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Hon Mick de Brenni MP  
Minister for Energy, Renewables and Hydrogen  
Minister for Public Works and Procurement  
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BRISBANE QLD 4001

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Dear Minister

#### **Transition and modifications for accessible housing in the NCC**

With the Building Ministers Meeting, to be held Friday 26 August, determining the transition arrangements for including accessible housing in the National Construction Code (NCC), Master Builders would like to reiterate industry's position on this significant change.

While industry remains opposed to the accessible housing inclusions on the basis of unjustifiable increases in the cost of housing and increased risk of defects and disputes, we must also work towards easing the impact of their implementation.

In order to achieve a positive outcome for Queenslanders the inclusions must be **sensible, achievable and balance housing affordability** (noting New South Wales, Western Australia and South Australia have opted out, citing the increased costs to housing and unjustified burden on the construction industry).

This cannot be realised until the significant technical concerns are addressed which are numerous and include:

- level dwelling entrance requirements - Australian Building Codes Board (ABCB) is yet to provide a solution that will effectively manage the risk of water ingress and termites.
- hobless/step free shower requirements – It must be acknowledged hobless/step free showers tend to have more splash and water spill than others. Homeowners may not be happy with the consequences, particularly smaller shower areas and bathrooms, and consider it defective work, which is not necessarily the case. They also come at a significantly higher cost to construct. A cost that will be borne by the homeowner.

Successful implementation will also require a realistic transition timeframe. 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 three years** is essential if widespread negative consequences are to be avoided. The transition period cannot commence until there is a final published version of the provisions from which industry can base its work.

Three years is required as the transition requires significant work and comes at a significant cost including:

- Redesigning standard plans (volume builders estimate the cost at \$100,000 to \$700,000 depending on the size of the business – worked examples can be provided).
- Altering display homes – display village homes are 12–18 months in planning and construction and are then open for a minimum of 2 years. Even with a 3 year transition, builders will be relying on ‘non-standard’ displays to sell their product.
- Awareness and training for industry participants and consumers. All must understand the changes to long held accepted practices, see the value in the additional cost and the design choices that will no longer be allowed (e.g. changes in floor coverings along a path of travel).

These are all costs which will only increase with a shorter transition timeframe (such as 12 to 18 months) and costs that will necessarily be passed onto home buyers.

There is also the impact on industry to consider at a time where it is already highly stressed due to material and labour shortages and price increases combined with continuing impacts of natural disasters, health pandemic and fixed price contracts.

Government is aware of the importance of transitioning arrangements and provided a three year transition 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.

We understand that the ABCB will be establishing a ‘Livable Housing Implementation Advisory Committee’ to work through the technical issues with the provisions and to shape the information needed to help implementation. As builders will be implementing the provisions and as we have collected extensive feedback on the technical challenges involved, it is essential that **Master Builders is invited to participate in the Implementation Advisory Committee.**

In conclusion, we believe the next step is for Government to make the necessary changes to the provisions so that they are sensible, achievable and balance affordability. There must also be effective support in the transition, starting with a realistic timeframe. If the changes are not to come at a significant cost to homeowners, time is needed to redesign standard plans, bring new display homes online, educate industry and inform consumers. There is no capacity for industry at present to take on this additional work in these challenging times.

Regards,



**Paul Bidwell**  
CEO

**Copy provided to Hon Anastacia Palaszczuk MP, Premier of Queensland**