

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.



Australian Network for
Universal Housing Design

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^{1,2}. 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”³. The Standard⁴ 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 standard⁵ 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 Association⁶ 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 buildings⁷.

In 2020, the ABCB Decision Regulatory Impact Statement⁸ (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 Regulation⁹.

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 Australians¹⁰.

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:

1. 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 borders¹¹. 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 practice⁵; requiring no new technology and minimal added building materials. It is easily adopted, and information and training is readily available¹².
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^{13,14}. 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:

1. The United Nations called Australia to account in 2019 for its lack of action in mandating accessibility in housing¹⁵. Six out of eight states and territories have since implemented the Standard in their building legislation⁷. (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 already¹⁶.
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 Standard¹⁷. (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 care¹⁸.
5. The Australian Intergenerational Report 2023¹⁹ 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 priority¹⁹ to drive down the cost of living, and give Queenslanders a better lifestyle and a place to call home in the following ways:


1. 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 connection²⁰.
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*"³, 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.



Margaret Ward BArch PhD (Hon)RAIA PSM OAM
Convenor, Australian Network for Universal Housing Design

References

1. National Dialogue on Universal Housing Design. Strategic plan. 2010; https://www.dss.gov.au/sites/default/files/documents/05_2012/national_dialogue_strategic_plan.pdf. Accessed January 20, 2015.
2. ANUHD, RI Australia. Report on the progress of the National Dialogue on Universal Housing Design 2010-2014. In. Sydney. 2015.
3. Australian Building Codes Board. National Construction Code Volumes 1&2. In: Australian Building Codes Board; 2022: <http://www.abcb.gov.au/>.
4. ABCB. Standard for Livable Housing Design. In. Canberra. 2022.
5. Winkler D, Martel A, Chen Y, Greaves T. Audit of accessible features in new houses, apartments and townhouses. 2021.
6. Killoran M, Fellows T. Public Works Minister refuses to delay housing code that could add \$20k to cost of home. *Courier-Mail*. July 11, 2023.
7. Building Commission NSW. *Livable housing requirements in NSW: Discussion paper*. Sydney. 2025.
8. Centre for International Economics. *Proposal to include minimum accessibility standards for housing in the National Construction Code: Decision Regulation Impact Statement*. Sydney: Australian Building Codes Board. 2021.
9. Office of Best Practice Regulation. Guidance Note: Cost Benefit Analysis. In: PMC, ed. Canberra. 2016.
10. Building Ministers Meeting. Communique, April 2021. In: Department of Industry, ed. Canberra: Australian Government; 2021.
11. Productivity Commission. Reform of building regulation. 2004; <http://129.3.20.41/eps/othr/papers/0506/0506007.pdf>. Accessed July 24, 2010.
12. ABCB. ABCB Livable Housing Design Handbook. In. Canberra. 2022.
13. Dalton T, Wakefield R, Horne R. *Australian suburban house building: industry organisation, practices and constraints*. Melbourne. 2011.
14. Dalton T, Chhetri P, Corcoran J, Groenhardt L, Horne R. *Understanding the patterns, characteristics and trends in the housing sector labour force in Australia*. Melbourne. 2013.
15. Committee on the Rights of Persons with Disabilities. *Concluding observations on the combined second and third periodic reports of Australia*. United Nations. 2019.
16. Royal Commission into violence, abuse, neglect and exploitation of people with disability. Final Report. 2023.
17. NDIS Review. Final Report of the Independent Review of the National Disability Insurance Scheme. 2024.
18. Royal Commission into Aged Care Quality and Safety. *Final report: care, dignity and respect*. Canberra: Australian Government. 2021.
19. Queensland Government. Government's objectives for the community. 2025; <https://www.qld.gov.au/about/how-government-works/our-priorities/governments-objectives-for-the-community>. Accessed May 10, 2025.
20. Wiesel I. *Living with disability in inaccessible housing: social, health and economic impacts: final report*. Melbourne: University of Melbourne. 2020.