

Response to ABCB Accessible Housing Options Paper

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Executive summary

Housing resides in a complex policy landscape. This Options Paper provides a start but is not adequate to frame the issues for subsequent assessment in a regulatory impact assessment. The Options Paper has:

- Not demonstrated sound underpinning knowledge of the economic and social role of housing in society and therefore cannot assess the real-world impact.
- Overstated 'considerations' as problems to overcome, due to lack of context.
- Incomplete information that misrepresents the issues.
- Pre-judged the outcomes and placed excess emphasis on costs of retro-fitting, rather than presenting a broad list of costs and benefits. This premature costing information is misleading (due to lack of context and its questionable methodology).
- Not acknowledged that different techniques can be used to measure costs and benefits, such as use of stated preference and revealed question techniques. These should be developed to assist quantification/assessment.
- Consultation response questions that are based on ill-defined objectives, poor methodology, and incomplete information.

Additionally, nine specific issues emerged from the document review:

1. The Options Paper uses the term 'accessible' differently to the existing NCC defined term.
2. The LHA terms/meanings of '*Livable home*' should be used to define the objectives of a future Regulatory Impact Assessment.
3. The Options Paper under-states policy commitments under the National Disability Strategy.
4. **Ageing and disability are not aspirational** and therefore 'market demand' is not a reliable measure. Society's demand/need should be assessed through stated preferences or revealed preferences.
5. An objective was not provided in the Options Paper. An objective should be provided for people to respond to, including properly defined terms.
6. The Options Paper has not followed Best Practice Consultation Guidance Note 2016, Office of Best Practice Regulation, Department of the Prime Minister and Cabinet. It has a flawed methodology from which a *rigorous rationale* cannot be obtained.
7. The Options Paper does not explain the difference between Silver and Gold LHA design guidelines. Understanding these differences is crucial to determine who will benefit, the level of accessibility/livability. Meaningful metrics should identify who benefits and the associated costs.
8. The QS methodology should be questioned and challenged. Including:
 - a. 'Standard practice' should be defined.
 - b. 'Estimate proportion of market' - should be changed to use actual ABS data on dwellings structures.
 - c. Value of /m² lost to other uses, makes sweeping generalisations:
 - i. It assumes that extra floor space will be required.
 - ii. Assumes that there is a cost for this 'space', even if the footprint and amenity of the dwelling has not been altered. If there is no loss, there is no cost.
 - iii. Uses composite rates, which will overstate the cost for bathrooms.
9. The QS figures and weightings in the weighted average cost scenarios for Class 1 and 2 buildings do not stand basic scrutiny.

Introduction

This response has been prepared by Dr Penny Galbraith FAIB FRICS. Penny is a builder, project manager and access consultant, who is currently a Subject Matter Expert for the Australian Building Codes Board (ABCB) and a Director for the Centre for Universal Design Australia (CUDA).

This document is a response to the Consultation on the ABCB's Accessible Housing Options Paper (Options Paper). In preparing this response, the policy, statistical and compliance context for housing has been considered alongside Office of Best Practice Regulation Guidelines. This provides the necessary background for the review of the Options Paper. The next section reviews the Options Paper following the headings and layout, for ease of reference. Lastly, Appendix 1 includes a completed alternative response questionnaire.

Housing in context

Policy

- Housing resides within a complex policy landscape.
- Taxation can represent 30% cost of a new dwelling; (up to 40% in Sydney).¹
- Housing is an important part of the nation's infrastructure.²
- Housing represents 6% of GDP.³
- The economic imperative of a whole-of-system housing policy framework is clearly expressed in tax reform and economics committee papers.⁴
- Most new housing supply is being provided in the upper price ranges.⁵
- Housing policy, specifically standards, lags other aligned policy areas, such as public buildings, transport, provision of essential services (NDIS).
- 'Livable homes' will have reduced functional obsolescence and increased service life.⁶
- Sustainability of the housing industry and homes can be improved if homes have increased service life.⁷
- For a home lasting 50 years, the embodied energy can represent about 30% of all energy used. Increased service life will improve energy productivity.^{6 8}
- Forecast demographic changes between 2015-54 include: Population increase from 23.9 million to 39.7 million; number of Australians aged >65 will more than double; cost of residential aged care will increase from 0.9% GDP to 1.7% GDP.⁹

Australian Bureau of Statistics

All data from Australian Bureau of statistics Census 2016 and Australian Bureau of Statistics, 4430.0 – Disability, Ageing and Carers, Australia: Summary of Findings (2015)¹⁰

- Over 1/3rd of Australian households contain a person with a disability.
- 45% of all Australian households contain a person with a long term health condition.
- 1 in 5 of Australians reported living with a disability; mostly a physical condition.
- 40% of the population either identify with disability or have a long-term health condition, such as arthritis or back problems.

- 71% of all dwelling structures are separate houses.
- 83% of dwellings are NCC class 1.
- The average Australian home has 3.1 bedrooms across all dwelling structures.
- and 2– person households are the most likely to rent.
- Nearly half of all semi-detached, row houses, townhouses etc are rented (49%).
- Almost 2/3rds of all flats or apartments are rented (69%, 66%, 63% respectively) - 3 times the level of rental for separate homes.
- Lone person households are projected to increase from 2.1 million households in 2011, to 3.3 million in 2036.
- 60% of lone person households comprise people aged 15-65.
- 46.6% of people with a disability were not in the workforce compared with 16.8% for people without a disability; nearly 3 times.
- Median incomes of people with disability are less than half of those with no reported disability.
- The likelihood of living with disability increases with age.

