

Council on the Ageing Queensland

Response to
Queensland Productivity Commission's
*Opportunities to Improve Construction
Industry Productivity*

Opportunities for sustainable, safe, and
accessible homes across the lifespan

August 2025



Council on the Ageing Queensland

Council on the Ageing Queensland is a for-purpose statewide charitable organisation.

We are the state's Seniors Peak and Seniors Social Isolation Prevention Peak and work with and for older adults - advancing the rights, needs, interests, and futures of people as we age. For more than 60 years, we have worked to influence positive social outcomes for older Queenslanders.

We connect directly with older Queenslanders, their families, carers, and organisations, service providers, consumer advocates, special interest groups, and our federal, state and local governments. We engage with all of these groups to understand needs, aspirations, and priorities for older people in Queensland, and partner to achieve the best outcomes for people as we age.

Our work includes policy analysis, community education, representation, evaluation and research, community engagement, and cross sector collaborations to achieve systemic change. We deliver funded programs directly to older people in need and provide sector support to those organisations who offer aged care and other services to older people.

We seek to eliminate ageism and support healthy ageing and growth of age-friendly communities. There are many areas of policy development needed to achieve this – elder abuse, energy, social isolation and loneliness prevention, climate resilience and disaster preparedness, digital inclusion, health, housing, and transport are just a few.

Our vision is that ageing is a time of possibility, opportunity, and influence.

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Acknowledgement

*Council on the Ageing Queensland acknowledges Australia's
First Nations Peoples as the original custodians of this land.*



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Introduction

This submission by Council on the Ageing Queensland responds to the Queensland Productivity Commission's Interim Report: *Opportunities to Improve Productivity of the Construction Industry*, with a focussed examination of the proposed Livable Housing Design Standards (LHDS). Our interest lies in the implications of these standards for older Queenslanders and the broader goals of equitable, accessible, and affordable housing.

We acknowledge that the Commission is not opposed to improving accessibility in housing design. However, it has raised significant concerns about the blanket application of LHDS across all new housing types, particularly in the absence of a demonstrated net community benefit. The Commission's preliminary analysis is that Queensland should opt out of the mandatory LHDS provisions introduced in the National Construction Code 2022, unless robust evidence supports their adoption.

The interim report identifies several key issues:

- 1. Cost justification and market demand**

The Commission questions whether mandatory compliance is proportionate to current market demand for accessible housing features. It suggests that the imposition of these standards may not align with household preferences and could increase housing delivery costs.

- 2. Uncertainty around compliance impact**

Concerns are raised about the uncertain financial impacts of LHDS, particularly in relation to housing affordability, site-specific challenges (e.g., small or sloped lots), and reduced design flexibility.

- 3. Alternative policy options**

The Commission outlines possible alternative or complementary policy approaches, including:

- Voluntary standards supported by financial incentives
- Prioritisation of universal design in public and affordable housing
- Consumer education to build organic demand for accessible homes

Recognising the complexity of this issue, we appreciate that the Commission has not reached a final position and is now seeking evidence-based submissions on the costs, benefits, public support, and practical alternatives to mandatory LHDS implementation.

In this submission, we provide our perspective on these matters, informed by our understanding of the lived experience of older people in Queensland and our commitment to ensuring housing is both inclusive and responsive to future generations.

Building sustainable accessible homes for an age inclusive Queensland

Council on the Ageing Queensland, as the peak body for older Queenslanders, and as the peak body for seniors' social isolation and prevention, advocates for enablers that assist Queenslanders to age well. Opportunities to improve productivity of the construction industry are opportunities for sustainable, safe, and accessible homes across the lifespan.

Queensland's demographic profile is shifting, with the population of older residents projected to double by 2050. Accessible housing that requires minimal modifications over time is one of the most important factors in creating a space in which anyone across the lifespan can age well. This means that people of all ages and abilities can move freely, confidently, and independently within their own homes, their neighbourhoods, access essential services, remain gainfully employed, participate in volunteer work, community initiatives and activities. They can do this with ease and stay connected to their communities.

