
NCC Public Comment Draft Response Sheet



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

Response Sheet

Your details

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Response(s)

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

Clause/Figure/Table: Clause E1D6 Where sprinklers are required: Class 2 and 3 buildings other than residential care buildings, sub-clause 1 (a)

Recommended change to draft:

Amend as shown in red: , a rise in storeys of ~~four~~ two (2) or more; ~~and~~ or

Comment/reason for change:

With increasing use of Class 2 apartments as a housing solution for vulnerable population groups, with a range of needs that may make it difficult for physical, sensory or cognitive reasons to escape quickly in a fire, sprinklers for Class 2 apartments (as well as Class 3 homelessness shelters) of two storeys or more will improve the chances for saving people's lives in the event of a fire.

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Clause/Figure/Table: Referenced Documents – Table 1

Recommended change to draft:

Clarification is required as Table 1 references AS 3740 2010 Waterproofing of domestic wet areas (including Amendment 1). However NCC 2022 public consultation draft Volume Two

& Housing Provisions 2022, Clause 10.2.1 Wet areas has shown has struck out sub-clause 1-(b) “~~comply with AS 3740~~”

Comment/reason for change:

Two different approaches to the applicability of AS3740.

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Clause/Figure/Table: Clause 1.1 Step-free access path, sub-clause 2 (d)

Recommended change to draft:

Amend with additional text as shown in red: “ (d) have a minimum width of 1000 mm with a side kerb of minimum 150mm height where the adjoining ground level is below the pathway or has an embankment of slope steeper than 1:40 for a width of 600mm from the edge of the path; and”

Comment/reason for change:

This is a safety issue, and a change will avoid trips and falls where the pathway is at a height from surrounding area. The 150mm side kerb and 600mm embankment are both established means of safety features for aged, people with low vision and people that require use of a wheelchair as noted in AS1428.1

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Clause/Figure/Table: Clause 1.1 Step-free access path – sub-clause 2

Recommended change to draft:

Additional sub-clause 2(g): “(g) Slip resistance in the path of travel should be minimise and provide safe access for dry and wet conditions applying R11 as per AS 4586.”

Comment/reason for change:

To prevent slips which cause a fall and to ensure that powered and manual wheelchair users are able to retain appropriate traction, braking and steer.

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Clause/Figure/Table: Clause 1.1 Step-free access path, sub-clause 4(a)

Recommended change to draft:

Amended wording to sub-clause 4(a) to read as shown in red: “(a) The aggregate length of a ramping in a single direction (excluding landings) must not exceed— “

Add new sub-clause (b) and relabel other following sub-clauses: “(b) However total aggregate lengths of ramps providing a travel path between two or more points may exceed these lengths, subject to (a)”

Comment/reason for change:

Sub-clause 4a) appears to imply only one length of inclined access path of the maximum length for the given gradient is permitted, whereas more than one inclined access paths may be a better solution.

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Clause/Figure/Table: Clause 1.1 Step-free access path, sub-clause 4(b)

Recommended change to draft:

Add to *sub-clause 4 b) further italic point (iv):* “(iv) landings and ramps are to be within the property boundary.”

Comment/reason for change:

Reason: Relying upon a public footpath or other public area external to the site where a ramp concludes as a landing may contain hazards such that it not suited for use as a landing. Hazards might include vehicles, high volume pedestrian traffic or feature of the surface itself including being non-level, uneven or having low slip resistance.

Comment: Noting that the Liveable Housing Australia Design Guidelines require the entire top and bottom landing of a ramp to be within the site boundary. AS1428.1 permits the 1:14 ramp to start within 900mm of the site boundary to allow for handrail extensions and Tactile Ground Surface Indicators.

We also note that the intent of the NCC as expressed in the Public Consultation Draft of the Liveable Housing Design Standard may need to be clarified. Whereas the text uses the word 'ramp', AS1428.1 does not include 1:20 grade walkways. However sub-clause 4(a) ii seems to imply that 1:20 is also a ramp for the purposes of this NCC.

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Clause/Figure/Table: Clause 1.1 Step-free access path, sub-clause 4 (c)

Recommended change to draft: *Additional wording to 4.c. as shown in red:* 4 (c) The landing space required by (b) must be measured exclusive of the swing arc of any door or gate that opens on to the landing. **Where this occurs in common entries to a Class 2 building the circulation spaces shall be designed in accordance with Part D4**

Comment/reason for change:

To avoid conflict with Part D of the NCC which requires common use areas of Class 2 to comply with AS1428.1

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Clause/Figure/Table: Clause 1.1 Step-free access path – sub-clause 4

Recommended change to draft:

Add new clause 4 (d): “4. (d) Where the longitudinal slope in the public domain exceeds 1:40 a 1200mm long landing shall be provided inside the property boundary to facilitate safe transition to the site pathways leading to the main entry door”

Comment/reason for change:

Safety issue, to facilitate safe transition from public domain where grade could be very steep thus not permitting a safe transition to ramp within the allotment boundary.

