

Comment – Planning Institute of Australia

Comment

The Planning Institute of Australia (PIA) is the national body representing the urban and regional planning profession. We are dedicated to promoting sustainable, evidence-based planning practices that create resilient, inclusive, and prosperous communities throughout Australia.

PIA appreciates the opportunity to provide this submission in response to the Interim Report.

Angela Moody
Queensland Productivity Commission
PO Box 12078,
George St, Brisbane QLD 4003
Email: enquiry@qpc.qld.gov.au

Dear Commissioner,

PIA's response to Interim Report: Opportunities to Improve Productivity of the Construction Industry

The Planning Institute of Australia (PIA) is the national body representing the urban and regional planning profession. We are dedicated to promoting sustainable, evidence-based planning practices that create resilient, inclusive, and prosperous communities throughout Australia.

PIA appreciates the opportunity to provide this submission in response to the Interim Report. We strongly support the Queensland Productivity Commission's (QPC) objective of lifting productivity in the construction sector. However, based on our extensive professional experience and analysis, we have significant concerns that some of the report's findings overstate the role of planning regulation as a primary cause of productivity decline without sufficient evidence to support this claim.

Following our productive discussion with QPC representatives, we were encouraged to provide recommendations that offer a constructive path forward.

This submission, which reinforces [PIA Queensland's earlier submission](#) to this inquiry dated June 2, 2025, addresses these matters by proposing actionable solutions to strengthen the Queensland planning system and enable better regulation. It focuses specifically on **Part B – Improving Land Use Regulation** of the Interim Report.

PIA's solutions in response to the Interim Report are:

1. The need for an independent Growth Monitoring Authority to monitor where housing is getting stuck in the pipeline.
2. An independent review of the planning and building regulation interface to streamline approval of low-risk housing.
3. Addressing infill and density uplift in well-located areas through collaborative solutions, such as streamlined planning scheme amendments.
4. Ongoing investment in long-term strategic planning with integrated infrastructure planning.

This submission draws heavily upon and is consistent with PIA's recent body of work on productivity and housing, including:

- PIA National [submission to the Federal Productivity Commission and Economic Roundtable](#), 2025
- PIA National position statement on the [Planning for the housing we need](#)
- PIA Queensland [submission to the SEQRP](#), 2023
- PIA Queensland [budget submission](#) to the Queensland Government, 2025
- PIA Queensland [submission on the draft Queensland Housing Code](#), July 2025
- PIA Queensland [joint letter with LGAQ and Master Builders, to Minister O'Connor](#) June 2025

This submission is structured into four (4) sections:

1. **Preamble and Context:** An overview of core planning principles and key data.
2. **Analysis of the Interim Report:** A detailed response to select matters.
3. **PIA's Recommendations:** Actionable solutions to enhance productivity through a strengthened planning system.
4. **Specific Responses:** Detailed feedback on each of the Interim Report's recommendations and requests for information.

We welcome the opportunity to discuss these matters further at the Queensland Productivity Roundtable on Urban Land Use Reform in September.

Please direct any further inquiries to Nicole Bennetts RPIA, State Manager, at [REDACTED] or [REDACTED]

Yours sincerely,

[REDACTED]

Sean Cullen RPIA
PIA Qld President

Attachment A – Response to Interim Report

PIA's Response to QPC Interim Report

1. Preamble and context

Planning is a profession focused on the public interest, aiming to create economically functional and thriving cities with a good quality of life. Planning is not a binary process but a complex balancing act of often competing needs, costs, and benefits across spatial and intergenerational considerations. Housing is one component of this complex system.

PIA agrees with several points in the Interim Report, including the urgent need for more housing, the need for increased density in the right locations, greater transparency, enhanced data, and better community understanding of the system. PIA has continued to strongly advocate for reform in these areas.

We welcome the QPC's reinforcement of these issues but caution that construction productivity must not be viewed solely through the lens of deregulation and red tape, but through a broader understanding of the structure and performance of the planning system. Ultimately planning is an enabling framework and not a delivery mechanism.

As PIA has consistently advocated, planning reform should not be pursued simply to remove perceived barriers, but rather to better coordinate land use, infrastructure and housing delivery and facilitate prosperity in an equitable, efficient, and sustainable manner.

1.1. Lack of state-wide data measuring planning system performance

While this submission is focused on the opportunities to improve Queensland's planning system, it is important to observe there are significant delays to housing commencements that occur *after* land has been zoned and planning approvals are granted.

A fundamental challenge to understanding Queensland's housing supply is the critical data gap: there is no state-wide dataset for the number of homes that are zoned or have active planning approvals.

This absence of data leads to widespread confusion, with many mistakenly interpreting monthly Australian Bureau of Statistics (ABS) building approvals figures as a measure of the planning system's performance. In reality, building approval is a later-stage approval that is distinct from the planning process.

According to the Queensland Government Statistician's Office (QGSO), across Queensland, planning instruments have zoned sufficient broadhectare land for nearly 580,000 new homes¹. As of December 2024, there are approximately 100,000 uncompleted residential lots with

¹ [Queensland Government Statisticians Office \(QGSO\), Residential land development indicators, March 2025 – 'Broadhectare' tab, cell G65](#)

active planning approvals, a number that has remained stable for over 15 years².

