



Consultation Regulatory Impact Statement

Australian Building Codes Board

Via email: abcbris@abcb.gov.au

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Re: Consultation Regulatory Impact Statement: Proposal to include minimum accessibility standards for housing in the National Construction Code.

The South Australian Council of Social Service (SACOSS) is the peak body for the community services sector in South Australia, with a long-standing interest in the efficient delivery of safe affordable and accessible housing especially for those people faced with disadvantage, poverty and injustice. The interests of people who live with a disability remain central to our considerations and thus our interest in these matters.

This is a very simple submission noting that colleagues at the Australian Network for Universal Housing Design (ANUHD) have also made a thorough and considered submission on this matter. We strongly commend this to you and endorse its analysis and recommendations.

More specifically we:

- Endorse the stated objective of the RIS with the addition of the word [all]: **to ensure that [all] new housing is designed to meet the needs of the community including older Australians and others with mobility limitations;**
- Strongly support Option 2 - "*Let's do it right first time*" - which provides the minimum accessibility standard that is compatible with the objective of the RIS. We believe **all** Australians want and should have homes which are well located, energy efficient and where they can feel safe and included while also being able to age in place. Regrettably this is not everybody's experience because the current regulatory frameworks do not deliver this type of housing and thus opportunity – especially if you are someone who lives with a disability, be that one present from birth or acquired during one's life;

- Support Dalton/Carter's¹ recommendation that a further assessment of a combination of options, namely combining Regulation with Option 5 (a subsidy program to encourage availability of accessible rental properties) is indicated for good economic reasons.

We thank you in advance for consideration of our comments. If you have any questions relating to this submission, please contact me directly ross@sacoss.org.au or 08 8305 4223.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ross Womersley', enclosed in a thin black rectangular border.

Ross Womersley

Chief Executive Officer

¹ Dalton and Carter Report (2020) was commissioned by the Melbourne Disability Institute and Summer Foundation to provide economic advice to assist with responses to the Consultation RIS.