Why the Livable Housing Design Standard (LHDS) matters for older Queenslanders

The LHDS matters for older Queenslanders because:

- Accessible, secure housing is a human right essential to health, independence, and community connection for older people, especially older women.
- Current housing stock is failing many older Queenslanders, contributing to rising homelessness, housing stress, and premature entry into residential aged care.
- The Livable Housing Design Standards (LHDS) are a low-cost, high-impact reform to ensure new homes are accessible, adaptable, and future-ready.
- The LHDS supports ageing in place, reduces care and hospital costs, boosts productivity, and facilitates workforce participation for carers and older adults.
- Economic modelling confirms modest upfront construction costs ($\approx 1\%$ of build cost) avoid expensive retrofits and generate long-term savings.
- The LHDS is backed by national policy, major inquiries, and human rights principles, aligning with sustainable, inclusive, and disaster-resilient housing goals.
- Queensland's tailored implementation already supports industry transition, providing a consistent, competitive advantage and smarter planning for demographic change.

Housing design matters for older Queenslanders

As Queensland's population ages, the sustainability of housing and the built environment plays a vital role in enabling older people to age in place with dignity, safety, and independence. Despite existing legislation and protective mechanisms, older Queenslanders are one of the fastest growing cohorts at risk of housing stress, homelessness, and insecure housing.¹ For older adults, especially women, housing means retaining agency, access to essential services, and remaining connected to community.

Appropriate, accessible housing is a matter of human rights. It underpins physical and emotional wellbeing and enables older people to participate fully in community life. Secure housing provides continuity, comfort, and the ability to make choices about where and how one lives. When housing fails to meet these needs, whether due to affordability, inaccessibility, or poor design, it can trigger or intensify hardship, leading to social isolation, declining health, and increased reliance on crisis services.

Older people in Queensland face complex housing challenges. Many are trapped in the private rental market, with limited options for affordable, stable alternatives. Legacy issues such as gender inequity, wage disparities, the superannuation gap, and unpaid caregiving have left older women in particular at a structural disadvantage. When these factors intersect with experiences such as domestic violence, elder abuse, bereavement, job loss, or chronic health issues, housing instability becomes a critical risk.

Designing and maintaining housing that supports ageing in place is essential. The Livable Housing Design Standards (LHDS) offer a national framework to ensure homes are adaptable, inclusive, and safe for people as they age with changing capacities, acquire or live with disability. For older Queenslanders, features like step-free access, reinforced bathrooms, and wider doorways are critical for independence and injury prevention. Yet, too often, home modifications are reactive, delayed, or unaffordable, putting individuals at risk and straining care and emergency systems.

Council on the Ageing Queensland views housing sustainability through a broad lens. It includes greater support for renters, targeted innovation in co-housing and shared equity models, and stronger coordination across housing, health, and social services. We advocate for live data monitoring to track housing needs and prompt responsive policy and service delivery. Services such as Housing Older Women's Support Service (HOWSS), the Home Assist Secure Program, and state Housing Service Centres are essential lifelines that must be preserved and expanded.

To future-proof the Queensland housing system, we must take into consideration the lived experiences of older people. This means engaging directly with those at risk, especially older women, to co-design solutions that uphold their dignity and reflect their preferences. It also means increasing property manager and service provider training, particularly around elder abuse and tenants' rights, and ensuring policies are informed by real-world data and stories.

Investing in liveable, inclusive housing is more than compliance and regulation - it is about creating resilient communities and improving long-term outcomes for all Queenslanders. The

Australian Building Code Board's (ABCB's) own governance review identified significant process failures in the accessible housing project, including insufficient engagement with older people, people with disability, and consumer advocates.² Further, the Centre for International Economics (CIE) Decision RIS has been criticised for underestimating the benefits of accessible housing and for failing to capture the lived realities of older people and people with disability.³ The LHDS framework is therefore fundamental to the goal of liveable inclusive housing that provides long-term benefits to health and wellbeing of communities, and Council on the Ageing Queensland urge its consistent implementation as a critical measure for equity, sustainability, and ageing in place.

