

20 December 2024

Hon. Sam O'Connor MP
Minister for Housing and Public Works
Minister for Youth
1 William Street
BRISBANE QLD 4000

Dear Minister

Small frontage blocks NCC accessibility exemption extension

We are writing to ask you to urgently consider extending the current National Construction Code accessibility provision exemption for homes built on smaller blocks of land with frontages less than 12.5 metres.

The current exemption was granted for a period of one year, and that period is to expire imminently, at the end of March 2025. We understand that you have received advice that this exemption is no longer required and should be removed. This is incorrect. In fact, given the continuation of the housing crisis, there has never been a more important time for the exemption.

Minister, we cannot emphasise enough the importance of retaining the existing exemption to the ongoing efficient and cost-effective delivery of new homes on smaller lots in Queensland.

Accessibility requirements that formed part of the NCC 2022 changes are continuing to have significant impacts on the delivery of new housing, however there remains disproportionate impacts on smaller detached lots, which are amongst the most affordable new housing product available during a housing affordability and supply crisis.

Removing the current 12.5-metre frontage exemption will increase the cost of smaller, more-affordable homes, reduce yield and ultimately, put further upward pressure on house prices. Builders have provided figures to show that the cost premium to build a single level three bedroom home is around \$8,000 as a direct result of the new NCC accessibility requirements, even on a site with bigger frontage. It is expected that this cost premium would only increase on a smaller frontage block, as construction options are more limited, and access is constrained.

The exemption is particularly needed in South East Queensland, where the exemption is most applicable given the government's clear direction to increase housing affordability, choice, and densities in greenfield communities.

In our submissions to the then-government in late 2022, we noted that:

- All infill lots would be impacted by the NCC 2022 changes
- There would be significant timeframe and yield impacts associated with adjusting masterplans to remove smaller, more affordable, lot sizes
- Around 30% of Broadhectare subdivisions have frontages of 12.5 metres or less and therefore the number of lots that would be negatively affected by the accessibility standards were up to around 23,000 existing lots.

Given the significance of these concerns, our organisations urged the then-government to consider an exemption. This exemption was also sought, given the absence of a resolved and improved mandatory Housing Code, which would provide greater clarity and a more modern approach to the building envelope, reflecting current design and consumer preferences. The variance in approach by different local governments and, in some cases, across different neighbourhoods within the same local government area, dictates the ability of our collective members to deliver the built form product that consumers are seeking, on lots of varying sizes. The combination of larger setback requirements and the increases in building width (as a result of the accessibility requirements), mean that smaller lot product (12.5 metres) would be unviable.

We are seeking an extension of the exemption, at least until such time that a mandatory statewide Housing Code is established to provide greater clarity on our industry's ability to continue to deliver much needed, small lot product.

At this time, Queensland cannot afford any unnecessary increased housing costs or construction complexity. There is precedent in other states where New South Wales and Western Australia have not committed to adopting increased accessibility standards, recognising the potential impacts on new home delivery.

The current exemption in Queensland has continued to enable the production of high quality, in-demand homes on smaller blocks, and has attracted no complaint or controversy in the community that our industry is aware of.

As you know, in order to meet housing targets that now exceed 50,000 per year in Queensland, all sectors of the home construction industry need to be firing – detached homes, unit towers and smaller infill and multi-unit developments.

Maintaining the current non-controversial exemption to accessibility standards for small-frontage blocks is one way that the government can support industry and first home buyers and continue to demonstrate its commitment to doing everything possible to increase housing supply.

Kind regards



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