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# Public Comment for Draft NCC 2022 28 May 2021

**Please note:**

**This is the draft response from Australian Network for Universal Design to the Draft NCC 2022**

**Please give feedback on this document to** [**anuhd@anuhd.org**](mailto:anuhd@anuhd.org) **by 10 June 2021.**

Please make a separate response if you wish.

See “How to use this response sheet” and proforma on p. 4

All responses must be made by 2July 2021.

You can find the ABCB Consultation HUB at <https://consultation.abcb.gov.au/engagement/ncc-2022-public-comment-draft/>

## Your details

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## Response(s)

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** 2.1(3)

**Recommended change to draft:**

It is recommended that 2.1(3), that is, “if the swing arc of the door does not extend far enough to enable door hardware to be outside of the clear opening width when the door is in the fully open position, any door hardware installed on the door leaf must be set at a height of not less than 900mm above finished floor level” be deleted.

The information note should read: “An 820mm door opening can reliably be achieved in most situations with a 920mm door leaf and door furniture”.

**Comment/reason for change:**

1. The door opening of 820mm is considered a minimum width for access for Silver Level. The protrusion of any door furniture into this space lessens the minimum width.
2. There are many wheelchairs with backrest structures that are higher than 900mm. These are likely to catch on the door furniture.

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** 3.1

**Recommended change to draft:**

It is recommended that the following change be made:

**All** internal doors ~~on the ground or entry level~~ of the dwelling must provide a minimum clear opening width of 820mm measured in accordance with Fig. 2.1

**Comment/reason for change:**

1. The objective of this Part is to ensure that housing is designed to meet the needs of the community, including older Australians and those with a mobility-related disability.
2. In accordance with H8F1 Livable housing Design, a dwelling should be designed such that it is capable of easy and cost-effective adaptation, and responsive to the changing needs of occupants. With the installation of a stair climber as needed, the dwelling can easily become accessible throughout.
3. The bathroom with the hobless and step-free shower, if on the first floor, would require an 820mm door clearance to be useable.
4. Using the same door size throughout the building will limit unforeseen building errors and costs.

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** 3.2

**Recommended change to draft:**

The threshold of an internal door that is subject to Clause 3.1 **or transitions within and between rooms** must—

1. be level; or
2. have a height not exceeding 5mm if the lip is rounded or bevelled

**Comment/reason for change:**

1. The current standard does not refer to internal transitions that are within and between rooms that are not at defined doorways, such as sunken lounges or changes in surfaces.
2. These transitions have the same effect on accessibility as transitions at doorways.

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** 4.2(a) and (b)

**Recommended change to draft:**

It is recommended that the following change be made:

1. For a toilet located in a separate sanitary compartment, there must be a clear width of not less than **1200mm** between the finished surfaces of opposing walls either side of the pan.
2. For a toilet located in a sanitary compartment that is combined with a bathroom, the pan **may** be located in a corner such that –
   1. the wall adjacent to the pan incorporates the reinforcing required by Clause 6.1;
   2. the centre-line of the pan is between 450mm and 460mm from the finished surface of the wall referred to in (i.)
   3. here must be a clear space of not less than **1200 mm x 1200 mm.**
3. For a toilet located in a sanitary compartment that is combined with a bathroom, the pan **may be located without an adjacent wall** such that—

**i. the wall behind the pan incorporates reinforcing of 1200 mm high and 1000 mm wide from finished floor level. (diagram will be required).**

**Comment/reason for change:**

1. The objective of this Part is to ensure that housing is designed to meet the needs of the community, including older Australians and those with a mobility-related disability.
2. The width of 900mm does not allow for ease of access, for a person using a mobility aid to transfer to and from the toilet pan with privacy; that is, with the door closed and the person with the mobility aid having room to turn 180 degrees.
3. Freestanding pans can have folding rails provided either side if there is reinforcement in the wall behind the pan. This offers greater flexibility for users.

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** H8D2(2)

**Recommended change to draft:**

(2) Clause 1.1 of the ABCB Standard for Livable Housing Design need not be complied with if—

1. It is not practicable to provide step-free access via an appurtenant garage, carport or parking space in accordance with Clause 1.1(1)(b) or (c); and
2. One or more of the following is true:
3. The average slope of the ground on which the access path would be constructed exceed a gradient of 1:14
4. To provide an external step-free access path would necessitate construction of ramping that exceeds the length and gradient allowed by Clause 1.1(4)
5. There is insufficient space available on the site on which to construct a step-free access path complying with Clause 1.1.

(3) Even if Clause 1.1 is not complied with:

1. **Any stairs provided as an alternative must be able to accommodate a stair climber or equivalent assistive technology at a later date;**
2. All other provisions of the ABCB Standard for Livable Housing Design must still be complied with.

**Comment/reason for change:**

1. The objective of the ABCB Standard for Livable Housing Design is to ensure that housing is designed to meet the needs of the community, including older Australians and those with a mobility-related disability.
2. Where Clause 1.1 cannot be complied with, provisions should be made for the easy installation of assistive technology, such as stair-climbers, at a later date.

*Click here to enter text.*

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This response sheet is to be used for submitting responses to the National Construction Code (NCC) 2022 Public Comment Draft.

## Response Sheet

## Your details

**Name:** *Click here to enter text.*

**Organisation:** *Click here to enter text.*

**Email or Phone No:** *Click here to enter text.*

## Response(s)

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** *Click here to enter text.*

**Recommended change to draft:**

*Click here to enter text.*

**Comment/reason for change:**

*Click here to enter text.*

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** *Click here to enter text.*

**Recommended change to draft:**

*Click here to enter text.*

**Comment/reason for change:**

*Click here to enter text.*

**NCC Volume(s):**  One  Two  Three  Housing Prov.  Livable Housing

**Clause/Figure/Table:** *Click here to enter text.*

**Recommended change to draft:**

*Click here to enter text.*

**Comment/reason for change:**

*Click here to enter text.*

## How to use this response sheet

1. Provide your details including name, organisation and contact details.
2. Provide your response(s) to the Public Comment Draft. For each response you should include—
   * the relevant NCC volume(s) that your response relates to by clicking in the appropriate box(es);
   * the “**Clause/Figure/Table**” that you are responding to, e.g. J6D3(1)(a), Housing Provision Figure 7.2.3 or Table C2D2;
   * your “**recommended change to draft**”, e.g. it is recommended that the proposed drafting to J6D3(1)(a) be amended as follows…(*see example*);

If you are not recommending a change, insert “N/A” in this field;

* + your “**comments/reasons for change**”. This should include justification to support your recommended change, e.g. heaters that emit light do not need to be excluded because these heaters have already been exempted by J6D3(3)(d) (*see example*).

If you are including multiple “**comments/reasons**”, use dot points or a numbered list.

1. Submit your response using the online response form on the ABCB website.

**Notes:**

*Completing all relevant fields will help to describe what change in the Public Comment Draft you are commenting on, what your alternative change is and why it should be made.*

*This response form is to only be used for submitting responses to proposed NCC amendments contained within the NCC 2022 Public Comment Draft. If you wish to make comments or a submission on documents that have been released with the Public Comment Draft, please follow the instructions accompanying that document.*