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Clause/Figure/Table: Clause 1.1 Step-free access path, sub-clause 5(d)

Recommended change to draft:

Delete the words: “irrespective of the gradient”.

Comment/reason for change:

This line serves no purpose.

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Clause/Figure/Table: Clause 1.2 Parking space incorporated into step-free access path, sub-clause 1.

Recommended change to draft:

Additional subclause (1) (c): “(c) Where the parking space is located in the confines of a garage or carport, there should be a minimum width of 3200mm plus 300mm for each adjacent wall, enclosing barrier or parking space on either side of the parking space.”

Comment/reason for change:

To provide sufficient width to be functional for wheelchair movement where there is wall, other enclosing barrier or parked vehicle to either side of the intended parking space

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Clause/Figure/Table: Clause 1.2 Parking space incorporated into step-free access path, sub-clause 1.

Recommended change to draft:

Add new sub-clause 1(d): “(d) Where the 3200mm wide x 5400mm long parking space is within a single car garage the size of the garage is required to be 3800mm wide”

Add sub-note: “Standard 5.4M wide double garage would be deemed adequate for this purpose as it can accommodate 2 cars when a wider space is not required.”

Comment/reason for change:

To comply with AS4299 which permits doors to be open for a mobility aid to be used and for access to the doorway inside a single garage. A standard 5.4M wide double garage would be deemed adequate for this purpose as it can accommodate 2 cars when a wider space is not required.

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Clause/Figure/Table: H8P1 Livable housing design - Exemptions

Recommended change to draft:

Additional text to be inserted below the exemptions: "However, it is not the intention of these exemptions to ordinarily deem a car space under a house or below as exempt, and especially including one on a flat site."

Comment/reason for change:

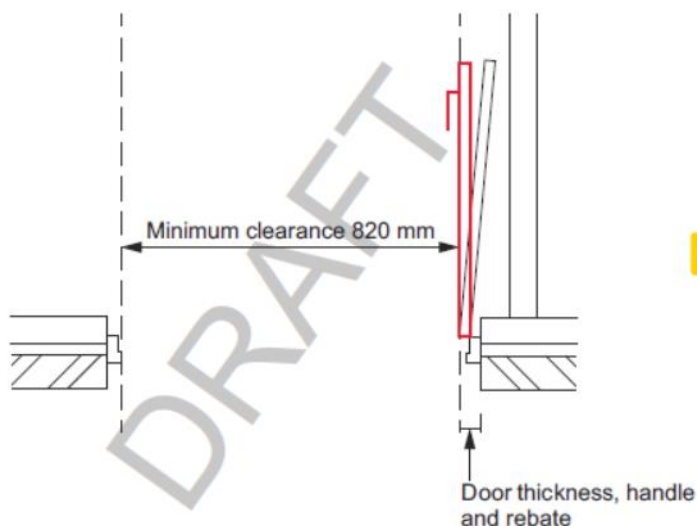
Steep sites, small sites, or other local factors where a high floor level is required (eg flood prone areas) are reasonable to consider for exemptions. However 'gaming' of the standards should not be encouraged and every effort made to comply with the intent of the standard.

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Clause/Figure/Table: Figure 2.1: Measurement of clear opening width – Figure note 1

Recommended change to draft:

Alternative Figure 1:



Comment/reason for change:

Measurement method for 820mm opening contradicts AS1428.1 which requires doorways to be measured at 90 degrees (permitting the door handle to be within the opening as long as it is minimum height of 900mm which is standard building practice). This will cause confusion in the industry with 2 methods of measurements. (for example common use doorway in Class 2

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measured with door leaf at 90 degree opening and internal doorways for the apartments via this standard. For sake of consistency provide image with door leaf at 90degrees. Show door handle permitted within the 820mm space

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Clause/Figure/Table: Figure 2.1: Measurement of clear opening width

Recommended change to draft:

Alternative Figure note 1 to read as follows: “Double doors, bi-fold doors may be used, with additional door leaves. However, a main single active leaf leaf must be included with a minimum leaf opening of 820mm such that entrance and egress can take place without the need to open additional leaves.”

