



Dedicated to a better Brisbane

Brisbane City Council ABN 72 002 765 795

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26 August 2025

Ms Angela Moody
Productivity Commissioner and Chair
Queensland Productivity Commission
PO Box 12078
George Street
BRISBANE QLD 4003
enquiry@gpc.qld.gov.au

Dear Ms Moody

Thank you for your email of 6 August 2025 and the opportunity to provide further information on the Queensland Productivity Commission's *Opportunities to Improve Construction Industry Productivity* (the Interim Report), which closes on 28 August 2025.

Brisbane City Council (Council) recognises the efforts of the Queensland Productivity Commission in the inquiry of the productivity of the construction industry. Council officers have provided a response to the relevant requests for information within the Interim Report and has also provided feedback regarding statements made, outlined in Appendix A.

The main areas we seek clarification on are the statements regarding land use regulations, development assessment responsibilities and timeframes and their impact on construction, and recommendations to increase the supply of housing.

Key matters for Council are:

- Support for a review of the *Planning Act 2016* and *Building Act 1975* (and related regulations) for inconsistencies and for a review of the infrastructure charging framework.
- Local governments should be able to apply variations in applicable planning and building provisions that relate to local variations to reflect local conditions and needs, including a tailored approach to the proposed Queensland Housing Code.
- Efforts to accelerate the development assessment process are supported, however, it should be acknowledged that we have a strong, well-documented track record of relatively fast assessment of well-made development applications. In addition, the assumptions about approval numbers should be informed by evidence (such as rates of refusals). Post-approval construction issues are more relevant as a consideration for the Commission.
- We support the Growth Monitoring Unit in the Queensland Government as being the body that reports on land supply rather than an independent body reporting on the same matters. Financial penalties are not supported against targets given we have no control over the financial, labour and supply chain environments impacting the construction industry or its delivery of housing to market.

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- We have a strong emphasis on undertaking community engagement for policy development, *Brisbane City Plan 2014* amendments and Development applications. Additional, legislative changes to further regulate community engagement are not considered necessary.

Council officers would welcome the opportunity to meet with the Commission to discuss the above matters.

Should your office require further information in the meantime, please contact Ms Suvela Tieken, Team Manager, Regional and Citywide Planning, City Planning and Economic Development Services, on [REDACTED] or at [REDACTED]

Yours sincerely

[REDACTED]

Kerrie Freeman
CHIEF EXECUTIVE OFFICER

Enc. Appendix A: Brisbane City Council's submission on the Queensland Productivity Commission's *Opportunities to Improve Construction Industry Productivity – Interim Report*

Appendix A – Brisbane City Council's Submission on the Queensland Productivity Commission's *Opportunities to Improve Productivity of the Construction Sector – Interim Report*

General Comments

Council appreciates the opportunity to provide information, feedback and evidence on the Queensland Productivity Commission's (the Commission) *Opportunities to Improve Productivity of the Construction Sector – Interim Report* (Interim Report) released on 31 July 2025.

Council's submission highlights key matters for consideration in the land use regulation and the regulation of building activities recommendations. Council's response also includes background to the matters raised in some of the submissions received by the Commission to provide a balanced perspective. We appreciate that the Commission is seeking additional information, feedback and evidence to consider if the recommendations are appropriate measures to address the issues in the construction sector.

Key matters for Council are:

- Support for a review of the *Planning Act 2016* and *Building Act 1975* (and related regulations) for inconsistencies and for a review of the infrastructure charging framework.
- Local governments should be able to apply variations in applicable planning and building provisions that relate to local variations to reflect local conditions and needs, including a tailored approach to the proposed Queensland Housing Code.
- Efforts to accelerate the development assessment process are supported, however, it should be acknowledged that Council has a strong, well-documented track record of comparatively fast assessment of well-made development applications. In addition, the assumptions about approval numbers should be informed by evidence (such as rates of refusals). Post-approval construction issues are more relevant as a consideration for the Commission.
- Council supports the Growth Monitoring Unit in the Queensland Government as being the body that reports on land supply rather than an independent body reporting on the same matters. Financial penalties are not supported against targets due to Council having no control over the financial, labour and supply chain environments impacting the construction industry or its delivery of housing to market.
- Council has a strong emphasis on undertaking community engagement for policy development, *Brisbane City Plan 2014* (City Plan) amendments and Development applications. Additional, legislative changes to further regulate community engagement are not considered necessary.

