



Response to Consultation Regulatory Impact Statement

Submission by the Summer Foundation, August 2020

The Summer Foundation is pleased to provide this submission in response to the Australian Building Codes Board (ABCB) Consultation Regulation Impact Statement (RIS).

The Summer Foundation endorses the stated objective of the RIS and proposes that it should include the word 'all':

The objective of the regulatory proposal is to ensure that [all] new housing is designed to meet the needs of the community including older Australians and others with mobility limitations.

Summer Foundation maintains that accessible housing is for everyone, every time, every day. It should not be regarded as 'an optional extra' or 'for special people.' The regulation of minimum standards of accessibility can bring significant benefits to the broader community and is in the public interest.

We believe that minimum standards for accessibility will:

- avoid exclusion and marginalization of people and denial of social and economic participation by communities
- allow people to "age in place"
- reduce the risk of falls
- reduce the length of hospital stays
- reduce the need for residential aged care (RAC) amongst both the elderly and younger people with disabilities
- minimise preventable costs for future users of health and support services
- reduce demand for government housing assistance such as SDA, social housing and home modifications
- contribute to the observance of the *COAG's obligations to build globally competitive, productive, sustainable, socially inclusive and future-oriented communities.
(*COAG has been replaced by the National Federation Reform Council, NFRC)

Principles for submission

Everyone benefits from universal design features: Innovation and design changes should be implemented to achieve equity for people with disability, improve functionality for everyone, for example - kerb ramps, Access to Premises Standards.

New economic analysis provides compelling evidence for change: An independent review of the RIA cost benefit analysis reverses the economic credentials of the regulation and demonstrates that the benefits of accessible housing outweigh the costs to our society.

Lived experience of people with mobility limitations: A current national survey is eliciting qualitative data that provides a compelling evidence base about the human cost of continuing to build housing that is inaccessible.

Accessible design is good design: A new audit of 20 homes being built by volume home builders shows that the proposed changes are not a 'big ask', but rather common sense changes that will improve the design and functionality of residential housing for all Australians.

Opportunity for improvements: The current RIA consultation provides a once in a generation opportunity to improve the design of new houses for all Australians and also future proof our housing infrastructure for our ageing population.

Recommendation

Summer Foundation recommends that the Government adopt Option 2 – Gold Standard be implemented in line with the current Livable Housing Design Guidelines for accessible housing. This standard should not be simplified or adjusted as described in the draft changes to the NCC. Our recommendation is based on independent analysis which we have commissioned, as the benefits clearly outweigh the costs.

The Summer Foundation's Housing Hub platform and the Nest platform already list existing accessible housing which either meets the Gold standard or is of a higher standard. Both platforms are used to facilitate the search of accessible housing.

Personal experiences of young people in residential aged care

The following case studies of people with disabilities illustrate, in their words, how inaccessible housing results in social exclusion, the inability to return home after an illness or injury and forced entry into nursing homes. It is clear that introducing accessible housing regulations that require minimum standards will reduce social isolation, reduce cost for modifications, and enable an ordinary family life.

Michelle Newland

Michelle was just 19 when she had a severe asthma attack that resulted in an Acquired Brain Injury.

Doctors did not hold much hope for her recovery or her ability to regain the skills she needed to live independently. When her time in rehab expired, with nowhere else to go, she was admitted to Residential Aged Care (RAC) where she stayed for 16 months – fighting to retain relearnt capabilities, like walking and talking, and to maintain her social connections.

However, the determination of Michelle and her parents finally saw her return to the family home just before her 21st birthday.

Although modifications had been made, everyone had to work around the limitations of the family home that made wheelchair access difficult, and presented risks for carers working in cramped spaces.

“Having Michelle home earlier would have had a big impact on her life,” Michelle’s mother Ann said.

“Sixteen months was wasted on an environment [RAC] that didn’t speak to Michelle. She should have been in rehab longer and then home. We were always going to bring her home no matter what, we just didn’t know it would take 2 years.”

Ann said Michelle had learnt to walk when she was in rehab but had lost the ability in RAC. “A shorter stay in RAC would have helped Michelle’s recovery because the main progress she made was when she got home.”

Universal building standards that included mandated wider doorways and an accessible bathroom, would have likely lessened the time Michelle was stuck in aged care by allowing her to return to an accessible home and not have to wait for such significant renovations to be done. Such standards would also have allowed her to visit the homes of family and friends, which had been too difficult when she was in a wheelchair.