Solution: Low-cost, high-impact reform

The Livable Housing Design Standards (LHDS) (part of the National Construction Code (NCC 2022) and adopted in the Queensland Development Code) ensure new homes include basic accessible design features.⁴ These standards require that dwellings are easy to enter and navigate, are able to be modified at low cost (adaptable design), and responsive to occupants' changing needs. Far from being 'red tape' that impedes construction productivity, the LHDS is smart and economically sound reform that delivers broad benefits and addresses long-recognised market failure.

The Summer Foundation (2022) reported that only 5% of new home builds in the last ten years have been compliant with current accessibility standards, leaving a serious shortage of accessible housing in Queensland.⁵ By mandating accessibility features in new construction, Queensland is future proofing its housing stock to meet demographic needs while supporting the construction sector's efficiency and competitiveness. We provide an analysis below across five key areas: cost effectiveness, consistent productivity gains, cost efficacy of ageing in place, boosting workforce participation of older adults and carers, and sustainable policy and reform. We also highlight an example of a specific context - climate and disaster management considerations - which has substantial impact on housing for Queensland communities and evidences the benefits of the LHDS especially for people living with disability, changing capacities, and older Queenslanders.

Minimal upfront cost

Implementing accessibility during the construction stage is more cost-effective than retrofitting with a report by the Centre for International Economics (2020) evidencing that the upfront cost increase is approximately 1.2% of construction cost for a standard new home (Class 1a dwelling) and 0.8% for apartments (Class 2).⁶ By contrast, retrofitting a home with accessibility features can cost over \$20,000.⁷ Livable Housing Australia cites international research which shows it is *22 times more efficient to design for accessibility upfront* rather than retrofit later.⁸

Industry data consolidated by a third party with data provided by Master Builders Australia and Housing Industry Association (HIA) reports that basic liveable design features during construction adds about \$3,600–\$4,700 to a new build, whereas major modifications such as installing ramps or remodelling a bathroom averages \$10,600 and can take up to 100 days to complete.⁹ A minimal 1% investment in compliance earlier in the build avoids larger costs down the line, whether borne by homeowners, insurers, or government disability/aged-care programs.¹⁰

Furthermore, as the market adapts, the small upfront cost is likely to shrink. Six other states and territories are already implementing the LHDS and industry familiarity growing thus economies of scale are expected.¹¹ In Queensland, extensive training and technical guidance have already been provided to builders (e.g. webinars, handbooks, case studies) to ensure smooth adoption. This preparation helps minimise any inefficiencies and reinforces that the LHDS imposes no significant burden on competent builders. As the Productivity Commission notes, issues are largely the result of inefficiencies in approvals, innovation, scale, and workforce development (issues within the control of government and industry), not minor compliance costs associated with accessible design.¹²

We acknowledge as well the difficulty and delay in finding the appropriate workforce to conduct those retrofits particularly in regional, rural and remote areas. Australia's regional, rural, and remote areas continue to face critical shortages of appropriately qualified workforce which remains heavily skewed toward metropolitan regions, resulting in delays and difficulties in undertaking Livable Housing Design Standard retrofits outside urban centres.¹³ This also needs to be considered in the cultural context of specific older cohorts such as older Indigenous people who are ageing in place in communities where there is limited capacity to retrofit homes or plan for inclusive and accessible design.¹⁴

Overall, the cost profile is justified by the benefits brought by a modest one-time cost resulting in a safer home for a lifetime, avoiding future major renovations or relocation costs.

Productivity gains through consistency

There is no evidence that indicates that the LHDS impedes construction sector productivity. The accessibility features required (e.g. a step-free entrance, slightly wider doorways, reinforced bathroom walls for future grab rails) are within established building practice, use conventional materials, and there has been continual advancement in the design of some features.¹⁵

However, they do not demand new technology or special techniques, and builders have decades of experience with similar standards in social housing (since 1991) and disability

housing (NDIS/SDA since 2017).¹⁶ As such, better-quality builds already routinely incorporate these features and/or have been adapted with minimal fuss.

