

31 July 2025

Queensland Department of Housing and Public Works  
Queensland Housing Code Review Team

## Queensland Housing Code

Thank you for the invitation to provide input on the Queensland Housing Code which will replace the existing design and siting provisions in the Queensland Development Code QDC 1.1 and QDC 1.2.

The Insurance Council is the peak industry body for Australia's general insurance industry. We work with governments of all levels to advocate for targeted and effective disaster resilience measures to better protect Australia's homes and businesses from extreme weather events. This includes extreme flooding events which are increasing in frequency and severity and are having a significant impact on insurance affordability and availability.

The Insurance Council has reviewed the Code's technical changes which we note are designed to make more efficient use of urban plots by making changes to a number of elements, including building height, the distance between houses and their boundaries, car parking and private open space.

The Insurance Council recognises the need for jurisdictions to review their housing codes to establish planning provisions that maximise the efficient use of land. We recognise Queensland's growing population necessitates housing regulations that ensure urban blocks are meeting the changing needs of homeowners, particularly in new, green-field developments. This includes maximizing livable housing space on urban blocks.

The Queensland Government needs to ensure any changes to its housing and planning provisions do not directly (or indirectly) lessen the resilience of Queensland homes, particularly in relation to homes' flood risk. The Insurance Council understands the new regulations will allow homes to be built 1.5m closer to the front of lots to enhance amenity and increase back yard open space. As part of this process, the Insurance Council encourages the Department of Housing and Public Works to satisfy itself that this change does not expose homes to greater flood risk in lower-lying areas of blocks.

In addition, the proposal to reduce the minimum distance between a structure and its side boundary from 750mm to 200mm does, however, raise concerns for insurers. Reducing the allowable distance to only 200mm will present significant challenges when repairs are required on homes, given the lack of side clearances. Reducing it by more than a half will also present additional hazards in terms of contagion risks and the potential for damage in adjacent properties.

As per the Insurance Council's previous input to the Queensland Ministerial Construction Council, the Insurance Council strongly supports measures to strengthen the resilience of Australia's housing stock. One of the keys to achieving this objective is by formally adopting resilience in the National Construction Code, and state and territory-based housing codes, including in Queensland.

Our support for this policy reform is reinforced by the impacts more frequent and severe extreme weather events are having on the built environment, and the significant implications this is having on the affordability and availability of insurance.

The total insured cost of extreme weather events over the past five years is approximately \$22.5 billion, an average of \$4.5 billion a year and an increase of 67 per cent on the previous five years. As Australia's most extreme-weather exposed state, it is imperative that we do all we can to minimise potential risks to properties in Queensland, particularly those in high-risk flood zones.

Our support for improved building resilience is also underpinned by analysis conducted by the Centre for International Economics which found that strengthening the National Construction Code to require that new homes are made more resilient to worsening extreme weather could save an estimated \$4 billion a year. This includes an estimated \$2 billion per year for cyclones, \$1.475 billion per year for floods, and \$486 million per year for bushfires.

More broadly, the Insurance Council encourages the Queensland Government to ensure its land-use planning arrangements prevent the development of new homes in high-risk areas.

Analysis by the Insurance Council<sup>12</sup> found that at least 310,000 Queensland properties – or around 10 per cent of all Queensland properties – are exposed to a 1-in-100, 1-in-50, or 1-in-20 risk of flooding each year, with at least 47,000 of these properties exposed to the highest 1-in-20 annual risk of flooding.

As Queensland's population increases, the pressure for new houses to be built in higher risk areas will grow. In light of this, the threshold of acceptable risk needs to be reconsidered and the consequence of extreme weather, not just the probability, needs to be taken into consideration. Failure to do so will result in more people being put in harm's way, increasing the cost of future disasters and placing upward pressure on premiums for all policyholders.

The Insurance Council therefore encourages the Queensland Government to ensure all regional development plans prioritise areas of zero-risk and low-risk to extreme weather for new dwellings. Furthermore, any housing development in areas prone to extreme flood risk should not be permitted, and in areas subject to high risk, stronger building codes and standards need to be employed and/or adequate resilience infrastructure built.

This fundamental principle needs to apply to dwellings that will be constructed under the revised Queensland Housing Code.

Yours Sincerely



**Andrew Hall**  
Executive Director and CEO

---

<sup>1</sup> [Resilience, Durability and the National Construction Code](#)

<sup>2</sup> [Stronger Queensland – Policy Recommendations for the next Queensland Government.pdf](#)