

Liveable Housing Design Standard

**PeakCare's Submission to the Productivity
Commission**

18 August 2025

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Introduction

PeakCare welcomes the opportunity to contribute to the Queensland Productivity Commission's Interim Report, *Opportunities to Improve Productivity in the Queensland Construction Industry* (31 July 2025). We acknowledge the Commission's effort to explore productivity and regulatory efficiency and appreciate the opportunity for a balanced dialogue on the implications of the National Construction Code's Liveable Housing Design Standard (LHDS).

As the peak body for child and family services in Queensland, PeakCare is committed to advancing inclusive, safe, and accessible environments for children, families, and people with disability. While we support the continuation of the LHDS as a national standard, we also recognise the value in considering industry insights and opportunities for regulatory improvement.

About PeakCare

PeakCare is a not-for-profit peak body for child and family services in Queensland, providing an independent voice representing and promoting matters of interest to the non-government sector. Across Queensland, PeakCare represents small, medium, and large local, state-wide and national non-government organisations which provide prevention and early intervention, generic, targeted, and intensive family support to children, young people, families, and communities. Member organisations also provide child protection services, foster care, kinship care and residential care for children and young people who are at risk of entry to, or who are in the statutory child protection system and youth justice systems.

A large network of associate members and supporters also subscribe to PeakCare. This includes individuals with an interest in child protection, youth justice and related services, and who are supportive of PeakCare's policy platform around the rights and entitlements of children, young people and their families to safety, wellbeing, and equitable access to life opportunities.

PeakCare's Submission

Supporting accessibility and equity through the LHDS

Equity and human rights

The LHDS is a foundational measure that supports universal access to housing. This includes people with disability, older Australians, families with young children, and people returning from hospital care. For vulnerable families, a lack of accessible housing can escalate risks to child safety and wellbeing. For example, the inability to secure housing suitable for a child with disability can lead to statutory intervention, costing the system significantly more (for example, \$400,000 annually for residential care) compared to less significant up-front design costs.

Cost-effectiveness over the long term

The economic case for LHDS is strong. While early Productivity Commission estimates suggested high compliance costs (up to \$20,000), localised insights from the Queensland building sector that have been adhering to LHDS since October 2023, indicate that LHDS-compliant design features add only \$2,000–\$4,000 to new builds, which amounts to approximately one per cent of the total cost. This small investment helps avoid much higher expenses associated with retrofitting, acute care, or institutional responses later.

Reducing downstream costs for public systems

Accessible housing eases pressure on health, disability, aged care, and child and family services by enabling independent living and reducing reliance on formal care arrangements. These savings accrue to both state and federal systems, including Queensland's obligations under the National Disability Insurance Scheme (NDIS).

The case for national consistency

Queensland has led the way by implementing the LHDS since October 2023, joining five other jurisdictions in setting a national benchmark. Reversing course now would impact national alignment and may cause confusion for industry and consumers. Builders and developers have already started adapting their designs and supply chains to meet LHDS requirements. Offering stability now will support both innovation and consumer confidence.

We do acknowledge concerns raised about regulatory volatility in the National Construction Code, with frequent updates creating challenges for compliance and productivity. Suggestions to reduce red tape and limit the frequency of code changes, as raised in recent economic forums, deserve serious consideration. However, proposals for a 10-year freeze on National Construction Code changes could pose risks to innovation, safety, and sustainability. We recommend a balanced path: fewer, better-planned updates that provide predictability without stifling progress.

Enhancing industry productivity without sacrificing standards

PeakCare supports improvements to the National Construction Code that increase clarity, reduce administrative burden, and support the timely adoption of practical standards. However, we are concerned about the possibility of trading short-term productivity gains for long-term social and economic cost. We recommend the retention of the LHDS while refining broader code implementation processes.

Conclusion

In conclusion, PeakCare urges the Queensland Government to:

1. Retain the Liveable Housing Design Standard within the National Construction Code as a mandatory requirement to safeguard accessibility, equity, and systemic sustainability.
2. Support regulatory reform that reduces red tape and improves the predictability of National Construction Code changes, without resorting to a decade-long freeze.
3. Promote a unified national approach to liveable housing design to avoid fragmentation, duplication, and confusion in the market.
4. Prioritise lived experience perspectives, including those of families, people with disability, and carers, in any decision-making around housing design.
5. Give due consideration to the economic and social impact these changes may have on the other tertiary human services sectors, such as child protection, health services and youth justice, should these standards not be maintained.

We commend the Queensland Productivity Commission for opening this dialogue and welcome future opportunities to contribute data, case studies, or further analysis.

Yours sincerely,



Mr Tom Allsop

Chief Executive Officer