Compliance

- State, Territory and local Governments have responded to the policy context through planning requirements for access and mobility, with resulting cost to industry from inefficiencies designing to multiple standards.
- No register of where livable/adaptable dwellings are located.
- Designers and product manufacturers have already responded to standards for other building types and the industry has a knowledge base that can be applied to the housing sector.
- Main costs to housing industry will be in changes to documentation and initially, site supervision.
- Some design features in LHA Gold level are cost neutral and should be considered for inclusion as they will benefit all users.
- Silver design does not allow for independent dignified use of a toilet.¹¹
- Silver and Gold design standards confer different degrees of benefit which requires careful consideration to optimise cost/benefit.
- The likely construction cost of applying Silver or Gold standards will be insignificant compared to the tax component (30%) cost of a new dwelling.¹

Office for Best Practice Regulation

The Options Paper alludes to the next steps at the end of the document. It is really helpful though, to understand what might be needed later, in order to help shape the options and to ensure the right questions are asked now.

Best Practice Consultation Guidance Note 2016, OBPR, Department of the Prime Minister states:

*'A genuine consultation process ensures that you have considered the **real-world** impact of your policy options. This is likely to lead to better outcomes and greater acceptance in the community, particularly among any stakeholders who may be adversely affected by the policy.'*

*'**Information provided** to stakeholders **should be easy for them to comprehend**. It should be in an easily understandable format, use plain language and **clarify the key issues**, particularly if the proposed regulation addresses **complex subject matter**. Written consultation documents should include summaries to allow those consulted to quickly assess whether the material is relevant to them and whether they need to read further.....'*

*'You should **explain the objectives** of the consultation and the **context** for it.'*

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An important part of a Regulatory Impact Assessment, is the cost benefit analysis (CBA) to ensure that proposed regulations will confer a net benefit to society. Office for Best Practice Regulation, Department of Prime Minister and Cabinet, Cost Benefit Analysis Guidance Note 2016, states:

'Conducting a well-executed CBA requires you to follow a logical sequence of nine steps. [The first four are applicable]

Step 1: Specify the set of options

- *Identify a range of genuine, viable, alternative policy options to be analysed.*

Step 2: Decide whose costs and benefits count

- *'as far as is practical, you should count the costs and benefits to all people residing in Australia.'*

Step 3: Identify the impacts and select measurement indicators

- *Identify the **full range of impacts** of each of the options. It is important to **identify the incremental costs and benefits for each option**, relative to the base case,*
- *All the effects of a proposal that are considered desirable by those affected are benefits; all undesirable effects are costs. CBA requires you to **identify explicitly** the ways in which the proposal makes individuals better or worse off.*

Step 4: Predict the impacts over the life of the proposed regulation

- *The impacts should be quantified for each time period over the life of the proposed regulation.*
- *The total period needs to be long enough to capture all the potential costs and benefits*
- *Because of the uncertainty involved in forecasting costs and benefits over long periods, exercise caution when adopting an evaluation period longer than, say, 20 years (although some environmental regulation may merit the use of a longer time horizon).'¹³*

The Guidance Note also cautions against **'Downplaying or ignoring non-financial social costs and benefits, stating:**

*'Regulatory proposals differ considerably in the ease and accuracy with which the prospective costs and benefits can be quantified. Although CBA places emphasis on valuing costs and benefits in monetary terms, it is important that the RIS process **is not biased** in favour of those proposals **with impacts that are relatively easy to value**. You should take care to ensure that monetised impacts **do not overshadow other important factors** in decision making.'*

The Government guideline continues to address potential difficulties:

'Costs and benefits can be difficult to value in dollars because their magnitude may be unknown or uncertain, or because they are difficult to express in money terms even if their impact is known. Examples include environmental, social and cultural considerations, regional impacts, health and safety, publicity, and national defence.'

*'It is important that you **identify and describe all costs and benefits**. You should then **quantify them as much as possible**. When valuations are uncertain, **sensitivity analysis** should be used to test how varying the value assigned affects the overall viability of the proposal. If the impacts cannot be valued, they **should still be quantified in non-monetary terms**.'*

Where impacts **cannot be valued**, the **reasons** why that is the case should be **set out clearly**.' The Guideline suggests 2 methods for dealing with hard to quantify costs/benefits.

1. Revealed preference

Eg ' Regulations that aim to reduce the probability of a negative event occurring can be valued by analysing the expense to which individuals previously went to avoid the event.'

2. Stated preference

'For example, people might be willing to preserve a wilderness area because they place value on knowing that some natural habitat exists for rare animal species.'

Accessible / livable housing has costs and benefits that may be hard to quantify in monetary terms. Here are some examples of revealed preference questions:

- What are the avoided costs of residential aged care?
- What are the avoided costs of slip/trips/falls in the home?
- What are the avoided costs of functional obsolescence of the dwelling?
- What are the avoided costs of lost embodied energy/lost energy productivity?
- What are the avoided costs of relocation/moving?
- What is the cost to Australia's productivity from people with disability being 3 x more likely to be unemployed than employed, as attributable to lack of suitable housing close to employment?
- What are the avoided costs of home modifications?

- What is the value of improved health outcomes from getting people home from hospital sooner? (after trauma or illness?)
- What is the avoided cost of inconsistent regulations between planning and NCC?

Here are some examples of stated preference questions that could be asked:

- How important is it to you that all Australians should be able to live where and with whom they choose?
- How willing are you to ensure new housing has minimal environmental impact to ensure the long-term viability and sustainability of Australia's industrial resources?
- How important is it to ensure you/your older relatives can stay at home when you/your relatives get older, rather than go to a facility?
- How important to you is excellence in construction of housing?
- How important is it to ensure that there are enough homes for all Australians as our population increases/ages?
- How important is it that the housing industry continually improves practices and techniques?
- How important is it for you to be able to return home promptly after a hospital stay?
- How important is it for you to be able to adapt your home at minimal cost, as life changes?
- How important is it to you that housing forms part of a sustainable infrastructure for the benefit of you, your family, children; grandchildren; the environment?
- How important is it to have a consistent set of technical codes and regulations for housing?

ABCB Options Paper Review

Introduction page 4

The ABCB states that the Accessible Housing Options Paper has been developed by ABCB to provide a preliminary menu of options and costings, on possible inclusion of a minimum accessibility standard for housing in the NCC, and that.