“It would have meant so much to me to have had that interaction with my friends,” Michelle said.

In February 2016 Michelle, who is now 37, moved into the house her parents bought and renovated next to the family home.

She is living her dream – a dream that was temporarily halted when she had the asthma attack.

“Now I can shower myself, dress myself, make my own breakfasts, clean my house...and with support I run a playgroup once a month in my home,” Michelle said. She is also an active public speaker.

Emma Gee.

“My name is Emma Gee. I am now 40 years old. When I was 24, just weeks after climbing Borneo’s Mt Kinabalu, I had a debilitating brainstem stroke, and faced a lifetime of relearning how to physically and emotionally reinvent myself. I was suddenly dependent on the medical system I had worked within as an occupational therapist, and reliant on my close networks as I gradually adapted to my new realm.

My physical limitations meant I could not return to the upstairs townhouse I rented with friends. Despite not feeling at all back to my old self, there was no longer a bed at rehab for me so, while I waited for the right accessible accommodation, I had to go back to my parents’ home.

I was still confined to a wheelchair and although my family were open to recommended modifications to make the house more accessible (like removing the bathroom door to give me better access), I felt it placed unnecessary pressure on them. The lack of a bathroom door hugely compromised my privacy – no door, no privacy, no dignity - and with no seat in the shower, I opted to sit on the cold tiled floor. Also, being unable to decipher hot from cold water, it was usually safer to either not shower or have a freezing-cold shower. Eventually I’d emerge, exhausted with un-rinsed soapy hair.

I longed for my own space and once I made the decision to move into my own more accessible unit, I felt a huge weight lifted off my shoulders. However, even though I was mobilising on a walking frame, finding permanent accessible accommodation was extremely difficult. I needed a place without stairs, with carpet, wide door frames and close to public transport and my parents – 95% of the properties I looked at didn’t meet the accessibility criteria.

Modifying my new home to make it more accessible was not only financially taxing but it also seemed to symbolise a level of permanency to my disability – that I would never improve.

After showering for 6 months in the disabled bathroom at my local pool, I finally accepted my therapist’s recommendations and succumbed to entirely modifying the place, levelling the shower floor and installing a shower seat and grab rails. I’ve even had a thermostatic valve fitted so I can’t burn myself.

Having an accessible environment means I am able to perform at my best level - rather than investing energy into worrying about navigating a space, trying to access things in my home or feeling like a burden on others, I can just get on with living.

V

V lives in public housing but it has been a long battle to get into an appropriately accessible home. She has had to move 12 times in as many years before being able to settle in her current home.

“After having 2 strokes I was in hospital for 13 months and I was at risk of going into a nursing home.

“There were just no houses available and the waiting list for accessible public housing was so long they told me somebody had to die for me to get a house and I literally moved into a house that somebody died in.

“People are waiting years to get into public housing but to add in accessibility makes the wait even longer.”

V said universal building standards would increase availability of accessible public housing and reduce expenditure on modifications of old housing.

“I live in public housing and to the general public it looks ok, but it is difficult for me to get from the kerb to my house. It’s isolating because I’m not free to leave whenever I want – I can’t get in my chair and just leave.

“When things are not designed correctly it diminishes your level of independence when you have to rely on other people to assist you.

“It makes me feel more of a burden that I can’t visit others, it takes the normality out of things – normally people visit each other, but we (husband) can’t visit anyone else. It’s not like a normal situation. The fact that I can’t even go to my families’ homes for Christmas means Christmas has to be here and that is more burden on my supports.”

V said it caused anxiety to have to take ramps to other people’s houses.

“I remember I tried to visit my sister, it really upset me when I put a big black wheel mark down her wall from my wheelchair. I actually chipped the door frame because it was so hard to manoeuvre, as you open the screen door it reduces the door width.”

Response to the Consultation RIS

The RIS primarily analyses individual need and not community or collective needs. It therefore fails to address all relevant costs and benefits to households and networks. Families are affected by lack of access to accessible housing. Social networks, essential to mutual support and well-being are affected by barriers to visitability caused by inaccessible housing.

