment, including housing, was unacceptable, that change to the built environment was not proceeding at an acceptable rate, and recommended changes to the Building Regulations. No such changes were made.
- Since **2004** several local councils including Melbourne, Moonee Valley, Manningham, Yarra and Port Phillip have moved to introduce planning amendments to improve housing accessibility in their local areas, most of which have been rejected by successive Planning Ministers citing the Government's desire for a consistent statewide approach to increasing housing accessibility.

- In **2005** the Government established the Accessible Housing Taskforce to provide advice on options for increasing the stock of accessible and adaptable housing. While the Taskforce's report has not been publicly released, it informed the Accessible Housing Platform in Labor's **2006** State Election Policy in which, alongside other non-regulatory initiatives, Labor committed to developing a "suite of standard 'low cost/no cost' measures' to be included in planning scheme amendments proposed by local governments to promote housing accessibility. These measures would 'apply only to the ground floor of new medium density developments and one out of five units in new high density apartment blocks'<sup>4</sup>.

The Victorian Government has failed to act to progress this election commitment to date, but even if it were implemented, it would apply to such a small percentage of new housing as to make little difference to Victoria's overall housing stock.

Even if such a standard were to be incorporated into the Planning Scheme (rather than taken up by a few councils voluntarily), it would affect only the third or so of Victoria's new and renovated dwellings that are subject to Council approval under the Planning Scheme. While this would still be a useful action to increase the amount of universal housing in Victoria, the only way to significantly increase universal housing stock is to amend State building regulations which apply to all new dwellings.

The Victorian Government has recognised the need to improve Victoria's sustainability and liveability, and is taking the lead amongst Australian governments in doing so. It has recently introduced regulations for all new housing and major home renovations to meet energy efficiency standards in order to improve the sustainability of our built environment.<sup>5</sup>

It has also commissioned an inquiry into making Victoria a "state of liveability". In its draft findings for this inquiry, the Victorian Competition and Efficiency Commission (VCEC) found that there was no doubt that Victoria's liveability could be enhanced through improving urban design policies, noting that urban design characteristics that make a place liveable include adaptability – the ability to respond to changing social, technological and economic conditions<sup>6</sup>.

But while energy efficiency regulations will make Victoria's housing more sustainable for changing environmental conditions, they will not improve the sustainability of housing in terms of adapting to social and demographic change. And the liveability of Victoria's housing would be significantly advanced by improving its capacity to adapt to the lifecycle changes of the population.

VCOSS believes that implementing universal housing regulations is the responsibility of the State Government. Such regulations are in the public interest; would further Government objectives of enhancing Victoria's liveability, strengthening social inclusion and improving human rights protections; would deliver substantial cost savings to government and individuals; and need not result in increased housing construction costs.

## 1. Universal Housing

### 1.1 Why?

As this paper will discuss, universal housing will be of real benefit to most of the population. But the key driver of demand for universally-designed housing internationally is population ageing.

Although not all older people acquire disabilities at the same rate, the combination of the rate of population ageing, increasing disability prevalence, community expectations of 'ageing in place', the role of inappropriately-designed housing in exacerbating age-related disability prevalence and the associated costs to the health, care and aged care sectors have mandated a significant rethink of housing policy overseas.

It's well recognised that housing design features such as stairs, narrow doorways and corridors and inaccessible toilets and bathrooms serve to create disability in older people, compromising their safety, independence and wellbeing<sup>7</sup>. For this reason, some of the key features in the World Health Organisation's "Age-Friendly Housing Checklist" are wide passages and doorways, even floor surfaces and appropriately-designed bathrooms, toilets and kitchens, as well as an elevator in multi-level dwellings<sup>8</sup>.

Victoria's housing stock is ill-equipped to meet the needs of our population in future. Currently around 13 per cent of Victorians are over 65. By 2031, this will have increased to just under a quarter of the population<sup>9</sup>. The increased incidence of disability, which affects core activities like mobility in future, will add to demand for universally-designed housing. Currently around 860,000 Victorians experience some degree of core activity restriction - a restriction to the core activities of mobility, self-care or communication<sup>10</sup>. By 2010 this is expected to increase to some 920,647 people<sup>11</sup>.

The frequency and severity of disability are strongly linked to age. According to the Australian Bureau of Statistics, in 2003 just over half of older Australians identified that they had a disability, with almost 20 per cent reporting a profound or severe core activity limitation and around 40 per cent indicating that they required assistance to cope with everyday activities or manage health conditions.

While 26 per cent of people aged between 60 and 69 identify requiring assistance with daily activities, 84 per cent of people aged over 85 identify requiring such assistance. The most common causes of profound or severe activity limitations in older Australians are arthritis and musculoskeletal conditions<sup>12</sup>. In 2010, it is predicted that 183,200 Victorians under 64 and 179,700 Victorians aged over 65 will experience a severe or profound core activity restriction<sup>13</sup>.

In light of this scale of demographic change, many countries overseas have acted to mandate construction of housing which meets a universal design standard. In its

National Strategy for Housing in an Ageing Society, the UK Government states “put simply, we are not building enough inclusive, mainstream housing for the additional 2.3 million older and disabled people that it is expected there will be in England by 2041.”<sup>14</sup> As noted previously, the Strategy sets out a plan for all new housing to comply with Lifetime Homes Standards by 2031, described as “a set of simple home features that make housing more functional for everyone (and) include future-proofing features that enable cheaper, simpler adaptations to be made when needed”.

Arguments against mandating universal housing features in all housing often propose instead that a certain proportion of housing should be built to a universal standard and that this stock should be targeted to people perceived to need it.

This would be undesirable for a number of reasons. Firstly, it would deny people who have an ongoing need for housing which can accommodate a disability the opportunity to move house according to their, and their family’s, changing needs. Very few people live in the same home forever. People move house for many reasons – to be closer to work or children’s schools, to down-size once children have left home, for a sea-change or “tree-change”.

But research by the Australian Housing and Urban Research Institute (AHURI) on the housing careers of Victorians with disability found that many people were unable to move house because of the difficulty of finding a home that is accessible to them or could be made accessible at low cost.

This was particularly an issue for people who had considerable ‘sunk costs’ as a result of home modifications in their current homes<sup>15</sup>. Additionally, the impacts on the housing market of older people under-occupying large houses but unable to move due to a lack of smaller, universally-designed homes is a driver of universal housing regulation in the UK. This will be considered later in this paper.

Arguments for targeting a proportion of universal housing stock also tend to underestimate the population groups who would benefit from universal housing. Demand projections for universal housing tend to be based on the relatively small proportion of Victorians with a core activity restriction who are eligible for services under the Commonwealth State and Territory Disability Agreement (CSTDA), and an estimate of the number of older people who may need universally-designed housing at any given age.

(It’s worth noting that this tendency to see appropriate housing as a reactive rather than a proactive measure in terms of age-related disability is problematic. The Australian Institute of Health and Welfare notes that inaccessible house design is one of the *causes* of reduced functioning and disease in older people)<sup>16</sup>.

As discussed earlier, a far greater proportion of the population would gain significant benefit from universal housing, not just those who currently identify that they have a disability. In addition, as there is currently no accurate way of measuring ‘demand’ for universal housing, the ‘evidence’ of demand often used in arguments against universal



housing regulation is flawed.

One indicator of demand for universal housing in Victoria, which is often cited, is the extent of recorded demand by people with disabilities for public housing, which is able to be modified.

Public tenancies currently provide housing for around one fifth of people with disability in Australia who live in the community.<sup>17</sup> Indeed, the percentage of households for which 'disability' is identified as a special need is increasing as a proportion of all new households who are allocated public housing, from 22 per cent in 2001-2002 to 37.2 per cent of all households in 2005-06<sup>18</sup>. However, people with disability are not the only population group who require universal housing, and many people (with and without disability) do not meet the criteria for applying for public housing for other reasons including their income.

Another frequently used estimate of demand for universally-designed housing is the extent of home modifications which have been made by Victorians, but statistics on the incidence of home modifications don't measure actual *demand*, or unmet demand, for modifications.

Statistics show that around a quarter of older Australians living in private housing have made modifications to their home to accommodate an activity restriction<sup>19</sup> - approximately 79,140 Victorians did so in 2003<sup>20</sup>. This number is significant, not least because home modifications are not an efficient or cost effective way of making a home more liveable or useable, as will be explored later. But these statistics don't show whether people who need to make home modifications don't do so, or make modifications to a lesser extent than they need to.

