Australian Institute of Architects

QLD ENERGY ROADMAP AMENDMENT BILL 2025

QUEENSLAND NAME

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ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 14,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to provide input on the Queensland Energy Roadmap Amendment Bill 2025
- At the time of this submission the Chapter President is Caroline Stalker
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INTRODUCTION

The *Energy Roadmap Amendment Bill 2025* represents a profound step backward for Queensland's energy, economic, and social future.

While described as a technical update to streamline energy planning, the Bill removes renewable energy targets, abolishes independent oversight, and consolidates control under a single Minister.

These changes:

- Increase financial, policy, and regulatory risk,
- Shift the burden of the transition to future generations, and
- Reduce transparency and accountability.

The consequences are not abstract — they are real and immediate for Queensland households, small businesses, and regional economies that depend on affordable, reliable, and sustainable energy.

1 KEY CONCERNS

1. REMOVAL OF RENEWABLE ENERGY TARGETS

The Bill eliminates Queensland's legislated renewable energy targets — the single most important policy mechanism ensuring clean, low-cost energy supply.

Without these targets:

- There is no clear plan to expand renewables or storage at the pace required.
- Market confidence collapses, deterring private investment in new, cheaper energy projects.
- The cost of electricity remains tied to volatile global fossil fuel prices.

This directly affects Queenslanders:

- Households face higher electricity bills as ageing coal plants become costlier to maintain.
- Small businesses — particularly in hospitality, retail, and manufacturing — face growing operating costs that will be passed on through higher prices and lower margins.

2. INCREASED FINANCIAL AND REGULATORY RISK

Energy infrastructure investors — from large-scale renewables to distributed solar and battery systems — depend on clear long-term policy.

Removing targets and oversight injects uncertainty, driving up the cost of finance. These higher capital costs are passed through the supply chain to consumers, raising household and small business energy costs even further.

3. REDUCED OVERSIGHT AND PUBLIC ACCOUNTABILITY

The Bill abolishes independent energy councils and advisory bodies that previously ensured expert input and public transparency.

Replacing these mechanisms with Ministerial discretion could diminish transparency and accountability, increasing the risk of decisions being made without sufficient public or expert oversight.

4. TRANSFER OF RISK FROM PRIVATE INDUSTRY TO THE PUBLIC

The Bill establishes full State ownership of energy assets, effectively transferring the financial responsibility for ageing coal and gas infrastructure to taxpayers.

While private operators and fossil fuel suppliers continue to generate profits, the State assumes the costs associated with maintenance, reliability risks, and decommissioning. This structure results in the public sector carrying the financial and operational risks, while returns remain within the private sector.

For households and small businesses, this may limit the availability of public funding for initiatives such as energy rebates, grid modernisation, and investment in local renewable energy projects.

5. ECONOMIC AND PRODUCTIVITY IMPACTS

5.1 Loss of Manufacturing Competitiveness

High energy costs directly undermine Queensland's ability to grow its manufacturing base.

By delaying renewable deployment, the Bill:

- Locks in higher electricity prices;
- Discourages global investors seeking clean, stable supply chains; and
- Limits the creation of regional clean-energy manufacturing hubs (e.g., hydrogen, battery, and critical minerals).

5.2 Erosion of Regional Opportunity

Regional Queensland's transition potential — especially in Gladstone, Townsville, and Mackay — depends on new renewable generation and transmission.

This Bill redirects planning to existing fossil corridors, cutting off regions from next-generation investment and job creation.

5.3 Productivity Drag

Keeping coal and gas plants operating past their viable lifespan introduces inefficiency and unreliability.

Outages, maintenance costs, and fuel price shocks will drag down productivity across all sectors — particularly small manufacturers, logistics, and construction firms reliant on stable energy inputs.

6. HOUSEHOLD AND SMALL BUSINESS IMPACTS

Higher Energy Bills:
The removal of renewable targets and reliance on ageing fossil infrastructure increase the wholesale cost of electricity. Retail prices inevitably follow — leaving families and small enterprises to absorb the difference.

Reduced Reliability:
Outdated coal plants are more prone to failure during heatwaves and peak demand, increasing blackouts that disrupt households and small retailers alike. Precedent for such community disaster is found in South Australia's rolling black out problems before becoming a renewables powerhouse.

Lost Economic Resilience:
With no clear renewable rollout plan, households lose access to cheaper rooftop solar integration and smarter grid systems.

Small businesses miss the opportunity to benefit from local microgrids or community batteries that reduce bills and boost resilience.

Public Funds Diverted:
Every dollar spent propping up coal or gas assets is a dollar not invested in energy efficiency grants, home electrification rebates, or small-business transition programs.