Total stock of uncompleted residential lots within active approvals (Queensland)



Source: Queensland Government Statistician's Office - Created with Datawrapper

As extensively reported and evidenced, many housing projects stall due to factors outside the planning system, including workforce shortages, rising construction costs, infrastructure funding limitations, and constrained access to finance. This is to say, the planning system can zone and approve homes, but many will not proceed to construction due to factors outside the control of planning – yet this data is not being measured or understood. This lack of data means it is difficult to identify where planning has failed to zone and approve sufficient housing supply, or where the market has failed to deliver. This is why PIA is advocating for a Growth Monitoring Authority to independently and consistently track housing supply from zoning to delivery.

1.2. Report Conflates Building Approvals and Planning Approvals

In Queensland, our system has separated building and planning for more than two decades. This has allowed private certification to lead on "building work," while planners focus on land use and planning matters. These two distinct forms of development are separately defined in Queensland legislation, each with its own requirements and approval processes. The Interim Report's conflation of the two is highly problematic and demonstrates a misunderstanding of the system.

Planning Approvals are the first step, granting permission for a development to occur. They define what can be built and where, but they do not compel construction to begin. These approvals are valid for several years and are subject to public interest considerations.

Building Approvals are a later stage in the process, typically secured after a developer's decision to proceed to construction. Unlike planning approvals, they ensure the proposed structure meets technical, engineering, and safety standards. A building approval is granted by a private certifier and signals that a project is "shovel-ready," provided financing and other delivery conditions are in place.

² [QGSO, Residential land development indicators, 2024 – 'RaL ClosingStock' tab, cell CG62](#)

Not all housing requires planning approval. In fact, most new homes proceed without requiring a planning approval. Since July 2017, Queensland's planning legislation has:

- Prohibited planning schemes from requiring an approval for a dwelling house or a dual occupancy, unless specific local matters (such as flood risk) apply.
- Prohibited planning schemes from including building assessment provisions.
- Required that planning instruments cannot be inconsistent with the *Building Act 1975*.

While the separation of planning and building since 2008 has functioned well in some respects, PIA has advocated for an independent review of the interface between these two systems.

1.3. The need for better regulation

PIA supports a reform agenda that prioritises better regulation. We recognise that regulation is adopted to address specific public interest objectives, but ill-considered, ad-hoc regulatory reform is not an effective solution for complex systems. Such changes often create unintended consequences, add unnecessary complexity, and consume valuable time on retraining.

Achieving a truly effective and productive regulatory framework requires a holistic approach that goes beyond legislative reform. More effective tools for achieving gains in productivity and a more responsive system include:

- Collaborative and cultural shifts among all stakeholders.
- Enhanced professional development and education across the industry.
- Detailed guidance and worked examples to ensure clarity and consistency.
- Stress-testing existing processes and reform options to identify potential issues before implementation.
- Enhanced government agency support to facilitate smooth project delivery.

Further, PIA stresses that any regulatory changes must be designed to be fit for purpose across the entire state of Queensland, not just for South-East Queensland. Ultimately, a focus on better regulation, supported by a robust and collaborative framework, will deliver meaningful and sustainable productivity gains.

2. The Interim Report

The Interim Report attributes slow productivity growth to growing regulatory burdens and sub-optimal procurement practices. While we agree there are opportunities for improved regulatory efficiency, we believe there are solutions that can deliver better regulation, and that a number of core planning concepts have been misunderstood or misrepresented in the Interim Report.

2.1 That land use regulation is a primary cause of construction productivity decline

PIA challenges the report's finding that land use regulation is the primary cause or contributor to construction productivity issues in Queensland, as it lacks sufficient evidence.

Critically, there have been no fundamental changes to Queensland's planning system since 2018, the year the QPC identifies as the start of a significant decline in construction productivity. The current system is fundamentally the same as it was pre-COVID-19. Contrary to the report's claims, land use regulation has not become materially more complex or restrictive, nor have regulatory design and behaviour significantly changed during this period. No evidence is provided to support these statements.

PIA considers that the Interim Report has inadequately distinguished between:

- **Systemic industry issues** (e.g. lack of infrastructure, workforce shortages, lack of finance).
- **Process and performance issues** (e.g. forms, lodgement, and monitoring).
- **Policy and statutory issues** (e.g. schemes and regulations).

The report's conclusions are based on a misunderstanding of how the planning system operates and its actual impacts on construction productivity. While there have been incremental improvements made in response to housing affordability and the COVID-19 pandemic, the Queensland planning system has maintained a consistent regulatory framework, unlike other areas where profound changes have occurred, such as with the National Construction Code or project trust accounts.

PIA submits that any reform be grounded in evidence and must ensure the overall system becomes more simple (not adds more layers), and becomes more efficient, effective and transparent.

2.2 The need for a streamlined assessment process.

PIA supports streamlining development assessment to the greatest extent possible but has serious reservations about introducing a new

streamlined process for significant developments. The *Planning Act* already offers several approval pathways.

In addition to the standard assessment pathways administered by local governments, the State Government has a suite of existing assessment pathways for state significant development, such as Ministerial Call-ins, State facilitated development, and Infrastructure designations. All of these provide different pathways for housing developments to progress through for State government consideration.