A recent study by the Australian Housing and Urban Research Institute (AHURI) reports that almost one fifth of people over 75 felt that changes to their home, including structural modifications, would make it easier to live in or increase their independence, but found that the cost of home modifications deters many older people from making them, particularly those with a limited income or on a government pension.

The study also noted that 10 per cent of people aged over 65 years had to move in the five years prior to 1998 due to "profound or severe" core activity restrictions. It concluded that the discrepancy between this relatively high rate of relocation on the basis of age-related disability, and the low rate of home modifications funded by the Home and Community Care (HACC) program, suggest that the needs of older Australians for home modifications are not being met<sup>21</sup>.

Assistance provided by state and federal governments for home modifications is also not an accurate indicator of actual demand as eligibility criteria for such assistance are so restrictive that, according to occupational therapists and support workers, many people do not even apply for assistance for the modifications that they need.

The only funding available in Victoria to assist with structural modifications such as modifying an inaccessible bathroom is a loan administered by the Office of Housing.

Actual grants for home modifications from both the joint Federal-State Government funded Home and Community Care (HACC) Program and the Victorian Government-funded Victorian Aids and Equipment Program (VAEP) are only available for *non-structural* modifications<sup>22</sup>.

Only around 3 per cent of HACC clients<sup>23</sup> and around 8 per cent of VAEP clients<sup>24</sup> receive assistance with home modifications, with assistance for home modifications through the VAEP limited to a maximum of \$4,400 once a lifetime. It is unclear how many people actually applied for such assistance from either program, or may have done so if eligibility criteria were less restrictive.

Against these figures, it is important to note that the majority of Victoria's housing could eventually meet a universal design standard if regulations applying to new private housing and major home renovations are phased in over the coming years.

If universal housing regulations affecting all new housing were to be implemented in Victoria in 2011, almost 40 per cent of Victoria's housing could meet a universal standard by 2031<sup>25</sup>. If regulation were implemented in 2011 applying to renovations affecting at least 50 per cent of the home - similar to those recently implemented in Victoria for energy efficiency - an additional 40 per cent of housing could be universal housing by 2031<sup>26</sup>.

Within a broader objective of making the majority of Victoria's housing compliant with a universal standard, an interim target of 25 per cent of housing meeting a universal standard within the next 20 years is realistic and achievable.

Regulation applying to all new housing and major home renovations is the only way to significantly increase the amount of universally-designed housing in Victoria.

The importance of planning and building regulation in increasing universal housing stock internationally was demonstrated in the report "Future-Proofing New Zealand's Housing Stock for an Inclusive Society" commissioned by the Centre for Housing Research Aotearoa New Zealand.

The report reviewed strategies to increase universal housing in a number of countries including Japan, Norway, the USA and European Union countries. **It found the most successful strategies included the adoption of universal design elements into planning and building codes, and strong enforcement of building regulations.**

**The least successful strategies were voluntary guidelines, branding of universal designs and information campaigns.** (The report also noted that the supply of accessible housing in Australia has been criticised as piecemeal, inadequate and of an inconsistent standard<sup>27</sup>.)

## 1.2 How?

In its report on the *Inquiry into the Disability Discrimination Act 1992 (DDA)*, the Productivity Commission considered the DDA as public interest legislation. In doing so, the Commission recognised the scope for its review to look beyond the quantifiable costs and benefits of the Act and take into account a range of other issues including social welfare and equity and the interests of consumers<sup>28</sup>.

Universal housing regulation should be similarly considered as public interest legislation. As will be discussed in this paper, a significant proportion of the community will derive a high degree of direct benefit from universal housing while the majority will derive at least some direct benefit.

Regulation is the only way to increase universal housing stock to the extent required to be of significant benefit to the community.

Additionally, the upstream costs of badly-designed housing are borne not only by individuals but also by taxpayers in the form of expenditure on the public housing, health, hospital, aged care and disability service systems. For this reason, universal housing regulation should be seen as a preventative measure to enhance the community's health and safety.

Some opponents of universal housing regulation maintain that regulation would override the private benefit to the 'average' homebuyer of consumer choice – namely, the choice to purchase a house without universal design features. Such arguments are often based on the misunderstanding that universal design features are unattractive or will make a house look like 'old peoples' housing'.

In reality, most universal design features such as those recommended in this paper are unobtrusive and many are already common features of modern housing, such as open plan kitchen and lounge areas. When the Joseph Rowntree Foundation in the UK surveyed fifty residents of Lifetime Homes, two-thirds of households interviewed did not realise that their home was built to Lifetime Homes standards<sup>29</sup>.

More to the point, much housing and building regulation already overrides individual choice to meet broader public interest objectives. Building regulations mandate minimum standards for reasons of health, safety and most recently, energy efficiency, while planning laws regulate construction in order to protect such things as neighbourhood character.

Such regulatory measures are accepted by our community as necessary to strike a balance between individual choice and broader public interest objectives. Universal housing regulation should be similarly considered.

In its draft report to the Inquiry into Enhancing Victoria's Liveability, the Victorian Competition and Consumer Commission (VCEC) acknowledged that "Government intervention to enhance liveability and meet social and equity goals is not without costs,

such as ...policy trade-offs involving winners and losers.<sup>30</sup> Similarly, any public interest regulation involves some costs and some balancing of competing priorities, and there will always be bodies which oppose it on those grounds.

Introducing public interest legislation requires bravery on the part of governments to override such vested interests on the grounds of meeting broader social, economic and environmental objectives, and this is the challenge facing the Victorian Government in considering universal housing regulation.

Notably, it is appropriate that the Victorian Government take this role. As the Department of Planning and Community Development (DPCD) submitted to the VCEC Liveability Inquiry, planning issues of “state and regional significance” are most appropriately handled by the state, rather than local, government.

Such issues include ensuring that there is a greater diversity of dwellings in Victoria to support young and older household growth<sup>31</sup>. As a key measure to increase the diversity of Victoria’s housing for both younger and older households, legislative measures to increase universal housing stock should be implemented by the Victorian Government.

### 1.3 What?

The potential additional costs of building to a universal standard are a key concern in considerations of universal housing regulation. VCOSS recommends that the features listed below are the minimum that should be included in a Victorian universal housing standard.

They are a combination of accessible, adaptable and visitable design features which are low or no cost, largely unobtrusive, and could easily be incorporated into most common housing designs, although some adjustments may need to be made based on dwelling type or the topography of a site.

If regulations were to apply the standard to major home renovations (renovations that affect 50 per cent or more of the home), these features would apply to the relevant extent based on the renovation.

**These features are broadly considered as the minimum required for a home to be liveable and visitable for most people and able to be easily and inexpensively adapted by people who require a higher level of accessibility.**

As such they form the basis of the Victorian Universal Housing Alliance Platform, which has been endorsed by the range of organisations detailed in Appendix 2.

The majority of these features are recommended by the Federal Department of Health and Ageing as the ‘**Top 10 housing features for all stages of life**’ and endorsed by a range of organisations including the Victorian Building Commission, the Housing Industry Association, the Master Builders Association and the Australian Network

for Universal Housing Design (ANUHD).<sup>32</sup> Most are also common to the accessible housing building standards developed by the Victorian Office of Housing and VicUrban (discussed below).

1. A clear pathway to a step-free, well-lit entry with access to street/car parking.
2. Appropriate lighting evenly distributed throughout the house.
3. Identifiable light switches, controls and handles in easy-to-reach places for someone sitting or standing.
4. Reinforced walls in the bathroom, shower and toilet.
5. Wide doorways and corridors.
6. A straight staircase adjacent to a load-bearing wall.
7. Slip-resistant flooring.
8. Open-plan kitchen, lounge and bathroom with step-free shower.
9. Open-plan room on entry level that can be used as a bedroom.
10. Accessible toilet and bathroom on entry level.

In any future cost-benefit analyses that consider the potential costs of incorporating these or other universal design features in new or renovated homes, VCOSS recommends that the following factors be taken into account:

#### *National and International Experience*

Countries such as the UK, the USA, Japan and the Netherlands, other Australian states and municipalities, and a range of public and private housing providers in Victoria are already incorporating universal design features in housing cost-effectively.

While there is not space in the paper for a detailed overview and analysis of universal housing construction in all of these jurisdictions, the following examples are notable:

- **The UK Government found the additional costs of building to its Lifetime Homes Standard are negligible.**

The consultation document on the Future of the Code for Sustainable Homes in the UK, which looks at incorporating the Lifetime Homes standard in the Code, cites a number of studies into the costs and benefits of building to the Lifetime Homes standard.