'The NCC provides the minimum necessary requirements for:

- *safety and health,*
- *amenity and accessibility, and*
- *sustainability*

In the design, construction, performance and livability of new buildings.'

ABCB remind us that:

*'As with any other potential change to the NCC, a minimum accessibility standard for housing must be underpinned by a **rigorously tested rationale**, be **effective and proportional** to the issue, and must **generate a net societal benefit**.'*

The Options Paper introductions includes some definitions:

'Accessible housing is any housing that includes features that enable use by people either with a disability or transitioning through their life stages.

Other similar (but not identical) terms include 'visitable', 'adaptable', 'livable' and 'universal'.

For simplicity, the term 'accessible' will be used generically throughout this Options Paper.'

Issue 1

The definition of 'accessible housing' seems reasonable. However, this term is not used elsewhere in the Options Paper. Instead, the term 'accessible' is used as an umbrella term to include other terms such as 'visitable', 'adaptable', 'livable' and 'universal'. However, using the word 'accessible' as an umbrella term for 'visitable', 'adaptable', 'livable', and 'universal', is arguably flawed because they are not the same.

- 'Accessible' is not 'visitable'.
- 'Livable' and 'universal' may have accessible features, but not necessarily, for example stairs are not considered 'accessible'.

Later in the Options Paper, a definition of 'accessible' is sought. However, the NCC already has a definition of accessible. **NCC 2016 - 'Accessible means having features to enable use by people with a disability.'**

Should this current term 'accessible' be changed? Should we have a new term? The term 'accessible' means many things to many people, depending on their perspective. Some see it in the literal sense of being accessible; others relate it strongly to disability.

The Building Ministers Forum communique to instruct an RIA states:

*'The BMF, in consultation with Disability Ministers, will undertake a national Regulatory Impact Assessment (RIA) regarding accessible housing for private residences. The RIA will examine the silver and gold performance levels as options for a minimum accessible standard; use a sensitivity approach; and be informed by appropriate case studies.'*¹⁴

Can definitions in LHA design guide help?

Issue 2

LHA design guidelines are based around universal design principles and 'livability', not solely 'accessibility'. Livable Housing Australia has the strap line: *'Championing safer, more comfortable and easier to access homes for everybody, everyday, at all stages of life.'*

What is Livable Housing Design? LHA states: *'A livable home is designed and built to meet the changing needs of occupants across their lifetime.'*

'Livable homes include key easy living features that make them easier and safer to use for all occupants including: people with disability, ageing Australians, people with temporary injuries, and families with young children.'

'A livable home is designed to:

- be easy to enter*
- be easy to navigate in and around*
- be capable of easy and cost-effective adaptation, and*
- be responsive to the changing needs of home occupants.'*¹⁵

Some key words include: **easier and safer to use**. The LHA term **'livable home'** includes the NCC 2016 definition of 'accessibility' as well as other aspects of the NCC, such as **amenity, safety and livability**. The **benefits** from **all** these attributes will confer to a large group of households and the people within. Using the term 'livable home' meets the Building Ministers Forum requirement of 'accessible home' as well as reflecting suggested LHA design guidelines.

LHA terms/meanings of *'Livable home'* should be used to define the objectives of a future Regulatory Impact Assessment.

Current situation page 6

The Options paper describes the current situation regarding the provision of 'accessibility' features with reference to:

- National Construction Code for Class 1 (houses) and 2 (apartments)
- Application of State/Territory regulations
 - NSW
 - Vic
 - ACT
- Role of NDIS

Regarding the NDIS, the Options Paper states:

*'At a Commonwealth level, the National Disability Insurance Scheme (NDIS) provides housing support to its participants through funding modifications to their own home or private rental property, and on a case-by-case basis in social housing. As at 30 September 2017, **there were 112,785 participants in the NDIS**, although the proportion of this group that accessed support for home modifications and the **nature of the modifications provided is not known.**'*

The role of NDIS and housing is therefore unclear.

Reference to the National Disability Strategy is relevant as the Regulatory Impact Assessment (RIA) will be undertaken in consultation with Disability Ministers through the Disability Reform council.

National Disability Strategy page 7

The background of the National Disability Strategy (NDS) in the Options Paper, seems rather limited in its focus on social housing and reference to the 'aspirational' target of an agreed universal design standard by 2020.

The Options paper has understated the extent of commitments made under the NDS. For example: The NDS notes that Australia's performance in areas such as health, education, employment support, housing and income support lags well behind achievements for the rest of the population. The Strategy *'identifies and will monitor action to ensure that mainstream service systems and **regulatory frameworks such as building codes become part of the solution** to overcoming barriers for people with disability.'*¹⁶

This policy states that the building code should become part of the solution. The NDS also follows UNCRPD Article 3 principles. The policies and practices developed by governments under this Strategy, including in mainstream areas, include, *inter alia*:

“Universal approach—products, services, environments and communities are accessible and usable by all people to the greatest extent possible without the need for specialised modification.”

“Life course approach—takes into account a person's likely needs and aspirations over their lifetime, paying particular attention to milestones and times of transition.”¹⁷

In NDS, Policy area 1 - Inclusive and accessible communities, the stated outcome of this policy is:

'People with disability live in accessible and well-designed communities with opportunity for full inclusion in social, economic, sporting and cultural life.' It continues, *“A key first step in removing these barriers is to incorporate **universal design** into the design and build of community resources, from parks to **houses**, to shopping centres and sporting arenas.'*¹⁸

Taking a **universal approach** to housing ensures that homes are as useable to the greatest extent possible, by all people, without the need for specialised modification. These benefits extend to the whole community as part of our social infrastructure.

In this policy area, there are 3 (out of 5) policy directions that are directly attributable to housing:

Policy Direction 1 - Increased participation of people with disability, their families and carers in the social, cultural, religious, recreational and sporting life of the community.’

'Policy Direction 2 - Improved accessibility of the built and natural environment through planning and regulatory systems, maximising the participation and inclusion of every member of the community.'