Many local governments brought in 'risk smart' approval processes, guaranteeing a short approval turn around (e.g. 10 days) for simple planning approvals. These were in response to the mining boom, pre-GFC, and many local governments went to considerable lengths to provide this service. This indicates that alternate approval processes can be introduced without any legislative reform.

We also highlight that improving the efficiency of development assessment is not limited to regulatory reform but also involves policy and administrative action. "Fit for purpose" planning instruments and better allocation of resources within existing systems can deliver more timely and effective improvements.

Further, PIA has reservations about enhancing the role of building certifiers to manage planning approvals without evidence of significant benefit. Any major changes to roles must be carefully considered to avoid unintended consequences, including a lack of transparency and accountability in the approval process.

PIA submits that any opportunities for reform should be considered as part of a broader review of the planning and building interface. The focus of any regulatory reform should be on improving the existing, "mainstream" approval processes to deliver maximum benefit.

Further, PIA submits there are opportunities to improve the statutory planning scheme amendment process to ensure planning instruments remain up-to-date and relevant.

2.3 Impact of land use regulation

The Interim Report claims that land use regulation is a significant impediment to productivity, citing issues like restrictions on housing density, limits on developable land, and delays. While PIA acknowledges that these are legitimate concerns, the report's assertions reflect a superficial view that fundamentally misunderstands the nature and scope of Queensland's planning system.

The report's statements that the system is "complex, difficult to navigate, inefficient, and lacks transparency" are vague and do not provide a basis for comparison. The property and construction industry is a multi-billion dollar sector, and given the critical role of the planning system to all

Queenslanders, a comprehensive regulatory framework is both necessary and appropriate, notwithstanding it can always be improved.

PIA fundamentally disagrees that planning regulation is a major impediment to housing supply and disputes the assumption that housing productivity performs worse than other industries because of it. All land use and development are regulated in a similar manner. If anything, housing development often receives preferential regulation.

The Interim Report Part B, goes further to say that:

- Queensland's planning system provides few opportunities for communities to be involved in decision making, other than to oppose development
- Housing affordability has declined
- Across SEQ most development is occurring on the urban fringe imposing significant costs and adverse impacts; and
- The planning system is complex, difficult to navigate, inefficient and lacks transparency and accountability.

The assertions that the Queensland planning system lacks opportunities for community engagement or lacks transparency and accountability ignore the comprehensive statutory processes around plan making and development assessment and the inherently political nature of policy setting and regulation by State and local governments. The Planning Act provides clear rules and timeframes for consultation, providing a higher degree of certainty than systems that rely on panel decisions at the end of the process.

In summary, PIA does not agree that land use regulation is a significant impediment to productivity without further robust evidence that demonstrates a clear cause-and-effect relationship and shows that regulatory changes will lead to significant benefits for housing delivery.

3. PIA's recommendations for reform to enhance productivity

PIA's four solutions for improving productivity include:

1. The need for an independent Growth Monitoring Authority and investment in data, an evidence base, and technology.
2. An independent review of the planning and building regulation interface to streamline approval of low risk housing.
3. Addressing infill and density uplift in well-located areas through collaborative solutions, such as streamlined planning scheme amendments.
4. Ongoing investment in long-term structure planning with integrated infrastructure planning.

These solutions are detailed below.

3.1 Investment in technology and an independent Growth Monitoring Authority

The Interim Report notes that "regulators need to be more accountable," including through the publication of data on planning system performance. PIA agrees and has long called for enhanced investment in this area.

Queensland has 77 different local government administering the planning system, making it a challenge to consolidate information. It is critical that the QPC's recommendations clearly differentiate between the concepts of land supply, development capacity, density, housing targets, and the number of active approvals.

3.1.1. Data Collection and Reporting

The issues of what data is collected, what metrics are used, and whether systems are compatible all require separate examination. While the State's Land Supply and Development Monitoring Report is a valuable resource, its release schedule is not regular, and the data can be outdated upon publication. While local governments have invested in their own systems, there is no common data collection system to provide consistent insights.

3.1.2. Digitisation and Automation

There is significant opportunity for improving lodgement and processing systems through investment. If a state-wide common system or dashboard is desired, the State should lead this initiative in consultation with local governments.

3.1.3. Using Technology for Future Reform

PIA agrees there is great opportunity for using technology and AI to enhance processes. Queensland is lagging behind other states in this regard. *PIA's 2025-26 Budget submission* called for investment in digital infrastructure for planning.

Solution: A Queensland PlanTech Strategy

PlanTech is not just about better tools for planners; it's about empowering communities, accelerating housing and infrastructure delivery, and building sustainable futures. The benefits of a digitally-enabled approach to planning include:

- Accelerated housing and infrastructure delivery.
- Reduced costs and improved efficiency.
- Enhanced engagement and transparency.
- A direct response to calls for productivity.
- Demonstrating leadership toward the 2032 Olympic Games.

PIA believes that this investment is a key area where the Queensland Government can contribute to meaningful acceleration and productivity to gain a state-wide picture of progress through data.

