

Inquiry Into Opportunities to Improve Productivity of the Construction Industry



Queensland Productivity Commission – Construction Productivity

August 2025

About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is a state-wide, not-for-profit organisation led by and for people with diverse disability and we are focused on advancing disability rights, inclusion and systemic advocacy in Queensland. QDN is the Executive Peak Body for people with disability in Queensland, providing overarching leadership and coordination across disability peak and representative organisations funded by Queensland Government. QDN operates a state-wide network of over 3,000 members and supporters all over Queensland. Guided by our motto “nothing about us without us,”

QDN ensures that people with lived experience of disability are central to shaping policies, services and supports. Our vibrant and dynamic membership is made up of people with diverse disability who are at the centre of everything we do. QDN as an organisation is in a unique position of representing people with a diverse range of disability.

QDN’s work is underpinned by a commitment to inclusion, co-design, collaboration, and innovation and is guided by the pillars of inform, connect, lead and influence. By partnering with communities, service providers, businesses, and government, QDN fosters systemic solutions that empower individuals, amplify the voices of people with disability, and create sustainable, inclusive systems of support, working toward a more equitable and inclusive Queensland.

Through a powerful and engaged network of individuals and 32 Peer Support Groups, QDN informs, leads and influences change on issues impacting the disability community. QDN’s extensive body of work includes connecting people through peer support groups, supporting future leaders through the Emerging Leaders Program, and influencing government policies and programs through targeted advocacy. QDN’s initiatives are co-designed and co-delivered with people with disability. QDN engages with diverse communities, including Aboriginal and Torres Strait Islander peoples, Culturally and Linguistically Diverse groups, and rural and remote populations across

Queensland. We believe that Queenslanders with disability need to be empowered active and valued citizens, and fully included in the economic, social, civic and cultural life of Queensland.

Introduction

Queensland Disability Network (QDN) acknowledges the work of the Queensland Productivity Commission (QPC) and this inquiry.

On 30 July 2025 the QPC released its interim report *Opportunities to Improve Productivity of the Construction Industry*. This report made twenty recommendations including the following:

- *“Unless it is demonstrated through consultation that energy efficiency and accessibility standards made as part of the NCC 2022 provide a net benefit to the Queensland community, the Queensland Government should amend the Queensland Development Code to opt-out of these provisions (that is, make them voluntary).”* (Queensland Productivity Commission 2025)

This recommendation refers to the Livable Housing Design Standards (LHDS) which have been in place in Queensland since 2022. The LHDS include basic accessibility features including:

- a step-free access path to the entrance
- at least 1 step-free entry
- slightly wider internal doors and corridors
- 1 step-free access into a bathroom and shower
- an accessible toilet
- reinforcing of bathroom and toilet walls to allow for future installation of handrails. (Q. Government 2025)

This submission is in response to the above recommendation to opt out of mandatory requirements the LHDS and aims to outline the key benefits that accessible housing

brings including inclusivity, cost effectiveness, future-proofing, and reduced strain on hospitals and healthcare services.

The Queensland Productivity Commission (QPC) was directed to undertake an inquiry reviewing the factors driving productivity in the Queensland construction sector. We also note that, in the Terms of Reference, however, the QPC was specifically asked to make recommendations without compromising quality and safety outcomes.

Current State of Housing for People with Disability in Queensland

Currently 1.2 million people in Queensland have a disability. This equates to 22.9% of the population and is higher than the national average of 1 in 5 people (Queensland Government 2025). The implementation of the LHDS forms part of a national move towards consistent accessible housing standards via the development of the National Construction Code. In response to the QPC's recommendation to opt out of the LHDS, a QDN member talked about the impact of not enough accessible housing stock in the community has on people with disability:

- *"I'm a wheelchair user, and I'm lucky enough to have been able to access government housing, but if I hadn't been offered my current rental unit, I would probably be living in a garage."*

Inclusive building design enables people with disability to participate in community and family life, and to be included fully as citizens within Australian society. However, it is important to note that homes that meet basic accessibility standards are important for everyone, including the growing population of older persons, people with mobility issues and families with young children. Queenslanders with disability have been facing a housing crisis with regards to accessible, affordable and safe housing for decades that has been well documented across reports and inquiries. Strategies to reduce premature entry into high-cost tertiary systems like hospitals and aged care will be an important consideration for all governments. Along with the need to build accessible housing stock to meet the needs of a growing ageing population that will continue to present economic and fiscal challenges across these systems into the future.