*'Policy Direction 3 - Improved provision of accessible and well-designed housing with choice for people with disability about where they live.'*¹⁹

The policy commitments under the NDS emphasise a universal and life course approach and this should inform the scope of an RIA and any definitions used.

Issue 3

The Options Paper under-states the current policy commitments under the National Disability Strategy.

Identifying the problem page 10-12

The Options Paper starts by saying that this section will articulate how the nature and extent of the problem needs to be identified, having regard to the available evidence. It then notes that their discussion of the problem is not definitive. Evidence referred to includes:

- *Victorian RIS (2010)*
- *ANUHD Survey*
- *Smith Rayer and Smith research (2008, 2011) (USA)*
 - a 60% probability that a newly built single-family detached unit will house at least one person with a disability (defined as mobility impairments) during its expected lifetime. If visitors are taken into account, the figure rises to 91%.

There is no reference to Australian Bureau of Statistics data on households or other data.

This section is concluded with the words: *'Therefore, it will be critical for a future RIS, in considering the introduction of an accessibility standard for housing in the NCC, to be able to articulate the level of unmet demand for accessibility features.'*

Issue 4

How is 'demand' defined? Unmet demand or need?

Demand implies this 'problem' is a market orientated issue, eg 'there is no demand for my product'. Need is a necessity.

Market-based demand is problematic because **ageing and disability are not aspirational**. Whereas purchasing a home is aspirational; the entertaining deck; the stone bench tops; the media room; dual vanities; place for the boat...; all aspirational. People do not aspire to be old, frail or disabled, and most people don't believe it will happen to them. Market demand for 'accessible/liveable' features is not a reliable measure of the need for these features in dwellings.

Arguably, the demand is Australia's need, and is a necessity. The Housing Industry Association in their paper on Affordable Housing state:

*' Access to shelter is a basic human need and is critical to allow all Australians to participate in society to their full economic and social potential.'*¹

The Centre for Economic Development Australia (CEDA)²⁰ reminds us that 'household' is the appropriate economic unit and the ABS data shows that as many as 8 in 10 households will benefit from accessible/liveable housing features, see table 1. This in itself **is evidence of demand/need**.

Table 1 Comparison of individuals and households with a person with a disability and/or a long-term health condition

Australian Bureau of Statistics 2015¹⁰	Individuals	Households
Identify with a disability	18.3%	35.9%
Have long term health condition	22.1%	45.2%
TOTAL Maximum	40.4%	81.1%*

* There may be overlap in households.

Further evidence of Australia's needs can be found in multiple policies, see above, including population growth and more than doubling of people aged over 65.. With reference to the Office of Best Practice Regulation Guidance, a series of stated preference and revealed preference questions should be developed to measure 'demand' or need.

[Objective page 13-14](#)

This section of the Options Paper states: *'the definition of the objective will influence the proposed level of specification and extent to which it should be applied.'* This includes:

- Clear definition of accessibility
- Identify essential accessibility features rather than desirable or best practice

And achieves positive cost benefit *'To **home buyers** and the community'*

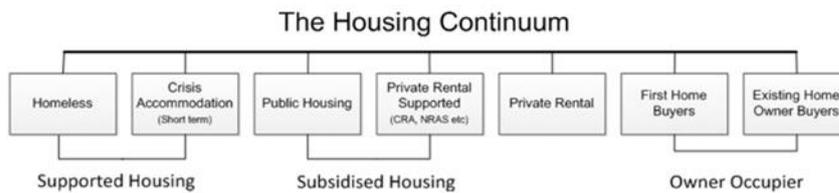
Surely this should just be a benefit to all Australians without differentiating home buyers and community? **Who are 'the community'? Are home buyers the only people who reside in dwellings?** Step 2 of the Cost Benefit Analysis Guidance Note (2016) states: *'As far as is practical, you should count the costs and benefits to all people residing in Australia.'*

This may be drafting, but potentially shows lack of understanding of:

- The housing continuum, figure 1 below, and
- Role of a home and housing in a productive society

Is the ABCB representing the housing industry? Or the interests of people residing in Australia? Further, this section **does not provide an objective for consideration, nor the context for it.** Despite this an objective is stated in the consultation questions.

Figure 1 HIA Housing continuum



The Options Paper states a key issue:

*'a decision must be made on the **extent of accessibility** to be addressed — whether this is primarily related to **mobility** or encompasses a broader scope of accessibility issues.'* It continues:

'On the basis of the BMF direction that the LHDG Silver and Gold level specifications should be considered as two possible options for a minimum accessibility standard, ¹⁴ addressing mobility-related issues is the primary objective.'

The NCC definition of 'accessible' does not distinguish between what type of disability. The LHA term 'livable housing' does not distinguish between particular disabilities. If a life course, universal design approach is taken, the majority of all people will benefit and designs will be mainstream, improving safety, health, amenity, accessibility, and sustainability.

Issue 5

An objective should be provided for people to respond to, including a properly defined term (see earlier). This is important to ensure a properly tested rationale, determine appropriate costs and benefits for society, and ensures the right questions are asked.

An accessibility standard for housing pg 15-16

The Options Paper scope uses the term single dwellings to cover all Class 1, multi-storey residential apartments to cover Class 2, and Class 1b and 4 are specifically excluded.

The Options Paper policy parameters are stated as

'Policy Parameters for analysis of minimum necessary accessibility standard:

- *Safety and health;*
- *Amenity and accessibility;*
- *Sustainability*
- *And the min technical requirements*
- *Other relevant policies*

'Other relevant policies incl:

- *National Disability Strategy (NDS)*
- *Ageing in place*
- *Reduced social isolation;*
- *Reducing costs of specialist accommodation'*

The importance of sustainability, safety, health, and amenity is acknowledged here, but does not translate into any other parts of the Options Paper. All these parameters are affected by housing standards.