The most recent report on the costs of building to the standard commissioned for the UK Government shows that building houses to the Lifetime Homes standard can incur an additional cost of around £547 (about \$1,130AUD) per dwelling. Notably, the Lifetime Homes standard provides a higher level of accessibility, and is therefore more costly, than the set of basic features listed above.

Based on this additional cost, the final cost/benefit analysis on which the UK Government's incorporation of the Lifetime Homes Standard into its Code for Sustainable Homes concluded that **the costs and benefits of building to Lifetime Homes standards are roughly equal**<sup>33</sup>.

- **Victorian housing providers are already building affordable housing to a universal standard**

VicUrban, the Victorian Office of Housing (OoH), community housing providers and housing associations such as Melbourne Affordable Housing are building properties across low, medium and high density areas that meet a universal design standard within a mandate of providing affordable housing.

VicUrban's Accessible Adaptable Housing Project at Roxburgh Park, for example, "will offer affordable, well-designed homes that incorporate accessible and adaptable housing features and 6 star energy efficiency<sup>34</sup>."

The OoH Construction Standards, approved in May 2007, have the key objectives of "provid(ing) housing with the flexibility to accommodate tenants with minimum modification" and 'provid(ing) a standards base for the cost effective use of funds". The Standards state that "All new dwellings should be appropriately designed for safety and ease of use by residents including those with physical disabilities, either temporary or permanent....Additionally, the design of dwellings should allow for future modifications, including full wheelchair accessibility, without the need for extensive structural work." To this end, they mandate that "potentially accessible" new housing will currently be "visitable" by people who use a wheelchair, and will incorporate many requirements of Adaptable Housing Standard AS 4299 in order to cost-efficiently facilitate future modifications.

Some of the key universal housing features now included in OoH properties are:

- a continuous path of travel from the car parking area to the front of the dwelling;
- an accessible main, and where possible rear, entry;
- a visitable toilet adjacent to the bathroom to allow for its incorporation into the bathroom in future;
- reinforced walls and level shower entry;
- minimum widths of doorways and corridors; and
- minimum floor areas for living rooms, kitchen, bathroom, toilet and laundry<sup>35</sup>.

As the potential cost impact of additional floor-space in universally-designed housing is sometimes raised as a concern, it is worth noting that although OoH dwellings tend to be smaller than standard dwellings, the OoH has managed to

incorporate minimum floor areas for living rooms, kitchen, bathroom, toilet and laundry in their properties. While the floor space requirements differ with the size of the dwelling, they are in accordance with Adaptable Housing Standard AS 4299.

The most comprehensive Australian research on the upfront costs of building accessible homes is still the “Cost benefit analysis of adaptable homes” study conducted by Hill PDA Land Economists for the NSW Government in 1999.

This study found that compliance with Australian Standard 4299 Adaptable Housing Class C resulted in additional upfront construction costs of up to 1 per cent of the total cost for all dwelling types except low-mid rise multi-unit dwellings<sup>36</sup>.

No work has yet been done, however, that compares the costs of building to the different universal housing standards used by public, social, affordable and private housing providers in Victoria, or elsewhere in Australia.

This work is essential in informing any serious consideration of developing a universal housing standard for Victoria - based on the experience of these providers, there is no reason why a cost-effective universal housing standard flexible enough to be applied to a range of dwelling types in different locations cannot be developed. As Hill PDA noted in its study, “Any standard must be flexible to ensure that it is not difficult for organisations, particularly non-profit organisations, to provide adaptable housing”<sup>37</sup>.

Such work should also include an analysis of the universal design standards included in the planning amendments proposed in recent years by Victorian councils including Melbourne, Yarra, Port Phillip and Moonee Valley.

The low-mid rise multi-unit dwellings for which Hill PDA found higher costs in complying with AS 4299 Class C are characteristic of the medium density areas covered by these inner city councils, and also of many of the areas in which the Office of Housing, and Melbourne Affordable Housing, build. Their expertise and innovation would be invaluable in developing a universal housing standard that can be implemented cost-effectively in medium density areas.

### *Housing Affordability and Construction Costs*

As the UK Government’s cost/benefit analysis of its Lifetime Homes standard stated, “Any analysis of costs is a ‘snapshot’ in time”. If regulation were implemented, the costs of the mandated features would decrease with competition and bulk purchasing as they became standard across the construction industry. Standardisation across designers and architects would also reduce costs.

The UK Government found that the **most significant factor** affecting the cost of introducing the Lifetime Homes standards was whether the standards were designed into the development from the outset or whether an average design was modified to

incorporate the standards<sup>38</sup>. It recognised that the mandating of the Standards will in itself reduce compliance costs - as elements of the Standard become commonplace and anticipated by designers, additional costs can be "designed out"<sup>39</sup>.

Additionally, housing affordability considerations tend to assume that the only costs to a home owner are those incurred at the time of purchase. They fail to consider the significant cost burden of adapting a home to cope with an unforeseen temporary or permanent injury, or having to make alternate accommodation arrangements - costs that are largely borne by residents, not governments.

The impacts on the housing market of population ageing also need to be taken into account in considerations of housing affordability. For example, the housing industry in the UK has found that the undersupply of "inclusive housing" actually serves to reduce housing affordability across the market.

In 2003 in the UK, 3.2 million private sector households in which the oldest person was aged 60 or over were "under-occupying" their homes (that is, they had two or more spare bedrooms, often upstairs). These households were unable to move due to the shortage of smaller universally-designed homes on the market, thereby blocking the housing supply chain, reducing movement in the market and driving up house prices.

**The UK Government recognised that mandating the Lifetime Homes Standard would enable older people to release large family homes into the market, increasing the supply of family homes and improving overall housing affordability<sup>40</sup>.**



## 2. Universal Benefits

### 2.1 Strengthening Social Inclusion and Improving the Recognition of Human Rights

Universal housing regulation would increase the liveability of Victoria's housing, and therefore contribute to enhancing Victoria's overall liveability.

In its draft report to the Liveability Inquiry, VCEC found that common elements of a liveable place include built infrastructure that is adequately provided and maintained, and social inclusion, which includes "the opportunity for all to participate in society in a range of relationships to gain a sense of belonging, fulfilment and wellbeing."<sup>41</sup>

VCEC also found that one of the main drivers of liveability is human rights, and noted that recognising human rights is about more than protecting existing rights, it is also about improving access to basic rights such as adequate housing<sup>42</sup>.

#### *Social Inclusion*

Regulations that substantially increase Victoria's universal housing stock would be an important step towards strengthening social inclusion. Increasing universal housing means increasing peoples' capacity, regardless of their age or ability, to live in a house that is close to friends, family, work, school, services and community, and therefore to participate in that community. It also makes it possible for them to choose to stay in their home within their community as their or their families' needs change, and to modify it cost-effectively if required.

The UK Lifetime Homes, Lifetime Neighbourhoods Strategy, which is underpinned by principles of both economic and social sustainability, states that "Housing must promote equality, social connection and inclusion, and the health and well-being of older people"<sup>43</sup>.

The Strategy recognises that building homes "with changing lifetime needs in mind" will enable older people not only to manage in their own homes but to visit and stay with friends and family, thus supporting informal networks and strengthening social inclusion<sup>44</sup>.

As the UK Strategy acknowledges, the visitability, as well as liveability, of housing is key to social inclusion. We don't only live in our houses, we visit and stay with other people and we have other people visit and stay with us.

Participants in research conducted by the Australian Housing and Urban Research Institute (AHURI) on the housing careers of Victorians with disability detailed the

negative impacts of badly-designed housing on the social lives of the research participants.

Simple things like an inaccessible entrance and the lack of a useable toilet in a house posed insurmountable barriers to simple social activities for many people – a number of participants noted that they preferred to meet friends in cafes and restaurants rather than their friends' homes simply because of problems in going to the toilet<sup>45</sup>.

Some of the personal impacts of housing that is not visitable are poignantly expressed by the father of a man with a disability:

“(Difficulties with visiting friends’, neighbours’ and family’s houses) excludes people with a disability from numerous contacts and networks, which those without such impairments take for granted: social events, such as barbeques, birthday and other parties and children’s sleepovers.... Not being able to participate in such gatherings is personally disappointing, difficult and at times devastating, and this is for good reason. Social gatherings are very often what make life worthwhile and enjoyable. They allow for informal contacts, which can lead to further social activities (and) such fragile and haphazard eventualities as meeting people with whom one forms various degrees and kinds of friendships, including romantic involvements.

