



The Chairperson  
Australian Building Codes Board (ABCB)  
GPO Box 2013  
Canberra ACT 2601 Australia

2 July 2021

**Re: Public Comment Draft on the National Construction Code – endorsement of the submission on behalf of the Australian Network for Universal Housing Design (ANUHD)**

The Physical Disability Council of NSW (PDCN) is the peak body representing people with physical disabilities across New South Wales. This includes people with a range of physical disability issues, from young children and their representatives to aged people, who are from a wide range of socio-economic circumstances and live-in metropolitan, rural and regional areas of NSW. Our core function is to influence and advocate for the achievement of systemic change to ensure the rights of all people with a physical disability are improved and upheld.

PDCN has a strong interest in the promotion of accessible design across all aspects of building and construction.

Accessible access to buildings, both within private and public contexts, is a right provided to our membership under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and is also prescribed in a domestic context through the Disability Inclusion Act and the National Disability Strategy.

PDCN advocated for the inclusion of mandatory minimum accessibility standards to Gold Level Liveable Housing Design in response to Consultation Regulation Impact Statement prepared for the Australian Building Codes Board last year.

Whilst the proposed standards fall short of Gold Level, which we continue to promote as the most equitable solution to the issue of housing accessibility, we commend the efforts of the Australian Building and Construction Board and State and Territory Ministers in reaching the point where the NCC will prescribe compliance to no less than Silver Level Liveable Housing design across future residential builds.

The changes proposed in in Class 1 and 10 buildings (Pt H8) and the introduction of the Liveable Housing Design ABCB Standard, if adopted into NSW Building legislation, will significantly improve the housing options for people with physical disability across NSW, both now and into the future.

The changes will give people with physical disability a greater capacity to live both within communities in the first instance, but also to live at home with greater levels of independence for longer. We are hopeful that the inclusion of minimum accessibility Standards will result in greater acknowledgement of the broad societal benefits in housing design which is responsive to all people at all stages in life.

 02 9552 1606  
1800 688 831

 [admin@pdcnsw.org.au](mailto:admin@pdcnsw.org.au)

 3/184 Glebe Point Rd  
Glebe NSW 2037

 [www.pdcnsw.org.au](http://www.pdcnsw.org.au)



We also commend the ABCB's efforts in promoting builds that exceed Silver Level through the inclusion of a non-mandatory version of the ABCB standard providing prescriptive information to meet Gold Liveable Housing Design Standards.

This inclusion is critical in emphasising that the standards in the NCC are minimums, and to encourage best practice in meeting our international and domestic commitments towards disability inclusion.

PDCN are not technical experts, and it is beyond the scope of our expertise as an organisation to conduct a rigorous assessment of the technical detail provided within either Class 1 and 10 buildings (Pt H8) or the Liveable Housing Design ABCB Standard Draft. Therefore, PDCN endorses the submission provided to the Public Comment Draft on the National Construction Code by the Australian Network for Universal Housing Design (AHUHD) as a body which has been a consistent leader both in the development of liveable design standards and as a champion for this important issue.

For any comments or queries, please contact Ms. Hayley Stone, Senior Policy Officer, on 0422 855 681 or via email, [hayley.stone@pdcnsw.org.au](mailto:hayley.stone@pdcnsw.org.au).

Respectfully,

A handwritten signature in black ink, appearing to read 'Jerrisa Owens', is written over a light blue circular stamp.

JERRISA OWENS

CEO

Physical Disability Council of NSW

 02 9552 1606  
1800 688 831

 [admin@pdcnsw.org.au](mailto:admin@pdcnsw.org.au)

 3/184 Glebe Point Rd  
Glebe NSW 2037

 [www.pdcnsw.org.au](http://www.pdcnsw.org.au)