

# Comment – Australian Network for Universal Housing Design

#### Comment

Please see attached submission. We have focused on the Livable Housing Design Standard (the Standard).

This submission argues that the continued implementation of the Standard in Queensland not only increases productivity of the housing industry but also supports the priorities of the Australian and Queensland Governments.



## Submission on the productivity of the Queensland construction sector.

This submission refutes the concerns of the housing industry peak bodies that the National Construction Code's Livable Housing Design Standard (The Standard) decreases the productivity of the housing industry. It argues that the continued implementation of the Standard (indeed, the Modern Homes reform) in Queensland not only increases productivity but also supports the priorities of the Australian and Queensland Governments.

#### Background

Every Australian deserves a home which is safe and secure, and meets their needs in any life circumstance. Established in 2002, Australian Network for Universal Housing Design (ANUHD) called for minimum access requirements in housing in the National Construction Code (NCC).

For decades, the housing industry and governments committed to transform construction practices voluntarily to ensure housing was adaptable to occupants' changing needs throughout the life of the dwelling—and failed to do so<sup>1,2</sup>. In 2022, the NCC was amended "to ensure that housing is designed to meet the needs of the community, including older people and those with a mobility-related disability"<sup>3</sup>. The Standard<sup>4</sup> requires a dwelling to be:

- easy to enter;
- easy to navigate in and around;
- capable of easy and cost-effective adaptation; and
- responsive to the changing needs of occupants.

Over the twenty years, housing practices gradually transformed to include these features, but not to a consistent or reliable standard<sup>5</sup> to be useful. Now implemented in six states and territories, the Standard ensures reliable physical access in new housing for both renters, buyers and visitors. Queensland builders have implemented the Standard since October 2023.

## Refuting the concerns of the housing industry peak bodies regarding increased cost and decreased productivity.

The Master Builders Queensland and the Housing Industry Association<sup>6</sup> continue to argue against the implementation of the Standard, citing increased cost of building and decreased productivity. An accurate cost is difficult to calculate; however, the most recent estimate is that the Standard would impose an additional 1.2% cost for Class 1a buildings and 0.8% for Class 2 buildings<sup>7</sup>.

In 2020, the ABCB Decision Regulatory Impact Statement<sup>8</sup> (RIS) found that the costs of implementing the Standard outweighed the benefits. The RIS was subject to scrutiny because it focused on financial benefit and failed to consider the full breadth and depth of benefits to the community—commensurate with the principles of the Office of Best Practice Regulation<sup>9</sup>.

In 2021 the Building Ministers Meeting considered the feedback from all sectors of the industry and community, and decided that mandated access requirements in all new housing would result in significant and lasting benefit to Australians<sup>10</sup>.

This submission argues that the continued implementation of the Standard in Queensland not only increases productivity of the housing industry but also supports the priorities of the Australian and Queensland Governments.

#### The Standard assists productivity in the housing industry

We argue that the Standard will increase productivity of the housing industry in the following ways:

- Generally, a nationally consistent approach to building standards has been found to have significant productivity benefits to the construction industry through breaking down inconsistencies between building standards across state and territory borders<sup>11</sup>. Given that six States and Territories have already implemented the Standard with NSW and WA currently expected to follow, Queensland can expect increased productivity in this area by continuing to implement the Standard.
- 2. Implementation of the Standard is within established building practice<sup>5</sup>; requiring no new technology and minimal added building materials. It is easily adopted, and information and training is readily available<sup>12</sup>.
- 3. The real causes of housing construction inefficiencies include the vagaries of supply and demand, the interdependence of many suppliers and contractors, and poor quality of work generally, requiring call-backs on defects<sup>13,14</sup>. The implementation of this Standard has little to do with these broader inefficiencies.

#### The Standard supports government policy priorities

### Australian Government priority: Making housing accessible and affordable for all Australians

Organisations, from the United Nations to the National Disability Insurance Scheme, have called for mandated access requirements in all new housing to assist making housing accessible and affordable for all Australians:

- The United Nations called Australia to account in 2019 for its lack of action in mandating accessibility in housing<sup>15</sup>. Six out of eight states and territories have since implemented the Standard in their building legislation<sup>7</sup>. (Queensland led the way demonstrating this State's commitment to the human rights of all Queenslanders.)
- 2. Recent recommendations by the Royal Commission into violence, abuse, neglect and exploitation of people with disability in 2023 urged State and Territory governments to implement the Standard for all new dwellings if they have not done so already<sup>16</sup>.
- 3. The Review of the National Disability Insurance Scheme (the Review) in 2024 identified a critical shortage of affordable and accessible housing in Australia, which simply cannot be met through the costly Special Disability Accommodation program or social housing programs. To address this, the Review recommended that all States and Territories to implement the Standard<sup>17</sup>. (Queensland, again, had already led the way to address this problem.)

- 4. The Royal Commission on Aged Care Quality and Safety in 2021 found that the lack of accessible housing impacted directly on the quality of life of older people. The Commission also found there was a clear link between the quality of housing and premature entry to aged care<sup>18</sup>.
- 5. The Australian Intergenerational Report 2023<sup>19</sup> predicts that, by 2063, the number of people aged 65 and over will more than double and the number aged 85 and over will more than triple. Population ageing will be an ongoing economic and fiscal challenge for the health, community and aged care responsibilities of all Governments.

Queensland Government priority: Growing our economy to drive down the cost of living and give Queenslanders a better lifestyle and a place to call home

The implementation of the Standard will assist the Queensland Government's priority<sup>19</sup> to drive down the cost of living, and give Queenslanders a better lifestyle and a place to call home in the following ways:

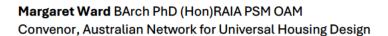
- Affordable and accessible housing is known to be a prerequisite for our more vulnerable citizens to find and maintain employment, to live a healthy lifestyle and to build community connection<sup>20</sup>.
- 2. While many homes will require modification at some time to meet individual needs, the Standard will allow for easier, faster and cheaper modification.
- 3. Accessibility in the home allows for timely discharge from hospital and the provision of home-based care, and delays placement in specialised residential facilities.
- 4. Accessible housing facilitates social inclusion by allowing people who need access to visit other people's homes, and participate in family and community life.

#### Conclusion

In summary, the construction of new housing and adapted existing stock should "meet the needs of the community, including older people and those with a mobility-related disability"<sup>3</sup>, so that people can remain in their own homes and connected to their families and communities for as long as possible. Queensland leads the way in implementing the Standard.

The housing industry peak bodies have objected to this important reform. They argue that the Standard adversely impacts construction sector productivity. We argue that the implementation of the Standard in Queensland not only assists productivity but also supports broader government priorities.

The quest for increased productivity in the housing industry is a worthy endeavour, but should not be at the expense of safety and inclusion for ordinary Queenslanders, old or young, renter or home owner, occupant or visitor. We all need homes that are safe and secure, and meet our needs in any life circumstance.



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