Inaccessibility...not only excludes people with a disability but also precludes others from receiving what excluded people have to offer. One small example would be the possibility of babysitting for others, but there is of course people’s wit, people’s grace, people’s courage, people’s grief, people’s shyness, and the numerous other elements of people that enrich our lives.”<sup>46</sup>

### *Human Rights*

The right to adequate housing is not currently protected in Victorian law. While Victoria has a *Charter of Human Rights and Responsibilities*, the Charter does not yet incorporate economic, social and cultural rights, which include the right to housing.

Housing is a human right in part because a person’s ability to exercise so many other fundamental rights depends on their having adequate housing.

As the Victorian Charter of Housing Rights states, “The human right to adequate housing means that everyone has the right to housing that is safe, secure, affordable, accessible and appropriate, and to live there in peace and dignity. You need adequate housing to exercise your rights to education and to work, to participate in the community, for physical and mental well-being and a decent standard of living”<sup>47</sup>.

According to the United Nations Committee on Economic, Social and Cultural Rights, accessibility is one of the key elements of adequate housing<sup>48</sup>. Yet, as noted by a housing worker who works with consumers of all abilities around Victoria, "For people living with physical disabilities there is no right to housing. If you are lucky enough to secure a wheelchair-accessible property it is seen by consumers as a privilege not a right. In a lot of cases the properties offered are not meeting their individual needs. Not wants - needs"<sup>49</sup>.

While regulating for universal housing would not fully protect the right to adequate housing in Victorian law, it would be an important step towards furthering access to this right.

## 2.2 Social Benefits

"Are you male, fit and aged between 18 and 40, not very tall nor very short? Do you have good sight, good hearing and are you right handed? If you are, then you are part of the 18% of the population for whom British houses are designed. The rest of the 82% of the population tolerate what is forced upon them by the 'average' housebuyer".

*Andrew Rowe MP*

*Helen Hamlyn Foundation 'Multi-Generational Housing' Conference', UK, 1989*

Although population ageing and associated increased disability prevalence are key drivers of the need for more universally-designed housing, it would be a mistake to assume that only older people and people identified as having a disability require or would benefit from universal housing.

By definition, universal housing is housing which is universally appropriate. For this reason it is often referred to as 'life-cycle housing' – housing for all stages of life.

This has been recognised by the City of Port Phillip in its Housing Strategy, which states "Port Phillip is home to a diverse community with varied housing needs. In the provision of future housing Council needs to not only consider changing household structure but also residents with special needs....For families with young children (universal design housing) will allow manoeuvrability for prams and trolleys; for all households level entry and wider doorways will facilitate movement of furniture, and the avoidance of steps will reduce accidents<sup>50</sup>."

Arguments against universal housing regulation maintain that universal housing features should not be mandated in all housing based on the perception that they aren't needed by 'average' homeowners. They cite turnover rates of home ownership as evidence that features that may be of greatest benefit to people when they are older

may not be taken advantage of by, for example, a first homebuyer during their housing tenure.

These arguments assume that everyone who may at some stage benefit from a universally-designed home will own that home. In fact, a considerable number of Victorians are renters not homeowners, and are renting for the long term. This has implications for the housing tenure of older generations: the fact that more younger and middle-aged Australians today are in private rental suggests that home ownership may be less available to older people in the future<sup>51</sup>.

But renting on the private market is not considered an option for many people with disability because of the difficulty of finding a suitable property and then gaining permission from the landlord to carry out home modifications<sup>52</sup>.

This puts pressure on the public housing system by people with disability for whom home ownership is not an option. If, as current trends suggest, more older people will be excluded from home ownership in future, this cohort will exacerbate the pressure on the public housing system if the private rental sector cannot provide housing which can accommodate their changing needs.

As most common home modifications would be unnecessary in a universally-designed home, increasing overall stock of universally designed housing would open up access to the rental market to these groups. It would also mean that an individual or family renting a home would be less likely to need to move if they or a member of their family acquired an injury or a major illness, minimising cost and disruption.

As turnover rates for rental housing are far higher than those for home ownership, a rental property built to a universal design standard would benefit a far greater number of occupants than a non-rental property.

Arguments that the 'average' person won't benefit from universal housing features also seem to be based on the premise that they – or one of their children – will never sustain an injury that affects their mobility, won't acquire a chronic illness, and will never need to accommodate an ageing relative. **This is clearly not the case.** While many people may not anticipate these events when they buy or rent a house, the costs – personal and financial – of having a home that can't accommodate them can be significant.

Some population groups for whom universal housing would make life considerably easier, but who are not often taken into account in considerations of universal housing benefits, are discussed below. It is recommended that these groups be accounted for in any future cost-benefit analysis of universal housing in Victoria.

- **Families with small children**

According to the 2006 Census, over 300,000 Victorians are children aged between 0 and 4 years<sup>53</sup>. Universal housing features such as easy access between an entrance to the home and the street or garage, a step-free entrance and wider doorways and corridors make it much easier for parents

with one or more small children in prams or strollers to negotiate getting in, out of and around the house. In the research by the Joseph Rowntree Foundation cited earlier of residents' perceptions of Lifetime Homes, features such as level entrances and wider doorways were noted as significantly increasing safety for children<sup>54</sup>.

- **People with chronic illnesses**

Chronic illnesses vary between diagnoses and from person to person. A chronic illness may be episodic, fluctuating and/or progressive;<sup>55</sup> for these reasons, not everyone with a chronic illness is accounted for in disability statistics. Nor are chronic illnesses confined to the ageing population – some of the most prevalent chronic illnesses affect people of working age.

While housing can be an issue for any chronic illness sufferer, particularly on release from hospital, people with the following illnesses would particularly benefit from universal housing:

- **Arthritis**

A report by Access Economics on the economic impacts of arthritis in Australia shows that around 19 per cent of Victorians, or 953,000 people, currently have arthritis. The rate of arthritis in Victoria is predicted to increase by over 30 per cent by 2050<sup>56</sup>. A significant number of arthritis sufferers in Victoria are of working age, with the average age of onset for rheumatoid arthritis 45 years<sup>57</sup>.

Many people with arthritis are clearly in need of housing which is more accessible. The report estimated that Victorians with arthritis spent around \$6 million on home modifications in 2007<sup>58</sup>. As noted in this paper, many common home modifications would be unnecessary or far cheaper in a home with universal design features.

- **Multiple Sclerosis (MS)**

Research by Access Economics shows that an estimated 16,081 Australians had MS in 2005 and predicted this number would increase to 17,162 people by 2010 and to 18,952 by 2020. 85 per cent of people with MS are of working age<sup>59</sup>. The research found that the total cost of aids and equipment for people with MS in 2005 was nearly \$28 million; while it did not give a cost breakdown for expenditure on home modifications, it did note that around 86 per cent of aids and equipment costs were borne by individuals and only 14 per cent borne by Australian governments<sup>60</sup>.

- **Parkinson's Disease**

Parkinson's Disease is the second most common neurological

condition in Australia: Access Economics has conservatively estimated that in 2005 over 54,700 had Parkinson's Disease. Almost one fifth of people with Parkinson's Disease are of working age<sup>61</sup>. Home modifications help people with Parkinson's Disease to remain independent and delay admissions to residential care, but as with other chronic illnesses, much of the cost of modifications are borne by the individual and their family<sup>62</sup>.

The Australian and New Zealand Association of Neurologists notes that it is imperative for people suffering from neurological conditions such as Parkinson's Disease to be able to access liveable, visitable and adaptable accommodation options<sup>63</sup>.

- **People with short or long term injuries**

Thousands of Victorians of all ages are injured every year, most frequently at work or school, from recreational activities, and transport accidents. For example, 6194 drivers, passengers, cyclists and pedestrians sustained serious injuries on Victoria's roads in 2004-05 alone. Almost 70 per cent of these were aged between 18 and 60<sup>64</sup>. Although such injuries can result in peoples' mobility being impaired for weeks, months or years, if the injuries are not likely to be permanent, they will not show up in disability statistics.

Recreational and professional sports are major causes of mobility-affecting injuries for younger people, particularly AFL football in Victoria. Over one third of the 14,147 hospitalisations from injuries sustained by Australians playing football in 2004-05 were caused by AFL.

Victoria has the highest rate of hospitalisations for AFL-related injury per head of population. Over 90 per cent of people injured playing football are under 34, with injuries to the knee and lower leg accounting for over a fifth of all AFL-related injuries<sup>65</sup>.