Council's view is that, while ongoing improvements to the planning system to accelerate development assessment are welcome, planning and building matters are not the most significant impediment to development and construction in Brisbane. Council currently has 9 years of development approvals that can be enacted but have not yet been constructed (source: Queensland Government's *Land Supply and Development Monitoring Report 2021*). Many of the matters affecting construction are outside of Council's control including construction material costs, land prices, and accessibility to labour.

Council is proactive in its approach to planning changes to increase housing supply and diversity across Brisbane. Council currently has three Suburban Renewal Precinct Plans underway for Stones Corner, Mt Gravatt Centre and Wynnum Centre and all are supported by economic and development feasibility assessments to support practical housing supply. Council is also developing the Kurilpa Precinct Plan which add significant housing supply in the inner city. Additional areas are currently being scoped to undergo precinct planning and are supported by the Queensland Government's Scheme Supply Fund. In addition, Council recently announced the More Homes, Sooner initiative which is a review of the Low-medium density residential zone to facilitate additional housing supply and diversity in well located areas. The project will consider issues raised in the Interim Report relating to restricted development and streamlined planning processes.

In 2023, Council released *Brisbane's Sustainable Growth Strategy* and the *Housing Supply Action Plan* which identified actions to facilitate housing including policy settings, infrastructure incentives and reviewing major centres for additional housing growth. Council amended City Plan in March 2025 to update car parking requirements for attached dwellings in the inner-city growth areas, intended to reduce costs to build new housing. We also incentivised the construction industry to bring forward new housing stock through several infrastructure charges incentives, the most recent of which is *AP290 Brisbane Housing Supply Incentive Policy*. The incentive offered reduced infrastructure charges for eligible multiple dwellings in well-located areas. Community housing providers receive 100% reduction of infrastructure charges for developments across the city to facilitate supply of affordable housing.

Currently, Council is investigating opportunities to increase building heights in key centres and transport corridors in line with *Brisbane's Sustainable Growth Strategy*. Delivering growth in areas where existing infrastructure can be leveraged is a key consideration for the potential to increase housing opportunities in these locations. Council has also committed to a Special Assessment Unit in Development Services to ensure well-made residential housing development applications are streamlined. Development Services' average processing timeframe for new applications received and approved within this financial year to 31 May 2025 is 56 days for code assessment applications and 86 days for Impact assessable applications. This is faster than the prescribed legislative timeframes.

Detailed Comments:

Topic/Recommendation	Interim Report Pg#	Feedback
General comments regarding Preliminary Recommendation 7 – Planning and development approval processes	9 and 148	<p>The example provided on pages 9 and 148 refers to a change application. An existing valid approval was in place for the development. The change application was initiated by the owner to amend the original approval to remove some of the requirements of the original approval.</p> <p>The request was complex with matters addressing infrastructure, slope and vegetation removal, all requiring negotiation between the parties. Council explored alternative pathways to facilitate the development as requested to ensure the development outcome could still be delivered as originally intended. The time and monetary delays referred to in the Interim Report were not solely attributable to Council.</p>
Improving regulation of land use the report indicates that “...it is beyond the scope of this inquiry to assess infrastructure planning and sequencing...”	26	<p>Infrastructure planning is part of land use planning and currently operates under the Planning Act, that is the process for making a Local government infrastructure plan (LGIP). An LGIP is part of the planning scheme and a pre-requisite requirement for imposing infrastructure charges. The inquiry placing infrastructure planning out-of-scope speaks to a broader concern of the planning frameworks disconnect between infrastructure planning and land use planning. They are fundamentally interconnected for the purpose of growth and appropriate, efficient, cost-effective land supply and should be treated as such under the land use regulatory framework and any associated review.</p>
Preliminary Recommendation 5 - Design of planning regulation	43	<p>The matters raised in this section consistently point to regulation restricting housing (minimum lot sizes, height restrictions and floor area ratios). Queensland planning schemes are performance-based planning schemes allowing alternate solutions to the minimum standards identified in the Acceptable outcomes. Local governments determine fit-for-purpose zoning and built form outcomes for locations. Blanket zones or provisions are not suitable to be placed over land without understanding local context including topography, hazards, proximity to supporting infrastructure and road layouts.</p> <p>Land use regulation can be varied through the different Queensland planning schemes but all must work with the <i>Planning Regulation 2017</i> (Planning Regulation) to have a similar structure and have the same suite of zones and land use definitions. The language of planning schemes (that is zones, codes, overlays, performance outcomes and acceptable outcomes) are consistent across the state. Local variation to reflect local circumstances is necessary given the nature of development and its setting. The Planning Regulation contains a list of zones that local governments may use within their planning schemes within Schedule 2.</p> <p>The Interim Report notes that Brisbane has 73 zones. City Plan contains 25 zones, some of which have zone precincts to provide clarity to the development industry and community on what land uses and scale of development are anticipated in these locations. For example, the Community facilities zone contains 7 zone precincts including schools, churches, cemeteries, major sports venues. These different uses are generally incompatible land uses, and clarity is provided on what can be constructed with this system of clear zoning. Similarly, this applies to the Centre zone where</p>

		<p>there are 4 precincts with differing scales of development from a small neighbourhood centre to a significant principal centre, such as Brisbane's Central Business District.</p> <p>Council supports an independent review of the Planning Act and Building Act (and associated regulations) to remove inconsistencies and clearly define who regulates what, and when. However, the ability for planning schemes to include alternative provisions to the Queensland Development Code/Queensland Housing Code (QDC/QHC) must be retained. These targeted variations are how local governments address location-specific risks and outcomes (e.g. character, height transitions, flood immunity, maintenance access, privacy and amenity).</p> <p>It is acknowledged that the Commission requests that variations from the QDC/QHC should have a demonstrated net benefit to the community. Importantly, many variations to the QDC are often intended to address site-specific circumstances such as topography or flooding. In these cases, the focus is on localised benefits, and it may be less relevant to prioritise broader community benefits in every instance.</p> <p>An example of a variation in development provisions for Brisbane is building height of dwellings houses and secondary dwellings. The current draft QHC proposes a maximum building height of 8.5 m. Brisbane has a building height of 9.5 m which is more suitable as it allows for buildings to be designed for flood resilience, topography and also the pitch of traditional character housing roof. Restricting or removal of variations for local matters in relation to the housing provisions will result in more restrictive regulation, poorer building designs and may not reflect local conditions.</p> <p>Council notes the inconsistencies between planning and building legislation continue with the release of the draft QHC. The draft QHC introduces new, and different, definitions for terms which are already defined in the Planning Act, resulting in additional confusion for local governments and the development industry.</p> <p>State Planning Policy and local government planning scheme overlays are applied consistently in response to locally identified need.</p> <p>The Interim Report references blanket character provisions as a way of preserving heritage. In the Brisbane context, the Traditional building character overlay is not intended to preserve heritage. It applies to specific locations to maintain a streetscape character valued by the local community.</p> <p>The review should also consider the misalignment between processes for infrastructure planning (i.e. making an LGIP) and land use planning (zoning, precinct planning etc) in the Planning Act as this is likely a contributing factor to uncertainty in the regulatory framework, and a barrier to development-ready serviced land for growth.</p>
Request for Information - Design of Planning Regulation.	43	<p>From Council's experience, the overlap between planning and building regulation (and the respective Acts) creates avoidable confusion for applicants, private certifiers and the public.</p> <p>Recent changes have, in some cases, worsened the situation. The 2022 amendments to the <i>Planning Regulation 2017</i> now prevent a local planning scheme from making a Material change of use for a new dwelling house, secondary</p>

