Submission to
Visitable and Adaptable
Housing Features
Regulatory Impact Statement

Council on the Ageing (COTA) Victoria
March 2010

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Introduction

Council on the Ageing (COTA) Victoria’s mission is to enable older people to age well in a just society. It is committed to human rights, social justice and the eradication of ageism.

As the peak body representing older people in Victoria, COTA engages with over 60,000 senior Victorians annually. As a result of our work with older people, and on the issues that impact on them and their quality of life, we are able to track emerging or continuing issues facing older Victorians, and inform the policy processes of COTA.

COTA welcomes the opportunity to contribute a response to the Victorian Government’s Visitable and Adaptable Housing Features Regulatory Impact Statement. The housing needs of older people is an issue about which COTA is deeply concerned, and we have long been an advocate for age-friendly environments, including accessible and appropriate housing, that will enable people to continue to live in their homes, and maximise their independence and participation in their communities as they age.

COTA congratulates the State Government for its commitment to increasing accessibility and adaptability of homes in Victoria under its Build for Life initiative, and the introduction of regulatory measures which will have significant benefits for older people with mobility and activity limitations, as well as their families and broader community.

With this commitment and the proposed regulations, the Victorian Government is establishing the benchmark for the rest of Australia. We applaud the pro-active stance the Government has taken to meet the growing needs and challenges associated with our ageing population.

The lack of appropriate housing and the high costs involved in adapting existing housing are significant contributors to loss of independence, social isolation, and reliance on community and aged care services among older Australians. The need to address these issues is becoming more urgent as we face a significant increase in our aged population.

- Approximately 13 per cent of Victorians are aged over 65. By 20312 this will have increased to just under a quarter of the population, and by 2051, about 27 per cent of the population will be aged over 65 – between 1.7 and 2.1 million people;
- About 860,000 Victorians experience some degree of restriction to the core activities of mobility, self care or communication. This figure is projected to increase by 70,520 over the next 12 months; and with core activity restriction strongly correlated to age, it can be anticipated that this figure will continue to increase significantly.
- Approximately 24 per cent of Australians living in private housing have made modifications to their home to accommodate activity restriction. In 2003, about 79,000 Victorians made modifications to their homes. However available data on modifications and people accessing the Victorian Aids and Equipment Program can not be considered to be a true reflection of the numbers needing home modifications or the extent of modifications needed.
- A study by the Australian Housing and Urban Research Institute (AHURI), found that almost 20 per cent of people over 75 felt that changes to their home, including structural modifications, would make their home easier to live in or increase their independence.
- Without leadership and action from Government it is unlikely that progress would be made in this area, as the RIS estimates that 96 per cent of new homes still lack basic accessibility features.

1 Department of Planning and Community Development, 2009, Adaptable Features Housing, Regulatory Impact Statement, p 8

Submission to Visitable and Adaptable Housing RIS
March 2010
Debra Parnell
The availability of suitable housing is essential if older people are to ‘age well’ and ‘age in place’. Appropriate and affordable housing is fundamental to both the physical and the mental health of seniors, and is a crucial determinant of the effectiveness of the health and care systems.

COTA identifies the provision of adequate and appropriate housing as a human rights issue and refers to the WHO Active Ageing Framework as a cornerstone for the ‘ageing well’ and ‘ageing in place’ approaches central to current service delivery and support programs for older people.

The Active Ageing Framework is underpinned by the UN Principles for Older Persons and identifies Security, Participation, and Health as the three pillars for an active and positive ageing experience:

Active ageing is the process of optimizing opportunities for health, participation and security in order to enhance quality of life as people age.  

WHO 2002

Active Ageing: A Policy Framework

Adequate and secure housing is fundamental in achieving this outcome through the development of:

- Barrier-free housing options for ageing people with disabilities;
- Housing in communities that encourage daily social interactions and interdependence among young and old;
- Policies programs and services that enable people to remain at home as they grow older;
- Housing options for older people that eliminate barriers to independence and interdependence with family members, and encourage full participation in community and family life;
- Housing security for older people to increase and enhance confidence and certainty.

The Active Ageing Framework has informed the WHO Global Age-Friendly Cities Project and Guide. While the Age Friendly Cities project incorporates wide ranging factors that contribute to an environment that support and enable people to age actively, appropriate and secure housing is identified as a core element in the independence and quality of life experienced by older people. The Guide identifies as fundamental requirements for age-friendly housing - 

- Even surfaces, passages wide enough for wheelchairs,
- Appropriately designed bathrooms, toilets and kitchens,
- Housing that can be modified for older people as needed,
- Housing modifications that are affordable.

