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Department of Housing and Public Works
BuildingPolicy@hpw.qld.gov.au

RAIA Queensland Chapter response to changes to QDC's and the Modern Home Standards

Dear Consultation Team,

The Royal Australian Institute of Architects (QLD Chapter) appreciates the opportunity to provide feedback, through BMAC, on the draft amendments proposed for the Queensland Development Codes for Modern Homes Standards. We have sought advice from our Sustainability and Practice Committees, who have reviewed the draft and given feedback on each of the proposed changes.

The Institute's feedback is detailed below.

QDC 4.1 Sustainable Buildings

Amendment 1

Reduce the energy efficiency (star rating) for small homes (<50m2 floor area) where achieving compliance with the 7-star standard is technically challenging and not cost effective.

Response: The Institute does not support reducing energy efficiency requirements for small homes. We have concerns about the long-term implications of lowering thermal performance standards, particularly as Queensland's climate is projected to become hotter and more humid.

It is important that homes remain sustainable, comfortable and liveable over their lifespan, irrespective of size. Homes approved under a lower performance standard today may be more vulnerable to future climate conditions, potentially affecting occupant comfort, energy use and resilience.

The Institute appreciates the desire to reduce construction costs, particularly for simpler and smaller houses. However, we are not convinced that reducing building performance is the most appropriate mechanism to achieve this outcome. We note the proposed change relates to the building shell and welcome any modelling or evidence used to assess the impact on thermal performance, occupant comfort and future liveability. Should the evidence demonstrate only a limited impact on building performance and liveability outcomes, the proposal may warrant further consideration.

The Institute also encourages consideration of alternative approaches that maintain overall liveability outcomes, including improved daylight access, shading of windows and walls, and cross ventilation; which should be simpler to achieve in a small house design.

The institute would welcome a briefing with its Sustainability and Practice Committees to better understand the evidence base, objectives and expected outcomes for this amendment.

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Amendment 2

Reduce the energy efficiency (star rating) for homes with raised floor construction (e.g. Queenslander-style homes) to a 6-star standard.

Response: The Institute does not support this amendment.

We believe that lowering the standards for homes with raised floor construction does not contribute to the liveability of homes in Queensland and the long-term sustainability and energy efficiency of homes built with raised floors.

We believe that a raised floor can still be insulated and are unsure how the reduction in the thermal efficiency in the building will benefit future liveability.

Amendment 3

Develop targeted guidance materials to improve practitioners' understanding and application of the requirements, thereby supporting better compliance with the 7-star rating, or lower for small homes (5-stars) and homes with raised floor construction (6stars).

Response: The Institute supports initiatives that improve, modernise and increase the accessibility of guidance materials. Improved guidance can support more consistent understanding, application and compliance with the requirements.

QDC 4.5 – Liveable dwellings grading to floor wastes

Amendment 1

Provide an additional compliance option for elevated houses to be 'ramp ready'. This will allow homeowners to install a ramp to provide access into the home at a later time i.e. when they need it. House plans will need to show the location and specifications of the ramp for its future installation as part of the building application.

Response: The Institute supports the proposed 'ramp ready' compliance pathway. This appears to be a practical solution that allows homes to be adapted efficiently should accessibility needs change over time.

The Institute would also welcome consideration of a 'lift ready' alternative where site constraints, lot conditions or dwelling design make future ramp installation impractical.

Amendment 2

Including relevant clauses for ramps from the Australian Standard 1428.1 – Design for access and mobility (AS 1428.1) into QDC 4.5 as an additional compliance option for step-free access. This will allow practitioners already familiar with this standard to use it as an acceptable solution.

Response: The Institute supports this amendment

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Amendment 3

Clarifying how to integrate step-free entry provisions with termite management and weatherproofing requirements with options to enable compliance as an acceptable solution.

Response: The Institute supports this amendment.

Amendment 4

For bathrooms that include both a toilet and a shower, introduce an additional compliance option that adopts the AS 1428.1 provisions allowing a shower door swing to overlap with the circulation space in front of the toilet.

Response: The Institute supports this amendment.

Amendment 5

For circulation space in bathrooms, remove the requirement that the accessible toilet be exactly centred in the circulation space of the accessible bathroom.

Response: The Institute supports this amendment.

Amendment 6

Extension of the exemption for houses on narrow lots (≤12.5 m frontage) to comply with LHDS will be extended for another 3 years after 30 September 2026.

Response: The Institute does not consider that an additional 3-year extension to the LHDS exemption for narrow lots is necessary.

Given the existing transition period and the proposed introduction of additional compliance pathways, including the ramp-ready option, the Institute would welcome evidence demonstrating why a further extension remains warranted.

On the information available, the Institute does not support this proposal.

Amendment 7

Develop targeted guidance materials to improve practitioner's understanding and application of the requirements, thereby supporting better compliance with the LHDS.

Response: The Institute supports initiatives that improve, modernise and increase the accessibility of guidance materials.

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The Institute would welcome continued engagement on the proposed amendments and would be pleased to provide further technical input to support sustainable, liveable and accessible housing outcomes in Queensland.

Yours sincerely,



Peter Gardiner
Queensland Chapter President