

Transition for the accessible housing amendments in the NCC

Government has committed to a transition period for the inclusion of accessible housing in the National Construction Code (NCC) and has called for submissions to assist in determining an appropriate timeframe.

While industry continues to oppose the accessible housing changes to the NCC, we must also work towards easing the impact of their implementation. To that end we are proposing a minimum transition of 3 years. That is the changes would take effect alongside NCC 2025.

Five years is a more realistic timeframe to turn over the sales product (standard plans). So even at 3 years there will be a transition cost which involves the following.

Redesigning Standard Plans

Redesigning standard plans will be a major undertaking for industry. There is a large cost involved in amending designs, specifications, bills of quantities and marketing material. Volume builders estimate that the cost to their business will be in the order of \$100,000 to \$700,000 depending on the size of the business. "As a volume builder we rely on doing the bulk of work up front and then replicating from that with minimal changes for our customers, changes like this have a massive impact."

Two cases have been provided at Attachment A detailing the work involved. These are case studies from builders with in-house design teams. Smaller builders who outsource this work will find the task even more onerous.

A 3 year transition will allow more of this cost to be drawn from the usual process of design updates, minimising the additional cost. A short, sharp implementation timeframe will have all builders working to adjust their standard plans quickly, adding significant pressure to the demand for building designers, quantity surveyors and marketing professionals. This will unnecessarily drive up the cost of this work.

Given the significant investment in time and money, industry will not be in a position to begin to undertake this work until there is certainty as to the detail in the regulatory provisions.

Adjusting Built Sales Product

Volume home builders will also need time to adjust the built sales product: display homes. These builders market their work through display villages. A display village home will often be 12 to 18 months in planning and construction. It will then be open for a minimum of 2 years. These builders have long since started planning the display homes that will be used to sell their product in 3 years. They have already considered - "What do I need to do to the home design now to ensure we're showing the public what is required in 3 years? "

Even with a 3 year transition, builders will be relying on a 'non-standard' displays to sell their product for a period of time but at least that period will have been kept to a minimum.

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No Capacity to Absorb Changes

Industry has no capacity to absorb additional changes for the foreseeable future. Builders across Queensland are experiencing unprecedented challenges with a perfect storm of a sharp increase in demand and extreme supply chain problems. The recent SEQ floods will only serve to further stretch builders who are already struggling.

As one builder put it: “Trying to allocate time to undertake a project of this scale at this time will be breathtakingly stressful.”

The Australia Building Codes Board recognises the costs and challenges for industry in transitioning to new regulation. They have provided a 3 year lead time to manufacturers for lead free changes to plumbing products which, like the accessible housing changes, are dependent on making changes along complex interdependent supply chains.

Government awareness raising and training

The new provisions will need to be well understood by the entire supply chain (developers through to tradies) if we are to avoid a spike in defects and unnecessary rework costs.

We especially need to be sure everyone knows how to design and build to the new requirements to manage the risk of water. As one builder said, “water is the devil” and steps at entry doors and hobs on showers help manage the risk of water ingress. The requirements will require a change to practices that are currently avoided by builders because of the risk of defects.

We also need to ensure that everyone understands the incredibly precise measurements that must be achieved. For example not bringing the toilet waste pipe up through the slab within the 10 mm window allowed will require rectification work that involves digging up the slab. An outcome neither the builder nor home owner wants to experience.

Then there are changes to age old practices such as how measurements are taken on site (from the frame and not the finished wall) that will need to be flagged for all those involved.


There must be time for government to provide consumer awareness. Consumers will be paying the increased costs, so they need to understand the purpose and value.

The experience of builders currently providing houses to the Livable Housing Design criteria have found that customers often identify accessible housing features as mistakes or poor design. For example, bathrooms which provide the clearance around the toilet pan are perceived as a waste of space. Consumers, especially those building on narrower lots, may not appreciate the compromised living area necessary for larger hallways and bathrooms.

Government must also engage with valuers and lenders to ensure the benefits are included in their calculations to offset the increased costs. Without this new housing projects won't ‘stack up’ and financing will not be available. This is already a long standing problem for new construction in the regions.

All this must be clearly communicated by government. Such a program will have its own lead time to be considered.

Given the scale and complexity of the accessible housing changes and the current pressure the industry is already experiencing, a **minimum transition of at least 3 years is essential** if



widespread negative consequences are to be avoided. Time is needed to redesign standard plans, bring new display homes online, educate the industry and inform consumers, valuers and lenders. There is no capacity for industry to take on this additional work in these challenging times.

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ATTACHMENT A

BUILDER 1

180 standard plans to be redesigned by the Design Manager will take a minimum of 8 hours each (considering that a percentage of designs just will not comply and will need a full redesign) – 8 hours x \$80/hour x 180 plans = **\$115,200**

180 plans each have approximately 5 façade options – 900 plans to be updated by a building designer at an approximate time of 10 hours per plan – 10 hours x \$50/hour x 900 = **\$450,000**

Prepare new 1:100 plans and formatting for marketing material 2 hours per plan – 4 hours x \$50/hour x 180 = **\$36,000**

Reprinting of all hardcopy marketing material for the new designs - **\$100,000**

Reloading of all new standard plans onto website 2 hours per plan – 4 hours x \$50/hour x 180 = **\$36,000**

Amend the Bill of Quantities for 180 standard plans – 4 hours x \$50/hour x 180 = **\$36,000**

This could not be completed by existing staff on top of their current duties so new staff would need to be onboarded and trained. A building designer takes a minimum of 3 months to train.

The minimum real cost to our business to convert our standard plans to meet the requirements is **\$773,200**.


We currently have 18 display homes under construction and another 51 display homes currently open. To turn over our entire Display program would take over 5 years. That means with a 3 year transition we will still have for a minimum of 2 years over half of our display product as 'non-standard'. It is impossible to quantify the loss of sales and revenue from not having standard product but it will be **millions of dollars**.

BUILDER 2

42 standard plans, all of which will need redesign work. In many cases the whole floor plan will need to be rearranged to allow for wider hallways, wider doorways etc. Our design range is almost wholly designed to suit narrow lots, so space is already at a premium.

Estimate an average of 20 hours of drafting time per plan to make this change. Speed over time always improves, but it might take a week or two for designs that do not easily lend themselves to the changes required. At a cost of \$50/hour (this is understated – only allowing for direct wages cost) that works out to be \$1000/plan, times 42 plans - **\$42,000**.

Once we add the different façade options on each plan that also need to be adjusted, that grows to a total of 237 plans that need adjusting (with 42 of these already adjusted in the first step – this is the base façade). As adjusting the façade of a new base plan is less work, estimated 2 hours per façade, \$100/plan, times 195 additional plans - **\$19,500**.



This equates to 810 hours (or 6 months) of drafting time to complete. We could not absorb that amount of work and would have to employ additional resource. For reference, our last major design range update took 14 months.

Every standard plan and façade combo then needs to be re-estimated, at 2 hours per design to update bills of quantity that is **\$23,700** and 474 hours (3 months).

Then there is the cost of re-creating marketing collateral which would cost a minimum of **\$15,000** and require another month to complete.

That gives equates to a total of **\$100,200** in direct costs, to get us back to a place where we have the same range of homes as we have today.