The Consultation RIS relies on a quantitative analysis only and does not provide a qualitative assessment of costs and benefits. Where quantitative data is not available, COAG¹ Best Practice Regulation Requirements require that this is carried out to consider all relevant benefits that cannot be quantified and are of importance to those most impacted. Relevant benefits that are addressed in COAG principles in the National Disability Strategy (NDS) and in Australia's human rights commitments, cover:

- effective participation and inclusion of all
- whole of community responsibility
- universal approach
- facilitation of independent living and enjoyment of a lifestyle reflecting societal norms
- respect for difference and acceptance of human diversity where accessibility is considered the norm
- opportunity for all to be able to find suitable housing in the right place at the right time
- increased choice and control over where and with whom you live

The CIE cost benefit methodology's failure to include a qualitative analysis compromises its findings.

Furthermore, the RIS does not take into account imminent changes in future need for accessible housing that are likely to be the result of current Royal Commissions into Aged Care Quality and Safety and into Violence, Abuse, Neglect and Exploitation of People with Disability. Interim reports have already published findings of the lack of safety in congregate institutional living in residential aged care and preference for independent housing. Future policy responses to reduce risk of harm have implications for increase in demand for accessible housing as governments will seek to minimise reliance on group/shared housing. Likewise, the impacts of the COVID-19 pandemic are revealing life-threatening risks of congregate care provided in share housing.

Summer Foundation has recently partnered with Melbourne Disability Institute to action two important pieces of research in response to the Consultation RIS, to inform the ABCB and Ministers.

Economic analysis of the CIE

The first, a new economic analysis of the CIE report (Dalton & Carter, 2020) identifies four key issues that individually have a large impact on the cost-benefit ratios reported. Taken together, they totally reverse the economic credentials of the regulation and demonstrate that the benefits of accessible housing outweigh the costs in our society. In their technical report they also identify a series of minor points, together with the importance of social justice in welfare economics, which would provide additional value to implementing the regulation.

¹ Now the National Federation Reform Council.

1. The Problem Reduction Approach

The principle of symmetry requires that benefits and costs are reported in a way that avoids bias or confounding. This is a key principle identified by the Office of Best Practice Regulation. If all the costs are counted then all the benefits should be counted, commensurate with the study viewpoint adopted. If only some of the benefits are counted, then costs should be presented in a symmetrical way – that is, calculated in full, but apportioned between those receiving the benefits. If only some of the costs are counted, then similar care is required to include only symmetrical benefits.

In the ‘problem reduction approach’ favoured by the CIE, all costs of the options are included, but only those benefits that result from improved access for those with housing access needs – both direct (problem reduction) and indirect (altruistic benefit) – are included. In this approach significant benefits that flow directly from improved design and functionality to the general community are not included.

Dalton and Carter see it as problematic to count all the costs of implementing each option, but only a component of the associated benefits. They argue that if the boundary around benefits is confined to those that flow from assisting a target sub-group, then the cost side needs to be apportioned accordingly between this target sub-group and the general population. To do otherwise would bias the benefit-cost relationship against the economic credentials of the target sub-group.

2. The CIE ‘willingness to pay’ approach under-counts the benefit side

In social benefit cost analysis, analysts are strongly encouraged to identify all costs and all outcomes across all stakeholders and to be transparent in their inclusion/exclusion decisions and associated measurement/valuation steps. CIE uses two approaches to identifying costs and benefits. These are a ‘problem reduction approach’ (covered in point 1) and a broader ‘willingness to pay approach’ (WTP) that focuses on the value of improved functionality to both those with accessibility needs and the general community. The costs identified in the two approaches are identical, but the benefits identified in the problem reduction and WTP approaches are largely mutually exclusive and so need to be added together (with any overlap excluded) to capture all of the benefits derived from making new housing more accessible.

3. The additional space has lasting value

The CIE cost benefit analysis assumes that the additional space per dwelling (e.g. 0.48 sqm for Silver) is a sunk cost for the sole benefit of people with mobility impairments that has no lasting value or benefit. Added space in any well-designed home, is added space and so the CIE cost benefit analysis should be modified to incorporate the fact that the cost of the additional space required for more accessible housing has at least an equal resale value - i.e. ‘capital gain’ for improved design and utility. Importantly, the value of the space is the sum of both the enhanced functionality from improved accessibility (as estimated from the CIE WTP exercises), plus the enhanced capital value. In their problem-reduction approach, there is also ‘utility from use’ in addition to problem-reduction benefits (e.g. reduced falls) already estimated. In their suggested re-analysis, Dalton and Carter include a minimum combined estimate for capital gain and ‘utility in use’ as being the retained capital value of the additional space (equal to the market price at the time of purchase).

