

28 August 2025

Construction Productivity Inquiry
Queensland Productivity Commission

Via 'Online Construction Productivity Inquiry Form'

To the Construction Productivity Inquiry

Queensland Productivity Commission: Opportunities to improve productivity of the construction industry – interim report (Interim Report)

Thank you for the opportunity to provide feedback in relation to the above.

About QCOSS

Queensland Council of Social Service (QCOSS) is Queensland's peak body for the social service sector. Our vision is to achieve equality, opportunity, and wellbeing for all Queenslanders.

QCOSS' position

QCOSS welcomes the inquiry by the Queensland Productivity Commission into opportunities to improve productivity of the construction industry. QCOSS supports changes to the construction industry that will help to expedite the delivery of new social and affordable housing in Queensland. However, QCOSS strongly opposes Recommendation 11 in the Interim Report which recommends potential changes to the Queensland Development Code¹, which would allow new housing developments to opt-out of accessibility and energy efficiency standards for residential homes.

Accessibility and energy efficiency standards have benefits for all Queenslanders, and they are particularly important for the wellbeing of discrete groups, including people with disability, people who are aging, and people and families with low incomes. QCOSS strongly supports maintaining current mandatory accessibility and energy efficiency standards to ensure housing supply meets community needs now and into the future.

Queensland's housing crisis

The human impact of the housing crisis in Queensland must remain front of mind when considering changes to the construction industry in Queensland. The University of New Wales City Futures Research Centre's 2024 *Breaking Ground: Queensland housing crisis progress report* (The Breaking Ground Report) confirmed the housing crisis is not abating and Queensland is the epicentre of the housing crisis in Australia.² The Breaking Ground Report found demand for homelessness support

¹ Queensland Government. *Queensland Development Code*. Queensland Business. Accessed 27 August 2025. <https://www.business.qld.gov.au/industries/building-property-development/building-construction/laws-codes-standards/queensland-development-code>

² H Pawson, A Clarke, R van den Nouwelant, H Petersen, J Moore, and T Sigler. *Breaking ground: Progress update and assessment of Queensland's housing crisis*. Queensland Council of Social Services. 2024. Accessed 27 August 2025. https://www.qcooss.org.au/wp-content/upload/2024/06/Report_Breaking-Ground_Progress-update-of-Queensland-HousingCrisis_web.pdf



services in Queensland increased at rates higher than other states and territories, rental costs rapidly increased, and rental affordability for low-income households dramatically declined.³

Critical community benefits delivered by accessibility standards

Accessible housing is critical for meeting the housing need for many Queenslanders, including for people with disability and who are aging.

Approximately 1.2 million Queenslanders have a disability⁵ and over 900,000 Queenslanders are over the age of 65.⁶ Yet, only an estimated 5 per cent of housing in Australia is suitable for a person with a mobility disability.⁷

The current unmet demand for accessible housing in Queensland is also clearly demonstrated by the more than 9,000 households waiting on Queensland's social housing register for housing with disability modifications.⁸

QCROSS members have also raised concerns that without mandatory accessibility standards, disability discrimination will be embedded in the housing system in Queensland, resulting in inadequate and limited access to housing for people with disability.

"Well-designed housing that works for people with mobility impairments does not compromise the design of housing for the general population – rather it enhances the built environment."⁹ Existing mandatory accessibility standards in Queensland (detailed in the Livable Housing Design Standards in the Queensland Development Code) ensure that new homes incorporate practical accessibility features, such as adequate door width and no step access, to improve the accessibility of all new homes.¹⁰ The practical accessibility features have long-term benefits for all Queenslanders and over time will significantly increase the availability of accessible homes in Queensland. Building accessible housing also creates many broader community and financial benefits, including:

- reduced falls
- reduced time in hospital/transition care (reduction of health care costs)
- reduced costs associated with loneliness
- reduced home modification costs (reduction of government home modification costs)
- minimal modification required for ageing in place (reduction in aged care costs)
- reduced carer related costs, and
- reduced premature/inappropriate entry to aged care (reduction of aged care costs).¹¹

QCROSS welcomes the Queensland Government's focus on increasing new supply of housing to address the housing crisis. It also creates a significant opportunity to deliver accessible homes for

³ Ibid. 2024. p. 21 - 41

⁵ Australian Bureau of Statistics. *Disability, Ageing and Carers, Australia: Summary of findings*. Accessed 27 August 2025. <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>.

⁶ Australian Bureau of Statistics. *Quarterly Population Estimates (ERP), by State/Territory, Sex and Age*. December 2024. Accessed 26 August 2025. <https://www.abs.gov.au/statistics/people/population/national-state-and-territory-population/latest-release#states-and-territories>.

⁷ Australian Network for Universal Housing Design. *Proposal For Change – National Construction Code Series – Accessibility in Housing*. Rights & Inclusion Australia. 2016. Accessed 26 August 2025. <https://anuhd.org/wp-content/uploads/2020/04/proposal-for-change-ncc-access-in-housing.pdf> p. 11.