PIA calls for:

State Government to take the lead, invest and provide funding streams for innovation in [PlanTech for a better, more efficient planning system](#), 2025, including:

- Develop PlanTech Strategy with a Digital Planning Taskforce
- Launch the \$20 million PlanTech Acceleration Fund
- Establish the Growth Monitoring Authority
- Develop the State-Led AI in DA Solution

3.2. Planning and Building interface reform

PIA has been advocating for a review of the interface between planning and building. The review will require clarity on scope and dedicated professionals in a taskforce style arrangement to stress test the various parts of the system. In May 2025 a joint letter from PIA, LGAQ and Master Builders Queensland to Minister O'Connor outlined the context of this request:

"Queensland councils have already zoned broad hectare land for 586,779 homes, according to the QGSO, as well as hundreds of thousands of apartments and townhouses, according to the Department of State Development, Infrastructure and Planning.

Meanwhile, productivity in the housing construction sector has decreased by 53 per cent since 1995 and the total number of new dwellings completed in 2024 dropped by 8.9 per cent.

It is clear that barriers exist to delivering new housing at a pace and scale which meet the needs of Queensland's growing communities. The LGAQ, MBQ and PIA have identified that a key barrier to delivering quality housing in the timely manner is a lack of clarity, efficiency and accountability at the interface of Queensland's planning and building frameworks.

This is contributing to project delays, inefficiencies, reduced housing supply responsiveness, and reduced certainty and confidence in the development/ building approvals process.

Our collective view is that the relationship between Queensland's Planning Act 2016 and Building Act 1975 is insufficiently integrated, resulting in inefficiency, regulatory overlap, confusion, and in some cases, direct conflict."

Importantly, the recent release of the draft Queensland housing code (QHC) does not resolve the tension between planning and building frameworks in Queensland. As we previously advised, our view is that the relationship between Queensland's *Planning Act 2016* and *Building Act 1975* is insufficiently integrated, resulting in inefficiency, regulatory overlap, confusion, and in some cases, direct conflict.

In our submission to the draft QHC (June 2025), PIA calls for a review to:

- Be led by a qualified and independent planning and legal expert, with stakeholder credibility;
- Deliver clear legislative and procedural recommendations to harmonise the two frameworks;
- Include targeted consultation with local governments, planners, industry, certifiers, and other relevant stakeholders;
- Be completed within a defined timeframe (e.g. 3 months); and
- Not fetter the timely finalisation of the Queensland Housing Code.

Solutions:

PIA calls for:

- The Queensland Government commits to an independent review of the interface between the Planning Act 2016 and Building Act 1975, to be completed by the end of 2025 including establishment of a taskforce

3.3. Unlocking density and infill development

At a recent PIA-led event with developers, economists, and other stakeholders, we explored the challenges of '[Making good development stack up](#)'. The session found that infill development is the most sensitive to feasibility challenges. Even small changes in design, access to capital, or planning provisions can render projects unfeasible.

While many local planning instruments seek to attract higher density, a short examination of many planning schemes would likely reveal an oversupply of higher-density zoning that has not yet been converted into housing. The Interim Report's assumption that "increased development rights [upzoning] translates into more housing supply in greater density" is fundamentally incorrect. PIA notes that the NSW government has recently introduced a capital guarantee for this type of development to increase supply.

Overwhelmingly, across the state, local planning instruments seek to attract higher density and housing forms other than single dwelling houses to improve infrastructure delivery efficiency and enable investment in high quality of life outcomes. PIA whole heartedly agrees with the discussion in the Interim Report (Section 10.1) that infrastructure delivery is more economic when used intensively, that well-located apartments are part of the solution, and that higher density may improve affordability.

At this point PIA cautions on the overt reliance upon situations in isolated LGAs vs the broader housing and zoning equation across the State. The statement on page 162 “[the analysis] *assumes increased development rights [upzoning] translates into more housing supply in greater density.*” is not supported by evidence. A short examination of many planning schemes in Queensland would reveal a likely oversupply of higher density zoning without successful conversion to housing due to the sensitivity of delivery, especially lending practices and access to capital. PIA notes the NSW government has recently moved with a [capital guarantee](#) for this type of development to enable increased supply.

The SEQRP ambitiously included ‘High amenity areas’ for the achievement of infill development, a concept PIA cautiously supported with reservations on the criteria and nomination of these. PIA’s SEQRP submission of 2023 called for:

“The areas for development of higher densities are recommended to be identified by considering where people want to live, where development is viable and where existing infrastructure can support the planning intent to focus on well serviced areas. For High amenity areas to tangibly contribute to housing supply in the short term, these areas need to be mapped and the minimum densities applied in development assessment where a local government has not reflected the policy intent. Policy settings may be adjusted accordingly such as:

- *Identifying target areas and timing considerations*
- *Identify the mechanism that will allow local instruments to be efficiently changed or overridden*
- *Allow development of density in a variety of locations that are not necessarily major centres*
- *Review car parking rates*
- *Identify and provide funding sources and/ or resources to enable this concentrated planning to be delivered in the short term and address local infrastructure needs*
- *Ensure regulatory controls are fit for purpose - everything under 5 storeys is code assessable for example*
- *Set minimum densities; and*
Ensure development uncertainties are address such as call in powers where timeframes are not being met (deemed approval call in) which will require robust upfront planning. ” (section 1.3.5, p.17)

PIA calls for:

- LGAs and the State convene to discuss details of challenges across industry stakeholders to develop collaborative strategies to *deliver* diversity and density where it is needed. This can be in association with delivery of the LHAPs mentioned above. LGAs such as Cairns Regional Council which is currently undertaking growth planning, Townsville with its Federally backed City Deal or Mackay which has an excellent in-house growth model should be included as state-wide representatives.
- Exploration of funding guarantee – similar to the NSW government guarantee, to facilitate desired housing diversity to address financial burden and capital access challenges
- Design pilots and compliant architectural plans or guidance to assist small developers; and
- Infill infrastructure funding to LGAs to specifically uplift desirable or transforming areas (which PIA has previously advocated)

3.4. The need for investment in longer term planning with integrated infrastructure

Addressing Queensland's unprecedented population growth, housing challenges, and increasing natural disasters require a proactive and well-resourced planning framework. Adequate resourcing and investment in long-term strategic planning is of critical importance to the state's future.

The state government's ambitious program for regional plan renewal provides an ideal opportunity to address these challenges. This initiative should incorporate outcomes from the Local Housing Action Plans (LHAPs), provide essential support to Local Government Areas (LGAs) for implementation, and crucially, align infrastructure planning with growth expectations. PIA has developed [8 Principles for contemporary regional plans](#) in anticipation of this agenda, one of which Principle 3 is for a connected and integrated plan:

Principle 3: A Connected and Integrated Plan

Regional plans bring together strategic level plans and priorities from across government. A connected and integrated plan will unite existing plans across settlement topics to create a collective picture of the future of the region and to identify catalyst moves and spatial hot spots for implementation actions to 2050.

Why Principle 3? Settlements are complex systems and, regional planning can be the connection point to integrate, confirm and visualise components. Strategic and structure planning within regional plans across critical components such as housing, natural hazards, infrastructure and services can reflect, embed and connect local and regional strengths, state policy aspirations and actions for more certain delivery and implementation.

Figure 1: Principle 3 from 8 Principles for contemporary regional plans

The government's immediate commitment of over \$2 billion to the Housing Activation Fund underscores a significant bottleneck in the delivery of trunk infrastructure at the required pace. This investment

highlights that while funding is available, a lack of coordinated long-term planning has constrained the delivery of development-ready land.

The role of planning in housing delivery includes coordinating a pipeline of well-located housing with existing and planned infrastructure capacity, population trends, and housing preferences. By putting the right housing in the right place, planning ensures that long-term affordability is achieved without compromising the creation of quality, liveable communities. Investment in robust planning at the outset, through strong planning schemes and structured planning, provides market certainty and facilitates orderly investment. This is essential for the cost-effective delivery of housing and infrastructure needed to support long-term growth.

To secure an ongoing pipeline of serviced land, PIA's [2025-26 Budget submission](#) called for dedicated funding to fast-track strategic and regional planning. Greater support, emphasis, and funding for collaboration and the integration of planning and infrastructure is required to deliver well-serviced, barrier-free land.

Solutions

PIA calls for:

- Regional planning as an opportunity to identify and prioritise strategic planning, location of key infrastructure, plans for delivery of same and implementation of existing LHAPs and corresponding streamlined processes for planning scheme amendments; and
- Enhanced funding for strategic planning as requested in our PIA Qld 25-26 budget submission.

4. Detailed response to recommendations and information requested

Chapter	PIA Response
Part B, Section 8 Design of Planning regulation	
Commission an independent review to remove inconsistencies between the Planning Act and the Building Act (and associated regulations) to provide clarity regarding local government powers to regulate building matters and ensure that planning matters are implemented consistently with the Building Act	<p>Support. PIA has been advocating for the commissioning of an independent review to address inconsistencies and regulatory overlap between the Planning Act 2016 and the Building Act 1975. The core objective of such a review is to clarify the responsibilities of each framework and, in doing so, streamline the delivery of low-risk housing by ensuring the building assessment process is sufficient in delivery quality housing.</p> <p>The statutory separation of planning and building regulation, originally implemented under the repealed Integrated Planning Act 1997, has been in place for nearly 30 years. Despite significant changes in the broader regulatory and industry environment, the system's core design remains largely unchanged. PIA considers that an independent expert review of this interface is long overdue and essential to providing an informed, evidence-based approach to reform.</p> <p>A key challenge lies not in the statutory separation of the two acts, but in their varied implementation and diverse interpretations. Planning schemes are lawfully drafted to reflect local identity, settlement patterns, and community aspirations, meaning they are not identical. As a result of this tailored approach and the repeal of the Queensland Planning Provisions (QPP) in 2016, the triggers for assessment of building works can be expressed differently across local jurisdictions.</p> <p>This complexity underscores the critical need for training and a greater understanding among professionals, such as building certifiers, who need to interpret and implement planning instruments. A comprehensive, independent review would not only harmonise these two legislative frameworks but also help to clarify the roles of all professionals, providing greater certainty, efficiency, transparency and accountability for the entire industry.</p>
Ensure the requirements in local government planning schemes are consistent with the Queensland Development Code, including any variations due to climatic or other conditions	<p>Not Supported. PIA does not support a rigid, state-wide requirement for planning instruments to be fully consistent with the Queensland Development Code (QDC). While greater alignment is desirable, there must be a provision for local variations to respond to unique climatic conditions, community-specific issues, and local amenity. The QDC has not been comprehensively reviewed or updated in over 10 years and therefore has not kept pace with evolving design and community expectations. In many cases, local planning schemes already vary the QDC to achieve more suitable development outcomes, such as increasing site cover, building heights, or reducing car parking rates.</p>