Social and Economic Benefits to Community

As noted by Professors Rob Carter and Bruce Bonyhady in their paper from the 26 August 2025 "*Economic Advice Prepared to Assist Responses to the Queensland Productivity Commission on the "Net Benefit To The Community"*" identify that when factors not adequately addressed in the CIE Final Report are factored into the cost benefit analysis, the ratio shows the benefits of accessible housing exceed the costs. (Rob Carter 2025). The *Queensland Productivity Commission's Interim Report* has argued that the minimum NCC standards fail this test with a conclusion that was based on the Centre for International Economics (CIE), which was included in the RIS but is widely contested.

Carter and Bonyhady highlight four issues not adequately addressed in the CIE Final Report.

1. More weight should be placed on the analysis undertaken from a societal perspective than the narrower problem reduction approach
2. The principle of symmetry in the reporting of costs and benefits is compromised in both the problem reduction approach (costs over-attributed) and their societal WTP approach (benefits under-attributed).
3. The exclusion of benefits by the CIE due to the potential for double counting is excessive and invalidates their conclusions; and
4. The CIE has included the cost of additional space but ignored its ongoing capital value and utility in use.

When these factors are built into the CBA, the cost-benefit ratio becomes 1.7 for Silver accreditation and 1.2 for Gold accreditation so benefits exceed the costs. This is because the cost benefit analysis uses current data around what the current accessible stock is now and doesn't look at how this impacts longer term change.

The social and economic benefits of people with disability, older persons and people with mobility needs having housing that they can live in (without the need for expensive modifications) is an important when considering the net benefits to communities and to

the state of Queensland. Being included in community, having a place to call home or being able to age in place without being forced to live in high cost acute, aged and disability care has social and economic benefits for people with disability. Regulatory Impact Statements do not take into consideration equity as part of measurements. Equity issues are matters that must be considered by Governments and they have responsibility to put appropriate levers in place.

As part of the work to establish the Modern Homes Standard, particularly the ABCB Standard for Livable Housing Design, the ABCB's Decision Regulatory Impact Statement (RIS) found that the costs of regulation of a minimum accessibility standard for all housing new construction outweighed the benefits. The Decision RIS acknowledged that, without regulation, the current situation (in 2020) left people with disability and older people in particular with inadequate and unsafe housing, now and in the future (p. 9) (Economics 2021). The RIS conceded that it did not consider the cost alternatives to regulation other than in general and limited terms (p. 212) (Queensland Productivity Commission 2025).

The RIS also conceded that quantifiable costs only were considered. It concluded that decision-makers are best placed to weigh up factors, such as social justice for people with disability, supporting more inclusive communities and ageing in place, as well as Australia's future progress towards international human rights treaties, against the net cost imposed on other members of the community (p. 20) (Economics 2021).

Why LHDS is Important for People with Disability and Queensland's Future

Safe and accessible housing is a fundamental need and human right - a sentiment that has been echoed through multiple policies and plans.

The United Nations' Convention on the Rights of Persons with Disabilities (CRPD) which defines the fundamental human rights of people with disability. Australia signed the CRPD on 30 March 2007, with ratification occurred 17 July 2008. Article 9 focused on accessibility and noted:

1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces.

Australia's Disability Strategy 2021-2031 places a policy priority on accessible housing:

Inclusive Homes and Communities

Outcome: People with disability live in inclusive, accessible and well-designed homes and communities

Policy Priority 2: Housing is accessible and people with disability have choice and control about where they live, who they live with, and who comes into their home. Accessible and well-designed housing supports independence and social and economic participation.

Increasing the availability of accessible housing provides choices on where to live, who to live with, and enables people with disability to visit, socialise and connect with neighbours, family, and friends. Improved take up of universal design principles will support people regardless of age or disability to live in their home through all stages of their lives

The Queensland Disability Plan 2022-27, the Government committed to *Inclusive Homes and Communities*, stating that one of the outcome areas is for “people with disability to live in inclusive, accessible and well-designed homes and communities” (Q. Government, Queensland's Disability Plan 2022-27 2025). The Queensland Government also stated that it will ensure “the rights of people with disability are promoted, upheld and protected, and people with disability feel safe and enjoy equality before the law” (Q. Government, Queensland's Disability Plan 2022-27 2025).

The 2032 Brisbane Olympic and Paralympic Games will mean that Queensland is on the centre of the world stage hosting Paralympians and visitors with disability from across the world as they compete, stay and play here. Millions of people are projected to visit Brisbane for the Olympic Games (O. Australia 2025) including Paralympians, people with disabilities and people with mobility challenges. The Olympic Committee for the 2032 Games listed inclusivity as one of the key areas in their Legacy Strategy, stating the following:

“By 2042, we will live in an inclusive, sustainable and connected society, with more opportunities in life for everyone... Our Vision is optimistic, co-created with our community and reflective of their priorities; it is responsive to the future needs of our people, places and landscapes.” (Committee 2025)

It is Queensland’s opportunity to be able to demonstrate our commitment to a legacy of accessible housing and to showcase Queensland as an accessible and inclusive state.