Comment/reason for change:

Smaller leaves in a double door set as the inactive leaf usually includes additional unreachable door furniture such as barrel bolt or flush bolts. Entrance and egress must be able to occur as if the door were a single leaf door with a minimum effective leaf opening of 820mm, and opened and secured using one single ergonomically optimal door handle inclusive of the security lock. Door should be able to activated with one hand

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Clause/Figure/Table: Clause 2.2 Threshold, sub-clause (c)(i)

Recommended change to draft:

Amend as shown in red to: “does not exceed ~~53~~35 mm in height; and”

Comment/reason for change:

The maximum 56mm threshold ramp height should be 35mm to be consistent with AS1428.1.

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Clause/Figure/Table: Clause 2.2 Threshold, sub-clause (c)(iv)

Recommended change to draft:

Amend subclause (c) (iv) to: (iv) ~~does not~~ can intrude into the minimum dimensions of a landing area that is required by Clause 2.3 Landing Area.

Comment/reason for change:

For consistency. Provision of a doorway threshold ramp within landing spaces is permitted in both Livable housing design standard as well as AS1428.1

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Clause/Figure/Table: Clause 2.3 Landing area, sub-clause 1

Recommended change to draft:

Additional sub-clause (c) to add as a subpoint to clause 1: “(c) The 1200x1200 space is to be fully in front of the doorway. Minimum overhead cover must be provided to the landing area of dimensions 1200mm depth x 1200mm width and immediately adjoining the entrance.”

Comment/reason for change:

To provide protection from rain and sun while gaining access into the dwelling, securing the dwelling upon egress, or waiting for others to provide access or waiting for transport.

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Clause/Figure/Table: Part 3 Internal doors and corridors

Recommended change to draft:

New clause 3.4: “3.4 Internal rooms at the entry level. There shall be no stepped level difference within a room at the entry level.”

Comment/reason for change:

To ensure that all essential spaces at the entry level are accessible as in the current proposal it is possible to have split levels and only part of the spaces accessible.

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Clause/Figure/Table: Part 4 Toilet – Clause 4.1 Location

Recommended change to draft:

Amend with additional text as shown in red and brackets: “There must be at least one sanitary compartment (this means both a toilet and a shower- but these may be in different rooms) within the ground or entry level of a dwelling.”

Comment/reason for change:

Required for clarity.

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Clause/Figure/Table: Clause 4.2 Circulation space, sub-clause (a)

Recommended change to draft:

Add to sub-clause (a) text as shown in red: “(a) For a toilet located in a separate sanitary compartment, there must be a clear width of not less than 900 mm between the finished surfaces of opposing walls either side of the pan, clear of basin or any other fixtures such as

a vanity cupboard. Note: Fixtures such as toilet paper holder, towel rails can be provided as long as the depth of these fixtures is not more than 150mm.”

Comment/reason for change:

Required for clarity

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Clause/Figure/Table: 4.2 Circulation space – sub-clause (b) (ii)

Recommended change to draft:

Amend sub-clause (b) (ii) as shown in red: “(b) (ii) (ii) the centre-line of the pan is between 450 mm and 460 mm from the finished surface of ~~the~~ any one wall referred to in (i).

Comment/reason for change:

Required for clarity and design flexibility

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Clause/Figure/Table: 4.2 Circulation space – sub-clause (c)

Recommended change to draft:

Amend sub-clause (c) as shown in red: “(c) ~~If a door used to access the sanitary compartment swings inward, a~~ A minimum circulation space of 1200 mm must be provided from the front edge of the pan to the swing arc of the hinged door or any other type of door such as a the sliding door to the sanitary compartment,”

Comment/reason for change:

Reason: This sentence seems to imply that the 1200mm clear space is only required if the door is an inwardly swinging type. *Figure 4.2a: Circulation space for a toilet located in a separate room* shows that the clear space is required regardless of direction of swing, as would also be required for a sliding door.

Comment: The 1200mm clear space in terms of length should be reviewed. The visitable toilets as per AS4299 which were based on research required a space of 900x1250mm.

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Clause/Figure/Table: Figure 4.2a

Recommended change to draft:

Amend Figure subtitle with additional wording as shown in red: “Figure 4.2a: Circulation space and location of wall reinforcements for a toilet located in a separate room.”

Comment/reason for change:

Required for clarity

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Clause/Figure/Table: Figure 4.2b

Recommended change to draft:

Amend Figure subtitle with additional wording as shown in red: "Figure 4.2b: Circulation space and location of wall reinforcements for a toilet located in a bathroom."

