Australian Institute of Architects QLD

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31 August 2026

The Honourable Sam O'Connor MP
Minister for Housing and Public Works
Queensland Government

Re: Queensland Development Code Amendments to Modern Home Standards (QDC 4.1)

Dear Minister O'Connor

On behalf of the Royal Australian Institute of Architects Queensland Chapter, I write regarding the recently announced amendments to Queensland Development Code (QDC) 4.1 as part of the Modern Home Standards review.

The Royal Australian Institute of Architects is disappointed that amendments reducing residential energy efficiency requirements for small homes and homes employing raised-floor construction have been adopted. These amendments represent a departure from the original intent of the Modern Home Standards, which sought to improve the energy performance of Queensland housing and reduce the long-term costs associated with heating and cooling homes.

The Institute previously provided detailed feedback during consultation outlining our concerns regarding the proposed reduction in minimum thermal performance standards. While we acknowledge the Government's decision to proceed with the amendments, the Institute remains uncertain as to how the concerns raised through the consultation process were evaluated and weighed in reaching the final outcome.

While we recognise the Government's objective of supporting housing affordability and improving the practical implementation of regulatory requirements, we remain concerned that reducing minimum energy efficiency standards may have unintended long-term consequences for Queensland households.

Queensland faces increasing exposure to hotter and more humid climatic conditions. These conditions are projected to increase the frequency, intensity and duration of heatwave events, with corresponding impacts on community health, energy demand and household operating costs. In this context, reducing the thermal performance of new housing appears inconsistent with broader government objectives relating to climate adaptation, resilience and public health.

Importantly, the Institute's position is not that housing should become unnecessarily expensive. Rather, we believe that well-designed, thermally efficient housing delivers long-term value by reducing energy consumption, lowering operating costs for occupants and improving comfort and health outcomes over the life of a dwelling. These benefits are particularly important for lower-income households, who are often the most vulnerable to rising energy costs and extreme heat events.

The Institute is also concerned that concessions intended to reduce upfront construction costs may instead transfer greater costs to homeowners and communities over time through increased energy consumption, reduced resilience and poorer occupant outcomes.

Given the significance of these changes, the Royal Australian Institute of Architects would welcome the opportunity for representatives of the Department to meet with our Sustainability and Practice Committees to

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discuss the rationale that informed the adopted amendments and the outcomes the Government expects they will deliver for Queensland households over the longer term, particularly in balancing housing affordability with energy performance, occupant wellbeing and climate resilience.

Constructive engagement between government and industry is essential to ensuring Queensland's housing stock remains affordable, healthy, resilient and responsive to future climatic conditions. The Institute would welcome the opportunity to contribute positively to that discussion.

We thank you for considering our concerns and look forward to your response.

Yours sincerely,



Peter Gardiner
Queensland Chapter President