



Australian Network  
for Universal  
Housing Design

Queensland Building Plan  
Department of Housing and Public Works  
GPO Box 2457  
CITY EAST BRISBANE QLD 4001  
qldbuidingplan@hpw.qld.gov.au

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To whom it may concern

We thank you for the opportunity to contribute the consultation of your Building Plan; in particular, on the proposals to improve the uptake of liveable housing design. We have attached our response to each of your proposals and placed them in order of priority.

**Australian Network for Universal Housing Design (ANUHD) believes that the homes we build for today should be fit for all of tomorrow's Australians.**

We acknowledge the Department's proposals are part of the Queensland Government's commitment in 2011 through COAG in the 2010-2020 National Disability Strategy (COAG, 2011) that all new homes will be of agreed universal design standards by 2020 (p. 34).

The housing industry in Queensland has supported several voluntary promotional initiatives to increase the supply of accessible housing in the last fifteen years (Department of Housing, 2001; Department of Public Works, 2008; Office of the Public Advocate, 2005; Queensland Government, 2011a) with minimal sustained take-up by individual industry members (Australian Network for Universal Housing Design and RI Australia, 2015; Colmar Brunton, 2004).

The Australian Government and other States and Territories have also had voluntary promotional initiatives (Building Commission Victoria, 2002; Government of Western Australia, 2011; Landcom, 2008; Queensland Government, 2011b, 2015; Victorian Building Commission, 2009) with similarly poor results.

There has been enough money spent on education and awareness raising. It is now time to mandate for minimum access features in all new and extensively modified housing. With this in mind, we make the recommendations outlined in our attachment.

Please do not hesitate to contact us by email if ANUHD can assist you further.

Yours Sincerely

**Dr Margaret Ward** PSM  
**David Brant**  
Convenors  
Australian Network for Universal Housing Design



Response to the proposals for increasing the supply of liveable housing in the Queensland Government Building Plan-Discussion Paper

Priority	Proposal in Building Plan discussion paper	Our recommendation	Rationale to our recommendation
Priority 1.	Mandate a minimum standard ('Silver Level') of liveable housing design to be included in all new residential dwellings by 2020 by developing a new mandatory part of the Queensland Development Code (QDC). Some exemptions could be considered, e.g. steep properties and very small lots.	<p><i>ANUHD recommends that, as a priority, the Minister:</i></p> <ul style="list-style-type: none"> <li><i>Mandate the Silver level specifications of LHA's Design Guidelines to apply to all new and extensively residential dwellings (class 1 and 2 buildings) through an amendment to the Queensland Building Act to commence 1 January 2020. Any necessary exemptions would be considered within a Regulatory Impact Statement.</i></li> <li><i>Through his ABCB representative, support similar mandated requirements in the National Construction Code to be included in its next review in May 2019.</i></li> </ul>	<p>Research in Australia and overseas supports mandating compliance through legislation is necessary to provide an adequate supply of accessible housing for older people, people with disability and their families. (Bringolf, 2011; Imrie, 2003; Kose, 2010; Malloy, 2011; Nishita, Liebig, Pynoos, Perelman, &amp; Spegal, 2007; Ward &amp; Franz, 2015).</p> <p>The Premier, as a member of COAG, and the Minister, as a member of the Building Ministers' Forum, <b>must act now</b> if Queensland is to meet its commitment within the 2010-2020 National Disability Strategy to reach the 2020 target of all new housing providing minimum access features.</p> <p>Inclusion of minimum access features in all new and extensively modified housing through the National Construction Code and its implementation through State legislation is the most effective path for this policy change. Nevertheless, ANUHD supports State legislative action, in the current absence of National action.</p>

