

Mr. Rob Stokes,
Minister for Planning and Environment
Level 3, 4-6 Bligh Street,
Sydney NSW 2000

June 9 2016

Dear Mr Stokes,

Proposal for Change to the National Construction Code to provide accessibility in housing

The Physical Disability Council of NSW (PDCN) asks that you, through your delegate, support the Proposal for Change to the National Construction Code (NCC) to provide accessibility in housing at the next meeting of the Australian Building Codes Board's Building Codes Committee on **14 July 2016**. This Proposal would enhance adoption of the NSW National Disability Strategy due to the following:

- The lack of accessible accommodation is reinforced by a lack of housing affordability. This lack of access excludes many people with disability from purchasing or leasing housing in the private and public market. As a result of inadequate access people with a disability often experience avoidable hospital admissions and specialist accommodation, and additional costs due to higher home care costs, and home modification subsidies.
- Improved access to housing stock cannot be achieved without government and/or private funding.
- Accessible accommodation was not considered as relevant when developing the *Disability (Access to Premises - buildings) Standards 2010* because this standard only applies to public buildings and not Class 1A buildings.
- In 2010, the National Dialogue on Universal Housing Design (National Dialogue) including housing industry, human rights and community leaders agreed to a voluntary plan to provide all new housing with minimum access features by 2020. This plan was endorsed by the Council of Australian Governments (COAG) in the 2010-2020 National Disability Strategy (NDS), and aligns with Australia's commitment to the United Nations Convention on the Rights of Persons with Disabilities.
- In 2012 NSW adopted the NDS NSW Implementation Plan identifying the need for universal housing design as part of reforms included in the Inclusion and Accessibility section of the NDS.
- Evidence to date shows that, in spite of the many awareness-raising initiatives particularly in Victoria, the Australian Capital Territory and Queensland, the voluntary

plan has failed to engage the housing industry sufficiently, and is expected to reach **less than 5% of the 2020 target**.

- 2015 and 2016 annual COAG Report on Performance does not include a measure for the effectiveness or efficacy for the voluntary implementation of universal housing design so consequently we are not aware of any more recent improvements in the implementation of universal housing design.
- Due to the lack of voluntary implementation of universal housing design, in February 2016, the Accessible Network of Universal Housing Design (ANUHD) and the Rights Inclusion Australia (RIA) proposed a consensus approach through Standards Australia with the involvement of national stakeholders to develop a standard for minimum accessibility for future inclusion in the NCC.
- Support for this initiative was gleaned from community and professional stakeholders, but not the housing industry. Over two hundred and fifty organisations representing aged, disability and women's groups, researchers, systemic advocacy organisations and local government authorities have now given formal support for a regulatory approach to meet this COAG commitment.

PDCN understands that the attached Proposal to change the NCC accessibility to housing may need to be edited before final approval is given; however, we seek an intelligent and informed process to consider how this important COAG commitment to the 2020 target within the 2010-2020 NDS can best be achieved.

I truly hope you can support this vital change and allow people with disability to gain access to housing that meets their needs, and ensures them full inclusion into the NSW community.

Sincerely,

Serena Ovens
Executive Officer
Physical Disability Council of NSW

serena.ovens@pdcnsw.org.au
mobile: 0411 327 877

Encl: