

Summer Foundation response to Streamlining and modernising the National Construction Code consultation

The Summer Foundation welcomes the opportunity to make a submission to the Streamlining and Modernising the National Construction Code consultation. The Summer Foundation focuses on identifying, designing, and scaling up better housing and living solutions for Australians with complex disabilities. As such, appropriate housing is central to realising our vision, and the National Construction Code (NCC) plays an important role to make this possible.

In addition, the Summer Foundation is the national convener of the *Building Better Homes* campaign, which is a coalition of over 70 peak bodies and agencies working to ensure the mandatory accessibility standards, now included in the 2022 NCC, are adopted nationally and implemented well in every state and territory in order to meet the needs of all Australians.

We wish to highlight the importance of national consistency in helping to secure the benefits of the NCC. As the Productivity Commission has noted, there are material benefits from the NCC, such as greater productivity and more certainty and efficiency for the building industry. However, these benefits are undermined when individual jurisdictions do not consistently apply the NCC. This also increases complexity – as the discussion paper notes, around 30% of the pages in the NCC are dedicated to state and territory variations.

The adoption of the Livable Housing Design Standard (LHDS) is a relevant example. Although the NCC itself included exemptions, such as when it is not practical to implement step-free access, multiple jurisdictions implemented their own, additional exemptions. Jurisdictions also adopted different implementation timelines, and some jurisdictions – NSW and WA – have not adopted the LHDS yet, at all. This has likely increased complexity and transition costs. Consistent national adoption of the LHDS would have allowed greater cost reductions through the sharing of lessons across borders and economies of scale. Instead, variations or non-adoption have plausibly made compliance more complicated, reduced opportunities for efficiency gains, and made it harder for industry participants to operate across state borders.

In short, we have seen the risk of state and territory variations increasing costs and reducing productivity. We would be supportive of measures to encourage greater consistency, especially with regard to the adoption of the LHDS.

Better homes, better lives for people with disability.

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The Summer Foundation acknowledges the Traditional Owners and Custodians of the lands on which we live and work and pay our respect to Elders past and present.