In effect, this Bill penalises Queenslanders twice — through rising bills today and reduced public investment tomorrow.

7. ALIGNMENT WITH FOSSIL FUEL INTERESTS

The Bill's architecture — removal of targets, centralisation of control, and indefinite extension of fossil assets — overwhelmingly favours incumbent coal and gas operators. It allows them to continue profiting under minimal scrutiny while the State assumes financial and environmental liabilities.

This is policy capture in practice: the interests of a few trumping the wellbeing of the many.

8. BROADER IMPLICATIONS FOR THE BUILT ENVIRONMENT

Energy Affordability: Increases in electricity costs threaten housing affordability and the economic viability of small practices and contractors across the built environment sector.

Climate Risk: A slower transition exposes buildings, infrastructure, and communities to higher temperatures, floods, and disaster recovery costs.

Urban and Regional Development: The policy retreat from renewables jeopardises infrastructure planning for sustainable precincts and future-ready cities.

2 COMMENTARY ON CLAUSES

CLAUSE 4 (LONG TITLE AMENDED):

Replaces the Act's long title from focusing on "renewable transformation" to "facilitating the development of infrastructure" for an affordable, reliable and sustainable energy system. This rephrasing shifts emphasis from *transforming* the energy mix toward enabling general infrastructure build-out. RAIA policy stresses a transformational, zero-carbon focus, so the new language may dilute the climate-first framing that built-environment advocates prefer - In contrast, RAIA's Green Pathways/Games advocacy emphasises *transformative design and planning* to unlock community and environmental benefits.

CLAUSE 6 (REPLACEMENT OF SS 3 AND 4 – MAIN PURPOSES):

Redefines the Act's purposes as :

a) **increasing electricity generation** in Queensland cost-effectively, safely and reliably;
b) (b) **supporting efficient augmentation of the transmission grid** to accommodate that new generation; and
c) (c) **providing support for workers and communities** affected by the increased generation.

While Clause 8 references emissions, the Bill lacks explicit emissions reduction or climate resilience targets. Clause 6(c)'s focus on jobs and communities aligns with the Institute's emphasis on workforce development and regional support. However, Clauses 6(a)–(b) prioritise supply-side expansion, likely including fossil generation, whereas the Institute advocates for demand-side efficiency and net zero infrastructure. The absence of references to clean energy or community design highlights a gap from the Institute's holistic vision for sustainable regional growth.

CLAUSE 7 (AMENDMENT OF S 7 – "OPTIMAL INFRASTRUCTURE PATHWAY"):

Renames the "optimal infrastructure pathway" as a "strategic infrastructure path" and redefines its components, adding "hub transmission networks for a regional energy hub."

While this aligns with the Bill's new regional energy hub framework, it remains a technical amendment that omits design and planning integration. The Institute notes that effective delivery of such infrastructure depends on coordination with urban and precinct planning to maximise community and spatial benefits — an alignment not evident in the current drafting.

CLAUSE 8 (REPLACEMENT OF S 8 – INFRASTRUCTURE PATH OBJECTIVES):

The Institute's Queensland policy submissions on housing and infrastructure explicitly call for strengthened climate resilience and a clear net-zero focus within regulatory frameworks.

On initial reading, Clause 8's inclusion of an emissions reduction objective appears broadly compatible with these goals. However, its coupling with a requirement to "minimise cost" introduces potential policy tension: a narrow cost-minimisation approach could incentivise continued reliance on lower-cost fossil or gas generation, undermining the emissions target. The Institute's position prioritises climate safety and long-term resilience, recognising that short-term cost savings should not compromise the State's transition objectives. Clause 3(c) also frames community outcomes primarily through the Job Security Fund, which the Institute has not specifically addressed.

Overall, while Clause 8's recognition of emissions reduction is welcome, it remains limited by the absence of any built environment dimension—particularly regarding health, resilience, and equity outcomes.

CLAUSE 9 (OMISSION OF PART 2 – RENEWABLE ENERGY TARGETS):

The Bill deletes Part 2 of the Act, removing Queensland's legislated renewable energy targets. This undermines the State's net zero transition and the Institute's long-standing position that binding renewable and efficiency targets are critical for climate-resilient, low-emissions buildings. The absence of targets risks misalignment between energy infrastructure and built environment policy settings, including the National Construction Code, as seen in South Australia where energy uncertainty preceded delays in updating building standards.

CLAUSE 10 (AMENDMENT OF S 13 – PUBLIC OWNERSHIP TARGETS):

The clause frames 100% public ownership of generation, transmission/distribution, and deep storage assets, ensuring the State retains existing energy infrastructure. While RAIA does not address ownership directly, the Institute supports government leadership in sustainable infrastructure that promotes equitable access and community benefit. Public ownership can help maintain essential services, but RAIA emphasises that governance arrangements should also consider design quality, environmental performance, and affordability, supporting broader sustainability and equity objectives.

