



**AAG**  
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Australian Building Codes Board (ABCB)

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31 August 2020

To Whom it May Concern,

**RE: AAG submission- Consultation Regulation Impact Statement: Proposal to include minimum accessibility standards for housing in the National Construction Code**

The Australian Association of Gerontology (AAG) thanks the Australian Building Codes Board (ABCB) for the opportunity to provide feedback on the [Consultation Regulation Impact Statement \(RIS\): Proposal to include minimum accessibility standards for housing in the National Construction Code \(NCC\)](#) (the Consultation RIS).

AAG's purpose is to improve the experience of ageing through connecting research, policy and practice. Its principles are to be evidence informed, multi-disciplinary and holistic, independent, collaborative and fair. AAG has a growing membership of over 1,455 professionals working across every State and Territory in Australia representing all sectors and disciplines in ageing including research, policy, education, aged care, health and allied health, and consumer advocacy. AAG has 20 Collaborating Research Centres which represent all major research in ageing and aged care and is connected internationally as the executive office of both the International Association of Gerontology and Geriatrics Asia Oceania Region and the International Longevity Centre – Australia. AAG has a Housing and Built Environment Special Interest Group (HBESIG), Chaired by Dr Victoria Cornell, that includes experts on the intersections between ageing, housing and the environment.

**AAG supports the implementation of both of the following options presented in the Consultation RIS:**

- **Option 2: Accessibility standard, broadly reflecting LHDG gold standard, in the NCC applying to all new Class 1a and Class 2 buildings, AND**
- **Option 5: A subsidy program to encourage additional availability of accessible rental properties**

AAG submits that Option 2 is the required minimum, with any combinations of options an addition to this. This is in line with [AAG's November 2018 Submission in response to the ABCB's Accessible Housing Options Paper and attached AAG Position Paper: Regulating accessible housing enables all Australians to age in a place of their choosing](#).

AAG is a member of the Australian Network for Universal Housing Design (ANUHD) and supports the [ANUHD submission in response to the Consultation RIS](#) (dated 25 August 2020). **AAG supports and reiterates the detailed feedback on the Consultation RIS provided by ANUHD in this submission.**

AAG and ANUHD's preferred options are in line with the [Dalton and Carter 2020 report Economic advice prepared to assist with responses to the Consultation Regulation Impact Statement on minimum accessibility standards for housing in the National Construction Code](#).

Please do not hesitate to contact me if you have any questions about this submission, would like more evidence on a specific issue, or would like to be connected with one of AAG's experts on ageing and housing.

Kind regards,

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