The inconvenience of even a minor injury can be exacerbated by housing that can't accommodate it – for example, a teenager with a broken leg may find it difficult to use their bathroom and be unable to sleep in their bedroom in a commonly-designed home. More serious injuries however can mean someone living in an inaccessible home having to relocate entirely:

Richmond footballer Nathan Brown won't be going home for several weeks. Richmond Football Club has been forced to make arrangements for Brown to move into a Docklands apartment to help him recover from a badly broken leg. The move was forced upon the Tigers because of difficult access to Brown's top floor Richmond apartment.

*Mark Stevens, reported in the Herald Sun,  
2 June 2005<sup>66</sup>*

## 2.3 Economic Benefits

Concerns about costs related to increased hospital admissions, home care, early aged care admissions and home modifications in future as a result of the combination of badly-designed housing and population ageing have been key factors driving regulation for universal housing overseas.

Such costs are significant: **conservatively estimated, increasing universal housing stock in Victoria could save the Victorian Government over \$70 million each year** solely on the basis of savings in home care, residential aged care and hospital costs based on the ageing population. (This estimate does not include costs saved from reducing injuries to carers or expenditure on home modifications, though these savings are also considered below.)

### *Savings in home care costs*

The Australian Institute of Health and Welfare recognises that well-designed homes decrease environmental demands on people with mobility restrictions, reducing a person's reliance on assistance in the home<sup>67</sup>.

The Joseph Rowntree Foundation in the UK estimates that people receiving home help would require 20 per cent less help if their homes were accessible.<sup>68</sup> (An Australian cost-benefit study on the impacts of housing on the magnitude and cost of community care is currently in publication.<sup>69</sup>)

The Home and Community Care (HACC) program is the main home care program in Australia, funded on a 60/40 basis by the Commonwealth and State Governments.<sup>70</sup> The HACC Budget for Victoria in 2008-09 is just over \$500 million<sup>71</sup>. Around 15 per cent of this funds home help<sup>72</sup>. **A 20 per cent decrease in home help costs would represent a saving to the Victorian Government of around \$15 million each year.**

Demand for HACC services is increasing with the ageing population, with spending on HACC services for people over 65 having risen by almost 20 per cent between 2001-02 and 2005-06<sup>73</sup>.

People with profound or severe core activity limitations are those most in need of assistance to manage in the home on a daily basis - as noted earlier, around one fifth of older Australians currently report a profound or severe activity limitation.

In 2010 it is predicted that 183,200 Victorians under 64 and 179,700 Victorians aged over 65 will have a severe or profound core activity limitation, the majority of whom will need home help on a daily basis. A 20 per cent saving in home help costs each year would therefore be even more significant in the face of future levels of demand for services.

### *Savings in costs of residential aged care*

The Australian Institute of Health and Welfare recognises “age-friendly housing” as a strategy to reduce demand on aged care services by enabling people to live independently and actively for as long as possible<sup>74</sup>.

Inappropriate housing combined with poor health is the strongest predictor of a move to residential aged care. Research by the University of Kent in the UK found that:

- Over 50 per cent of people in aged care have moved there after hospitalisation because returning to home is not practical;
- 15 per cent are admitted because of serious housing problems; and
- 18 per cent of relatives in a survey cited a physically unsuitable home as a direct reason for admission.

Research conducted for the Joseph Rowntree Foundation suggests that living in a home built to the UK Lifetime Homes Standard could delay a move into residential aged care by three years.

Based on the above estimates, the Joseph Rowntree Foundation assumed for its cost benefit analysis of its Lifetime Homes Standards that 25 per cent of people could have avoided moving into residential aged care if they were living in a Lifetime Home<sup>75</sup>. Other research conducted in the UK on the cost savings of home modifications estimated that delaying a person’s admission into aged care by a year saved around £26,000 (the equivalent of \$55,641 AUD) per year<sup>76</sup>.

Around 50,000 people enter permanent residential aged care in Australia each year – based on population share, approximately 12,500 of these are in Victoria.<sup>77</sup>

**Deferring 25 per cent of aged care admissions each year could save the Victorian Government around \$14 million per year<sup>78</sup>.**

It’s estimated that demand for aged care services nationally could increase over thirteen-fold by 2042-3, with costs in service provision nationally increasing from \$7.8 billion in 2002-03 to \$106.8 billion by 2042-3.<sup>79</sup> Proportionately, this would equate to a Victorian aged care budget of over \$26 billion in 2042-3.

In light of such potential future costs, deferring a quarter of aged care admissions each year would represent significant cost savings to the Victorian government.



### *Savings in health care and hospital costs*

Falls, particularly by older people, are a major public health problem - management of injurious falls cost the Federal Government \$498.2 million in 2001 alone<sup>80</sup>. Badly-designed housing is a key contributor to falls in the home.

About half of all falls in Victoria occur in a private home, with nearly all of these occurring in a person's own home<sup>81</sup>. According to the Australian Institute of Health and Welfare, 13,087 Victorians were hospitalised due to accidental falls in the home in the 2002-03 financial year.<sup>82</sup> Men and women 65 and over accounted for 71 per cent of these falls.<sup>83</sup>

The UK Government has recognised that housing design is critical in the reduction of risk of falls, and that the provision of appropriate housing can prevent costly expenditure on health and care<sup>84</sup>.

Research conducted for the Australian Government also reported that close to a 60 per cent reduction in falls in the home could be achieved after home modifications were implemented with modifications found to be even more effective in preventing falls in at-risk patients discharged from hospital<sup>85</sup>.

It must be noted that home modifications are tailored interventions based on a person's specific needs and are therefore more targeted than universal features. But those findings support the assertion in the cost benefit analysis of adaptable homes conducted by Hill PDA Urban Economists for the NSW Government, that at least half of all serious falls in the home could be avoided by building homes to be accessible.<sup>86</sup>

People with fall related injuries spend an average of 15 days in hospital.<sup>87</sup> This means falls in the home have accounted for over 196,000 Victorian hospital bed days in recent years – nearly a third of all hospital bed days budgeted for in 2008-09<sup>88</sup>. **Prevention of half of all falls in the home could save the Victorian Government almost \$48 million each year<sup>89</sup>.**

Projections indicate that by 2051, managing fall-related injuries will require an additional 886,000 hospital bed days (or 2,500 hospital beds) per year nationally, almost tripling current costs to government<sup>90</sup>.

Reducing falls in the home through better housing design now would prevent significant health care expenditure in future, and also contribute to delaying entry to residential aged care. A common route to an aged care facility is after hospitalisation, often resulting from a fall<sup>91</sup>.

### *Savings through preventing injury to carers*

The inappropriate design of housing increases the risk of injury to people caring for someone with an illness or a disability. The main activities with which primary carers whose main care recipient is aged 65 or over provide help on a daily basis are related to mobility (84 per cent) or self-care, including bathing and showering (55 per cent)<sup>92</sup>. Such activities would be made considerably easier – and safer – in an appropriately-designed home.

The National Carer Survey found that over two thirds of carers are carrying some kind of physical injury<sup>93</sup>.

A recent report by Melbourne CityMission found that inappropriate housing features, particularly inaccessible bathrooms, mean that carers do excess lifting, putting them at risk of injury<sup>94</sup>. It identified that once-in-a-lifetime funding through the Victorian Aids and Equipment Program for home modifications means that families with a child with a disability are forced to wait for their child to become an adult before applying for funding for modifications.

This can result in parents lifting their child in ways that can cause injury to both themselves and the child, creating upstream health costs for both carer and the person being cared for<sup>95</sup>. As discussed elsewhere in this paper, many common modifications would be unnecessary or far cheaper if homes were built to a universal design standard.

Care by a family member enables many older people to delay or avoid admission to residential aged care. The need for such care will only increase with the ageing population - between 1998 and 2003 the number of older Australians with high care needs living in private homes who received some form of assistance increased by nearly a quarter<sup>96</sup>.

With approximately 2.3 million carers providing care in Australia, valued conservatively at \$18.3 billion each year for adults alone<sup>97</sup> design features that reduce the occupational health and safety risks to carers and enable them to continue to provide care would represent a significant cost saving to Australian governments.

### *Savings in home modification costs*

Home modifications are often an inefficient and expensive way of incorporating features in a home to improve its liveability and useability that would have been low or no cost if included at the time of construction.