CLAUSE 11 (OMISSION OF S 14 – PUBLIC OWNERSHIP REPORT):

The Bill removes the requirement to publish regular reports on public ownership targets, reducing transparency and weakening accountability. While not addressed in built

environment policy, this change contrasts with the Institute's emphasis on oversight and strategic reporting, as reflected in its guidance on design and planning frameworks.

CLAUSE 13 (AMENDMENT OF S 15 – INFRASTRUCTURE BLUEPRINT → SYSTEM OUTLOOK):

Section 15 replaces a static blueprint with a rolling "Energy System Outlook" to identify strategic infrastructure objectives, priority transmission projects, and potential regional energy hubs. While adaptive planning is a positive step, the clause remains energy-focused, omitting integration with land use, precinct design, or social infrastructure. It also fails to address urban clearance, revegetation timelines, or environmental and community health risks—including heat island effects, dust, and extreme weather—leaving long-term resilience unprotected. RAIA policy consistently advocates linking energy infrastructure with green corridors, precinct planning, and climate-sensitive design; without these safeguards, Section 15 only partially aligns with the Institute's priorities.

CLAUSE 14 (AMENDMENT OF S 16 – REVIEW OF BLUEPRINT):

There is no explicit requirement to consider social, health, or sustainability outcomes, nor to assess equitable energy access or precinct livability. As such, it represents a missed opportunity to embed integrated planning oversight into the energy system review.

CLAUSE 18 (OMISSION OF S 21 – CANDIDATE PRIORITY TRANSMISSION INVESTMENTS):

The clause provides none of the stakeholder or community consultation that RAIA would expect in infrastructure rollouts.

CLAUSE 19 (AMENDMENT OF S22 AND S23 – FUNDING OF PRIORITY TRANSMISSION INVESTMENT):

From a built-environment standpoint, flexible funding could speed grid upgrades that enable more renewables (a positive for net-zero goals). Conversely, it could also facilitate fossil infrastructure with less oversight. The Bill provides no requirement that funded projects pursue social, environmental or health objectives, which contrasts with the Institute's call for strategic investment in people-oriented outcomes[i].

CLAUSE 30 (REPLACEMENT OF PART 5 DIVISION 2 HEADING – RENEWABLE ENERGY ZONES):

The Institute's advocacy has encouraged "regional thinking" (the Green Pathways vision includes a regional Green Gridii), so in concept a "hub" might allow multi-disciplinary development (energy, transport, green space together). But the Bill text itself (further clauses) does not require any inter-disciplinary integration. The narrow focus remains on energy. The renaming alone doesn't align with RAIA's push for design coordination or place-based thinking, though it could have been framed that way.

3 CONCLUSION

The Energy Bill clearly prioritises energy infrastructure—ownership, transmission, and regional hubs—but largely omits the broader built environment considerations that underpin resilient, equitable, and healthy communities. While the inclusion of greenhouse gas reduction as an objective is a positive step, the repeal of renewable targets and removal of a formal transition plan weaken Queensland's trajectory toward net-zero. The Bill's emphasis on a "safe, secure, reliable" supply does not extend to climate resilience of energy assets or connections to public health outcomes, leaving a gap between technical infrastructure goals and the wider environmental and societal imperatives highlighted in RAIA Queensland's submissions.

Health, equity, and precinct-scale planning are notably absent. Opportunities to leverage public ownership for affordable, equitable energy access, or to integrate energy planning with community growth, transit, and placemaking, are missed. Similarly, the Bill contains no provisions addressing sustainable materials, circular economy principles, or lifecycle management of energy infrastructure. These omissions contrast sharply with national commitments and RAIA advocacy on sustainable, design-led infrastructure, highlighting a missed chance to align energy policy with holistic urban and precinct development.

Finally, the Bill overlooks mechanisms for interdisciplinary collaboration, which RAIA identifies as essential for delivering long-term, inclusive outcomes. Repealing advisory structures and failing to mandate input from architects, planners, and health experts further narrows the Bill's scope to a technical infrastructure focus. In sum, while the Energy Bill advances critical grid and infrastructure objectives, it misses opportunities to embed climate resilience, design quality, circularity, and equitable outcomes. This divergence underscores the need for integrated planning approaches that align energy policy with the built environment and the holistic vision championed by RAIA.

Additional Sources: RAIA Qld (Green Pathways/Gold Places)

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[i] architecture.com.au
[ii] architecture.com.au