Studies have also shown that making accessibility standards voluntary is ineffective. In 2009, the National Dialogue on Universal Design announced a goal that all new homes would include universal design standards by 2020 (A. Government 2009). However, in 2015, the number of new homes that complied with the Universal Design Standard was revealed to be 5% (Ward 2015).

Winding back the LHDS would not only stall progress but increase long-term costs and entrench barriers for generations to come. It would impact national consistency and the costs to reverse something that is already in place. Most other states including the ACT, Victoria, South Australia and Tasmania have committed to the LHDS (Homes 2025). For Queensland to stay aligned with other states and territories in the housing market, it must maintain LHDS to ensure modern housing design is in place for all Queenslanders, including those with disability.

Net Benefits of the Livable Housing Design Standards

1. Inclusivity

Queensland Disability Network (QDN) supports the United Nations Convention on the Rights of Persons with Disabilities, which promotes dignity, equality, and full participation for people with disability. Despite these principles, accessibility barriers in social and physical environments continue to limit opportunities for individuals with mobility impairments, restricting their community involvement and social inclusion. These challenges can lead some to withdraw from active lifestyles, contributing to long-term socio-economic and health impacts. QDN advocates for solutions that remove these obstacles and foster greater inclusion and accessibility for all.

While accessible housing is essential for people with disability, it benefits all members of society. For example, ramps are not just for people with wheelchairs but can also benefit people who are using a stroller, a shopping trolley, or need to navigate with other heavy or bulky items such as bicycles or suitcases.

Accessible homes allow people with disability to have greater independence, facilitate social engagement and reduce isolation. In a national survey, over 80% of participants reported that inaccessible housing limited their ability to socialise, and more than 30% said it affected their ability to work (Wiesel 2020). One QDN member shared:

- *“My daughter is a 14-year-old girl and a wheelchair user, and one of the things that's killed me is that she never can go to anyone else's house. Like, of all the people that we know, there's no houses that she can go and visit, and it's just so socially isolating....She's got all these big dreams, because little kids with disabilities are told that they can do anything, and she wants to go to Melbourne and be an actress, and I don't even know if I can find her a house.”*

Another QDN member commented:

- *“Whenever I'm invited to visit or meet with friends, my first thought is always “Is it an accessible space? Can I get up the driveway and in the front door, access a bathroom, sit with everyone else?”. So often, the answer is “No, sorry.” And that's not just private dwellings, but cafes and other public venues.*

By limiting the number of accessible houses in Queensland, people with disability will have less choice in where they live, which may result in them being forced to move away from friends, family and other support networks.

2. Cost effective

Studies have shown that the cost of including accessibility in new house builds costs significantly less than retrofitting existing properties. According to the Melbourne Disability Institute and the Queensland Government, the average cost of including LHDS features in new homes is just 0.8% to 1.2% of construction costs—equivalent to approximately \$3,000–\$4,000 for a \$400,000 build (U. D. Australia 2025). In contrast, retrofitting inaccessible homes post-build can cost around \$20,000 and is often impractical for apartments (Works 2025).

The financial risk for investors including minimum accessibility standards is extremely low. Everyone can live in a home with LHDS. However, not including LHDS can result in alienating a large demographic of potential buyers. Approximately 38.5% of Australians have mobility challenges (Australian Institute of Health and Welfare 2024) and may require accessible homes. As highlighted by one QDN member noted:

- *“We are supposed to be the Lucky Country, but it seems unfair that if you are already unlucky enough to be living with a disability, you have very high odds of being unlucky in finding somewhere safe and equitable to live.”*

There is also extremely high demand for accessible housing Australia wide as well as in Queensland due to limited supply. According to the Disability Advocacy Network Australia (DANA), the lack of available and affordable housing is one of the primary concerns experienced by people with disability:

- *“In 2022-23, more than half (53%) of people with a disability identified housing (e.g. affordability, availability, accessibility) as the main reason for seeking assistance”.* (Disability Advocacy Network Australia 2023).

The table below shows a snapshot sample of people with disability Australia wide, who were provided long-term accommodation as identified by the Department of Health and Welfare. Concerningly the amount of people with disability who received long-term accommodation was at 6.2% in 2022-23 an example of the demand for long-term accommodation from people with disability.