The Queensland housing industry has had access to ample information, training, and case-by-case exemptions for challenging sites, meaning the standard is being integrated without disrupting workflow.¹⁷ The real drivers of construction delays and higher costs such as volatile supply chains, skills shortages, subcontractor coordination, and rework due to defects are systemic issues unrelated to the LHDS.

The LHDS supports productivity by improving regulatory consistency and certainty. The 2004 Productivity Commission Research Report – Reform of Building Regulation found that a *nationally consistent approach to building standards equates to significant benefits to productivity* including a decrease of differences in regulation across Australia.¹⁸ The LHDS establishes a harmonised baseline for accessible design replacing state variations. Queensland’s adoption aligns with other states and territories, with New South Wales and Western Australia expected to follow. This consistency allows Queensland builders to compete across state borders more easily, without re-learning or altering designs for different codes. It also encourages suppliers and trades to standardise products and practices, which can lower costs.

Importantly, the LHDS was developed through extensive consultation (including input from Master Builders Queensland) and has become an example of flexible practical reform which can be tailored to the built environment needs of different states and territories. For example, high-set ‘Queenslander’ homes that can only be reached by stairs are exempt from the step-free entry requirement under both the NCC¹⁹ and QDC 4.5.^{20,21} The LHDS modernises the building code, reforms streamline design rules, fosters innovation, reduces duplication, decreased ‘regulatory overhead’, and delivers an efficient, future-ready construction industry.

Cost efficacy of ‘Ageing in Place’

Liveable housing standards are cornerstone to ‘ageing in place,’ with significant health and aged-care cost benefits. Queensland, like the rest of Australia, faces a demographic shift - by 2038 about *1 in 5 Queenslanders will be aged 65 years or older*. The number of people aged 85 years and older is projected to more than double by 2053.²² This ageing population will put increasing pressure on healthcare, home support, and aged care systems. Ensuring that new homes are built to accessible, adaptable standards is a proactive investment. Accessible homes enable older adults to continue living safely in their own residences longer, remaining connected to their communities and existing supports, rather than being forced into premature entry to residential aged care facilities due to preventable environmental barriers.

The Royal Commission into Aged Care Quality and Safety (2021) found a *direct link between a lack of accessible housing and early entry into residential aged care*, with many older people’s

quality of life suffering because their homes could not accommodate their needs.²³ Features like step-free entry, ground-floor accessible bathrooms, and provision for grab rails can prevent falls and injuries, reduce hospitalisations, and delay (or altogether avoid) the very high costs of institutional care.²⁴ Even a one-year delay in moving an older person into residential aged care represents substantial savings (e.g., a government-subsidised aged care bed can cost \$50,000–\$100,000 per year).²⁵ Keeping older adults safe at home is *what older Queenslanders overwhelmingly prefer*, and also frees up residential aged care places for those with the greatest care needs or who have no alternative accommodation.

Accessible housing also yields health system efficiencies. Hospitals can discharge patients sooner when their home is accessible; for example, a person recuperating from surgery or a fall can return to a single-level, accessible home without needing longer hospital stays or rehabilitation in a facility. Home care services (like visiting nurses or disability support) can be delivered more easily in a house with basic accessibility features, cutting down the need for the transition to an expensive hospital or residential aged care.²⁶

Widespread adoption of the LHDS will help bend the cost curve in health and aged care by reducing avoidable accidents and facility admissions. These benefits were not fully accounted for in early regulatory impact analyses that focussed primarily on construction costs.²⁷ However, they are very real ‘social productivity’ gains and support an ageing population in cost-effective ways. As the 2023 Intergenerational Report notes, population ageing will be an ongoing economic and fiscal challenge for all governments.²⁸

The LHDS directly responds to this challenge by enabling older people and those living with disabilities to remain in their homes and communities longer, with dignity and safety. This translates to fewer people needing taxpayer-funded care facilities and a healthier, more independent older adult population.