Comment/reason for change:

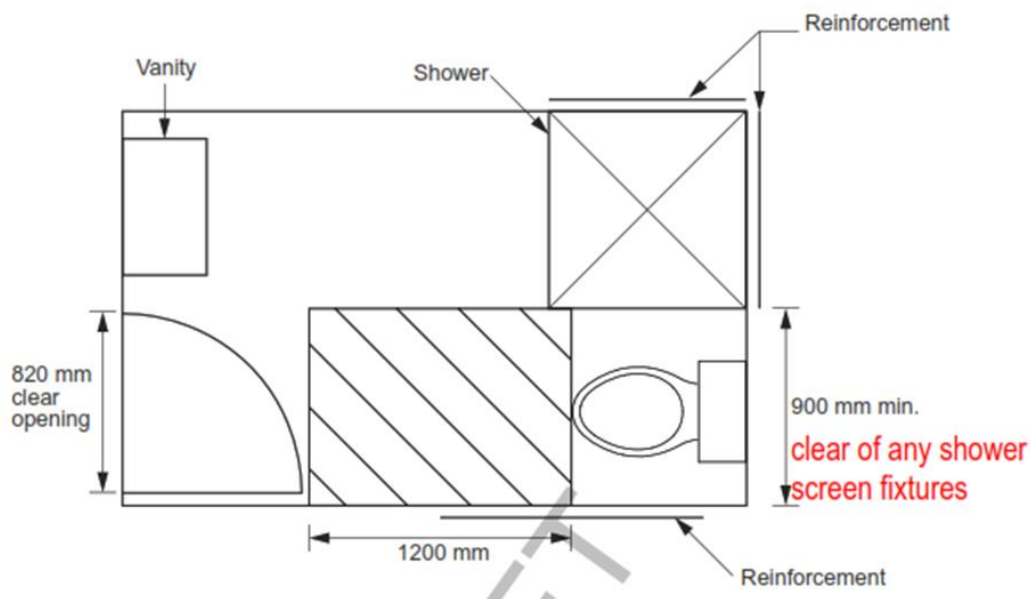
Required for clarity

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Clause/Figure/Table: Figure 4.2b

Recommended change to draft:

Add text: "clear of any shower screen fixtures" to Figure 4.2b as shown:



Comment/reason for change:

Required for clarity

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Clause/Figure/Table: Clause 5.2 Hobless and step-free entry

Recommended change to draft:

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Amend clause (as shown in red: “At least one shower on the step-free entry level within the dwelling must comply with each of the applicable clauses in this Part.”

Comment/reason for change:

Required for clarity

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Clause/Figure/Table: Clause 5.2 Hobless and step-free entry, sub-clause 1

Recommended change to draft:

Alternative (additional wording) for sub-clause 1: “At least one shower is to be located on a floor level which is able to be passively accessed without powered lifts or stair climbing chairs, but may be accessed using a compliant internal ramp, and which must have a hobless and step-free entry.”

Comment/reason for change:

To ensure access to the hobless and stepless shower is fully available with reference to the level of the dwelling on which entry and exit occurs and which is independently accessible without reliance on additional mechanical conveyance apart from the person’s own wheelchair or other personal mobility aid (including wheeled shower chair).

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Clause/Figure/Table: Clause 5.2 Hobless and step-free entry

Recommended change to draft:

Add further sub-clause 3: “3. The shower floor must have a minimum slip resistance of (R11) as per AS 4586.”

Comment/reason for change:

A quantified slip resistance would assist the prevention of falls resulting from a slip in the shower. Our recommended change also refers to Standards Australia HP197 1999. We note there appears to be no such specification for bathroom floors in NCC Volume 1 or 2 and even references to “slip-resistance” in relation to pool surrounds and the areas surrounding pool hoists in the public consultation draft Volume 1 NCC 2022 are currently unquantified.

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Clause/Figure/Table: Clause 5.3 Shower screen, sub-clause 1

Recommended change to draft:

Delete word as shown in red: “1. The shower screen ~~door~~ (if provided) must be capable of removal without causing damage to adjoining parts of the shower enclosure.

Comment/reason for change:

The doors in standard shower screens can be as narrow as 600mm. Therefore the entire screen should be removable. This is consistent with the requirements of LHDG (Livable housing design guidelines).

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Clause/Figure/Table: Clause 6.2 Construction – subclauses 2(a) and 2(b)

Recommended change to draft:

Replace sub-clauses 2(a) and 2(b) with a new single sub-clause 2 (and supporting schematic diagrams): “2 Any wall openings such as door / window openings including door / window frames are to be clear of the required wall reinforcements.”