Chapter	PIA Response
	Further, PIA strongly opposes any form of standardisation for managing natural hazards, such as bushfire and flood. The <i>State Planning Policy</i> commits the planning sector to a best-practice, risk-based approach to natural hazards, which has been established through the Queensland Flood Commission of Inquiry and the ongoing work of the Queensland Reconstruction Authority and Inspector General Emergency Management. PIA, through its professional development courses, actively supports the integration of these risk-based principles and the State Planning Policy to ensure appropriate and resilient development outcomes.
Require that any variations from the Queensland Development Code (the Code) in local and state government planning schemes have demonstrated net benefits to the community — consideration should be given to introducing a requirement for a formal regulatory assessment for any variations from the Code	<p>Support. All planning schemes already undergo a formal assessment (the State Interest Review) prior to approval by the Minister and adoption by the Local Government.</p> <p>PIA supports greater transparency in variations to the QDC. This could be accomplished through a summary in Part 1 of a scheme (which generally outlines building matters within a planning scheme)</p> <p>PIA submission to the draft Queensland Housing Code 31 July 2025:</p> <p><i>PIA acknowledges there will be legitimate planning reasons that the statewide proposed QHC provisions may not be the best outcome for a local community, and if this can be adequately demonstrated, then a local government should be able to vary the Code.</i></p> <p><i>We suggest that any variations to the statewide QHC provisions, enabled through a state interest review process, must be assessed to ensure:</i></p> <ul style="list-style-type: none"> • <i>The variations do not inhibit or add complexity to the design and delivery of new housing;</i> • <i>The variations do not unnecessarily add costs to delivery of new housing; and</i> • <i>The variations are necessary to serve a genuine planning and/or community purpose.</i> <p><i>Where variations to the proposed QHC can satisfy the above, they should be done in the most transparent way.</i></p> <p><i>The Department should maintain a central database that is publicly available and details which local governments have approved variations to the proposed QHC.</i></p>
Amend the Planning Act to standardise zoning types across all local plans.	<p>This is current practice. The <i>Planning Regulation 2017, Schedule 2, Zones for planning instruments</i>, sets the requirements 41 standardised zones, zone purpose statements and zone colours. Local planning instruments can choose from this schedule. Zones can be adopted in relation to the scheme drafting ethos as noted above. Some schemes use many zones for greater differentiation, where the City of Gold Coast uses only 13 zones. Smaller local governments tend not to require a full suite of zones as its simply not necessary.</p> <p>It is acknowledged that some older planning schemes prepared prior to the development of standardised zones of the QPP and the <i>Planning Act 2016</i>, may still feature old zone names or variations.</p>

Chapter	PIA Response
Continue to progress standardised siting and design requirements for detached housing, secondary dwellings, and smaller townhouse and apartment buildings	<p>Support. PIA supports this and has included a similar recommendation in the submission to the draft Queensland Housing Code in June 2025. We have been advocating for a state-wide opt-in code for Housing Diversity, since 2021. We support the priority action within <i>Shaping SEQ 2023</i> for a Distinctly Queensland Design Series.</p> <p>However, to achieve this, it first requires an independent review of the building and planning frameworks. The current framework does not enable this in a clear and consistent manner, balancing the range of competing priorities.</p>
Ensure that state and local government overlays are consistently applied across planning schemes.	<p>Not Supported. The fundamental purpose of an overlay is to identify and address specific, unique local features. Overlays are a critical mechanism through which the State Planning Policy (SPP) is applied to the distinct circumstances of a local government area. They reflect necessary planning considerations for protection or specific assessment within a local context, such as natural hazard risks.</p> <p>Therefore, the very intent of an overlay is to illuminate local conditions which are, by their nature, not consistent with other areas. Standardising overlays would undermine the ability of planning schemes to respond to site-specific risks and opportunities, eroding the core principle of a tiered and responsive planning framework.</p>
Information sought:	
<ul style="list-style-type: none"> • if there are other reforms that would help to reduce regulatory complexity or inconsistency • the extent to which developers and residents could be provided the flexibility to negotiate variations to existing regulation to reach mutual agreement on development in a neighbourhood, and what frameworks need to be established to make this work • what other mechanisms could help to better align regulatory outcomes with community preferences 	<p>PIA's solutions in response to the Interim Report are:</p> <ul style="list-style-type: none"> • The need for an independent Growth Monitoring Authority to monitor where housing is getting stuck in the pipeline. • An independent review of the planning and building regulation interface to streamline approval of low-risk housing. • Addressing infill and density uplift in well-located areas through collaborative solutions, such as streamlined planning scheme amendments. • Ongoing investment in long-term strategic planning with integrated infrastructure planning. <p>PIA cautions that regulatory change:</p> <ul style="list-style-type: none"> • Requires commitment to training, resourcing and takes time to be implemented and see change; and • Is only one part of the industry and should be balanced with other options, stress tested to ensure it will deliver and not increase regulatory complexity.