Research by the Australian Housing and Urban Research Institute (AHURI) has noted that policies encouraging universal design of housing would eliminate the need for houses to be extensively modified to accommodate the needs of older people and that

legislation requiring accessibility features to be incorporated into housing is a way of improving the usability of new houses for an ageing population<sup>98</sup>.

Home modifications cost both the Victorian and Federal Governments many millions of dollars each year.

Government funding for home modifications through the Home and Community Care (HACC) program was provided to 21,979 clients nationally in 2004, with an average of \$328 spent per client per modification<sup>99</sup>. This amounts to over \$7 million, of which the Victorian Government would have contributed just under \$3 million<sup>100</sup>.

Additionally, almost \$2 million was spent by the Victorian Aids and Equipment Program (VAEP) on subsidies for home modifications in 2005<sup>101</sup>. Over half of all clients assisted by the VAEP are over 65<sup>102</sup>.

Demand for assistance with home modifications will only increase in coming years. Population forecasts for the VAEP indicate that demand for the aids and equipment program by people with core activity restrictions will increase by 1 per cent per year between 2006 and 2012, meaning an increased demand of 25 per cent by 2031 if this trend continues.<sup>103</sup>

Additionally, the recent review of the VAEP conducted by KPMG recommended that government funding be increased to allow applicants to access assistance with home modifications more than once a lifetime, and that funding should be indexed to inflation.

But the greatest costs of modifications are borne not by governments, but by consumers. Modifications often cost tens of thousands of dollars and, as noted earlier, eligibility criteria for home modifications assistance in Victoria are very restrictive.

Many older people pay for modifications themselves through their savings, assets or income – a recent study by the Australian Housing and Urban Research Institute (AHURI) on the out-of-pocket costs borne by people following a stroke showed that almost a quarter of the 353 Victorians surveyed paid for home modifications themselves within a year of being discharged from hospital. The average cost of these modifications was \$630, with the most expensive being \$20,026<sup>104</sup>.

A frequent criticism of the Victorian Aids and Equipment Program is the size of the “gap” between the full cost of an item and the subsidy provided through the program.

According to KPMG, the average gap across all items subsidised by the VAEP in 2004-05 was approximately \$500 per person but the gap was significantly higher for home modifications, reflecting their greater costs<sup>105</sup>.

Research by the organisation SCOPE found that the VAEP funded an average of 60 per cent of the total cost of equipment for which clients applied for assistance; however the VAEP only funded an average of about a quarter of the cost of the home modifications made by its clients, with an average gap of almost \$9,000, as shown by the table below:<sup>106</sup>

	Cost of modification	VAEP funding
Client A (school-aged, rural Victoria)	\$6,743	nil
Client B (adult client)	\$20,715	\$4,300
Client C (adult client)	\$11,726	\$4,400
Client D (rural Victoria)	\$6,105	\$1,870

Building houses to a universal design standard would not remove the need for some home modifications, but research shows that it would significantly reduce the costs of such modifications.

A comparative cost analysis of retrofitting home modifications in adaptable and non-adaptable homes in NSW found that modifications made to a non-adaptable home would cost *between three times and eighteen times* as much as those made to an adaptable home, depending on dwelling type<sup>107</sup>.

Analysis by the Joseph Rowntree Foundation of the type and cost of modifications made to homes built over the last thirty years in the UK indicates that the average cost of major adaptations could be reduced by at least half if all of its Lifetime Homes features were incorporated at the time of construction<sup>108</sup>.

This kind of research has not yet been conducted in Victoria. However a snapshot survey of Victorian occupational therapists was conducted through the Occupational Therapists Association of Australia Victoria comparing therapists' experiences of the costs of common modifications between adaptable and non-adaptable dwellings.

Therapists surveyed identified that common home modifications would be on average 50 per cent cheaper when made to adaptable homes compared to non-adaptable homes. Therapists also identified that universally-designed housing also has the potential to decrease demand for other adaptive devices which assist people to manage in inappropriately-designed homes<sup>109</sup>.

Increasing universal housing stock would reduce government expenditure on home modifications, demand for which will only increase in coming years. Importantly, making modifications cheaper would also reduce the extent to which older Victorians need to draw on savings, assets and limited income post-retirement to pay for modifications.

### 3. Conclusion

Regulating for Victoria's housing to meet a universal standard is the appropriate way to increase universal housing stock to the extent required to be of real benefit to the community. While the Victorian Government has considered introducing such regulations for the last decade it has failed to do so.

It is now time for the Government to act.

The key driver for increasing universal housing stock, in Australia and overseas, is population ageing. Almost a quarter of Victorians are predicted to be aged over 65 by 2031, many of whom will acquire a disability that affects their mobility and which may be caused or exacerbated by badly-designed housing.

Governments overseas facing similar challenges – most recently the UK Government through its 'Lifetime Homes Lifetime Neighbourhoods Strategy' - have mandated that new housing meet a universal design standard.

Based on overseas cost-benefit analyses, the Victorian Government could save over \$70 million each year in health, home care and hospital costs by introducing universal housing regulation. The costs of most common home modifications, currently borne most by individuals, may also be reduced by as much as half in a universally-designed home.

Older people and those with disabilities are not the only ones who would gain real benefit from universal housing. Universal housing features benefit a wide range of people, from families with young children in prams or strollers to anybody moving house. Most importantly, they would also be of a high degree of benefit to many people with a chronic illness such as arthritis, multiple sclerosis and Parkinson's Disease, and to people with a short or long term injury.

Few people of working age would plan for the possibility of an injury or a chronic illness when buying or renting a home, yet it is those of school and working age who are most at risk of certain chronic illnesses or of sustaining an injury in a traffic accident or playing sport such as football. Although not estimated in this paper, the costs, personal and financial, to them and their families of a home which cannot cope with such an injury would be significant indeed.

The minimum features broadly accepted as necessary for a universal housing standard are detailed in this paper. Homes are already being built cost-effectively to a version of this standard in Australia and overseas.

The UK Government found that the additional upfront costs of incorporating Lifetime Homes Standards at the construction stage of housing were negligible; while in Australia many government and non-government housing providers are already building affordable housing to a universal standard.

Additionally, international research has shown the most effective strategies to increase universal housing stock including the adoption of elements of universal design into planning and building codes while the least effective were voluntary guidelines, branding of universal designs and information campaigns.

If the Victorian Government continues to drag its feet on this vital community issue, the very significant costs of *not* regulating for universal housing will continue to be borne largely by taxpayers in the form of government expenditure in health, aged care and disability services.

Importantly, the benefits that universal housing regulation would contribute to the realisation of State Government's liveability, social inclusion and human rights objectives as outlined in its own policy framework – *A Fairer Victoria* - would be lost.

## 4. Recommendations

1. That the Victorian Government adopts a target of at least 25 per cent of housing in Victoria meeting a universal design standard by 2031, within a broader objective of making the majority of Victoria's housing compliant with this standard.
2. That the Victorian Government develop a Universal Housing Standard which includes, at minimum, the following features:
  - a. A clear pathway to a step-free well-lit entry with access to street/ car-parking
  - b. Appropriate lighting evenly distributed throughout the house
  - c. Identifiable light switches, controls and handles in easy-to-reach places for someone sitting or standing
  - d. Reinforced walls in the bathroom, shower and toilet
  - e. Wide doorways and corridors
  - f. A straight staircase adjacent to a load-bearing wall
  - g. Slip-resistant flooring
  - h. Open-plan kitchen, lounge and bathroom with step-free shower
  - i. Open-plan room on entry level that can be used as a bedroom
  - j. Accessible toilet and bathroom on entry level
3. That in developing this Standard, the Victorian Government draw on the expertise of local councils and of public and private housing providers in Victoria, elsewhere in Australia, and overseas in order for this Standard to be flexible, cost-effective and applicable to a range of dwelling types and sites;
4. That the Victorian Government implement regulatory measures applying the Standard to all new housing in Victoria as soon as possible;
5. That the Victorian Government progressively implement regulatory measures applying the appropriate elements of the Standard to renovations affecting at least 50 per cent of a home
6. That in conducting a cost-benefit analysis of universal housing regulation, the Victorian Government take into account the public interest considerations and the range of population groups detailed in this paper who would gain benefit from universal housing.

## Appendix 1

### Definition of universal housing

Universal housing is a broad term which is used in this paper in place of the terms which are commonly used to describe housing built to a universal standard: “accessible”, “visitable” or “adaptable”. These terms have particular design meanings:

- Accessible housing is designed to allow a wheelchair user to enter, move about and use all rooms and facilities in a dwelling unaided;
- Adaptable housing is designed with basic accessible features which can be complemented with further features to meet individual needs over time;
- Visitable housing is designed to allow a wheelchair user to enter the dwelling, use a bathroom and toilet facility and reach the living areas<sup>110</sup>.

