

31 August 2020

Australian Building Codes Board  
Via Email: [abcbris@abc.gov.au](mailto:abcbris@abc.gov.au)

Dear Sir / Madam

**Subject: Proposal to include minimum accessibility standards of housing in the National Construction Code: Consultation Regulation Impact Statement**

Thank you for the opportunity to provide feedback the consultation regulation impact statement.

Master Builders Queensland endorses all the elements of the detailed submission made by our colleagues at Master Builders Australia. As this is such an important issue, we wanted to iterate the key issues from a Queensland perspective.

Master Builders has been a longstanding supporter of accessible housing. Our members are prepared and able to provide solutions to the issues facing an ageing population and acknowledge that over time there will be many more people with disabilities living in the houses that we build.

Master Builders advocates for a non-mandatory approach to adopting accessible standards in housing. We are opposed to regulations that put productivity at risk and adversely impact housing affordability. The cost of providing a wider social good, as in the case of accessible housing, should not be carried by the relatively few people looking to buy or build a new home.

The process of investigating whether the NCC is the appropriate vehicle to ensure the provision of accessible housing has now been ongoing for over two years. During that time both industry and the community have provided extensive input.

This latest work, the consultation draft Regulation Impact Statement, has found that the cost-benefit for mandatory options does not stack up. It has also confirmed that while there is a social benefit to providing accessible housing, the cost is greater. And that this cost will be carried by a relatively small group of people – those buying or building a new home.

With the Regulation Impact Statement now complete, we believe the time has arrived to accept that there is no case for mandatory inclusion of the accessible housing into the NCC.


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If the government is serious about ensuring accessible housing then it is now time to deliver on the non-mandatory options available to it. As a start these should include:

- non-mandatory NCC accessible housing handbook providing a best practice guide using Livable Housing Australia design guidelines;
- pilot projects to test market appetite and minimise additional cost for builders; and
- appropriate resourcing for voluntary options.

As it has from the beginning, Master Builders Queensland stands ready to assist.

Kind Regards,

Paul Bidwell  
Deputy CEO