Put another way, everyone benefits from accessible design features. The Australian Government needs to apply the “Curb Cut Effect” to new residential housing in Australia. Today we take “curb cuts” for granted – the wedge cut in an elevated kerb to allow smooth passage between footpaths and roads. “Curb cuts” were an innovation initially implemented specifically for people with disability. Our entire population benefits from kerb ramps – parents with prams, business travellers and tourists wheeling suitcases, and workers delivering heavy goods to businesses and homes.

The “Curb Cut Effect” illustrates the outsized benefits that accrue to everyone from policies and investments designed to achieve equity.

Likewise, wider doors and hallways, one stepless entry into the home and open plan design makes life easier for parents with prams, the very young and very old at risk of tripping on a step and people recovering from sports injuries and surgery. Accessible design features not only expand the user base but also make it easier and safer for everyone to move home, receive large parcels, get luggage in and out of the home and replace whitegoods and furniture.

Therefore, the CIE cost benefit analysis should be modified to reflect the fact that the entire population derives some benefit from the improved design and functionality of the proposed changes.

4. The 7% discount rate used in the cost- benefit analysis is too high

The discount rate is a factor that is applied to allow a comparison between costs and benefits today and in the future to calculate the ‘present value’. In this study, the discount rate assumption has a huge impact on the estimated benefit cost ratios because most of the costs are upfront and the benefits are in the future. Therefore, any reduction in the discount rate assumption will favour the benefit side more than the cost side. Most economists acknowledge that the prevailing bond rate is the best ‘rule of thumb’ for the discount rate and the current 30 year bond rate in Australia is 1.87%. Therefore, the findings should be based on the 3% discount rate shown in the CIE report, not 7%.

Summary of the Dalton and Carter Analysis

The table below shows the benefit-cost ratios in the CIE Report (Base Case benefit-cost ratios) and after adjustment. A ratio of less than 1.00 implies that the costs exceed the benefits (highlighted in red), while a ratio above 1.00 implies that the benefits exceed the costs (highlighted in green).

Benefit-cost ratios in the CIE Report and after adjustment using Dalton and Carter assumptions

	Option 1	Option 2	Option 3	Option 4	Option 5
1. Base case benefit-cost ratios in CIE report in RIS	0.77	0.14	0.11	0.09	1.00
2. Adjust for symmetry in cost and benefits using the WTP approach	2.41	0.86	0.68	0.49	1.64
3. Symmetry applied to WTP approach, plus add capital value of space to benefit side	2.87	1.28	1.09	1.13	1.64
4. Add in effect of 3% discount rate to row 3	3.49	1.56	1.33	1.38	2.00

Social Justice

In addition to examining the problem reduction and WTP approaches to the cost-benefit analysis used by CIE, Dalton and Carter also identify important social justice arguments to support the regulation of accessible housing. They note that it is only in the world of perfect competition – which rarely if ever exists and certainly does not exist in the housing market in Australia - that summing individual welfare maximised through the marketplace, is a legitimate approach to maximising community welfare. They conclude that the full extent of broader social justice considerations, including the obligations of governments to create the kind of society that citizens want, would not have been captured in the CIE WTP survey that assessed the altruism benefit.

Once social justice is added in, Dalton and Carter conclude that the economic credentials for all options considered by the CIE are considerably stronger than those presented in their (CIE) report. While the CIE favored continuation of a voluntary code, they concluded that a social benefit code analysis based on their advice would underpin the case for adding a regulation to the national building code. Dalton and Carter argue that Option 2 (Gold standard) has particular merit as the most cost-effective of the options that achieve functionality for those elderly and/or disabled people in wheelchairs.

Lived experience survey

The second research initiative is a current survey by the University of Melbourne that is eliciting important qualitative data that provides a compelling evidence base about the human cost of continuing to build housing that is inaccessible for some and not future proofed for an aging population. The survey is for adults with mobility limitations, including people with disability and older Australians. This qualitative analysis will add a critical evidence base to the RIA process, because it is impossible to quantify all of the benefits to people with mobility impairments including improved quality of life, well-being, mental health and a greater sense of personal freedom and empowerment.

Audit of current building practices

In addition, the Summer Foundation has commissioned a new audit of 20 of the most popular homes being built by volume builders. Completed by the Summer Foundation and Melbourne University, the audit shows that the proposed changes are not a “big ask” but rather common sense changes that will improve the design and functionality of residential housing for all Australians. All of the houses audited in this study included at least 6 of the 15 accessibility features proposed in the RIA. Two houses included 10 out of the 15. However, no house in the study included all 15 standards, and no houses met the full criteria of proposed NCC changes. While the proposed accessibility features are incorporated into some new houses, there is a lack of a systematic and consistent approach to incorporating them into all new builds. Commonly, these features do not all line up in the one house design to enable access by people with a mobility-related disability. The audit summary is available at Appendix 1.

