



# Lane Cove Council

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Submission No 129

30 March 2009

The Secretary,  
House of Representatives Standing Committee on  
Legal and Constitutional Affairs,  
PO Box 6021,  
Parliament House,  
CANBERRA ACT 2600

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BY: LACK

Dear Sir or Madam,

## RE: DRAFT DISABILITY (ACCESS TO PREMISES - BUILDINGS) STANDARDS

Lane Cove Council appreciates the opportunity to make the following comments on the Draft Disability (Access to Premises - Buildings) Standards 2009.

### 1. Residential flat buildings

Council is concerned that the Premises Standards do not apply to Class 2 buildings (residential flat buildings) although these buildings will continue to be subject to the general provisions of the DDA.

This is of particular importance in view of the residential growth planned for Sydney under the Department of Planning's Metropolitan Strategy. In Lane Cove Council alone, 2,700 new dwellings, principally residential flats, are to be provided by 2021.

A valuable opportunity is presented by the review of the Standards to clarify and improve the regulation of access in advance of this substantial future development of residential flats across the region.

### 2. Parts of buildings to be accessible

Council has recently undertaken a review of its Access Development Control Plan, and awaits the finalisation of the Access to Premises Standards in order to complete the process.

Various options relating to the parts of residential flats to be accessible were discussed during this review by Council with the Lane Cove Access Committee (which includes representatives of disability organisations and a former officer with the NSW Department of Housing).

**The Lane Cove Access Committee recommended that 20% of all residential flats should be adaptable**, given that the Lane Cove has a comparatively high population aged over 60 years of age (although this

proposal has not to date been submitted by staff to Council for formal endorsement, pending this review).

Furthermore, the ability of wheelchair-users to purchase adaptable housing depends on a relatively high proportion of adaptable dwellings being available within the market at any one time.

In cases where housing affordability is impacted by the cost burden of requiring wheelchair accessibility, **Council requests that “visitable” housing at least be required for a high proportion of new flats**, preferably 100% - that is, wheelchair access into the unit and to the living room and bathroom.

This approach recognises that the larger dimensions of a fully adaptable flat may reduce its housing affordability since, for design efficiency, the ground floor building footprint is generally repeated in all floors above. It acknowledges that, whilst a relatively small proportion of the population use wheelchairs and requires fully adaptable housing, it is nevertheless an important goal for social connectivity that all Australians should be able to visit all dwellings.

Council is aware of the submissions which will have been made by specialist organisations, such as the Australian Federation of Disability Organisations and Physical Disability Council of NSW and others, and does not seek to duplicate the issues which they raise other than those outlined above.

Thank you for your attention to Council’s submission on this important matter.

Yours faithfully,

Peter Brown,  
**General Manager**