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<ul style="list-style-type: none"> any unintended consequences, implementation issues or other issues that should be considered. 	
<p>Recommendation 6 The Queensland Government should commission an independent review of the infrastructure charging regime to ensure it provides:</p> <ul style="list-style-type: none"> an efficient level of funding to support the necessary infrastructure to support development price signals that ensure that future development considers the efficient use and provision of infrastructure assets. the review should consult widely, including with local governments and industry stakeholders. 	<p>Support. PIA strongly supports this recommendation, which directly aligns with the key issues raised in our initial submission of May 2025. This call for an independent review is a core recommendation that PIA has consistently championed to address a significant bottleneck in delivering serviced, development-ready land and improving housing supply and affordability.</p> <p>However, PIA urges the need to broaden the scope of this review beyond just the infrastructure charging regime. For the review to be truly effective and to deliver a sustainable solution for the future, it must be holistic and examine:</p> <ul style="list-style-type: none"> Infrastructure funding from all levels of government, including the complex interplay of federal, state, and local funding contributions. The efficacy of infrastructure agreements as a tool for delivering infrastructure. Current provisions and practice regarding offsets, refunds, and extra payment conditions. <p>We endorse the review's objectives to ensure efficient and sufficient funding, provide clear price signals, and conduct a wide and inclusive consultation. A broadened review will provide the evidence base needed to reform the entire funding ecosystem, creating a more transparent, predictable, and effective system.</p>
Part B, Section 9 Approval Processes	
<p>Preliminary Recommendation 7 To streamline high priority development assessments, the Queensland Government should provide a streamlined alternative development assessment pathway for significant developments, including for housing. This alternative development assessment pathway should:</p>	<p>This is current practice. Queensland already has streamlined assessment pathways for dwelling houses and for larger developments, which include:</p> <ul style="list-style-type: none"> State Facilitated Development – used by the state government; and Risk Smart. <p>This is in addition to the gazettal of Priority Development Areas, State Development Areas, the ability for Ministerial call in, Ministerial Infrastructure Designations and more. Any additional approval pathway simply adds more complexity to practitioners to understand and implement.</p> <p>When the <i>Planning Act 2016</i> was established, Schedule 6 of the Planning Regulation 2017 'Development local categorising instrument is prohibited from stating is assessable development' included Part 1 for Building Work and Part 2 for a Material Change of Use. Part 2 (1) and (2) relate to class 1 and 2 buildings and</p>

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<ul style="list-style-type: none"> • use independent planning professionals • have objectives consistent with maximising the welfare of Queenslanders • should have clear guidelines on the definition of a significant development but should not be subject to any other requirements. 	<p>the inability for a planning instrument to make a dwelling house assessable except in certain circumstances. This has been the case since 1 July 2017. While some overlays may apply, these are necessary planning tools to shape development where localised constraints may apply. In most cases dwelling houses are approved and constructed without planning interventions.</p> <p>PIA does not support legislating further approval pathways without a rigorous testing process to demonstrate clear benefit over other avenues and reform of existing approval pathways.</p>
<p>Preliminary Recommendation 8</p> <p>To improve approval processes, the Queensland Government should:</p> <ul style="list-style-type: none"> • review the Building Act and Planning Act to ensure statutory timeframes are adequate to allow for staged approval processes 	<p>Support. PIA supports a data-driven review of the currency periods of development approvals. The framework for the lapsing and extension of approvals is well-established within the <i>Planning Act 2016</i>, Part 5, Division 4, Section 85. This system, which has remained relatively stable since 1998, generally prevents approvals from lapsing once commenced, providing a degree of certainty for projects.</p> <p>PIA considers that any alteration to the current currency periods requires a robust analysis and testing to determine what, if any, changes would yield a net benefit to productivity. Without comprehensive evidence, changes to this long-standing and functional system risk creating unintended consequences for developers, investors, and the market. The statutory timeframes set out in the Development Assessment Rules (DA Rules) already provide a clear regulatory framework, and any proposed changes must be evaluated within this broader context.</p>
<ul style="list-style-type: none"> • require local governments to publish their performance information, including approval outcomes, time taken to approve developments and outcomes from planning disputes taken to court 	<p>Support. PIA supports the goal of enhanced public transparency and data measurement. However, we caution that simply collecting more data is unhelpful unless it is contextualised and analysed to be transformed into meaningful information and knowledge. PIA supports additional measurement and performance reporting where it is specifically designed to provide valuable insights for government, industry, and the public.</p> <p>It is important to recognise that a high degree of transparency already exists within the planning system. As mandated by the Planning Act 2016 (Section 246) and the Planning Regulation 2017 (Section 70), a wide range of documents relating to development approvals are required to be publicly available. Large councils already operate sophisticated, spatially-enabled platforms that provide easy access to all documents within the planning approval process. Furthermore, outcomes from the courts are already published and publicly accessible via the Queensland eCourts and Queensland Judgements systems.</p>