⁸ Queensland Government. *Queensland Social Housing Register*. Department of Housing and Public Works. 31 March 2025. Accessed 27 August 2025. <https://www.data.qld.gov.au/dataset/social-housing-register/resource/0ac13d1b-5258-4ad3-8f93-9f5a7cb47a7a>.

⁹ A Dalton and R Carter. *Economic advice provided to assist with responses to the Consultation Regulation Impact Statement on minimum accessibility standards for housing in the National Construction Code*. Melbourne Disability Institute and Summer Foundation. 2020. Accessed 27 August 2025. https://assets.summerfoundation.org.au/pdf_offload/2021/03/Accessible-Housing-The-Way-Forward-Submission-to-Consultation-RIS_31Aug-1.pdf p. 28.

¹⁰ Queensland Government. *Livable Design Housing Standards*. Department of Housing and Public Works. 23 May 2025. Accessed 27 August 2025. <https://www.housing.qld.gov.au/initiatives/modern-homes/livable-housing-design-standard>.

¹¹ Dalton and R Carter. 2020. p. 6

Queenslanders who need them now and in the future. QCOSS strongly supports maintaining existing mandatory Livable Housing Design Standard in Queensland.

Wellbeing and cost of living benefits from maintaining energy efficiency standards

Low energy efficiency standards in the past have resulted in many Queenslanders living in homes which are hot during summer and cold in winter.¹² Research by the Australian Institute of Health and Welfare (AIHW) confirmed “poor building quality, conditions and environmental performance is prevalent in Australia’s housing stock...[and]... 70 per cent of households reported one or more major building problems.”¹³

People and families living in housing without energy efficiency measures experience high energy costs and poor living environments (too cold or hot).¹⁴ As described below, people renting in Queensland in summer have reported significant adverse wellbeing impacts from living in hot homes.

- “At night we all struggle with sleep deprivation due to the heat. The thought of another summer in this house causes conflict, my children are desperate to move but there’s nowhere to go. Our house gets so hot that it becomes impossible to sleep, work or even think clearly.”
- “The relentless heat and its impact on me also results in depression, boredom and grief as I am unable to do the things I want to do and ultimately lose the desire/ability to do anything that might bring pleasure. I’m not as productive as I could be which has a negative impact on my mental health.”
- “We can’t be in the house on really hot days. I have to take my four children out in the car to be able to keep them cool because no amount of freestanding fans keeps the house cool enough for them.”
- “I’m not as productive as I could be which has a negative impact on my mental health.” “...I’ve been almost completely incapacitated by the recent heat.... I don’t have the energy to tend to basic self-care (like showers) and it’s incredibly overwhelming. Things are difficult for me at the best of times, but the heat really adds to my difficulties.”¹⁵

Energy efficiency measures make homes safer and healthier to live in and help people to manage their energy costs. Research has demonstrated there is on average a \$450 saving for households each year on heating and cooling alone just by living in energy efficient homes with a seven-star energy rating rather than a six-star energy rating.¹⁶

Based on the wellbeing and cost of living benefits energy efficiency standards provide for people and families, particularly people and families with low incomes, QCOSS strongly supports maintaining mandatory residential energy efficiency standards contained in Queensland Development Code 4.1 Sustainable Buildings.¹⁷

¹² Climate Council of Australia. *Tents to castles: building energy efficient, cost-saving Aussie homes*. 2022. Accessed 27 August 2025. <https://www.climatecouncil.org.au/wp-content/uploads/2022/04/Tents-to-castles-2022-final.pdf>. p. ii.

¹³ L Daniel, M Lang, C Barlow, P Phibbs, E Baker and I Hamilton. A national roadmap for improving the building quality of Australian housing stock. AHURI Final Report No. 426. Australian Housing and Urban Research Institute Limited. 2024. <https://www.ahuri.edu.au/research/final-reports/426>, doi: 10.18408/ahuri3232301

¹⁴ Healthy Homes for Renters. Community Sector Blueprint: A National Framework for Minimum Energy Efficiency Rental Requirements, (November, 2022). Accessed 27 August 2025. <https://www.healthyhomes.org.au/news/community-sector-blueprint>

¹⁵ Better Renting. *Hot Summer Nights: Notes on Queensland Renter Research*. February 2024. Accessed 27 August 2025. https://assets.nationbuilder.com/betterrenting/pages/456/attachments/original/1707089760/Hot_Summer_Nights_v1.0.pdf?1707089760. p. 5 – 7.

¹⁶ Ibid. p. ii

¹⁷ Queensland Government. *Queensland Development Code – Mandatory Part 4.1 – Sustainable buildings*. Version 1.15. Accessed: 27 August 2025. https://www.housing.qld.gov.au/__data/assets/pdf_file/0019/36064/QDCMP4.1SustainableBuildings.pdf

Conclusion

QCOSS urges the Queensland Government to maintain mandatory accessibility and energy efficiency standards whilst continuing to explore and implement opportunities to rapidly increase the supply of affordable and social housing.

Thank you again for the opportunity to provide our submission.



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