Housing needs for people with disability

The RIS makes the assumption that the housing needs of people with disability have been met through the funding of home modifications and other services through the NDIS, RAC places, planning policies put in place by some state and local governments to encourage private provision of accessible housing, and the provision of accessible social and community housing. While these provisions contribute in a small way to the housing needs of people with disability and older people, they do not ensure appropriate accessible housing or reach the levels of supply required.

Home modifications

The Australian Network for Universal Housing Design (ANUHD) provides a detailed analysis of limitations of the home modification programs across Australia and the lack of evidence considered in the RIS that these programs do not meet current needs. This shows that home modifications are underfunded, complex and slow to access, may not meet accessibility standards, and have long wait times. The many costs associated with these limitations (backed by research provided by ANUHD), are not considered in the RIS. They should be thoroughly assessed and factored into the analysis of the cost of home modifications.

Funding for RAC places

Currently there are approximately 5297 people under the age of 65 in RAC. The harmful (and as a result of the COVID-19 pandemic – dangerous) effects for younger aged people are well documented in the interim report of the Royal Commission into Aged Care Quality and Safety. Admission to RAC is not a choice for younger aged people and is commonly a result of lack of available accessible housing.

The Commonwealth Government is committed to YPIRAC targets to achieve zero admissions of people under the age of 65 by 2022, and supporting all those living in age care to find alternative age-appropriate housing and supports by 2025. In order to reach these targets accessible housing is needed. Regulation for accessible housing standards will stimulate the market and have positive outcomes for better housing industry awareness and inclusion of people with a range of disabilities including those with complex disability support needs. Over time there will be a lower cost burden on the NDIS Specialist Disability Accommodation (SDA) program as a minimum level of accessibility is progressively available in new housing.

State based planning policies

State-based and national planning policies over the past decade have been slow in addressing the lack of accessible housing. In its review of the outcomes of the past policy of relying on increase in accessible housing via voluntary adoption of the Livable housing standards, ANUHD found that there was only a small number of planning policies in some state and local governments that required accessible housing, and these specified a target of 5-20% accessible housing. The RIS's assertion that these initiatives have stimulated the private housing sector to provide accessible housing must be contested.

Social and community housing

Social housing makes up less than 5% of Australia's housing stock. As ANUHD has documented, each State and Territory has a different standard and approach to providing accessible housing; none has met the agreed targets in the 2010-2020 National Disability Strategy.

There are no long-term government strategies or programs currently in operation or in contemplation to increase social and affordable housing at a rate that would meet the needs of Australia's growing population, let alone to maintain its current housing stock. Of the 20,400 newly allocated households in public housing, 15,600 were households that were in greatest need. Summer Housing has had direct experience of the effects on people such as Virginia (profiled on page 3 in this report), of this essential form of housing being progressively available as a crisis response rather than a secure long-term option for people who cannot afford market housing costs.

Although the Summer Foundation recognises the efforts of the social housing sector to address inequities caused by a lack of government commitment to meet public housing demand, social housing is not, and will never be, a viable strategy to address the lack of accessible housing in Australia.

Housing for people with disability

Accessible housing is needed for people with disabilities with a range of impairments affecting their ability to move around their home. This can apply for people who are both eligible and non-eligible for participation in the NDIS.

As Michelle, Emma and Virginia's stories demonstrate, the implications of the lack of availability of accessible housing for people with complex disability needs can be catastrophic. All too often they are forced to live in RAC, which can cause severe social isolation and result in additional costs.

Young people with disability living in RAC constitute one of the most marginalised and isolated groups of people in our society. Fifty-three per cent of young people in RAC receive a visit from a friend less than once per year and 82% seldom or never visit their friends.² They generally lead impoverished lives, characterised by loneliness and boredom. They are effectively excluded from society with 45% seldom or never participating in leisure activities in the community³.

The NDIS provides Specialist Disability Accommodation (SDA) funding for those participants who meet the Scheme's stringent criteria outlined in the SDA Rules 2020. The NDIA has estimated that a total of 28,000 of NDIS participants will be found eligible for SDA funding. This number represents 25% of the 110,000 people with disability (under the age of 65 years) estimated to need alternative accommodation. This means that 82,000 people will need accommodation in the mainstream (non-specialised) accommodation market. As at 30 September 2019, only 13,944 people out of the 364,879 active NDIS participants had SDA funding in their plans.⁴ This figure gives one source of data on the current demand for accessible housing.

