

The Committee Secretary  
Inquiry into Housing and Rental Affordability  
Standing Committee on Economy and Gender and Economic Equality  
ACT Legislative Assembly, GPO Box 1020, Canberra ACT 2601  
[LACommitteeEGEE@parliament.act.gov.au](mailto:LACommitteeEGEE@parliament.act.gov.au)

Dear Committee Secretary

### **Inquiry into Housing and Rental Affordability**

I am writing on behalf of Advocacy for Inclusion (AFI) to make a submission to the Inquiry into Housing and Rental Affordability by the Standing Committee on Economy and Gender and Economic Equality.

AFI provides independent individual, self and systemic advocacy for people with disabilities. We are a Disabled Peoples Organisation (DPO) which means most of our board, members and staff are people with disabilities. We represent people with disabilities nationally from the ACT in our policy work.

Issues of affordability and accessibility are linked for the group of people we represent and should be joined in policy responses. There is a shortage of housing with features such as wider doorways, ground level entries, accessible bathrooms and other basic features.

People with disability are often on low incomes and face the dual challenge of locating housing which is affordable to people on modest incomes including Jobseeker, the Disability Support Pension (DPS) and low wages on top of a lack of appropriate built form.

In relation to vacancies we are not convinced that changes in vacancy settings are likely to improve the situation of people with disabilities in housing and the availability of affordable and accessible housing.

While there may be some accessible housing in under occupied dwellings or in dwellings left vacant what is most needed is new, fit for purpose affordable and accessible rental housing in Canberra that is available to people on DSP earning under \$450 a week without experiencing housing stress.

This requires a response through public and social housing although we welcome efforts to grow accessible private rental housing.

Our understanding is that the scope of the inquiry relates to vacant *unoccupied* housing and commercial properties rather than under-occupied properties, however there has been consideration in the past given to addressing under occupied housing and these need to be considered with care.

People with disabilities may live in homes that appear to be under occupied but are not actually under occupied given the circumstances of residents. This includes single people in homes with larger rooms or extra bedrooms in order to allow for wider turning circles for people in wheelchairs or walkers, overnight stays by carers or the storage of equipment.

Downsizing from larger housing as people age can be difficult due to logistical, financial, emotional and other factors which make moving home challenging and stressful. Larger housing may be appropriate for some people. Work in this area needs to be based on incentives and support and we would not support any kind of levy made against people in *under* occupied housing.

In relation to the broader issues of affordable and accessible housing under item (G) of the Inquiries terms of reference, AFI notes that we have a housing crisis in Canberra which is acutely experienced by people with disability.

The evidence for this is:

- The lack of suitable housing now forms a growing and complex area of advocacy in AFI's advocacy intake work with people with disability in Canberra. Issues include: people with disability living in rental housing which is no longer affordable or accessible, long wait lists for accessible public housing and maintenance and quality issues with housing,
- Research by the Australian Government indicates that 60% of people with disability live in housing that is not suitable for them
- Surveys like the rental affordability snapshot by Anglicare consistently show that housing which is affordable to people on Disability Support Pension is less than 1% of the market share.
- There is demonstrated market failure in the supply of accessible housing – the previous voluntary approach has been ineffective. The Australian Network on Universal Housing Design calculated that, using the market-capacity approach, basic accessibility was achieved in less than 5% of new housing across Australia<sup>1</sup>
- When combined with the need for accessible built form there is almost no rental – outside of social and public housing – which is available to people with disabilities.

In order to address this we support the following actions

- The new ACT Planning system should prioritise the development and construction of affordable and accessible housing at scale within greenfields and brownfields development.
- The ACT should progress work by the Building Reform team within the ACT Government to review the current provisions in the ACT planning laws requirements to ensure all new housing in the ACT complies with minimum accessibility standards for residential housing and apartments in the National Construction Code 2022 based on the Liveable Housing Design Guidelines silver standards. The accessible housing provisions include new livable housing requirements for Class 1a buildings (houses and townhouses) and Class 2 sole-occupancy units (individual apartments) which put in place features based on the LHDG silver standard, with a voluntary gold standard also available for features beyond this. The ACT should implement the silver standard and seek to foster and encourage more housing development which meets the Gold Standard.
- Accessibility should be prioritised within the Indicative Land Release Program commitment to a 15% minimum target for social and affordable housing.

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<sup>1</sup> <https://aduhdblog.files.wordpress.com/2021/09/inquiry-into-affordable-housing-anuhd.pdf>

- AFI supports a focus on growing public housing and ensuring this is available, accessible and well maintained with proximity to transport, commercial centres and services.
- We support the range of recommendations made by ACTCOSS to increase the delivery of community housing run by not for profit housing providers. The focus should be on creating more affordable and accessible housing which enables people to live independently in the community rather than group housing or congregate settings.
- There should be a package of market development work to encourage accessible private rental focussing on championing the need for the real estate sector (including entry level 'mum and dad' investor landlords) to play a more socially responsive role in addressing the increased barriers faced by people with disability to access appropriate, affordable rental housing.
- This should be twinned with a measures to foster more socially responsible, sector-wide leasehold application processes. Features of this would include
  - Better identification of rental housing that is suitable for people with disability. This would include, but extend beyond the legislated requirement to advertise adaptable housing dwellings in accordance with Residential Tenancies Act 1997 Section 11AAA Adaptable housing – advertising.
  - Better housing rental application processes that support applicants with disability; and
  - Provision of longer term housing leaseholds, suitable for NDIS-funded home modifications where appropriate.
- We also support proposals by Rights and Inclusion Australia to develop a comprehensive, detailed overview of unmet housing needs for people with disability of all ages to inform supply

This submission is also endorsed by Rights and Inclusion Australia. Thank you for considering our contributions and please feel free to contact us via AFI Head of Policy Craig Wallace on 0477 200 755

Best regards

(Sent by email)

**Nick Lawler**

Chief Executive Officer

Advocacy for Inclusion

29 July 2022