Research and aged care industry experience has long supported the assertion that a correct housing ‘fit’ can improve the well being, health and quality of life of older people. The correct fit can mean a myriad of different things to different people such as:

- Familiar location, close to family and friends;
- Easy access to essential services such as doctors, recreational activities and public transport;
- Safety and security;
- Appropriate house and garden size; and
- Accessible design with technological supports.
The benefits of including accessibility and adaptability features into new housing will benefit not only older people directly, but will also impact on their family, networks of friends and supports, and their communities –

- It will mean that older people with mobility or core activity limitations will be able to visit friends, neighbours and families; and
- It will mean that older people living in new housing arrangements will be more visitable by family members and friends who have mobility or core activity limitations, or who have young children in prams and strollers, enabling them to continue to participate in family and social activities;
- It will have benefits for older people who have fluctuating conditions, such as arthritis and Parkinson’s disease, enabling them to live more inclusively with their injuries, or chronic condition. People who are impaired temporarily, such as when recovering from surgery or illness will be able to return home earlier, and recover in more comfortable and familiar surroundings;
- It will enable support and care services to be delivered in the older persons home more easily and to better effect; and under safer conditions for the care workers.

Adaptable, accessible design is an important factor in keeping people living in the community and can prevent premature admission to residential care. One study of the impact of the provision of appropriate and supported housing on older persons found that it delayed their entry into residential care by an average of six years.

Benefits and potential savings of adopting accessible and adaptable housing standards for all new housing construction would also accrue to the economy, the community and to government budgets. These broader benefits include:

- Greater social inclusion of older Australians leading to savings in health care costs, including mental health care.
- Greater economic participation of older Australians leading to higher economic growth.
- Potential savings in major adaptations costs by providing for such changes in the upfront design of the property.
- Greater capacity for older people to live independently leading to a reduced need to move into residential care and savings in home care costs.
- Greater capacity of people to remain in their own homes leading to a reduced cost of rehousing.
- Improved safety of living independently leading to savings due to reduced falls at home – a major cause of hospital admissions for older people.
- Reduced hospital stays and stays in rehabilitation facilities, as people will be able to return home more quickly after surgery or illness.
COTA’s Response to the Proposed Accessibility Features

COTA strongly supports the four features proposed in the Regulatory Impact Statement as minimum requirements for accessibility and adaptability of new housing in Victoria, namely:

- a clear path from the street to a level entry
- wider doorways and passages
- a toilet suitable for people with limited mobility on the entry level, and
- reinforced bathroom walls to allow grab rails to be fitted inexpensively if they are needed.

However, we believe that an additional feature should be included as an essential minimum requirement, to ensure that the accessibility and visitability of new homes achieves maximum benefit to a wide range of people - that is provision of a level entry shower.

Such an accessibility feature would have significant benefits, especially for older people with mobility or sight limitations. Falls associated with showering are a significant issue, very often caused by the difficulty many people face in stepping into, or out of, the shower or bath. Furthermore it would reduce costs for in-home support as fewer people would need assistance with showering. The RIS highlights this benefit in indicating that about 25 percent of users of personal care services provided by the HACC program may be able to shower unaided if a step-free walk-in shower with handrails was available in their home. To overlook this feature severely limits the accessibility and safety benefits being sought by the proposed regulations.

Estimates of costs suggest that the additional costs for this feature would be very low considering the long term and wide ranging benefits that would be achieved. Costings provided in the RIS indicate that a level entry shower would incur an additional $200 for houses, $70 for medium density units, and no additional cost for units in high-rise apartments with lifts.

While we fully support the four features proposed in the RIS, we would like to raise some issues in relation to the features which, if adopted, would enhance their benefits.

1. Placement of toilet

Consideration should be given to allowing toilets to be placed in positions other than in a corner. Such an option has the potential to increase the functionality of the bathroom in some cases, and may also facilitate the inclusion of a more functional level entry shower.

If this option was to be introduced, reinforcements in the wall should be provided for pull down grab rails.

2. Wider doors and passages

We support the position of the Victorian Universal Housing Alliance (VUHA) which identifies a preference for

- a minimum clear opening for doorways of 850mm, rather than the proposed 820mm, and
- passage widths of 1200mm rather than 1000 mm where there are doorways off a passage way.

