

Introduction

As someone who has recently completed a Cert IV in Residential Drafting, designed and project managed a house incorporating many features referenced in the Livable Housing Design Standards, I believe I can offer some useful insight into the Queensland Productivity Commission's Interim Report Preliminary Recommendations (PR).

It is quite concerning to see some of the preliminary recommendations in the *Opportunities to Improve Productivity of The Construction Industry Interim Report*. In particular those that reference and challenge the authority and robustness of the evolutionary changes to the NCC, many driven by industry feedback, scrutinised by industry experts and rigorously challenged through analysis and public consultation processes. Change recommendations that generally seek to meet modern building standards and community expectations when it comes to building quality, safety, accessibility and durability.

However, I will confine my observations to one particularly very concerning recommendation that not only threatens to water down existing Queensland building practices, mandatory Livable Housing Design Standards adopted in 2023, but negatively impact social, cultural and economic benefits accruing to communities throughout Queensland, with particular effect on disadvantaged and marginalised members of our communities.

PRELIMINARY RECOMMENDATION (PR) 11 – IMPACTS ARISING FROM NCC 2022

Unless it is demonstrated through consultation that energy efficiency and accessibility standards made as part of 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).

The Disability Discrimination Act 1992, Australia's Disability Strategy 2021-2031 (focuses on removing barriers from everyday life to enable people to participate in society fully and effectively) and the Convention on the Rights of People with Disabilities (UNCRPD) 2008 brought a particular focus to the broadly accepted right to social inclusion, by promoting the right for people with disability to access all aspects of the physical and social environment on an equal basis with others. The Convention, to which Australia is a signatory, identifies the importance of accessibility beyond simply public places and spaces to the design of housing and home. (ANUHD) The participation of all is the ultimate goal of any society. (Hedvall, Ståhl & Iwarsson, 2025). Opting out of Queensland's current position of mandatory standards for Livable Housing Design in residential buildings will only serve to reinforce stereotypes and prejudices, through exclusionary and alienating access to the family home, related to social growth and development in society. The adoption of PR11 has little relevance to increased productivity in the residential construction industry but conversely has the potential to wind back decades of struggle for fair and equitable access for all members of society to housing, the family home and the inherent ability to fully participate in a universal functioning and inclusive social system.

The Facts

'Housing Design and Livable Housing Australia, commenced in 2010, this voluntary initiative failed to reach its 2013 target and has little chance of reaching less than 5% of its 2020 target¹³. This demonstrates a fundamental failure of this option' (ANUHD). Voluntary standards generally do not function to promote accessible building standards adoption.

Queensland led the way with mandatory adoption of NCC 2022 Livable Housing Design Standards in 2023, something all Queenslanders should be very proud about. Many within the industry are already familiar with these standards and have incorporated them into their standard business practices. There seems little justification in claiming that reducing Livability Standards to voluntary levels will in fact lead to an increase in productivity.

‘Comprehensive studies in the USA estimate that there is a 60% probability that a newly constructed single-family dwelling will house at least one resident with a long-term physical limitation during its lifespan. When similarly disabled visitors are taken into account, the probability rises to 91%.’ (Smith et al., 2008, 2012) Accessible housing benefits large sectors of the community. Including the disabled, the elderly, families with young children and those that incur injury or health issues during their life. The benefits seen for these groups continue on compounding, to be seen in the health, education, employment and care sectors amongst others. These benefits then feed into a more productive and resilient society, a society that rejects rhetoric and produces a more inclusive and equitable community. We are all winners in this scenario.

‘The (Australian) government introduced a voluntary programme in 2011, which aimed to provide accessible features in all new housing by 2020 (Council of Australian Governments, 2011; Ward, 2011). This voluntary programme intended to achieve accessible features in all new dwellings, to ensure that people with mobility impairment are able to visit or live in the dwelling (Ward & Franz, 2015). However, the Centre for International Economics (2020) estimated, based on previous evidence, that less than 10 per cent of new housing stock has been built to these baseline standards, indicating that this approach has failed.’ (Goodwin et al., 2022)

‘The Australian Building Codes Board estimates the additional cost to implement the minimum accessible design standards is between \$2,900 and \$4,400 per home, depending on the type of dwelling. This is significantly less than the cost of modifying a home for accessibility after construction.’ (Walker, 2024)

What others think

“The role our built environment has on each and every person’s life cannot be overestimated. That’s why it is so important that inclusion and accessibility is at the heart of all stages of design; if we’re going to build a world where everyone feels welcome, safe, and valued.” (Royal Institute of British Architects, 2023)

“Buildings and urban spaces frequently disappoint people with disabilities by being inaccessible, stigmatising, creating the feeling of being out-of-place, a misfit in places you have a fundamental right to be in.” (Howe, 2024)

‘Accessible housing design promotes social inclusion, as people with mobility impairment are freer to move around their own homes, and those of others. For some people, getting into the houses of family and friends was either impossible or extremely difficult. Participants noted that if the effort of visiting someone at home was too great, they were less likely to visit again.’ “I have lost friendships because I’ve had to say no to social invitations due to lack of access. Some of the most humiliating moments of my life have involved trying to access friends’ and family’s inaccessible houses.” Anon participant (Building Better Homes)

'Rather than costing more, it pays to get it right first time and to resist cutting corners... Get it right first time - it's cost effective' (Chandler, former NSW Building Commissioner) in response to a discussion on Livable Housing Design Standards.

'People with disability are two to four times more likely to die or be injured in a disaster than the general population.' (Villeneuve, 2021). Housing that poses levels of compromise in accessibility and Livability Standards feature in this statistic.

