

## Retention of the Liveable Housing Design Standard

Prepared by GUIDE DOGS QUEENSLAND

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Dear Commissioners,

### Re: Construction Productivity Inquiry

#### Retention of the Liveable Housing Design Standards (LHDS)

Guide Dogs Queensland is pleased to submit the following in support of retaining the Livable Housing Design Standards (LHDS) within the National Construction Code. As an organisation dedicated to supporting individuals with low vision and blindness, we maintain that accessible housing is vital for promoting safety, independence, and dignity for all residents of Queensland.

#### Purpose of the Standard

The objective of the ABCB Standard for Livable Housing Design (the Standard) is to ensure that housing is designed to meet the diverse needs of the community, including older people and those with mobility-related disabilities. The Standard is focused on creating homes that are:

- Easy to enter;
- Easy to navigate;
- Capable of easy and cost-effective adaptation; and
- Responsive to the changing needs of occupants.

#### Background and Rationale

In 2010, the peak bodies of the housing industry agreed to implement this reform for all new homes by 2020. However, by 2015, it became evident that less than 5% of this target would be achieved without government regulation. Consequently, the Standard was incorporated into the National Construction Code in 2022 and implemented in Queensland in October 2023.

#### Supporting the Needs of Queenslanders: Now and in the Future

As an organisation representing people with disability, older people, carers, and sectors within the disability community such as housing and community, we strongly support Queensland's continued implementation of the LHDS under the National Construction Code. Every individual deserves a home that meets their needs. Accessible housing is not a luxury; it is a fundamental human right for all. With an ageing population and many people experiencing mobility needs, it is critical that the homes built today are suitable for both current and future Queenslanders.

## Economic and Social Considerations

The Queensland Productivity Commission's Interim Report, *Opportunities to Improve Productivity in the Queensland Construction Industry*, published on Thursday 31 July 2025, asked whether Queensland should consider opting out of the Livable Housing Design Standards unless it can be demonstrated that their implementation provides a net benefit to the state.

The Queensland Productivity Commission has argued that the new minimum accessibility standards introduced in the National Construction Code do not satisfy the necessary economic criteria. This position was based on an analysis conducted by the Centre for International Economics (CIE). However, it is important to note that the conclusions drawn by the CIE have been challenged in several reports<sup>12</sup>.

It is critical to acknowledge both the economic and social benefits of accessible housing. In terms of social policy, these two underlying influences share an important reciprocal relationship, each enabling the other to achieve outcomes that benefit individuals, community and the economy.

Accessibility features add only a small cost upfront (approximately 1% of build costs), yet they save millions in future health, aged care, and retrofit expenses. Building homes to be accessible from the outset is far more cost-effective than making modifications later. This data was acknowledged in the ACBC analysis of the LHDS, which found that:

- The average cost to implement LHDS in a new home is \$3,874, while retrofitting can cost up to \$20,000;
- For people with low vision, features like step-free entry and wider corridors reduce falls and hospital admissions, saving approximately \$1,200 annually in healthcare costs;
- Accessible design supports independence, reducing reliance on carers and support services, with estimated savings of \$1,000–\$1,800 per year; and
- Economic participation improves when individuals can live independently, contributing up to \$2,500 annually in workforce productivity.<sup>3</sup>

## The Value of the Livable Housing Design Standard

The LHDS ensures that the homes built today are accessible, safe, and future proof. Queenslanders deserve homes that are not only affordable, but also liveable and accessible that enable people to live independently, age in place, recover from hospital stays more quickly, and remain part of their communities.

## Consequences of Rolling Back the LHDS

Rolling back the LHDS would have significant negative impacts. It would:

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<sup>1</sup> D, W., A, M., Y, C., & T, G. (n.d.). Preliminary Findings: Audit Of Accessible Features In New Build House Plans [Review Of Preliminary Findings: Audit Of Accessible Features In New Build House Plans]. The University of Melbourne.

<sup>2</sup> (2021). Proposal to include minimum accessibility standards for housing in the National Construction Code Decision Regulation Impact Statement [Review of Proposal to include minimum accessibility standards for housing in the National Construction Code Decision Regulation Impact Statement]. Centre for International Economics.

<sup>3</sup> *The implementation of the ABCB Standard for Livable Housing Design in Queensland*. (2025). <https://qshelter.asn.au/wp-content/uploads/2025/03/Livable-Housing-Design-Standard-Letter-to-Minister-OConnor.pdf>

- Deny people with disability and older people their right to safe, accessible housing and a place to call home;
- Undo standards in place since October 2023, despite existing flexibility and exemptions that address industry concerns;
- Increase long-term costs in health, disability, and aged care;
- Shift expensive retrofit costs to state and commonwealth administered schemes; and
- Create national inconsistency and uncertainty within the industry.

Queensland cannot afford to reverse the progress that has been made.

## Conclusion

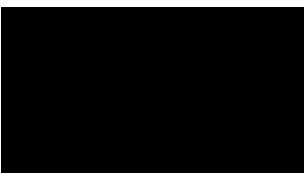
We strongly urge the Queensland Government to maintain the mandatory implementation of the Livable Housing Design Standard (LHDS). Upholding this standard is essential to ensure that all Queenslanders—now and in the future—have access to homes that offer accessibility, dignity, independence, and safety. These standards benefit not only current residents but will also have a positive impact for generations to come.

Guide Dogs Queensland joins this call by specifically urging the government to retain the LHDS in its entirety. To achieve this, we recommend the following actions:

- Reject proposals to opt out of national accessibility codes: maintaining alignment with national accessibility standards ensures consistency and fairness for all Queenslanders seeking safe and accessible housing
- Continue phased implementation to support industry adaptation: a gradual, staged approach will help the housing industry adjust effectively while maintaining progress towards more accessible housing for everyone
- Invest in public awareness and training to support compliance: providing resources and education to the public and industry professionals will facilitate understanding and successful adoption of the standards.

Accessible housing is not a luxury - it is a fundamental necessity. Retaining the LHDS is not only a cost-effective measure, but also a socially responsible choice that will benefit thousands of Queenslanders with low vision and other disabilities.

Yours truly,



Jock Beveridge  
Chief Executive Office  
Guide Dogs Queensland