Comment/reason for change:

This clause is incorrect as it seems to imply that if the wall for reinforcement is not available then the reinforcement need not be provided. Clarity is required as this is a major issue.

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Clause/Figure/Table: Figures 6.2 (a)

Recommended change to draft:

Delete Figure 6 (a) Location of noggings for walls surrounding a bath.

Comment/reason for change:

The prescribed locations and dimensions do not sufficiently cater to a variety of needs of users according to their differing size or functional attributes. Flexibility and more bespoke responses are required. The prescribed specification risks being considered as an adequate universal response for a large range of needs of bathtub users.

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Clause/Figure/Table: Figures 6.2 (c)

Recommended change to draft:

The wall reinforcement and noggging location diagrams shower areas need to be extended.

Comment/reason for change:

The areas shown are insufficient in coverage for larger or more extended rail systems involving rails of greater dimensions or multiple rails/ hand holds.

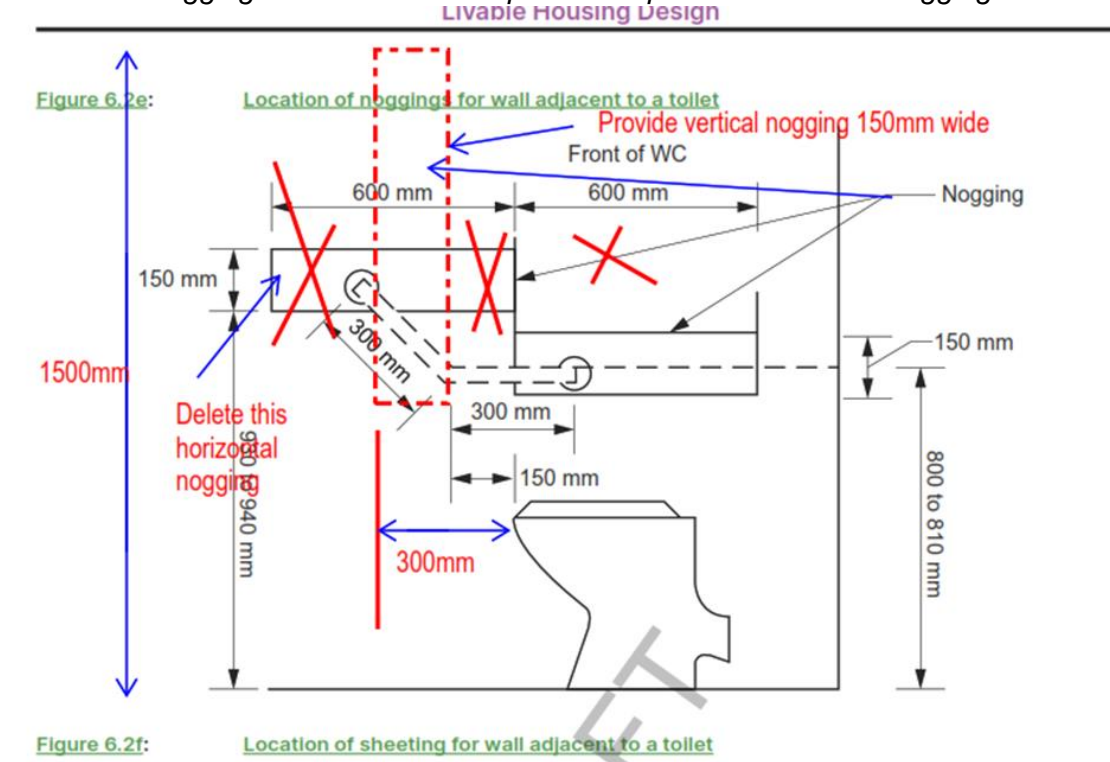
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Clause/Figure/Table: Figures 6.2 (e)

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Recommended change to draft:

Delete the nogging forward of the WC pan and replace with vertical nogging as shown:

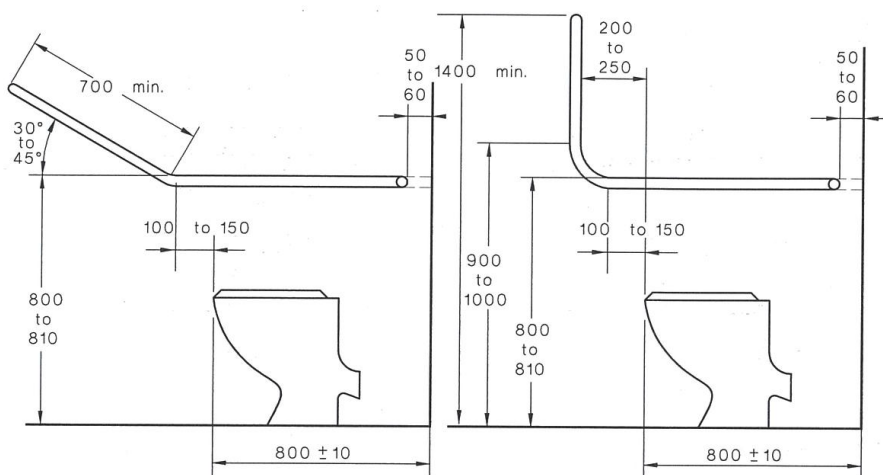


Comment/reason for change:

The 600mm nogging option forward of the pan should be redesigned to allow for the most commonly used 90 degree grabrail available in the market in lieu of the short angle grabrail shape which is shown in the document which is hard to source. See most commonly available grabrail size shown below (AS1428.1).

AS 1428.1—2009

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(a) Side view showing optional systems for grabrail at sides of pan

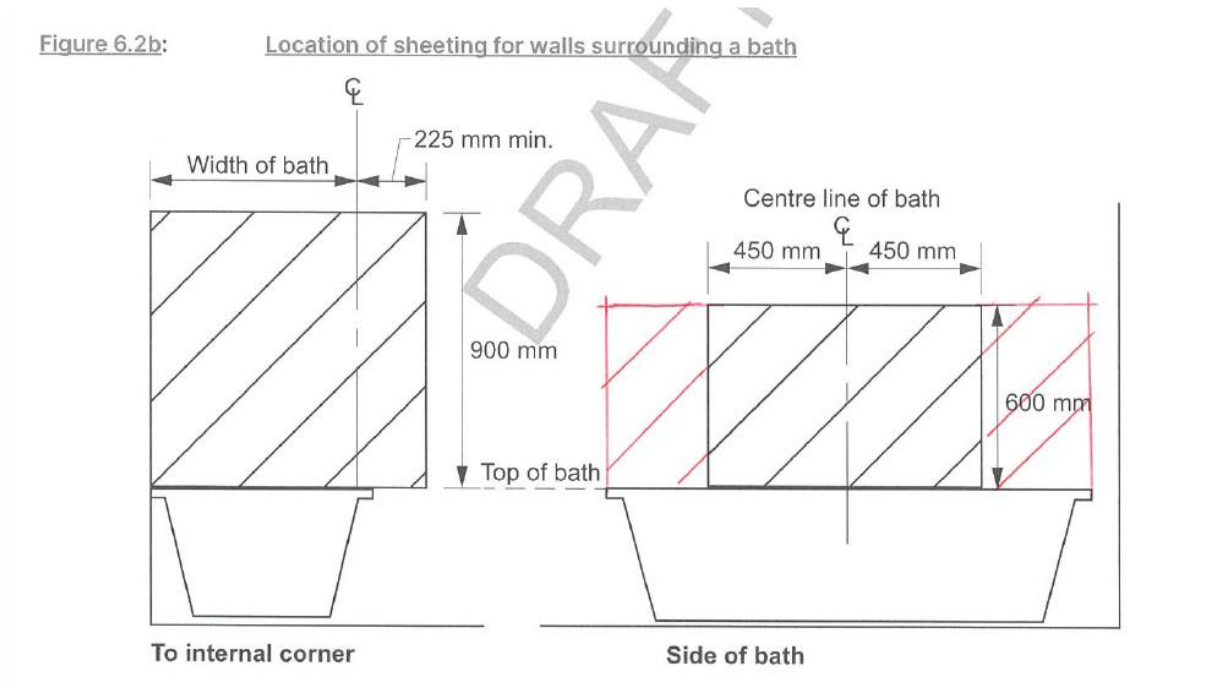
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Clause/Figure/Table: Figures 6.2 (b), (d) and (f)

Recommended change to draft:

The indicated areas of sheeting in the schematic diagrams should accord with AS4299.

The extension of the area for 6.2 (b) is as follows:



Comment/reason for change:

All sheeting areas in the document are based on Livable Housing Design Guidelines that were not based on any research. The AS4299 has the recommended area of sheeting which is slightly different and for consistency the AS4299 version of sheeting for WC pan, shower and bath tub should be used.

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Clause/Figure/Table: Figures 6.2 (b), (d) and (f)

Recommended change to draft:

The indicated areas of sheeting in the schematic diagrams should accord with AS4299 or better.