Adapted from “A new analysis shows only six per cent of people with disability who are homeless or at-risk of homelessness are getting the long-term housing they need” by Disability Advocacy Network Australia, People with disability are missing out on homes , <https://shorturl.at/9FMMk>

	2013-14	2022-23
Number and Percentage of People with Disability Provided Long-term Accommodation	189 (6.6%)	228 (6.2%)

3. Future-proofing

Australia is facing an aging population. Multiple factors including advances in medicine and changes in lifestyle and diet, are resulting in higher life expectancies and fewer fatalities. By 2066, older Australians are projected to be between 21% and 23% of the population (A. I. Welfare 2024). In addition, the number of people aged 85 and over is estimated to double in the next 25 years (A. I. Welfare 2024).

The impacts of Australia’s aging population are already being felt through risk of injury due to falls. Approximately 44% of hospitalisations and 52% of patient days are comprised of people aged 65 and older (A. I. Welfare, Hospitals: Admitted patient care 2025). In addition, 2 in 5 injury hospitalisations occurred due to falls (welfare 2025).

Incorporating accessibility features enables Queenslanders to age in their home, reducing the pressure on aged care facilities. One QDN member stated:

- *“I also am worried about the effects [opting out of the Livable Housing Design Standards] will have on my parents, and grandparents being able to age in their homes, a change like this means they would need to move into a home quicker than they otherwise would.”*

Ensuring that all Queenslanders have the appropriate level of accessibility in their housing is something that will help secure the future viability of that residence, for current and future occupants.

4. Reduced strain on hospitals and healthcare services

Livable housing promotes independence, safety, and dignity. It enables people with disability to return home from hospital and reduce reliance on both paid and unpaid support.

One QDN member commented:

- *“Keeping this building policy in place would mean everyone from people aging, disabled people of all ages, and people who get injured and need mobility aids temporarily would still be able to visit and access friends, family, their own home. Homes that adapt to the person when the person cannot.”*

According to the Australian Institute of Health and Welfare, there were approximately 421 hospitalisations per 1000 people in 2023 –2024. Over this period almost half (47%, or 397,000 hospitalisations) of all injury hospitalisations had a principal diagnosis of *Injuries to upper and lower limbs* (A. I. Welfare 2025). However, as established in the economic paper prepared by Carter and Bonyhady, the associated healthcare costs could be significantly reduced by adopting minimum accessibility features. The research revealed that with the LHDS:

- \$46M of healthcare costs were saved due to reduced falls.
- \$187M was saved for reduced time in hospital / transition from earlier discharge
- \$210M was saved for premature/inappropriate entry to aged care (Rob Carter 2025).

These considerations were not included in the QPC cost benefit analysis.

Summary

People with disability make up one fifth of the population - many of whom experience mobility challenges. Including LHDS supports like wide hallways, reinforced bathroom walls and a minimum of one step-free entry will not only support people with disability to socialise and fully participate as citizens but also improves other aspects of life such as their ability to work.

Incorporating the LHDS in new buildings is significantly less expensive than the cost of retrofitting an existing property (1.2% compared to 5%). There is also considerable demand for accessible houses making the LHDS valuable to investors and buyers.

Studies have also shown that accessible housing can reduce the strain in hospitals and age care facilities, allowing people to be discharged from hospitals earlier and being less reliant on formal and informal supports. The LHDS also allows people to age-in place, which is extremely important due to Australia's aging population.

LHDS is in alignment with multiple state and federal policies such as the United Nations Convention on the Rights of Persons with Disabilities, Australia's Disability Strategy 2021-2031, and the Queensland Disability Plan 2022-27. Opting out of the minimum accessibility features in the NCC will significantly wind back progress and affect Queenslanders' ability to secure safe and accessible housing.

QDN has highlighted its belief based on economic advice that key considerations of societal net benefits have been ignored and have skewed the benefit cost ratio in its current form. As noted, if considerations from the economic advice provided to QDN was included, the benefit-cost ratio for Silver accreditation standards would be 1.7 and the benefit-cost ratio for Gold accreditation standards would be 1.2.

Recommendations

QDN recommends that the QPC maintains the current mandatory requirements for minimum accessibility standards in the NCC. This will involve making it mandatory for all new homes to be built with the following features:

- a step-free access path to the entrance
- at least 1 step-free entry
- slightly wider internal doors and corridors
- 1 step-free access into a bathroom and shower
- an accessible toilet
- reinforcing of bathroom and toilet walls to allow for future installation of handrails. (Q. Government 2025)

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