There are other policies that are impacted by housing and housing standards, such as:

- Affordable housing
- Energy Productivity
- Productivity Commission reports
- Intergenerational Reports and forecast demographics
- Smart Cities

Assessment of costs and benefits

The Options Paper has decided that: *'The primary benefits from an increase in accessible housing are avoided costs of adapting housing for future occupants.'* This would seem to be pre-judging the data and potentially skewing the options and costings put forward. Of course avoided retro-fitting is important, but as 0.9% of Australia's GDP is spent on residential aged care, this is likely to be a big-ticket item too, particularly, delayed entry/avoided costs/health outcomes.

'Consideration of the benefits of accessible housing will also take into account social benefits, such as reducing social isolation, ability to age in the community, independent living and averted pressure on specialist housing.'

The Options Paper says these items will be assessed as part of the Regulatory Impact Statement.

The Options paper approach is at odds with the Government Best Practice Guidance on Regulation and Cost Benefit Analysis as well as making a common mistake, ie over stating the importance of easy to measure items as compared with other benefits/costs.

It is recommended that revealed preference and stated preference techniques are used to identify costs and benefits of proposed regulation, as housing is complex.

Issue 6

- The Options paper has potentially pre-judged the outcome of the process and emphasised the avoided cost of retro-fitting.
- The range of potential costs listed is limited.
- The range of potential benefits listed is limited, and only a short list has been added to the response questionnaire.

The Options Paper has not followed Best Practice Guidelines, which require as many costs/benefits to be identified as possible. Thus, it has a flawed methodology from which a *rigorous rationale* cannot be obtained.

Possible options for NCC amendment

The Options Paper provides a reminder that *“Under the COAG Principles, any proposed solution must be efficient and effective”* and that this is different to desirable or best practice.

3 options are proposed:

- Option 1 – LHDG Silver Level (5 Elements).
- Option 2 – LHDG Silver Level (7 Elements).
- Option 3 – LHDG Gold Level (12 Elements).

Issue 7

The Options Paper does not explain what the difference is between Silver and Gold LHA design guidelines. Not even in the appendices. Understanding these differences is crucial to determine who will benefit, the level of accessibility/livability; ie the benefits. In turn, this may affect the costs. There are important differences. For example:

Internal doors and corridors:

Silver = 1000mm wide corridors and 820mm clear width doorways.

Gold = 1200mm wide corridors and 850mm clear width doorways.

Shower:

Silver = hobless shower in corner of room.

Gold = 900mm x 900mm shower plus a 1200mm x 1200mm space outside the shower. **AND located on entry or ground level**

Toilet:

Silver: 900mm wide x 1200mm in front of pan. The spatial is for a 'visitable' toilet and assumes a person will **receive assistance** ¹¹.

Gold: 1200mm wide x 1200mm in front of pan. Spatial assume independent use.

Bedroom:

Silver = no requirement.

Gold = a room capable of being a bedroom on the ground or entry level.

Using the Australian Standard AS 1428.1 Access and Mobility²¹, and with reference to the Victorian RIS¹¹ that confirmed a Silver design guide toilet is not designed for independent use, the following statements indicate a range of benefits:

- Silver might mean that you may not be able to leave hospital early because there is no bedroom on the ground level, no shower, and you would likely need help using the toilet.
- Silver might mean that your elderly parent can visit for a short time, but they cannot stay overnight, and you might need to help them use the toilet.
- Silver might mean that if you/family member need to use a walking aid/walker/wheelchair, you may have difficulty turning from a corridor through a doorway.

- With Gold, you are more likely to get home from hospital, have a bedroom on the ground/entry level. and more likely to be able to use the shower and toilet independently.
- Gold means your elderly parent is more likely to be able to come and stay overnight and shower and toilet independently.
- Gold means that if you/family member need to use a walking aid/walker/wheelchair, you can safely navigate through your home.

These are big differences. In weighing costs and benefits, people need to know what the options mean, not least because it is required as part of a robust methodology, but also to ensure an effective consultation process.

Quantification

The Options Paper reminds us that the NCC is a performance based code and that performance requirements need to be expressed in measurable terms. (Eg...to and withinto the degree necessary.....)

ABCB are advising that the LHA design guideline performance statements will require to be changed and give some examples:

- *'comfortable and unimpeded movement'*
- *'easy and independent access'*
- *'safely and economically' installed (regarding grabrails)*
- *'reduce the likelihood of injury'*
- *'easy to reach'*

'Quantifying these subjective phrases would not change the policy intent, but would make future Performance Requirements for housing accessibility more easily understood and, therefore, more likely to be applied correctly. This would help ensure their effectiveness and improve outcomes for home occupants.'

This is important and well noted by ABCB.

Dwelling structures

Before considering application issues and concerns (pages 23-24), a reminder of the Australian Bureau of Statistics, 2016 Census data on the breakdown of dwelling structure types, see figure 2. This provides important context.

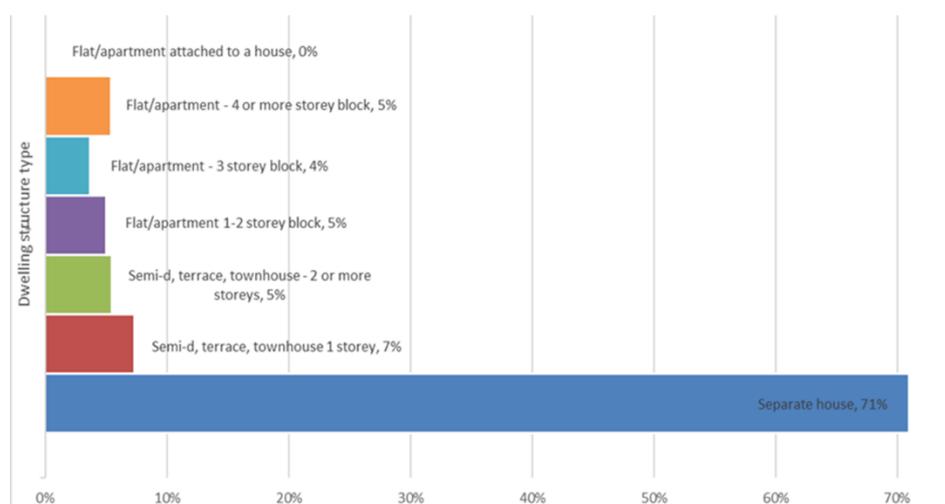
Class 1 (83%):

71% of all dwellings are separate homes, with a further 7% as 1-storey townhouse etc and 5% as 2-storey townhouse etc.