Boosting workforce participation for older adults and carers

Liveable homes also support economic participation, particularly for older Queenslanders and family carers, which is a productivity benefit often overlooked. Accessible, appropriate housing is foundational for all ages to find and maintain employment, live a healthy life, and engage in their communities. For an older person, an adaptable home which reduces or eliminates mobility limitations (e.g. one with a level entrance and accessible bathroom) can mean they can continue to work full-time, part-time or volunteer. The LHDS helps experienced workers remain in the labour force longer, preventing early retirement. Appropriate housing is vital to retaining willing older workers, boosting economy and easing pension and welfare burdens.

Crucially, supporting informal carers with accessible homes has productivity payoffs. Many family caregivers reduce their employment or exit the workforce because the homes they live in make caregiving too difficult (for instance, carrying a wheelchair-bound family member up steps, or lacking an accessible bathroom requires constant supervision). When a home is

designed with basic universal features, it relieves pressure on public systems and carers are better able to balance work and caregiving responsibilities. In Queensland, there are thousands of carers of older parents or disabled children, and many older adults who are informal carers. If even a fraction can stay in paid employment thanks to adaptable home design, that translates into higher workforce participation and economic productivity.²⁹

In addition, accessible housing fosters social inclusion and mental health and it allows people living with disability or frailty to visit friends and family (no longer impeded by obstacles from poorly designed entry/exit points, for example) and to participate in community life. This social connectivity supports better outcomes and lessens reliance on government support.³⁰ An appropriate built environment aligns with the Queensland Government's objectives to "give Queenslanders a better lifestyle and a place to call home," in turn supporting economic growth through older adult participation.³¹ The LHDS contributes to a more inclusive economy where age or disability is less of a barrier to contributing skills and care.

Relevant sustainable policy and reform

The implementation of the LHDS in Queensland is bolstered by national policy and recommendations, underscoring the benefits and relevancy of reform. In April 2021, after extensive industry and public consultation, the national Building Ministers' Meeting agreed that *introducing minimum accessibility standards in all new housing would yield significant and lasting benefits* for Australians.³² Queensland was among the first to demonstrate foresight and a commitment to human rights of people living with disabilities and older people.³³

Since then, a series of high-profile reviews in the disability and aged sectors have reinforced the importance of this standard such as the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2023) which recommended that all states and territories implement the LHDS for all new dwellings as soon as possible, recognising that accessible housing is critical infrastructure for disability inclusion.³⁴ In addition, the NDIS Independent Review (2023) found a "critical shortage of affordable and accessible housing" in Australia that cannot be met by specialist disability housing alone and urged every jurisdiction to roll out the LHDS to expand a mainstream accessible housing supply.³⁵ A further landmark review was the Royal Commission into Aged Care (2021) which highlighted how a lack of accessible homes undermines older people's quality of life and contributes to premature entry into aged care facilities. A key reform was building more accessible homes would help older adults live at home longer with better quality care.³⁶

Furthermore, broader governance concerns across Australia's building system, as highlighted in the Building Confidence Report, reinforce the need for transparent, inclusive and rights-based regulation in accessible housing.^{37,38} The Australian Human Rights Commission and United Nations (UN) have pointed out that accessible housing is a matter of rights and equity. Australia was called to account by the UN in 2019 for not having mandated accessibility in housing.