Priority	Proposal in Building Plan discussion paper	Our recommendation	Rationale to our recommendation
Priority 2	Update Economic Development Queensland’s Guideline to include increased requirements for liveable housing design in new dwellings in its Priority Development Areas.	<p><i>ANUHD recommends that in their priority development areas, EDQ:</i></p> <ul style="list-style-type: none"> <li>• <i>require 10% of their housing to reach Gold level.</i></li> <li>• <i>require <u>all</u> their housing to reach Silver Level.</i></li> <li>• <i>Registers these properties (see Priority 5) so that prospective buyers and renters can find them.</i></li> </ul>	<p>As part of the Queensland Government, Economic Development Queensland has an obligation to implement COAG’s 2010-2020 National Disability Strategy; in particular, the targets outlined in the National Dialogue for Universal Housing Design (2010).</p> <p>Accessible dwellings within EDQ developments are not advertised or promoted, nor are they registered in any way. In effect the initiative is lost to those who would benefit most; that is, future buyers or renters of private housing. Further, Class 1 dwellings are currently exempt from this approach.</p>
Priority 3	Provide a financial incentive to new homebuyers to include a minimum of ‘Silver Level’ design features in their new dwellings (using Livable Housing Australia’s Design Guidelines).	<p><i>ANUHD recommends that incentives be offered for Gold level or above, given that the Queensland Government through COAG has already agreed to the target of all new housing providing Silver Level by 2020 (NDUHD, 2010).</i></p>	<p>ANUHD has found that:</p> <ul style="list-style-type: none"> <li>• builders and buyers are unlikely to seek accreditation when it costs them to do so. LHA has already discovered this to be the case.</li> <li>• Incentive programs have a reputation within the housing industry of being inadequately funded, poorly administered and often do not align with their “design and build” lead times (Nishita et al., 2007; Ward, 2013).</li> <li>• Buyers of new housing are typically unwilling to pay extra for features unless they consider they will immediately benefit from them (Crabtree &amp; Hes, 2009). The incentive would have to ensure the access features required were at least cost neutral.</li> </ul>

Priority	Proposal in Building Plan discussion paper	Our recommendation	Rationale to our recommendation
Priority 4	Develop case studies and display homes in partnership with industry to promote liveable housing design to builders and consumers.	<i>ANUHD recommends the State Government use partnerships and initiatives already in place, where accessible housing is required, as case studies for the broader housing industry.</i>	<ul style="list-style-type: none"> <li>• Grocon’s Commonwealth Games village is incorporating Platinum, Gold and Silver levels. It could be a case study for the housing industry.</li> <li>• EDQ multi-dwelling developments require 10% or more accessible units. EDQ could use some of these as case studies for the housing industry.</li> <li>• The Department builds some of the most cost effective accessible housing through their public housing program.</li> </ul>
Priority 5	Require all Livable Housing Australia compliant properties to be registered on a publicly available database so consumers seeking liveable housing can easily locate suitable properties.	<i>ANUHD supports this proposed strategy.</i>	<p>The Queensland Government (2010) initiated a voluntary self-registering strategy with a Sustainability Declaration Guide with minimal voluntary disclosure on accessible features. The Queensland Government withdrew this initiative, in spite of the advocacy of the disability and ageing sectors.</p> <p>Any similar initiative that requires people to register their properties would need to be linked to a financial incentive as with Priority 5.</p>
Priority 6	Build a partnership to raise awareness of liveable housing design and build industry capability to deliver houses to a minimum ‘Silver Level’ of liveable housing design.	<i>ANUHD recommends that the Department review the decision to defund the Smart and Sustainable Homes Project before if launches into a similar strategy a decade later.</i>	The Queensland Government’s Smart and Sustainable Homes Project ran an extensive and costly demonstration program from 2004-2009 expressly to increase public and industry awareness of universal design and environmentally sustainable practices.

Priority	Proposal in Building Plan discussion paper	Our recommendation	Rationale to our recommendation
Priority 7	Work with the real estate industry to develop a recognisable icon for real estate marketing of houses that already include liveable housing design features so they are readily identifiable to consumers.	<i>ANUHD recommends the adoption of the established Livable Housing Australia icons in any Queensland Government initiative to support National consistency.</i>	The purpose of the national LHA icon was to make dwellings with compliant liveable housing design specifications under LHA’s Design Guidelines easily recognisable to real estate agents and consumers of web page advertisements (Livable Housing Australia, 2012). There is little value in developing an initiative that runs concurrently, especially when the purpose of the National approach of Livable Housing Australia was to avoid further confusion (NDUHD, 2010).

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