Class 2 (14%):

5% 1-2 storey apartment; 4% 3-storey apartment; 5% 4+ storey apartment.

Figure 2 Breakdown of different dwelling structure types



Note: percentages do not add up to 100% due to rounding and other structures, such as caravans that are outside current NCC remit.

Application p23-24

Class 1 - ABCB expressed some practical considerations:

- Steep sites and step free from boundary
- Distance from boundary and insufficient room to provide step-free path
- Queenslanders, and framed sub-floor homes, and homes in flood areas
- 2 + storey dwellings on narrow allotments
- Toilet on ground level vs garage

Some quick observations, putting these concerns into context:

- 71% of all dwellings are separate dwellings
- Steep sites can be addressed through a path of travel from a parking space (**current LHA requirement**) or a performance solution/exemption.
- Distance from boundary scenario is not mainstream, and can be addressed though a performance solution/exemption.
- Queenslanders and 'raised' homes - the issue is more linked with how high they need to be above the ground level and the ease (or otherwise) of providing a step free path to the entrance. Guidance can be developed through deemed-to-satisfy, and/or can be addressed though a performance solution/exemption. Or, there could be a requirement to have a space/cupboard that has the potential to be used for a platform lift at a later time, and which has minimal cost impact at time of construction.
- Row/terrace homes with 2 or more storeys represent 5% of all dwelling structures. Not all of these will be 'narrow'. Therefore, this is not a mainstream concern and can be dealt with using a performance solution and/or good design.
- Garage at entry level and no living accommodation - this is not a mainstream scenario and can be addressed though a performance solution/exemption.

Class 2 - ABCB expressed some practical considerations:

- Step free path for 'walk-ups'
- Step free path from parking space, add the need for lifts...
- Increase size internal doors, hallways and bathrooms = corresponding loss of space, unless footprint increased.

Some quick observations, putting these concerns into context:

- A step free path from the allotment boundary to the front door of ground or entry level units is **already an NCC requirement**.
- It is a **current NCC requirement** that 4+ storey apartments have lifts.
- 1-2 storey (5%) and 3-storey (4%) apartments would be affected if there was a requirement for a path of travel to all units, but this would only affect the upper floors. (Likely 2.5% + 1.33% = **3.83%** all dwellings) This could be addressed through a performance solution. It is not a mainstream concern.
- Silver level requires 820mm clear width doors and 1000mm wide corridors. 820mm wide is standard in many buildings.
- Gold level requires 850mm clear width doors and 1200mm wide corridors. An 850mm door is already an NCC requirement to enter the building.
- Apartments do not tend to have many corridors as they are small dwellings. Door swing concerns can be addressed by installing sliding doors. Door and corridor widths may have an impact, but this is minimal/can be minimised.
- A Silver toilet seeks a space in front of the toilet of 900mm wide x 1200mm deep. Most new Australian homes have 2 toilets. This is usually accommodated in a bathroom. The toilet-space concern typically relates to a toilet within its own room.
- A Silver shower is only required to be hobless and located in a corner, with no impact on space.
- A Gold toilet seeks a space 1200mm wide. This is more likely to require additional space, but can often be designed out, with shared circulation spaces.
- A Gold shower is required to be 900mm x 900mm; small by many standards today, and have a 1200mm x 1200mm circulation space (that can be shared, eg with the toilet).

The majority of these concerns are minimal. The Gold toilet and shower space requirements can be addressed through design and sharing circulation spaces, but still pose a potential cost impact, particularly for very small dwellings.

Raising concerns is not unreasonable, but ABCB should have provided context to allow people to form a considered view.

The majority of new dwellings will not be affected by these considerations. The NCC is a performance-based code and can address non-standard situations through performance solutions, exemptions and the development of deemed-to-satisfy outcomes.

Weighted average cost scenarios p 25

The costings have been prepared by quantity surveyors Donald Cant Watts and Corke (DCWC). DCWC were asked to provide:

- Prepare estimates for Class 1a and Class 2 based on Silver and Gold
- Costings represent estimate of 'weighted average'
- Range of scenarios:
 - High
 - Medium
 - Low impact

These scenarios are then weighted according to DCWC '*estimated of proportion of the market*' and with reference to *standard practice*. No further detail is provided on 'estimated proportion of market', nor is there a definition of 'standard practice'.

A summary table of costs is provided and this is discussed in the review of Appendix A, see below.

Preliminary costings – new buildings p26-27

The Options Paper describes using the weighted average impact cost approach with cost impacts assessed on:

- Products/materials;*
- Labour/design*
- iii. Value of /m² lost to other uses***

Item iii. Value of /m² lost to other uses states:

'This value exists regardless of whether the required floor space is obtained by expanding the building footprint or by reducing the size of adjacent rooms.'

This assumes that extra floor space will be required. Without a definition of 'standard practice', we don't know what space is being valued, nor do we know how much extra space is being priced. It is not that this is unreasonable, but lacks transparency and cannot be validated.