Adopting LHDS helps fulfill these obligations and aligns with international best practice for inclusive communities.^{39,40}

From an economic standpoint, the Office of Best Practice Regulation (OBPR) principles demand that when assessing regulations, governments need to consider the full range of benefits.^{41,42} The earlier cost-benefit analysis that questioned the LHDS has been criticised for failing to account for the broad societal benefits.⁴³ In reality, once the health, social, and economic gains are included, this reform is clearly net-positive.⁴⁴ It enjoys bipartisan roots and support from a coalition of seniors', disability, and housing organisations.⁴⁵ Reversing or weakening the standard now would not only counter this evidence and expert consensus but also risk fragmentation and uncertainty in the building industry.^{46,47}

Notably, Queensland's implementation was tailored in QDC 4.5 with sensible adjustments such as exemptions for steep sites, provisions for high-set homes, and allowance of thresholds via garages (largely addressing the specific concerns raised by industry).⁴⁸ The Government has also provided transition assistance (e.g. a certifier guideline and new variation forms) to ensure smoother compliance by builders.⁴⁹ In light of this, many in the industry have already adjusted to the standard and it has become 'business as usual.'⁵⁰ It enables Queensland builders to design once and build everywhere,⁵¹ tapping into a growing market for accessible adaptable homes as people age.

Impact of LHDS in climate and disaster considerations

Climate change and planning for natural disasters is not addressed as a primary issue in the QPC's Interim report. We note in other sectors that climate impact in accessible design is a primary consideration. The Australian Housing and Urban Research Institute (AHURI) inquiry⁵² into housing and disaster makes a compelling case for integrating resilience, accessibility, and coordination into housing policy, particularly when addressing the needs of older people and at risk or vulnerable cohorts. These findings offer strong conceptual and policy support for implementing the LHDS within a broader framework of construction sector reform, especially as Australia faces growing climate and disaster-related challenges.

A central principle from the inquiry is the need to *elevate resilience* as a core function in local governance. This means ensuring that housing is also durable and adaptable in the face of increasing risks such as bushfires, floods, and heatwaves. The report emphasises that the time to build better is before disasters strike, not simply during recovery phases. Design standards such as the LHDS support this approach by embedding features like step-free access, wider doorways, and reinforced structures that protect older residents and enable safer sheltering or evacuation during emergencies. These design elements also contribute to long-term savings by reducing the need for costly retrofits (and eliminating the difficulty of sourcing qualified

tradespersons in a timely manner which currently continues to be problematic especially for regional areas) and improving the safety and usability of housing over time.

It is also important to strengthen local government capacity. Local councils play a crucial role in planning approvals, building regulation, and emergency response, yet many are under-resourced. The AHURI report argues for clearer mandates, better resourcing, and enhanced training for local governments to carry out disaster risk management, prevention and responsibilities in relation to housing. For the LHDS to be effectively implemented and enforced, local authorities need the capacity to assess developments, apply consistent design standards, and collaborate with emergency and health services. Empowering councils will help ensure that accessibility and safety are not treated as red tape, but as integral to community resilience, wellbeing, *and* construction sector productivity.

The AHURI report also underscores the need for risk-informed land use planning. It strongly recommends using planning and zoning tools to restrict new residential developments in high-risk areas and supports the idea of pre-disaster planning for relocation and buyback schemes. This has direct implications for housing intended for older people, who may be particularly vulnerable to hazard exposure. It makes little sense to build homes that are later rendered uninhabitable due to foreseeable risks. Locating housing for older people in safer areas and designing it to be accessible and disaster-resilient from the outset is not only more ethical but more efficient in the long term.

A further key recommendation is improving data governance and evidence-based decision-making. The AHURI inquiry calls for better quality, access, and sharing of data related to housing conditions, demographic needs, disaster risk, and insurance coverage. For the LHDS implementation, this means that design standards can be more effectively targeted and justified using robust evidence. For example, data could show how certain accessibility features reduce injury rates or how building to higher standards reduces rebuilding costs after disasters. Streamlining planning and building approval systems to be 'data responsive' would also allow regulations to adapt more consistently to emerging needs.

Overall, the AHURI report stresses the need for cross-sector coordination. The efficacy of policy depends on how well it aligns with e.g., planning, emergency management, community services, and health systems. The LHDS should not be viewed narrowly as a construction issue, but as part of a broader social policy aimed at improving health, safety, and inclusion. Coordinated, multi-level governance helps reduce regulatory gaps and duplicated effort, leading to more effective and efficient outcomes. The AHURI evidence reinforces the value of the LHDS as a proactive measure that supports resilience, equity, and long-term productivity.