		<p>dwelling, or rooming accommodation assessable (in certain circumstances). However, building work extensions can still be made assessable under the planning scheme, requiring both a development approval and, in parallel, a referral to Council via a private certifier as part of the building approval process.</p> <p>Council has created guidance, self-service online lodgement, and support to assist customers and the industry through Council's Planning Information Officers. However, the underlying framework needs improvement. To provide clarity, consistency and flexibility, Council recommends:</p> <ul style="list-style-type: none"> • Remove contradictory triggers and define a single, primary pathway for each common development type, so the same proposal doesn't fall into different legislative tracks based on minor circumstances. • Where planning assessment is excluded, ensure the building pathway (including any referrals) fully captures location-specific impacts, or reinstate a planning trigger—don't require both. • Keep explicit scope for local governments to apply locality-based overlays and conditions (e.g. heritage, flooding, biodiversity, transport corridors) so place outcomes aren't diluted by generic state settings. <p>To assist the Commission's understanding, it is Council's view that the key problem is not the number of rules or assessment benchmarks relevant to development, so much as competing or sequential triggers that require applicants to act between planning and building pathways, with unclear delegations and duplicated referrals.</p>
Preliminary Recommendation 6 - Infrastructure charges	44	<p>Council supports a recommendation for changes within the infrastructure charging framework to support the coordinated, efficient and cost-effective provision of trunk infrastructure to support existing and new development.</p> <p>In addition to the outcomes sought by this recommendation, Council suggests that a fundamental objective should be to ensure the framework provides Councils and developers with greater upfront certainty on outcomes, process and costs. A lack of clarity in relation to certain processes, particularly relating to funding of infrastructure required as part of a development approval, can result in prolonged negotiation and infrastructure procurement decisions outside of Council's direct control. These factors contribute to delay in the delivery of housing. Providing more upfront certainty to determine a fair market value of required infrastructure will support realistic project feasibility and lead to a smoother post approval process.</p> <p>While an independent, whole of framework review could address the objectives, Council also supports a more targeted approach to respond to specific and immediate pain points.</p> <p>In both a targeted review or a larger scale review, Council agrees with and emphasises the importance of genuine consultation with local governments to understand the challenges and potential solutions.</p>
Preliminary Recommendation 7 - Planning and Development Approval Processes	44	<p>Council does not support creating a separate "streamlined" pathway for significant development. Brisbane already delivers fast, accountable decisions within the existing framework. Council created a Special Assessment Unit to prioritise assessment of complex high-priority developments and has seen average assessment timeframes of 37 business days from lodgement of a properly made application to decision for both code and impact applications.</p>

		<p>Council's House and Homes team averages 40 business day assessments from lodgement of a properly made application. This is faster than the statutory timeframes under the Development Assessment Rules.</p> <p>With regard to a State-led streamlined pathway it is acknowledged that in practice, the State's previous State-Facilitated Development process did not improve on these timeframes and still relied heavily on Council for technical feedback, conditioning and design changes to align proposals with City Plan. This added an extra layer of review and assessment, without net time savings, and at significant cost to Council and applicant resources.</p> <p>Shifting decisions to independent third parties risks duplicating process, confusing accountability, and creating multiple interfaces for applicants, while still requiring Council's expertise. It is Council's view that the most reliable way to streamline high-priority assessments is to continue strengthening the existing local pathway via early pre-lodgement with Council, clearer information requirements, and greater focus on providing the right information for assessment.</p>
Reform Direction 5 – Planning and Development Approval Processes	44	<p>Council supports simplifying the Planning Regulation to reduce procedural complexity. However, Council's practical experience with greater involvement of private building certifiers does not necessarily result in faster process. This is due to certifiers typically being risk-averse and relying heavily on Council officer advice and direction.</p> <p>Enquiries related to building certification to Council account for around 17% of Council's call volume to the Planning Information Officers (based on a sample of 4,500 calls received during 2024). Community members also turn to Council to query certifier decisions, with some certifiers reluctant to engage directly these members.</p> <p>Where exploring the option for certifiers or other third parties to take a larger role, it is recommended that any model requires:</p> <ul style="list-style-type: none"> • accreditation and training in technical development assessment, • clear statutory accountability with published reasons, and • direct engagement with community submitters and a complaints pathway to remove unnecessary involvement of the local government. <p>As part of any third party taking on a larger role in development assessment, the following points need to be addressed:</p> <ul style="list-style-type: none"> • Who will enforce the conditions that are set by the certifier? • How will Infrastructure Charge Notices be calculated and issued? • Process for specialist review when required (e.g. traffic, vegetation, environmental issues (air quality, contamination, etc)) • Process for coordinated issue resolution where desired outcomes may be in conflict with each other. This frequently occurs in relation to road dedication, streetscape upgrades and verge constraints. • Inconsistency with design outcomes/inconsistency with interpretation of performance outcomes (and the community's expectations).
Preliminary Recommendation 8 - Planning and	45	<p>Council acknowledges the factors associated with delivering a large residential development. To support the industry, manage Development approval currency periods, Council has approved currency periods in response to applicant requests beyond timeframes set out in the Planning Act.</p>