It also assumes that there is a cost for this 'space', even if the footprint and amenity of the dwelling has not been altered. If there is no change to the footprint and the amenity is the same, then surely there is no loss. **If there is no loss, there is no cost.**

Thinking about some examples:

- A wider corridor only impacts if there are corridors and if the width is wider than the current '**standard**'. Apartments seldom have extensive corridors (unless the premium penthouses), with shared circulation space being **standard**.
- A space around a toilet in an ensuite may not have any additional space requirement because circulation is shared with other fittings (unlike a small toilet compartment).

iii. Value of /m² lost to other uses also states that composite rates have been applied, eg \$/m² of bathroom. Does this include services, fixtures, and fittings? Or just the increase in floor, wall and ceiling construction? The bathroom is one of the most expensive rooms in a dwelling. **Even if a bathroom requires to be larger, applying a composite rate would over-state the actual cost.**

Preliminary cost – retrofitting

A similar methodology is applied to costs for retro-fitting. A table of 'weighted costs' is provided. This is addressed in the review of Appendix A, see below.

Issue 8

The QS methodology should be questioned and challenged.

- 1- 'Standard practice' should be defined.
- 2- 'Estimate proportion of market' - should be changed to use actual ABS data on dwellings structures
- 3- iii. Value of /m² lost to other uses, makes sweeping generalisations:
 - a. It assumes that extra floor space will be required.
 - b. Assumes that there is a cost for this 'space', even if the footprint and amenity of the dwelling has not been altered. If there is no loss, there is no cost.
 - c. Uses composite rates, which will overstate the cost for bathrooms.

Appendix A Detail on costings page 33-37

Appendix A provides a more detailed breakdown of how the weighted average cost scenarios were derived. The definitions of low, medium and high impact are in the main document and each performance requirement is labelled as a number. This makes easy cross referencing harder. Detailed review of the tables showed:

Tables A1 and A2 - Silver, dwellings, new and retrofit comments

- The low, medium and high impact assessment for items 1 (step free from boundary), 2 (level entry), 3 (doors/corridors), 5 (bathroom), & 7 (stairs) is exactly the same for both new and retrofitted dwellings. This is unlikely.

Tables A3 and A4 - Silver, apartments, new and retrofit comments

- The low, medium and high impact assessment for items 1 (step free from boundary), 2 (level entry), 3 (doors/corridors), 5 (bathroom), & 7 (stairs) is exactly the same for both new and retrofitted apartments. This is unlikely.
- Item 6, wall reinforcement, is very low technology (ply sheet and noggins); a high impact assessment is an over-statement for new apartments.
- Item 1 (step free from boundary) is a current NCC requirement in new apartments, so the medium and high impact ratings are an over-statement.
- Item 2 (level entry) – almost all apartments have concrete slabs, and no thresholds at apartment entry door . The impact will relate to entry door width, which will be higher for retrofitting.

Tables A5 and A6 - Gold, dwellings, new and retrofit comments

- The low, medium and high impact assessment for items 1 -5 (table 5) are exactly the same as Silver, even though the design guidelines are different. This is unlikely.
- Item 6, wall reinforcement impact weightings for new Gold dwellings are different to new Silver dwellings (table A1) even though the design guidelines are the same.
- Wall reinforcement is very low technology (ply sheet and noggins), a high impact assessment is an over-statement for new Class 1 dwellings.
- Items 11 (switches) and 12 (door hardware) were omitted from the Options Paper. Even if their cost impact was negligible, these items should have been included for completeness.
- Items 1- 6 (table 6) are the same as for new Silver (apart from wall reinforcement), despite different design guidelines with a potentially greater impact on retrofitting.
- Items 7 – 10 (table 6) (stairs, kitchen, laundry, bedroom) – the impact for retrofitting is noted as the same for new dwellings; this is unlikely.
- Item 4 (Table 6), retrofitting a toilet to Gold is more likely to have high impact.

Tables A7 and A8 – Gold, Apartments, New and Retro fit comments

- The low, medium and high impact assessment for all items, except item 4 (toilet) are the same for new apartments and for retrofitting apartments. This is unlikely.
- Items 11 (Switches) and 12 (door hardware) were omitted from the Options Paper. Even if their cost impact was negligible, these items should have been included for completeness.
- Item 6, wall reinforcement impact weightings for new Gold apartments are different to new Silver apartments (table A3) even though the design guidelines are the same.
- Wall reinforcement is very low technology (ply sheet and noggins); a high impact assessment is an over-statement for new Class 2 dwellings.
- Item 1 (step free from boundary) is a current NCC requirement in new apartments, so the medium and high impact ratings are an over-statement.
- Item 2 (level entry into dwelling etc) – almost all apartments have concrete slabs, and no apartment entry door thresholds. The impact will relate to entry door width, which will be higher impact for retrofitting.

Issue 9

The figures and weightings in the weighted average cost scenarios do not stand basic scrutiny and raises significant concerns about the methodology used and the robustness of the costing assessment.

Consultation questions page 41

The Consultation questions provided are based around a flawed methodology, a limited discussion of the issues, a lack of information on the differences between Silver and Gold

levels, a limited range of costs and benefits to consider, and costings that do not stand scrutiny. The effect is to present an incomplete 'real world' view, which makes a considered response difficult. From this, it is unclear how ABCB can have a credible consultation process.

An alternative response questionnaire is attached in Appendix 1 which seeks to address these shortcomings.

Conclusion

The Options paper provides a start but is inadequate to frame the complexity of housing for inclusion in a regulatory impact assessment. As a builder I want a properly conducted cost benefit assessment for the proposals to avoid unnecessary regulation. As an access consultant, I want to see economic, social and human rights imperatives of access to housing met. As a senior built environment professional, I expect the highest levels of rigour to be applied to this regulatory process.

There are many view points on this important topic. For this reason, the breadth and depth of the impact of homes and housing must be considered within a broad policy context, to adequately assess who benefits and what the costs will be, remembering that people do not aspire to be old, frail or disabled.

If you would like to raise any queries about this submission, please contact Dr Galbraith directly on 0420 415202, or penny@box50.com.au.

Appendix 1 Alternative Response Questionnaire

Alternative Consultation Questions

These alternative consultation questions are intended to stimulate discussion and guide ABCB in their ongoing work with the Options Paper. Some of the original questions have been retained. Several questions cannot be answered because there is insufficient information provided in the Options Paper. These response questions have been simplified.