The requirements for accessible, adaptable and visitable housing are included in Australian Standards 1428 and 4299. AS 4299 is the recommended building standard for adaptable housing and contains the requirements for visitable housing. AS 4299 identifies three classes of adaptable housing: AS 4299 Class C includes the minimum essential adaptable housing features and AS 4299 Class B and Class A add desirable features. AS 1428 Part 1 and Part 2 are the basic and enhanced access standards for public buildings respectively. AS 1428 Part 1 contains the technical specifications for the features detailed in AS 4299<sup>111</sup>.

A Victorian universal housing design standard would include a combination of basic accessible, adaptable and visitable housing features such as those recommended in this paper, which would comply with the appropriate technical requirements of AS 1428 and 4299.

While universally-designed houses won't meet all the needs of people who require fully accessible homes, they would accommodate the majority of home modifications far more easily and cheaply than homes that aren't built to a universal standard.



## Appendix 2

### Victorian Universal Housing Alliance

The Victorian Universal Housing Alliance (VUHA) was established to promote regulatory measures to increase the amount of universal housing in Victoria. VUHA is auspiced by Council on the Ageing, the Chronic Illness Alliance, Housing Resource and Support Service, the Victorian Local Governance Association and the Victorian Council of Social Service.

At the time of writing, the following organisations are members of VUHA:

- Access for All Alliance
- Action for Community Living
- Aids and Equipment Action Alliance
- Alcohol Related Brain Injury Australia Services (arbias)
- Archicentre
- Association for Children with a Disability
- Australian Manufacturing Workers Union (AMWU)
- Australian New Zealand Association of Neurologists
- Blind Citizens Australia
- Brotherhood of St Lawrence
- Cancer Council of Victoria
- Chronic Illness Alliance
- Construction, Forestry, Mining and Energy Union (CFMEU)
- Council on the Ageing
- Council to Homeless Persons
- Ethnic Communities Council of Victoria
- Housing Resource and Support Service
- ICLEI - Oceania Local Governments for Sustainability
- Inner South Community Health Centre
- Medical Scientists Association
- Melbourne Affordable Housing
- Melbourne CityMission
- Mind (formerly Richmond Fellowship)
- MS Society of NSW/Victoria

National Disability Services Victoria  
North Yarra Community Health Centre  
Occupational Therapists Association of Victoria Australia  
Royal Australian Institute of Architects Victoria  
Rural Housing Network  
Tenants Union of Victoria  
Trades Hall Council  
Travellers Aid Society of Victoria  
Victorian Council of Social Service  
Victorian Local Governance Association  
Victorian Psychologists Association  
Victorian Women with Disability Network  
Women's Housing Ltd.  
Young People In Nursing Homes Alliance (YPINH)

## Endnotes

- 1 Cited in Granek S, *Housing for Life: Planning for Accessible and Adaptable Homes in Victoria*, Housing Resource and Support Service, 2005
- 2 Australian Network for Universal Housing Design, [http://www.anuhd.org/about\\_anuhd.html](http://www.anuhd.org/about_anuhd.html), viewed 14 February 2008
- 3 Saville-Smith K, James B, Fraser R, Ryan B & Travaglia S, *Housing and Disability: Future Proofing New Zealand's Housing Stock for an Inclusive Society*, report for the Centre for Housing Research Aotearoa New Zealand and the Office for Disability Issues, 2007, p 75-76
- 4 Labor Party 2006 Victorian Election Policy, *Addressing Disadvantage: Investing in a Fairer Victoria*, Victorian Labor Party, 2006, p 13
- 5 Minister for Planning, *5 Star Boost to Sustainability for Home Renovations*, media release, 24 October 2007
- 6 Victorian Competition and Consumer Commission, *A State of Liveability: An Inquiry into Enhancing Victoria's Liveability*, draft report, State of Victoria, 2008, pp xlv,111
- 7 Jones A, de Jonge D & Phillips R, *The impact of home maintenance and modification services on health, community care and housing outcomes in later life*, Australian Housing and Urban Research Centre (AHURI) Queensland Research Centre, 2007, p 47-48
- 8 World Health Organisation, *Global Age-Friendly Cities: A Guide*, World Health Organisation, p 31-37
- 9 Department of Planning and Community Development, *Victoria in Future – Your Questions Answered: Ageing*, Victoria in Future 2004, State of Victoria, <http://www.dse.vic.gov.au/DSE/dsenres.nsf/LinkView/BD4EF8A400A9E6DECA256D8D00151A4F775206E3E0281595CA256F0E0013C1FB>, viewed 3 July 2008
- 10 Estimate based on 1,000,000 Victorians (one in five) having a disability and about 86 per cent of Australians with a disability having a core activity restriction (ABS, *Survey of Disability Ageing and Carers: Summary of Findings*, cat. no. 4430.0, ABS, 2003, pp 4, 19)
- 11 Estimate based on a projected increase of 8.2 per cent in the number of Victorians with a disability by 2010 (Australian Institute of Health and Welfare (AIHW), *Current and future demand for specialist disability services*, AIHW, 2007, p 159)
- 12 Jones A et al 2007, p 46
- 13 AIHW 2007, p 89
- 14 Department for Communities and Local Government 2008, p 87-88
- 15 Kroen M et al 2007 p 6
- 16 AIHW, *Australia's Welfare 2007*, Chapter 3: Ageing and Aged Care, AIHW, p 86
- 17 Bridge C, Kendig H, Quine S & Parsons A, *Housing and care for younger and older adults with disabilities*, AHURI Final report no. 16, AHURI Sydney Research Centre, 2002 p ix
- 18 AIHW Current and future demand for specialist disability services 2007 p 104
- 19 AIHW Australia's Welfare 2007 p 129
- 20 Estimate based on Victoria's population share from figure of 395,700 people having made home modifications to accommodate a disability nationally (ABS 2003 p 32)
- 21 Jones A et al 2007 p 48-54
- 22 As above p 38
- 23 .... p 50

- 24 Estimate based on 2107 applications for home modifications being funded by the VAEP in 2005 of a total of 26,619 people assisted by the Program in 2005-06 (KPMG, *Final Report of the Review of the Aids and Equipment Program*, report prepared for Department of Human Services, 2007, pp16, 20)
- 25 Projection based on estimates of around 1.9 per cent of housing being new stock per year (personal communication with Professor Mike Berry, AHURI-RMIT/NATSEM Research Centre, RMIT and Professor Terry Burke, Institute for Social Research, Swinburne University, June 2008)
- 26 Projection based on estimate that these energy efficiency regulations would affect around 40,000 Victorian homes per year (personal communication with Penelope Smith, senior advisor to Minister for Planning, September 2007). This represents around 2 per cent of Victoria's total housing stock (Australian Bureau of Statistics (ABS) *2006 Census Quickstats: Victoria*, ABS 2006 <http://www.censusdata.abs.gov.au/ABSNavigation/prenav/ViewData?&action=401&tabname=Summary&areacode=2&issue=2006&producttype=QuickStats&textversion=true&navmapdisplayed=true&&breadcrumb=PLD&>, viewed 3 July 2008)
- 27 Saville-Smith K et al 2007 p 73-74
- 28 Productivity Commission, *Review of the Disability Discrimination Act 1992*, report no. 30, Commonwealth of Australia, 2004, p 116
- 29 Joseph Rowntree Foundation, *Foundations 2: Building Lifetime Homes*, 1997, <http://www.jrf.org.uk/knowledge/findings/foundations/2.asp>, viewed 3 July 2008
- 30 Victorian Competition and Consumer Commission (VCEC) 2008, p 19
- 31 As above p 21
- 32 Department of Health and Ageing, *Top 10 Housing Features for All Stages of Life*, <http://www.health.gov.au/internet/wcms/publishing.nsf/Content/ageing-top10-housing.htm>, viewed 5 November 2007
- 33 Department for Communities and Local Government, *The future of the Code for Sustainable Homes: Making a Rating Mandatory*, 2007, p 55
- 34 VicUrban, *Accessible Adaptable Housing Project* flyer, <http://www.vicurban.com.au>, viewed 10 July 2008
- 35 Department of Human Services Office of Housing, *Housing Standards policy Manual 2. Construction Standards Version 1.1 May 2007*, Victorian Government Department of Human Services, 1997
- 36 Hill PDA 1999 p iv
- 37 As above p 17
- 38 Department for Communities and Local Government 2007 p 51
- 39 Department for Communities and Local Government 2008, p 89-90
- 40 Department for Communities and Local Government 2007 p 54
- 41 .... p 11
- 42 .... p 21
- 43 Department for Communities and Local Government, *Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society*, 2008, p 39
- 44 As above p 88
- 45 .... p 29
- 46 Bartl, B, *Submission to Inquiry under section 207 of the Equal Opportunity Act 1995 by the Scrutiny of Acts and Regulations Committee regarding Discrimination in Planning, Building and Local Government Law*, unpublished, 2004
- 47 Victorian Council of Social Service (VCOSS), *Little Piece of Heaven: Thoughts from Victorians*