Only 88 of the 5,468 young people living in aged care at 30 September 2019 had funding for specialist disability accommodation in their NDIS plans⁵. SDA funding is not designed to cover the needs of the majority of people with disability for accessible housing. An earlier analysis gives a range of 83,000 to 122,000 of NDIS participants who cannot get affordable and accessible housing in the social housing or private housing (rental or purchase) market and represent the size of unmet housing need nationally.⁶

The lack of accessible housing in the community means that when NDIS participants achieve funding for support to leave residential aged care, hospital or other inappropriate settings, they often have nowhere to go.

Young people with disability and complex needs are at risk of admission to RAC when their accommodation does not meet their needs. The lack of timely access to accessible housing is one of the many reasons they are forced into an unsatisfactory long-term setting. To fix this problem we need housing to be accessible and in locations that build community connections.

² Winkler, D., Sloan, S. & Callaway, L. (2007), *Younger people in residential aged care: Support needs, preferences and future direction*, (Melbourne, Victoria: Summer Foundation). PDF

³ Ibid.

⁴ NDIS Disability Reform Council Quarterly Report Q3 December 2019.

⁵ Senate Estimates, Budget Estimates Hearing Questions on Notice February 2020

⁶ Bonyhady, B. (2016) Presentation: The National Disability Insurance Scheme: A catalyst for scalable, affordable and accessible housing for people with disability.

Making better use of existing accessible housing stock

There is a current lack of information in the market about the accessible housing stock. There is no single register of accessible housing or housing with substantial modifications. Likewise, there is no efficient way to get reliable information when searching for a home, which speaks to accessible options and provides detailed information on the housing option.

For people with disability, there are two large online platforms in Australia which facilitate the availability of accessible housing and provide adequate information to support appropriate search for housing. Both Nest and the Summer Foundation's Housing Hub list accessible vacancies across Australia. The Housing Hub also obtains information about the housing needs and preferences of housing seekers and facilitates a 'matching' service to assist in the identification of accessible housing which meets the specific needs of a person with disability.

The initial pilot version of the Housing Hub was developed in 2017 by the Summer Foundation with support from the Australian Government Department of Social Services' Sector Development Fund.

The majority of dwellings currently listed on these sites are Specialist Disability Accommodation (SDA), rather than accessible private housing for sale or lease. The Housing Hub currently lists 507 SDA properties and non-SDA properties, with the capacity to list further properties as the number increases in the market.

To ensure all people are able to search for accessible housing options, better data is needed on accessible private, social and community housing in Australia that includes reliable information about the level of accessibility. There is currently no process for identifying accessible private housing and matching this stock to buyers or tenants with mobility limitations.

A comprehensive register of adaptable housing in Australia has the potential to make better use of existing accessible housing stock, streamline processes for build of new accessible housing and contribute to the ongoing independence of Australians as their lives and circumstances change.

The development of a register of existing stock and a strategy for maintaining this register is likely to involve collaboration across a range of entities and government agencies, including the Real Estate Institute of Australia, Livable Housing Australia, the NDIS, the Summer Foundation, state work and accident compensation schemes, large developers, access consultants and State/Territory Governments. A logical starting point for the development of a register is a pilot in a local government area or jurisdiction that is proactive regarding accessible housing, using the existing infrastructure provided by the Housing Hub and/or Nest matching platforms.

About the Summer Foundation

The Summer Foundation works to change human service policies and practices related to young people (18-64 years old) living in, or at risk of entering Residential Aged Care (RAC) facilities.

Our vision is that young people with disability and complex support needs will have access to services and housing that supports their health and wellbeing and a good life in the community.

We are committed to working with governments and other stakeholders towards achieving accessible and affordable housing for young people with disabilities and complex support needs.

We are also committed to working to ensure that the NDIS and other state and government policy initiatives fulfill their potential to end the forced admission of young people with disabilities into RAC.

Our response to the Consultation Regulatory Impact Statement is focused on accessible housing issues for people with complex disability support needs. We recognise however, that universal housing design will benefit the entire Australian community, especially the ageing population.

Appendix 1

[View Preliminary findings: Audit of accessible features in new build house plans](#)