**ABCB Accessible Housing Options Paper – Summary review**

Housing resides in a complex policy landscape. This Options Paper provides a start, but is not adequate to frame the issues for subsequent assessment in a regulatory impact assessment.  The Options Paper has:

* Not demonstrated sound underpinning knowledge of the economic and social role of housing in society and therefore cannot assess the real-world impact.
* Overstated 'considerations' as problems to overcome, due to lack of context.
* Incomplete information that ‘skews the view’.
* Pre-judged the outcomes and placed excess emphasis on costs of retro-fitting, rather than presenting a broad list of costs and benefits.  This premature costing information is misleading (due to lack of context and its questionable methodology).
* Not acknowledged that different techniques can be used to measure costs and benefits, such as use of stated preference and revealed question techniques. These should be developed to assist quantification/assessment; see alternative consultation responses.
* Consultation response questions that are based on ill-defined objectives, poor methodology, and incomplete information.

An alternative set of response questions has been prepared to try and address some of these issues.

Additionally, nine specific issues emerged from the document review:

1. The Options Paper uses the term ‘accessible’ differently to the existing NCC defined term.
2. Should the Options Paper use the LHA terms/meanings of *'Livable home'* to define the objectives of a future Regulatory Impact Assessment? Or another definition?
3. The Options Paper under-states the policy commitments under the National Disability Strategy.
4. Should the Options Paper reframe the 'problem' into articulating the level of **society's demand/need through stated preferences or revealed preferences,** rather than market demand?
5. An objective was not provided in the Options Paper.  An objective should be provided for people to respond to, including properly defined terms; either the existing NCC definition of *accessible*; *livable home*, or another term.
6. The Options Paper has not followed **Best Practice Consultation Guidance Note 2016, Office of Best Practice Regulation, Department of the Prime Minister and Cabinet**.  It has a flawed methodology from which a *rigorous rationale* cannot be obtained.
7. The Options Paper does not explain what the difference is between Silver and Gold LHA design guidelines. Understanding these differences is crucial to determine who will benefit, the level of accessibility/livability. Meaningful metrics should identify who benefits and the associated costs.
8. The QS methodology should be questioned and challenged. Including:
	1. 'Standard practice' should be defined.
	2. 'Estimate proportion of market' - should be changed to use actual ABS data on dwellings structures.
	3. Value of /m2 lost to other uses, makes sweeping generalisations:
		1. It assumes that extra floor space will be required.
		2. Assumes that there is a cost for this 'space', even if the footprint and amenity of the dwelling has not been altered.  If there is no loss, there is no cost.
		3. Uses composite rates, which will overstate the cost for bathrooms.
9. The QS figures and weightings in the weighted average cost scenarios for Class 1 and 2 buildings do not stand basic scrutiny.