

25 March 2025

Tom Kearney
Executive Director Policy and Programs
Building Commission NSW

Via email: HBAreview@customerservice.nsw.gov.au

Re: Livable Housing Requirements in NSW Discussion Paper

Dear Tom,

In addition to the submission Urban Development Institute of Australia NSW (UDIA) provided on 20 March 2025 to the Livable Housing Requirements in NSW discussion paper, we seek to provide an addendum and expand the feedback that was not included in the original document.

This feedback was provided by a member (deidentified) who specialises in delivering apartments for both sale and rent on a large scale. They have estimated the additional costs being far higher than those presented in the discussion paper as those figures do not account for the loss of yield as explained in our submission. They have calculated the estimated costs in NSW beyond the physical work being at circa \$51,000. They calculate an additional \$15,000 needs to be accounted for per dwelling by way of the loss of yield across the entire building. This is because the GFA/FSR restrictions that apply in NSW mean that accommodating the increased space needed for an accessible bathroom while maintaining the size of living and bedrooms means fewer units can be built overall in the building with the available building floorspace. The remaining estimated extra cost is associated with building 30% larger basements to accommodate the additional width required for each accessible car space (\$36,000) which can vary significantly depending on subsurface conditions (geotechnical, groundwater, contamination) and the additional time required to deliver the project. As noted in our submission, while the consent authority is the one who determines the portion of carparks that are required to be accessible,

increasingly, consent authorities are requiring up to 30% to be delivered to an accessible standard.

As we flagged in our submission one concern in mandating the silver standard of accessibility is that there will be a concerted push to then mandate that all carparks are also made accessible, which would require major changes to the layout and design of apartment basements.

Should your team require further information please contact Harriet Platt-Hepworth, Director of policy on 0474 772 291 or hplattheppworth@udiansw.com.au.

Kind regards,

A handwritten signature in black ink, appearing to read 'Stuart Ayres', with a stylized flourish at the end.

Hon. Stuart Ayres
Chief Executive Officer