- on housing as a human right, VCOSS, 2004, p 4
- 48 Nicholson D, *The Human Right to Housing in Australia*, Centre on Housing Rights and Evictions, 2004, p 16
  - 49 K Magee, Housing Resource and Support Service Inc, in VCOSS, *There is no dignity living suspended like this: The Victorian Housing Rights Tribunal Volume*, VCOSS, 2005, p 51
  - 50 City of Port Phillip, *City of Port Phillip Housing Strategy*, City of Port Phillip, 2007 p 54
  - 51 Kendig, H and Bridge, C, *Housing policy for a long-lived society*, in Borowski A, Encel C & Ozanne E (eds), *Longevity and Social Change in Australia*, UNSW Press, Sydney 2007, p 223
  - 52 Kroen M, Hutson K, Faulkner D & Beer A, *The Housing Careers of Persons with a Disability and Family Members with Care Responsibilities for Persons with a Disability, Project C: Qualitative Data Collection, Report of Focus Groups*, AHURI Southern Research Centre, 2007, p ii
  - 53 ABS 2006
  - 54 Joseph Rowntree Foundation 1997
  - 55 Carter M, Walker C & Furler J, *Developing a Shared Definition of Chronic Illness: The Implications and Benefits for General Practice, Final Report*, Health Issues Centre, 2002, p 38-39
  - 56 Access Economics, *Painful Realities: The economic impact of arthritis in Australia in 2007*, report prepared for Arthritis Australia, 2007, p 25
  - 57 As above pp 76, 26
  - 58 .... p 44
  - 59 Access Economics, *Acting Positively: Strategic Implications of the Economic Costs of Multiple Sclerosis in Australia*, report prepared for Multiple Sclerosis Australia, 2005, p 23
  - 60 As above p 56
  - 61 Access economics, *Living with Parkinson's Disease: Challenges and Positive Steps for the Future*, report prepared for Parkinson's Australia, 2007, p i
  - 62 As above p 63
  - 63 Personal communication, Australian and New Zealand Association of Neurologists, 18 June 2008
  - 64 Transport Accident Commission (TAC) crash database, statistics generated by search of serious injuries between 31/12/2004 and 31/12/2005, <http://www.tacsafety.com.au/jsp/statistics/reportingtool.do>
  - 65 Henley G, *Hospitalised football injuries 2004-05*, AIHW National Injury Surveillance Unit, 2007, p 13
  - 66 Cited in Granek S 2005 p 1
  - 67 AIHW Australia's Welfare 2007 p 86
  - 68 Hill PDA Rider Hunt & Brian Elton and Associates, *Adaptable Housing Study: "A cost benefit analysis of adaptable homes"*, report for NSW Government Department of Urban Affairs and Planning, 1999, p. 24
  - 69 Bridge C, *Housing and Disability a great opportunity: A commentary on the CHRANZ report "Future Proofing New Zealand's Housing Stock for an Inclusive Society"*, Centre for Housing Research Aotearoa New Zealand, 2007, p 2
  - 70 AIHW Australia's Welfare 2007 p 127
  - 71 State of Victoria, *State Budget 2008-09 Budget Paper No. 3: Service Delivery*, State of Victoria, 2008, p 94
  - 72 Based on estimate that approximately 15 per cent of the State Government HACC budget funds home help (personal communication with Adina Hamilton, HACC Data Collection and Resource

- Allocation, Department of Human Services, February 2008)
- 73 AIHW Australia's Welfare 2007 p 141
  - 74 .... p 145
  - 75 Hill PDA et al p 23
  - 76 Conversion at 22 February 2008. Heywood F and Turner L, *Better outcomes, lower costs: Implications for health and social care budgets of investments in housing adaptations, improvements and equipment – a review of the evidence*, executive summary, Office for Disability Issues, 2006, p 2
  - 77 AIHW Australia's Welfare 2007 p 106
  - 78 Based on estimate that a government-funded category 2 (mid-range) aged care bed costs approximately \$125/day or \$45,625 per year including service costs (personal communication with Tony Gribble, Manager Aged Care Finances, Aged and Community Care Victoria, June 2008)
  - 79 Bridge C, Phibbs P, Kendig H, Mathews M & Bartlett B, *The costs and benefits of using private housing as the 'home base' for care for older people: a systematic literature review*, AHURI Sydney Research Centre, p 3
  - 80 Hill K, Vrantzidis F, Haralambous B, Fearn M, Smith R, Murray K & Sims J, *An analysis of research on preventing falls and falls injury in older people: community, residential care and hospital settings (2004 update)*, National Ageing Research Initiative, Commonwealth of Australia, 2004, p i
  - 81 NSW Falls Injury Prevention Network, *Falls Links*, volume 2 issue 5 2007, p 3
  - 82 AIHW, *Fall related injuries in the home: Victorian Admitted Episodes Dataset (VAED)*, 25 July 2005, unpublished
  - 83 As above p 4
  - 84 Department for Communities and Local Government 2008 p 37
  - 85 Hill K et al p 22-25
  - 86 Hill PDA p. 26
  - 87 Bradley C and Harrison J, *Hospitalisations due to falls in older people in Australia 2003-04*, cat. no. INJCAT 96, AIHW 2007, p ix
  - 88 Based on a target of 688,000 sub-acute & palliative care bed days in 2008-09 (State of Victoria 2008 p 86)
  - 89 Based on average cost of \$487 per palliative or sub-acute bed day in Victoria in 2007-08 (Department of Human Services, *Public hospitals and mental health services: Policy and funding guidelines 2007-08*, State of Victoria 2007, p 12)
  - 90 Hill K et al p 5
  - 91 Department for Communities and Local Government 2008 p 37
  - 92 AIHW Australia's Welfare 2007 p 100
  - 93 Cummins R, Hughes J, Tomy A, Gibson A, Woerner J & Lai L, *The Wellbeing of Australians – Carer Health and Wellbeing*, Australian Unity Wellbeing Index Survey 17.1 Deakin University and Australian Unity Ltd 2007, p 18
  - 94 Pate A and Horn M, *Aids and equipment for Victorians with disabilities – entitlement or hand-out?*, Melbourne CityMission 2006, p 9
  - 95 As above p 9
  - 96 AIHW Aust Welfare 2007 p 100
  - 97 Cummins R et al 2007 p 9

- 98 Jones A et al 2007 p 57
- 99 As above p 50
- 100 Home and Community Care funding is allocated on around a 60/40 basis by Commonwealth and State Governments
- 101 KPMG 2007 p 20
- 102 As above p 22
- 103 .... p 158
- 104 Jones A p 51 - 54
- 105 KPMG 2007 p 25
- 106 Figures from supplementary data obtained by Scope for its report *Too little too late: Wait times and cost burden for people with a disability in seeking equipment funding in Victoria, Melbourne, 2006*
- 107 Hill PDA 1999 p iv. 'Adaptable' refers to Australian Standard 4299 Adaptable Housing Class C
- 108 Joseph Rowntree Foundation 1997
- 109 Occupational Therapists Association of Australia Victoria, snapshot survey of occupational therapists on comparative costs of home modifications in homes with and without adaptable features, 2008 (unpublished)
- 110 Hill PDA et al 1999, p vii
- 111 Granek S 2005, p 8

**“Are you male, fit and aged between 18 and 40, not very tall nor very short? Do you have good sight, good hearing and are you right handed? If you are, then you are part of the 18% of the population for whom British houses are designed. The rest of the 82% of the population tolerate what is forced upon them by the ‘average’ housebuyer”.**

*Andrew Rowe MP,  
Helen Hamlyn Foundation ‘Multi-Generational Housing’ Conference’, UK, 1989*



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