This increase in widths would accommodate a greater number of people in wheelchairs and other mobility aids.

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2 Ibid, p.87
3 Ibid, p 162
Application of the Proposed Features on New Dwellings

1. BCA Class 1
COTA welcomes the proposal that the accessibility features be applied to all new Class 1a (single dwellings) and Class 1b (boarding house, hostel, guest house etc). The application to all single dwellings will result in greater numbers of homes being accessible in the future, and consequently will provide these benefits to people over their life course.

It is very important that these requirements be applied to all dwellings in developments such as retirement villages, and other developments of smaller units, as these often target older people as suitable options as they age. Without accessibility features these dwellings become liabilities if the person’s abilities and support needs change as they age.

We also welcome this move as it will serve to ‘normalise’ accessibility features and increase the potential for more age-friendly features to be introduced into our communities.

The application to Class 1b dwellings is particularly important as many low income older people and people with disabilities are forced to access hostels and boarding houses as they are a lower cost form of housing.

The application to other forms of dwelling in this class will also increase the inclusion of older people with mobility limitations and people with disabilities as it will assist them to access affordable holiday accommodation.

2. BCA Class 2
COTA welcomes the fact that the features will be required in Class 2 (medium density and high rise) dwellings. This class of dwelling is particularly relevant to older people who may down-size from the family home, because they cannot afford to retrofit them to meet their changing needs.

We endorse the issues raised by VUHA in relation to the requirements being applicable to only 20% of apartments in high rise developments, and support the suggestion that all new high-rise apartments should be required to include the accessibility features. The reasons for this include:

- High–rise apartments are often located near public transport, shops and other community facilities, making them good housing options for older people and people with disabilities.
- While older people haven’t taken up apartment living in large number, the accessibility features will mean that the people currently choosing this style of housing will be able to stay there longer as they age.
- High-rise apartments are often more affordable than houses, and as many older people are on fixed incomes, with many are on low incomes, the inclusion of accessibility features will make them a more viable option for this group.

COTA also supports the suggestion that if only a proportion of dwellings in high rise buildings are required to have minimum accessibility features, that guidelines representing good practice be developed to encourage appropriate location of these units within the building.

3. Other forms of housing
COTA strongly urges the Government to consider the application of the proposed features to other forms of housing not covered by Classes 1, 2 and 4. In particular we suggest that Demountable Mobile Units (DMUs) be included in the proposed applications. This form of dwelling is found in Residential Parks, which, while they are technically caravan parks, are developed to look like, and provide an affordable alternative to traditional retirement villages. They are marketed specifically to older people, yet the dwellings are not compatible with...
ageing-in-place, and are unsuitable if the resident’s needs change. Many older people who have used their available funds to buy into such a development in their retirement, are in extremely difficult situations if they have to move because the unit can not accommodate their care and support needs.

Building on a Good Start to Accessibility

COTA welcomes the proposed regulations, and with inclusion of additional features and enhancements identified here and by VUHA, we believe that they will deliver significant benefits to a wide range and diverse sectors of our community, from families with young children, to older people and people with disabilities. Most importantly they will go some way to meet the changing needs of the people of Victoria’s as they age.

As an auspice of the VUHA, COTA sees these regulations as a starting point to achieve optimum accessibility, and to achieving universal design, which will progress the development of an age-friendly environment and greater amenity for all members of the community.

Since its launch the Alliance has called on the government to develop a Universal Housing Standard which, at a minimum, includes the following features:

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

We look forward to opportunities to continue to work with the Government to realise a more inclusive and age-friendly community in which all people will be able to live in and visit housing which maximises their independence and quality of life, regardless of their disabilities, age or mobility limitations.
Council on the Ageing (COTA) Victoria

Council on the Ageing (COTA) Victoria’s mission is to mobilise older people and those who work with them, to age well in a just society. It is committed to human rights, social justice and the eradication of ageism.

COTA Victoria is a non-profit organization, of individual older people and organizations representing older people, committed to improving the well-being of all older Victorians. There are Councils on the Ageing in each state and territory, and a federal policy group based in Canberra - COTA National.

COTA Victoria’s role

- Provides education, information and services to older people, their relatives and the wider community
- Provides policy advice on behalf of older people to state and local governments, service providers and the general community
- Undertakes research and policy development on issues affecting older people
- Promotes and publicizes the needs and preferences of older people to the general community
- Encourages a high level of involvement of older people in the organisation and its activities.

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