Development Approval Processes		<p>Where applications have been linked to other permit types (i.e. Material change of use or Reconfiguring of a lot), Council generally aligns the currency period with those other permits to help applicants meet delivery schedules.</p> <p>The duration of an assessment is also a shared responsibility between Council and applicants. It does not rest solely with local government performance. Council consistently receives applications that are not properly made as they lack the information needed for a full assessment. Many proposals seek outcomes that do not comply with assessment benchmarks. Council's preference is to negotiate solutions that lead to approval rather than refuse applications, and the feedback received is that applicants value this approach. Accordingly, Council regularly agrees to extensions to the statutory timeframes under the Planning Act to resolve issues.</p> <p>All relevant application information is publicly available 24/7 via Council's Development.i portal, including lodged documents, decision outcomes, and published reasons for decision as required by the Planning Act. Development.i also shows lodgement and decision dates. Details of appeals and court judgments are available on the Queensland Courts website. In short, approval outcomes, assessment durations, and dispute results are already transparent and publicly accessible.</p> <p>Council is continually upgrading its digital systems to streamline assessment and approvals and is actively exploring AI tools to further improve the development application and assessment process.</p>
Request For Information - Planning And Development Approval Processes	45	<p>Council's position is that development should be assessed under City Plan, not via alternative pathways. Council continues to support the provision of housing supply and in 2024 Council approved 11,924 new homes, exceeding <i>ShapingSEQ South East Queensland Regional Plan 2023's</i> (<i>ShapingSEQ</i>) annual target.</p> <p>Council also decides applications quickly. A dedicated Special Assessment Unit has averaged 37 business days from properly made to decision for complex proposals, and the House and Homes team has averaged 40 business days for lower-intensity residential—both faster than the statutory decision timeframes.</p> <p>Council does not support the establishment of an alternative development assessment pathway. Development in Brisbane should continue to be assessed under City Plan with Council as the prescribed assessment manager. Expanding third-party roles (e.g. building certifiers) risks duplication, fragmented accountability and increased reliance on Council officers—undermining the aim of streamlining. Council's operational experience is that certifiers often defer to Council and are reluctant to engage directly with the community.</p>
Recommendation 9 - Zoning Regulations and Land Supply	46	<p>Most local government planning schemes identify areas with good public transport and access to services and facilities. The definition of these locations will depend on the available transport options including frequency of service and other services and facilities available in proximity. The <i>ShapingSEQ</i> already includes identification of well-located areas (high amenity areas) for increased densities and target densities for these areas. Zoning areas to higher densities ahead of detailed planning and research does not necessarily result in the market following to develop these areas.</p>