Comment/reason for change:

All sheeting areas in the document are based on Livable Housing Design Guidelines that were not based on any research. The AS4299 has the recommended area of sheeting which is slightly different and for consistency the AS4299 version of sheeting for WC pan, shower and bath tub should be used. We note there may be a more recent and more rigorous standard such as the National Disability Insurance Scheme's (NDIS) Specialist Disability

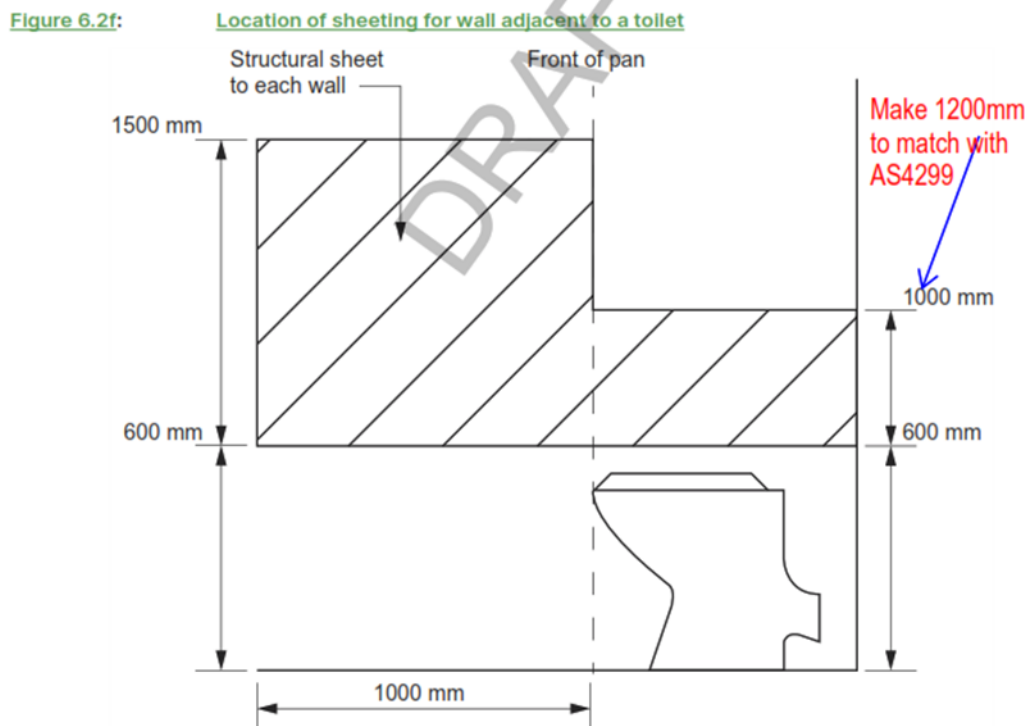
Accommodation (SDA) Design Standard (2019) which specifies that for 'improved liveability' and 'robust' design categories, "Internal side of full sanitary facility shall have wall reinforcement which consists of minimum 12mm thick sheeting, from FFL [finished floor level] and extending to a height of minimum 2100mm from FFL." (pp 38).

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Clause/Figure/Table: Figures 6 (f)

Recommended change to draft:

Extend height for upper edge of sheeting immediately adjacent to toilet from 1000mm to 1200mm to match AS4299 as shown in this diagram in red:



Comment/reason for change:

Most Councils in NSW reference AS4299 Adaptable Housing Standards for around 10 to 20% of the building stock. The Standard which was based on research already has the requirements for wall reinforcements and therefore introducing a new version of the required wall reinforcement will create confusion in the market. Also it should be noted that LHDG were not based on any research and therefore an established Australian Standard provision should take precedence. This is required for clarity as well.

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Clause/Figure/Table: Table E3.6 (a) Limitations on use of types of passenger lifts

Recommended change to draft:

Add new table sub-clauses (g) (h)(i)(j) as follows:

“(g) when in the unfolded position, encroach on the minimum width of a stairway plus 300 mm; or

(h) rely upon users to use the long edge (1200mm side) of the platform; or

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- (i) be installed on stairways where the lower landing is less than 3000 mm in length or the upper landing is less than 2000 mm in length; or
(j) be installed on stairways where the height clearance above each nosing is less than 2800 mm”

Comment/reason for change:

E3.6 amendments are required to fill the gaps created by the deletion of parts 7, 14 and 15 from the NCC.

