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Consumer, Building and Occupational Services
Department of Justice
PO Box 56
Rosny Park TAS 7018

By email to: CBOS.comms@justice.tas.gov.au

Re: Draft Directors Guidelines – Livable Housing Access Requirements

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank you for the opportunity to review and provide feedback on the draft Directors Guidelines – Livable Housing Access Requirements.

About our organisation

The Australian Institute of Architects (the Institute), has been the peak body for the architectural profession in Australia for more than ninety years. It is an independent, national member organisation, with more than 14,000 members across Australia and overseas and 340 members in Tasmania.

- The Institute's vision is: Everyone benefits from good architecture.
- The Institute's purpose is: To demonstrate the value of architecture and support the profession.

At the time of this submission the Tasmanian Chapter President is Daniel Lane RAIA and the Tasmanian Executive Director is Jennifer Nichols.

Our feedback

Members of the Tasmanian Chapter have reviewed the draft Directors Guidelines – Livable Housing Access Requirements (the Guideline), and generally think that the Guidelines is a helpful document.

However, the Guidelines contains information that is already elsewhere within the National Construction Code (NCC) suite of documents, along with the ABCB Livable Housing Design Handbook, and as such, adds another layer to the already complex building regulation system. It is noted that the Guideline pulls together this information, some of which is contained in the ABCB Livable Housing Design Standard – Part 1 Dwelling Access, and also within the NCC 2022 Volume Two Part H8D2. The Institute suggests that this information could be contained in the one place,

within the Livable Housing Design Standard, for clarity (noting that changes to any ABCB document is not within CBOS' remit).

More broadly, members have raised the complexity of the NCC and the associated suite of documents. It is noted that while the NCC Volume Two is for Class 1 and 10 buildings, much of the information that is needed is contained within the ABCB Housing Provisions. The ABCB Livable Housing Design Handbook is then another separate document. The NCC Volume Two Part H8D2 requires compliance with the ABCB Standard for Livable Housing Design, contained within the ABCB Liveable Housing Design Handbook, and only loosely touches on its contents. The Institute suggests that the ABCB Standard for Livable Housing Design should be an integral part of the ABCB Housing Provisions, which should be integrated into NCC Volume Two.

The Institute notes that the NCC and the associated ABCB documents can be complex, however they are a vital to have an understanding of. If there is broader confusion within the industry about the new liveable housing access requirements within Tasmania, the Institute suggests industry professional development sessions could be run, or there could be another mechanism to answers questions that may arise.

Whilst the Institute understands that these broader issues are not the focus of this consultation, in undertaking consultation with Institute members about these draft Guidelines, practical and cost implications of other parts of the ABCB Standard for Livable Housing Design were raised. These include the requirements for wall reinforcement for bathrooms and toilets (which the outcome of which effectively increases the floor area of bathrooms), and the exemptions that are applied to small prefabricated buildings, but not small buildings of the same size if they are constructed on site. As with any changes, the impacts of these are often not realised until things are put into practice, and the Institute would appreciate the opportunity to discuss these implications further with CBOS.

Thank you for consulting with the industry and professions regarding the draft Guidelines. Please don't hesitate to contact us if you would like to discuss the above further, or if we can further contribute in any way.

Kind regards,



Daniel Lane

President, Tasmanian Chapter
Australian Institute of Architects



Jennifer Nichols

Executive Director, Tasmanian Chapter
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