		<p>Any amended process should ensure streamlined land use and precinct planning work in conjunction with streamlined infrastructure planning amendments. Long-term affordability and supply of developable land requires infrastructure planning to be considered and prioritised at a precinct and local government area (LGA) level, not just site-specific infrastructure considerations.</p> <p>Council would like to understand the context of Figure 10.1 in the Interim Report that indicates zoning in the LGA. The map does not include the Queensland Government Urban Footprint which identifies where urban development is to be located. Urban development is not supported outside of the footprint boundary. Figure 10.1 identifies Rural residential zoned areas. This zone may consider issues such as bushfire and flooding, which would make urban development inappropriate in these locations.</p> <p>Council's City Plan identifies growth nodes and corridors that will deliver future residential and economic growth. Some of these nodes are not currently planned and are included as part of the Suburban Renewal Precinct program.</p> <p>Council is currently undertaking a number of actions that will increase housing supply and also facilitate a diversity of housing options available for the community. Council is currently delivering four Suburban and Urban Renewal Precinct projects including Stones Corner, Mt Gravatt Centre, Wynnum Centre and Kurilpa. Work is also underway on reviewing major and district employment centres for opportunities for housing close to transport stations and a high level of shops and services.</p> <p>The More Homes, Sooner initiative is currently preparing City Plan amendments to increase housing supply and diversity within the Low-medium density residential zone (LMR) through reviewing built form standards, lot sizes, car parking rates and looking at opportunities to expand the LMR zoned areas within the city. All of these projects will increase opportunities to improve housing affordability and provide benefits to the community.</p>
Recommendation 10 - Zoning Regulations and Land Supply	46	<p>Council already provides 24/7 public access to development application information via Development.i, including lodged documents, decision outcomes and published reasons (as required by the Planning Act), along with lodgement and decision dates. Appeal details and court judgments are available on the Queensland Courts website. As such, approval outcomes, assessment durations and dispute results are already transparent and publicly accessible.</p> <p>Council currently monitors development occurring across the city as many other LGAs do although the level of maturity across the LGAs may vary depending on scale, resourcing and budget. The current Growth Monitoring Unit within the Queensland Government provides monitoring of development occurring and updated reporting is expected to be released in the near future.</p> <p>The Interim Report suggests targets to be set for different housing typologies. It should be noted that ShapingSEQ already includes overall housing targets with diversity targets for a range of housing types.</p> <p>Council would like to understand the consideration to apply financial incentives or penalties to local governments for not meeting new land or housing targets. Councils are responsible for approving development applications. Post</p>

		<p>approval there are many factors that affect whether a development is constructed. In 2024 Council approved 11,924 new homes, exceeding the <i>ShapingSEQ</i>'s annual target for that year. It is unknown how many of these homes will be delivered and in what timeframe post approval.</p> <p>LGAs should not be penalised if a development is not constructed post approval. In addition, Brisbane is an infill city and has very limited new greenfield land that is available for new homes. Council should not be penalised for this as housing supply is delivered through precinct planning and other City Plan amendments that increase densities for residential development.</p>
Request For Information - Zoning Regulations and Land Supply	47	<p>The Growth Monitoring Unit in the Queensland Government prepares and reports on data relating to land supply, take up rates, approvals and sales of house and land. At this time the unit has not released a report for SEQ since 2021 although updated reporting is expected to be released in the near future. Creating another independent body will only create another layer of reporting where different datasets may be released. Having one point of reporting reduces inconsistencies and ensures transparency for local governments and the community. The level of reporting by the Growth Monitoring Unit is considered appropriate.</p> <p>The current zoning practice in Queensland has the potential to be more streamlined for all stakeholders. Currently, planning schemes set out the zoning for the majority of development applications. The process to update zoning is through a Major amendment process as identified in the planning legislation. This process can take approximately 2 years. More recently, Council has been working with Queensland Government on trialling a streamlined process which is yielding positive results to date.</p> <p>Complexity is introduced for community and industry where the Queensland Government declares a Priority development area (PDA) which essentially excises an area or a site from Council's land use and infrastructure planning framework. Efforts involved in developing a bespoke planning scheme and supporting assessment process for PDAs duplicates Council's standard development assessment resourcing, reducing productivity.</p> <p>The value and process of PDAs relative to local government plan making processes for land use and infrastructure planning should be considered as part of any review. Currently they create parallel and inconsistent process and outcomes to the surrounding local governments. If PDAs are seen as successful, the learnings could be used to amend the Planning Act processes so local governments can operate with the same controls. If they are not seen as successful then rescind the PDAs to be managed under a consistent, coordinated Planning Act process for the development industry and broader community benefit.</p>
Reform Direction 6 - Community Support for Housing Development and Reform	47	<p>Council encourages proponents to engage with the community before lodging development applications. Statutory public notification for impact assessable proposals is undertaken in accordance with the Planning Act.</p> <p>Beyond this, Council provides 24/7 access to application material, decisions and reasons via the Development.i portal, and accepts submissions on all applications—not only impact assessable—which are considered in the assessment. These measures ensure community views are captured well beyond the minimum legislative requirements.</p>