'In the context of architecture, empathy is a catalyst for social change. It challenges architects to consider the broader impact of their designs on social equity, making spaces more inclusive and adaptable... empathy-driven design elevates the role of architecture in promoting social justice. By integrating empathy into the design process, architects have the power to create more equitable, caring environments that serve the common good.' (Ferreira, 2024)

'Providing solutions to the challenges faced by people with disabilities benefits everyone. For instance, while ramps are required for wheelchair users, they are also useful for the elderly, parents with strollers, people on crutches, and couriers making bulky deliveries.' (Davenport, 2024). Many of the benefits of mandatory Livable Housing Design Standards are not obvious until circumstances highlight the community wide advantages.

'A recent survey of 1187 Australians with mobility impairments showed that 74 per cent of respondents were living in housing that did not fully meet their accessibility needs.' (Goodwin, 2022)

'It is estimated that one third of all Australian households are currently occupied by a person with disability' (Galbraith, 2018)

'Universal Design is essential for some, necessary for many and comfortable for all' (Lifemark, 2025)

'These commitments matter (Livability Standards) because there is a 60% chance that any home will house someone with a disability during its lifespan. As the Queensland Government itself notes, the LHDS will improve economic and social participation for people with disability, and will help to reduce demand for care services and for beds in the hospital system. A recent discussion paper from the NSW Government estimated the additional cost to implement the LHDS is only 1.2% of total construction cost for detached dwellings and 0.8% for apartment buildings' (Summer Foundation, 2025)

'Voluntary measures have been tried over the last two decades to encourage the inclusion of universal housing design in new homes but these efforts have failed to make transformative change.' (ANUHD, 2021)

The Case for Productivity Improvements

The Australian Institute of Architects has warned that pausing updates to the National Construction Code would harm, rather than help, construction productivity. A position also supported by the Sustainable Builders Alliance plus other industry bodies. Moving from mandatory standards to voluntary standards would have even greater impacts, with particular reference to PR11 I contend that its implementation would lead to a significant reduction in productivity, particularly when viewed over the long term. When weighed with the corresponding potential negative impacts on long term financial, social and life stage benefits that accrue from housing accessibility the Queensland community would wear the brunt of these costs that would perpetuate far into the future.

“The Institute strongly rejects claims that building standards create unnecessary red tape. Evidence shows that robust codes enhance rather than hinder genuine productivity by:

- Preventing costly rectification work
- Reducing insurance claims and legal disputes
- Ensuring buildings perform as designed
- Maintaining Australia’s reputation for quality construction
- Delivering quality homes for our community.”

Institute national president Adam Haddow added, “Building upgrades cost significantly less when the code is updated more frequently. A pause creates costly backlogs of quality and safety improvements that ultimately burden the industry and society.”

Haddow emphasised that updates to the NCC is necessary to ensure that buildings meet evolving expectations around health, wellbeing, inclusivity and accessibility.

“Ignoring expert evidence in the built environment is akin to knowing what causes cancer but doing nothing about it,” he said. “Changes to the NCC improve people’s lives – they are essential to delivering better homes for people.”

The Australian government Productivity Commission in their recently released *Housing construction productivity: Can we fix it? Research paper* (2025) identified a range of issues that have contributed to falling productivity in the housing construction sector, specifically

- Complex, slow approvals
- Lack of innovation
- Lack of scale
- Workforce issues

The research paper states, in relation to suggestions on ways to improve productivity in the construction industry

‘The National Construction Code (NCC) has been a positive development and remains sound in principle. However, some aspects of the code and the way it is implemented, including its interaction with state and local government regulations, impose unnecessarily high costs on building construction.’

Much of this additional cost results from the inconsistent way in which different state jurisdiction implement the NCC. Examples include making some codes voluntary that were meant for mandatory adoption, defining state variations to the code or simply outright rejection of some codes. Other cost factors are incurred through ineffective compliance and enforcement of the NCC and incorporated Australian Standards, I have personal experience of this. Some of this non-compliance is the direct result of poor understanding and diffusion of the NCC and Australian Standards through to industry participants. Significant productivity gains will eventuate just through the addressing of these issues, training, reinforcing and standardised adoption of the NCC in its entirety not by knee jerk reactions that aim to render sections of the NCC jurisdictionally void.

To this, the commission should bear in mind that there are increasing calls for the NCC to be mandated uniformly across the Nation, I believe it is only a matter of time before this common-sense approach is implemented. A Nationally mandated NCC will itself secure standardised building practice universally, eliminating confusion for industry participants who migrate or operate across

state jurisdictions. It should be obvious that this in itself will be a boost to productivity levels without the lowering building standards (Noroozinejad, 2025).

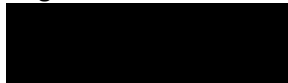
Personal Experience

My own experiences in designing and project managing the build of a home to high livability standards was ample evidence to me that good design and building practices that incorporate Livable Housing Design Standards has a minimal to no impact on building budgets.

As an emerging designer I am fully cognisant that costs to incorporate livability standards can, in some particular circumstances, be a contributor to budgetary impacts. Excessive cost factors usually revolve around poorly understood and implemented design and construction work, poor site characteristics and antagonistic design specifications and priorities. Perhaps consideration to exemptions from mandatory standards under special circumstances e.g. architectural significance, onerous site conditions may alleviate concerns for some parties. Which is already the case.

I implore the commission not to abandon a commitment to the people of Queensland to make communities more accessible and equitable for the benefit of everyone, regardless of circumstance. Keep Livable Housing Design Standards mandatory.

Regards

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