

Submission on Review of the Building Code – September 2007

The New Zealand Association of Occupational Therapists (NZAOT) believes that in accepting the premise that universal design principles should be issued as guidelines rather than code requirements and backing down from accessibility for all, the Department of Building and Housing (DBH) is departing from the visionary and innovative focus of exciting new aspects of the proposed update to the Code.

New Zealand risks falling 20 or more years behind its counterparts with regards to accessibility and universal design, while being at the forefront of design in 'sustainability' and 'light in connection to the 'outdoors'. As discussed in the NZAOT's 2006 submission on the review of the Building Code¹, universal design can be completed for a nominal extra cost, and yet it would save up to tens of thousands in later alteration. While the 'design furniture' standard is likely to achieve the DBH's goal of being non-prescriptive, it does not go far enough in ensuring accessibility for all.

Dwelling design in New Zealand is increasingly open plan increasing the likelihood of accessibility in living areas of the home. Unfortunately the design furniture standard is unlikely to guarantee this: designers could rightly argue that no one need shift large pieces of furniture into the toilet, bathroom or laundry. These are areas in the existing housing stock that are constantly in need of modification due to their confined spaces and lack of usability.

Rather than the 2007 Consultation Document's suggestion of issuing guidelines, the Building Code itself must include simple solutions to later needs such as inclusion of multiple dwangs in the bathroom, toilet and anywhere with steps to allow safe installation of rails at a later time. Such solutions will reduce the risk of many injuries over time, removing the cost of healthcare to ACC and the social and emotional cost of injuries to individuals and their families.

NZAOT invites the DBH to cost out the outcome of providing versus not providing accessibility and universal design for new dwellings. Factors to consider include:

- Housing modifications budget – MoH, ACC, HNZ
- Healthcare cost at all levels – primary, secondary and tertiary (MoH, ACC, individual)
 - GPs
 - District nursing
 - Allied health – occupational therapists, physiotherapists, etc
 - Pharmacy costs
 - Emergency, acute and rehabilitation hospital stays
 - Rest home and hospital level care
 - Equipment provision (ramps, rails, commode chairs, etc)

¹ Please note that the NZAOT's September 2007 submission document on the review of the Building Code is intended to be read in conjunction with the NZAOT's August 2006 submission, which provided greater detail of issues arising from the current Building Code and proposals for change (attached).

- Sundry costs, such as ambulance or fire staff to assist shifting people in and out of difficult to access homes

NZAOT is confident that the DBH will find that the cost of not providing accessibility far outweighs the costs involved in designing accessible and universally designed homes. It is also worth noting that the government's current strategy is to allow people to remain in their own home for as long as possible – *Aging in Place*. By not aiming for accessibility and universal design, the DBH is inconsistent with our government's policy.

There is another cost to consider. The social and emotional toll on many in need of housing modifications is enormous. Many people find themselves stuck inside a dwelling, unable to leave except in an emergency or for crucial appointments with ambulance or fire service assistance – prisoners in their own home. Others cannot access their own amenities, which can be mentally and physically stressful. The housing modifications process takes time, often many months, to plan, gain acceptance from all parties, have the builders start then complete the work.

To add to this, New Zealand is facing a crisis in the Occupational Therapy workforce. Occupational Therapists are on Long Term Skill Shortage List. The projection is that this will only get worse. The already large waiting lists in some areas will extend much further, increasing the time that people must wait to see an Occupational Therapist not just for assessment for housing modifications, but for the equipment necessary to tide them over till housing modifications could be completed. Having the beginnings of a housing stock that requires minimal intervention from Occupational Therapists would reduce costs to the state (and therefore taxpayers), not least the time needed for an Occupational Therapist to be involved.

NZAOT endorses the submission made by Susan Lennie of Life Unlimited as regards Hearing accessibility.

NZAOT hopes that the DBH will take the position of expecting all new buildings to be fully accessible to all people by stating this in the Building Code.

Where it is impossible to gain full accessibility, an access statement to justify exclusion would be mandatory. However, these exceptions should not be built in such a way that they preclude later advances in technology which would allow access, i.e. a building that would be difficult to enter for someone in a wheelchair or with a baby stroller should still have accessible toilets, bathrooms etc. Accessibility and universal design may reduce aspects of the future workload of the building industry, and NZAOT would urge that the DBH does not give this consideration priority over the physical, social and emotional well-being of the New Zealand population.

The NZAOT would also like to ensure that builders and designers don't state that a space is accessible when it is not, such as the example cited in the

NZAOT's 2006 submission on the review of the Building Code, where a wet area shower was installed with a threshold step.

New Zealand needs one compliance document that provides standards for accessibility for all buildings for people with disabilities.

This would eliminate conflict between compliance documents and ensure that people with disabilities are able to access all buildings (those with Access Statements aside). NZS 4121 would be the best starting point. As noted in the NZAOT's 2006 submission, this requires an urgent review to both update it and incorporate aspects of other compliance documents. NZAOT has stated that it would like to be included in any review of NZS 4121 and eagerly awaits a timetable for its review. NZAOT also believes that NZS 4121 should be free to all.

The DBH would be well aware of the United Kingdom's Building Code and its successes in the areas of accessibility for all and universal design. Let's join with the United Kingdom and ensure that our new housing and building stock is prepared for the future.

The NZAOT is keen to be involved at all stages of proposals to change the Code and Compliance Documents.

Thank you for the opportunity to comment.

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On behalf of the New Zealand Association of Occupational Therapists
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