In a Queensland context, the element of heat stress, is hugely impactful to the construction industry and to the workers on construction sites as acknowledged in the QPC's Interim report. However, equal importance is the impact of heat stress on more vulnerable or at-risk residents who live in poorly designed dwellings which are not equipped for the Queensland heat. Research from climate adaptation and public health experts including those involved with Queensland-based initiatives frequently emphasises that poorly designed or inaccessible dwellings pose significant health risks to older people during heat events. Homes that do not meet Livable Housing Design Standards or climate resilience criteria often lack, for example:

- Passive cooling features (e.g., shading, insulation, cross-ventilation)
- Mobility-adapted layouts that allow vulnerable individuals to access cooler areas or leave their homes safely
- Appropriate indoor climate control (such as efficient air conditioning or thermally protected zones).

These deficits can make homes dangerous in prolonged heat, increasing the likelihood of heat exhaustion or heat stroke, exacerbation of chronic conditions (particularly cardiovascular and respiratory conditions), and dehydration and immobility complications, particularly for older people living alone or with mobility impairments. According to studies in the Queensland climate adaptation sector, ageing populations in non-compliant or thermally inefficient housing are at heightened risk, particularly in regional or remote areas where support services may be delayed during emergencies.⁵³

Resilience, local capacity, risk-informed planning, data-driven regulation, and cross-sector alignment offer a framework to support the adoption of design standards that make housing safer and more inclusive, particularly for older people living in communities impacted most by natural disasters and climate change.

Future: Productivity and inclusion

While the recently published Interim Report⁵⁴ asserts that the adoption of the Livable Housing Design Standards occurred without clear evidence of net community benefit, this overlooks findings in the Australian Building Codes Board's (ABCB) own Decision Regulation Impact Statement (RIS) (2021). The RIS acknowledged that even under conservative modelling, the LHDS would result in long-term savings when societal benefits (such as reduced aged care admissions, fewer injury-related hospitalisations, and lower demand for home modifications) were included. The RIS noted that applying the LHDS to new Class 1a dwellings (freestanding houses) and Class 2 buildings (apartments) would yield modest upfront costs but generate substantial cost savings over time through avoiding retrofits and public expenditure. More recent assessments, such as those referenced in the 2024 NDIS Review and the 2023 Royal Commission into Disability, have reinforced these conclusions, identifying accessible housing as essential public infrastructure with measurable fiscal and health benefits. The claim that the LHDS lacks a sound evidentiary basis fails to account for broader, well-established analysis.

The LHDS are an investment in a more efficient, inclusive future for Queensland. The housing industry's peak bodies have raised concerns that the LHDS could slow construction or add costs, but the cost impact is marginal (roughly 1% on build price), and that is likely to diminish with scale and innovation.⁵⁵ The dividends are significant with a reduction in future renovation expenses, improved national consistency for businesses, and broad social benefits ranging from safer homes and lower healthcare burdens to greater workforce participation by carers and older adults.⁵⁶

Queensland does not need to choose between economic efficiency and social responsibility as the LHDS advances both - it ‘future-proofs’ the housing stock for our ageing society, delays entry into costly aged care, and fosters independence and dignity for people of all abilities.⁵⁷ As stakeholders have noted that earlier inclusion of accessibility features reduces (avoidable) costs later on.⁵⁸

Reaffirming the LHDS will solidify Queensland’s leadership in modern, resilient housing. To repeal or alter the standard would undermine progress, satisfying a narrow segment of industry at the expense of longer-term community and economic well-being. The Queensland Government’s own objectives of driving down cost of living and giving people a better lifestyle in their own homes are directly supported by this reform.⁵⁹ Maintaining the LHDS is a prudent decision that will keep the Queensland building industry competitive and innovative, save public funds in healthcare and aged care, and ensure every new home is an asset for multiple generations.⁶⁰

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