

17 March 2017

Senator the Hon. Arthur Sinodinos, AO  
Minister for Industry, Innovation and Science  
Parliament House  
Canberra ACT 2600



**By email: [senator.sinodinos@aph.gov.au](mailto:senator.sinodinos@aph.gov.au)**

Dear Minister

We acknowledge receipt of the report on the Review of the *Disability (Access to Premises – Buildings) Standards 2010* (Premises Standards) Report and the Government's response.

The Registered Accommodation Association of Victoria (RAAV) is the peak industry body whose 115 members operate around 380 or one third of Registered Rooming Houses in Victoria. These premises provide affordable accommodation for low income people, homeless, disadvantaged and vulnerable people. The prime source of this accommodation is in Class 1b rooming houses.

RAAV is pleased to note the coverage which has been given to the effect that the disability provisions have had on providing Class 1b accommodation requirements and "the impact of Premises Standards on Class 1b buildings".

The Report adds that "a clear theme emerged from submissions that the requirements may be acting as a disincentive to the conversion of buildings to specified Class 1b buildings". The main reason provided was that the cost of compliance was too onerous, causing a reduction in conversion of pre-existing Class 1a buildings. RAAV commented in the Review on the impact the Premises Standards were having on the rooming house sector.

We repeat our conclusions made during the Review that the Premises Standards have had such an adverse impact on the rate of conversions that it has caused a reduction in the number of rooming houses available to people who are disadvantaged, homeless or vulnerable. This also applies to new buildings being constructed for rooming houses as the same issues apply.

There is virtually a complete stop of conversions from Class 1A to Class 1 b rooming houses. Many building sites are unsuitable for including disability access facilities making it much more expensive and harder to convert Class 1a's or to build new dwellings. In addition, the cost of the conversions cannot be recovered over the period of a lease.

We are taking this opportunity to restate the results of a survey RAAV conducted about the impact of the disability access provisions in Class 1b which was included in our submission in 2015. RAAV received 58 response from its members at that time, an encouraging 70% response. These 58 members own or operate 167 registered rooming houses with 1,314 residents.

The survey reported that over a four year period, only 6 members had received a total of 7 requests to provide disabled access facilities with 52 members reporting that they had not received a request for providing disabled facilities. Based on the industry average of 5 enquiries per room in the rooming houses surveyed, 26,280 enquiries for accommodation were received. The percentage of requests for disability access rooms over the 4 years was 0.0266% or less than three out of every 10,000 enquiries.

Regrettably, the survey found that 204 class 1b rooming houses were deferred or cancelled with 1,605 people remaining homeless. 244 new class 1b rooming houses would be opened if the legislation is rescinded accommodating a further 1,865 people. Both of these initiatives would have assisted in significantly reducing the current homelessness crisis in Victoria.

The impact of the reduction in Class 1b rooming houses is slow to materialise as rooming houses close and new ones are not replacing them. This is now contributing to massive social issues in Victoria and the Government has had to step in to provide vast quantities of funds to apply “band aid” measures.

It is also pleasing to note that the Report includes RAAV’s comments that the Premises Standards should not apply to rooming houses as they are “not public buildings”. Rooming houses are private homes of the residents and are a principal place of residence, the same as residents in Class 1a dwellings.

RAAV complements the Government’s “support in principle” of the establishment of an expert advisory group to consider whether the conversion of Class 1a building to specified Class 1b rooming/boarding houses has been affected by the Standards as outlined in 2.1.1 of the Review Report.

We note that the expert advisory groups should include accommodation stakeholders. RAAV would be pleased to participate in such a group. We encourage the Government to form the group under consideration in Recommendation 6.a as a matter of urgency given the increasing social issues being faced by disadvantage, homeless and vulnerable people in Victoria.

RAAV would welcome the opportunity to meet with the Government to discuss this important social issue and we look forward to receiving your early response.

Yours sincerely

A handwritten signature in black ink, appearing to read "Simon Roberts". The signature is fluid and cursive, with the first name "Simon" and the last name "Roberts" clearly distinguishable.

**Simon Roberts**  
**President**

Copy: The Hon. Craig Laundy, MP  
Assistant Minister for Industry, Innovation and Science