		<p>Council planning schemes, local government infrastructure plans and infrastructure charges are the critical tools used to ensure community benefits are obtained as part of developments. These documents are publicly available and set the expectations, for community and the development industry, as to what is to be provided. Examples include parkland dedications, community facilities, stormwater and road upgrades, active transport infrastructure, streetscape upgrades, public artwork and creative lighting.</p> <p>Council's experience is developers are often resistant to providing community benefits as part of developments, and the adopted planning framework is the only tool to ensure these benefits are provided. Council queries the chance of success of negotiations between developers and the community. In addition, circumstances whereby all community members fully agree with development outcomes are rare.</p> <p>There are already guidelines on best practice community consultation available. Each local government will need to adapt these to the local circumstances. In the case of increasing residential densities and the need for a range of housing typologies, the discussion should be at a region level or state level.</p>
Request For Information - Community Support for Housing Development And Reform	47	<p>For a fast-growing region like South East Queensland, a broadscale education and engagement campaign is needed to support the communities' understanding of the benefits, and trade-offs, of increased density for their neighbourhoods and their city. There is a need for a local government moderation of local community views on housing and density in the face of community hesitance to accept change associated with increased density and changes to built form outcomes.</p> <p>Guidelines on best practice community consultation techniques are available, for local governments to adapt to the local circumstances.</p> <p>Council's experience is developers are often resistant to providing community benefits as part of developments, citing development costs and timeframes. The availability of land, particularly in the existing urban area, also limits the ability to obtain community benefits that rely on land being rendered unavailable for buildings and associated infrastructure.</p> <p>Council therefore maintains that planning schemes, local government infrastructure plans and infrastructure charges are essential tools to ensure community benefits are obtained as part of developments.</p>
Preliminary Recommendation 12 – Future Regulatory Changes to Building Codes	48	<p>Council would like to understand how net benefits to community would be assessed. Accessible building design standards would have benefits to many within the community and allow for more adaptive use of a building or dwellings. Consideration could be given to the level of accessibility standards.</p>
Reform Direction 7 – Stock Review of Building Regulations and Standards	48	<p>There appears to be an over-reliance on the courts and Queensland Civil and Administrative Tribunal to settle routine interpretive questions. Currently, each council duplicates legal and policy analysis which is inefficient and could be done once at the State level.</p>

		An authoritative, citable State guidance with legal status for recurring interpretation issues, a rapid advisory service for councils, and model conditions and reasons could be considered to resolve this issue and will likely reduce appeals, improve consistency and increase productivity by freeing up industry resources.
Reform Direction 8 – QBCC Performance	48	<p>The Interim Report recognises performance and role clarity issues however it does not address the inconsistency in enforcement tools available to LGAs compared with the Queensland Building and Construction Commission (QBCC).</p> <p>This results in duplication and regulatory gaps on the ground. Local Government Association of Queensland (LGAQ) advocacy materials record ongoing resolutions seeking stronger and clearer powers for LGAs in building compliance, alongside improved QBCC support for local enforcement.</p> <p>See LGAQ Advocacy Action Plans 2023 and 2025 (published on the LGAQ website) for context on member resolutions, and QBCC compliance strategy material which highlights the current central role of the QBCC in enforcement.</p>
Request For Information – Modern Methods of Construction	212	Council supports modern methods of construction and provides opportunities for this to be a feasible development pathway. Council also has adequate supply of industrial zoned land to facilitate construction of the components needed for construction.