How to submit your response

Responses may be emailed to: nccawareness@abcb.gov.au (with the subject line 'Accessible Housing'). Please send response as an attachment to the email, either as a Word or PDF file.

Alternatively, responses may be posted to:

Accessible Housing
Australian Building Codes Board
GPO Box 2013
Canberra ACT 2601.

The due date for responses is close of business (AEST) on **30 November, 2018**.

Late submissions will not be accepted without prior arrangement.

Your details

Note: You do not need to provide this information, however doing so will enable us to contact you if we need to seek clarification or further information regarding your response.

Name: Penny Galbraith

State / Territory: Qld

Telephone number: 0420 415202

Email or postal address: penny@box50.com.au

General Questions

1. Are you participating in this consultation as an individual or on behalf of an organisation or business (tick one as appropriate)?

Individual

Organisation

Business

If you have ticked 'business' or 'organisation' above, please answer question 2.

Note: only answer questions 2 if you are responding on behalf of a business or organisation.

2. Which of the following best describes your organisation or business (tick one as appropriate)?

Developer

Building / Construction

Architect / Designer

Occupational therapist

Access consultant

Community Housing provider

Disability or accessible housing advocate

Government

Other (please specify) Project manager

Defining the objective

Note: the objective is discussed on pages 13-14.

3. Which definition should be used to help frame the objective?

- The current **NCC definition of ‘accessibility’** (*Accessible* means having features to enable use by people with a disability.)
- The current Livable Housing Australia **‘livable home’** term (*A livable home* is designed and built to meet the changing needs of occupants across their lifetime.)
- Another term, please state.

Click here to enter text.

Questions about the Potential Benefits of Accessible Housing

4. Please tick one box in each row of the table below, where ‘1’ means ‘strongly disagree’ and ‘5’ means ‘strongly agree’.

	Strongly disagree				Strongly agree
Potential Benefit	1	2	3	4	5
It is important that new housing has minimal environmental impact to ensure the long-term viability and sustainability of Australia’s industrial resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It is important to have a consistent set of technical codes and regulations for housing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It is important to be able to adapt my home at minimal cost, as life changes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It is important that housing forms part of a sustainable infrastructure for the benefit of me, my family, children; grandchildren.	<input type="checkbox"/>				
It is important that the housing industry continually improves practices and techniques.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
All Australians should be able to live where and with whom they choose.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It is important to be able to return home promptly after a hospital stay.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It is important for me or my older relatives to be able to stay at home	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Strongly disagree				Strongly agree
Potential Benefit	1	2	3	4	5
when I/they get older, rather than go to a facility.					
It is important to ensure that Australian homes can respond to changing demographics, including the doubling of the number of people aged 65+by 2054.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Excellence in housing construction is important.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments [Click here to enter text.](#)

Question about the Preliminary Costings

These questions are about the preliminary cost estimates for accessible housing. These estimates are detail in the section titled '**Preliminary Costings—New Buildings**'.

5. Do you feel you have the knowledge, information and/or experience to evaluate the costing methodology?

Yes Go to Q6

No Go to Q7.

Comments [Click here to enter text.](#)

6. Overall, in your opinion, how much do you agree or disagree with the statements below?

Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

	Strongly disagree				Strongly agree
Statement	1	2	3	4	5
The methodology for estimating costs is appropriate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Strongly disagree				Strongly agree
Statement	1	2	3	4	5
The estimated costs for each option are accurate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments [Click here to enter text.](#)

Other considerations

- 7 To what extent do you agree that the following factors should be considered in a cost benefit analysis?

Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

	Strongly disagree				Strongly agree
Considerations	1	2	3	4	5
Avoided cost of inefficiencies from inconsistent regulations between planning and NCC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Value of improved health outcomes from getting people home from hospital sooner. (after accident or illness)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Avoided costs of home modifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Avoided costs of slip/trips/falls in the home	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Avoided costs of residential aged care – (delayed entry)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Avoided costs of relocation/moving	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Avoided costs of functional obsolescence of the dwelling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Avoided costs of lost embodied energy/lost energy productivity (from reduced service life, ie home no longer fit-for-purpose)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments [Click here to enter text.](#)

Questions about the Options

Note: some possible options for an accessibility standard for housing are discussed in the section titled '**Possible Options for NCC Amendment**'.

8. The Options Paper discussed 12 Performance Requirements from the LHDG. Please indicate whether you agree or disagree that these requirements should be the **minimum** standard for all new residential housing?

Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

	Strongly disagree				Strongly agree
Performance Requirement	1	2	3	4	5
A safe, continuous, step-free pathway from the street entrance and/or parking area to a dwelling entrance that is level.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
At least one level (step-free) entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Internal doors and corridors that facilitate comfortable and unimpeded movement between spaces.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The ground (or entry) level has a toilet to support easy access for home occupants and visitors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The bathroom and shower is designed for easy and independent access for all home occupants.	<input type="checkbox"/>				
Bathroom and toilet walls are built to enable grabrails to be safely and economically installed (immediately or in the future).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Where installed, stairways are designed to reduce the likelihood of injury and also enable a safe pathway.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There is a space on the ground (or entry) level that can be used as a bedroom.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Light switches are located at heights that are easy to reach for all home occupants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Strongly disagree				Strongly agree
Performance Requirement	1	2	3	4	5
Occupants are able to easily and independently open and close doors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

9. What other Performance Requirements should be considered (if any)?

Slip resistant flooring/ outdoor surfaces

10. To what extent do you agree or disagree that the National Construction Code (NCC) should be modified to include accessible features in housing?

Tick one box in each row of the table below, where '1' means 'strongly disagree' and '5' means 'strongly agree'.

	Strongly disagree				Strongly agree
Statement	1	2	3	4	5
To what extent do you agree or disagree that the NCC should be modified to include accessible features in housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

End of alternative consultation questions.

Send this document, and any other documents, as an attachment to an email to NCCawareness@abcb.gov.au

with Accessible Housing in the subject line.

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