To provide for adequate stairway width when these type of lifts are used

A wheelchair finds it very difficult to make a 90 degree turn when entry is required on the longer side of the platform

Landings are required so that when the stairway platform lift is in the open position the wheelchair can use the landings to get on and off the lift including making a turn

Head height clearance is crucial for use of the lifts

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Clause/Figure/Table: Table E3.6 (a) Application of features to passenger lifts

Recommended change to draft:

It is noted that this replicates Table E3.6a & Table E3.6b and references AS1738.12 and page 544 states it is AS1735.12 1999.

There is a later version of AS1735.12 2020 which should not be referenced as it is inconsistent with the NCC and AS1428.1 despite the Australian appendix.

It should also not be used as a basis for performance solutions as it is deficient in respect to Australian conditions.

We are unsure how to ensure this requirement is embedded into the NCC.

If NCC were to reference AS1735.12 2020 there will need to be a substantial rewrite of this clause to ensure all inconsistencies and inaccuracies are rectified.

1. Insert new sub-clause row below current draft sub-clause (g) Lift landing doors at the upper landing: “Lifts that provide manually operated doors and gates must provide

- doorway landing circulation spaces complying with AS1428.1; and
- landing areas with a slope complying with AS1428.1;
- sills (lift floor) that exceed 10mm or more in height difference to the landing must provide a 1:8 gradient threshold ramp with a maximum length of 280 mm; and
- D-handles complying with AS1428.1; and
- force to open the door or gate must not exceed 20 Newtons.

Add note: “Door automation is required where door/ gate handle is less than 500mm from an internal corner”.

2. Insert two new rows below current draft sub-clause (h):

“Where lift and landing control buttons require continuous pressure, then:

- control buttons must be in a height range of 900 mm to 1100 mm above the lift floor and 500 mm minimum distance from the corner of the lift or platform; and
- luminance contrast needs to comply with AS1735.12; and
- the force to operate the control buttons shall not exceed 5 Newtons.”

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“Where lifts are not enclosed within a walled enclosure at the lower landing then they must incorporate a retractable protection screen to avoid headroom hazards.”

3. Amend current sub-clause (i) with additional text as shown in red: “(i) A Lighting in accordance with AS 1735.12 for all enclosed and semi-enclosed lift cars”

Comment/reason for change:

E3.6 amendments are required to fill the gaps created by the deletion of parts 7, 14 and 15 from the NCC.

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Clause/Figure/Table: D1V3

Recommended change to draft:

Delete entire section from NCC

Comment/reason for change:

Verification method for ramp gradient, crossfall surface profile....., is fundamentally wrong and contradicts the DTS requirement for 1:14 ramps. It is recommended that this formula be removed. This should be replaced by simpler interpolation tables.

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Clause/Figure/Table: F4D5 (c)

Recommended change to draft:

AS1428.1 uses the defined term 'ambulant accessible toilet' and the NCC draft now creates a contradiction with the new terminology ambulant disability toilet. We recommend the existing definition of 'ambulant accessible toilets' be retained.

We recommend the permissibility of unisex ambulant accessible toilets where they are stand alone cubicles.

Comment/reason for change:

The ABCB should initiate the project to include a definition for all gender toilet facilities consistent with LGBTIQ community social trends.

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Clause/Figure/Table: F4D12

Recommended change to draft:

We recommend the expansion of development types for the inclusion of accessible adult change facilities in particular University and Tafe College campuses, and significant tourist destinations.

Comment/reason for change: Increase social inclusion for people with disabilities.

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Clause/Figure/Table: F4V1(3)(c)

Recommended change to draft:

Delete sub-clause 3 (c).

Comment/reason for change:

The time provisions for verifying the number of toilets is not appropriate for wheelchair accessible toilets and the existing DTS provisions should apply.

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Clause/Figure/Table: E3D8

Recommended change to draft:

There needs to be relevant clauses that address the different lift types covered by these parts of AS1735

Comment/reason for change:

Since the deletion of reference standards AS1735 parts 7, 8, 14,15, and 16 the DTS requirements do not adequately cover the necessary requirements for access for people who use a wheelchair.

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Clause/Figure/Table: G7P1

Recommended change to draft:

Amend as shown in red: "Each sole-occupancy unit in a Class 2 building must be provided with—

(a) at least one level **that has a living area** and step-free entrance door into the sole-occupancy unit from an accessible part of the floor on which it is located; and

(b) internal doors and corridors which facilitate unimpeded **step-free** movement between spaces; and"

Comment/reason for change:

A big loophole exists whereby a dwelling would comply with these requirements if it has a step free entry door with just a bathroom at the entry level. To ensure visitability at least a living area is also required to be on the entry step-free level. Unimpeded is not qualified and therefore should be replaced with "unimpeded step-free".