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	Building on this existing framework, the implementation of a similar public-facing system for building approvals would be of significant benefit to the public and the industry, providing a more complete picture of the development pipeline.
<ul style="list-style-type: none"> • require a suitable entity to consolidate and publish this local government performance information 	<p>Support. PIA strongly supports this recommendation. As we have detailed in the body of this submission, the absence of a comprehensive, state-wide data system for planning approvals and zoned capacity is a significant impediment to effective policy-making and long-term planning.</p> <p>PIA has consistently called for the establishment of an independent Growth Monitoring Authority with a clear remit to address this challenge. Such an authority would be empowered to collect, standardise, and analyse planning and development data from across the state. This would overcome the current fragmentation and provide the essential evidence base needed to guide strategic planning, coordinate infrastructure investment, and enhance public transparency. This is a critical step towards creating a more efficient and productive planning system for Queensland.</p>
<ul style="list-style-type: none"> • consider developing, in collaboration with local governments, a ‘service guarantee’ to ensure approval processes occur in an efficient and timely manner 	<p>Support.</p>
<ul style="list-style-type: none"> • investigate digital planning and permitting technologies to improve the efficiency, accuracy and transparency of the approval process. 	<p>Support. PIA strongly supports this recommendation. We recognise that the strategic application of digital planning and permitting technologies is a critical lever for improving the efficiency, accuracy, and transparency of the development approval process.</p> <p>This recommendation aligns directly with PIA’s PlanTech Strategy, which advocates for a digitally-enabled approach to planning to achieve significant productivity gains. Our strategy outlines how investing in digital infrastructure can lead to:</p> <ul style="list-style-type: none"> • Accelerated housing and infrastructure delivery. • Improved efficiency and reduced costs across the development lifecycle. • Enhanced public engagement and transparency in decision-making. <p>By modernising the planning system, we can create a more predictable and streamlined environment for industry while ensuring better outcomes for communities. PIA is ready to collaborate with the Queensland Government to advance this vital agenda.</p>

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Part B, Chapter 9, Zoning	
<p>To increase the supply of housing and improve housing construction productivity and affordability, the Queensland Government should introduce measures to ease zoning restrictions in well-located areas. To do this it should:</p> <ul style="list-style-type: none"> identify well located areas near activity centres and surrounding transport hubs in South East Queensland and regional cities where housing densities could be increase 	<p>Support. PIA agrees that increasing housing density in well-located areas near activity centres and transport hubs is a crucial strategy for enhancing productivity, improving housing affordability, and delivering sustainable urban growth.</p> <p>In South East Queensland (SEQ), PIA supports further work to complement the strategy within the <i>SEQ Regional Plan</i>, which already identifies "High Amenity Areas." This provides a valuable, existing framework to identify opportunities to increase densities and deliver a greater diversity of housing.</p> <p>It is important to acknowledge that this approach is not limited to SEQ. Planning schemes across the state have already identified their own uplift areas and density targets in various locally relevant ways. We urge the government to draw on these existing strategies to inform a broader, state-wide approach to densification that respects local context while contributing to the overall supply of well-located housing.</p>
<ul style="list-style-type: none"> institute a rigorous process that includes open consultation on how and where greater densities should be achieved to improve housing affordability and maximise net benefits to the broader community 	<p>Support. PIA has been strongly advocating for a broad and ongoing state-led community awareness campaign on infill and housing diversity. The need for a greater community understanding of planning is a persistent and complex challenge that continues to impact the delivery of critical housing and infrastructure. The prevalence of community resistance significantly impacts the ability of local governments to progress infill development and hinders the timely delivery of approvals.</p> <p>While local governments commit considerable budgets to community input and dialogue, PIA contends that a more concerted, state-wide, sustained approach is required, and that a more robust strategy is needed to communicate the benefits of a consolidated urban form and housing diversity.</p> <p>PIA's SEQRP submission extracts included:</p> <p><u><i>1.9.7 Communication and engagement</i></u> <i>The Community Engagement and Awareness Campaign is noted to be only in the short-term to support the implementation of the ShapingSEQ 2023 Update. Ongoing community engagement is vitally important, through plan implementation, particularly for a plan such as Shaping SEQ, and the issues of transparency raised in the Executive summary of this submission.</i></p> <p>Submission: <i>Extend the community campaign to be a key feature of the ongoing monitoring and amendment cycle. This could be managed by the entity that would be responsible for implementation and future reviews.</i></p>

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	<p><i>We recommend that dedicated and ongoing commitment is required to stakeholder communications, working groups and updates along with public engagement in the plan and progress</i></p> <p>Submission: <i>We recommend ongoing community conversations are undertaken to ensure stakeholders understand and can provide input to the dwelling diversity targets.</i></p> <p><u>1.3.15 Community understanding and ongoing dialogue</u> <i>To support the shift to a more consolidated urban form by introducing gentle density to local areas and investing in enabling transport infrastructure to support higher density in key areas, PIA contends community understanding of growth and change is critical, to understand the need for change and the outcomes of a more sustainable growth model.</i></p> <p><i>Whilst the draft SEQRP thematic maps give some indication of the likely rate of change in local areas, there is still a lack of information for community members about what will change and when. Transparency surrounding the projected or possible rate of change in neighbourhoods would help to communicate this better.</i></p> <p><i>Taking a change management approach to this task is crucial to ensure we don't face resistance when development applications are lodged as a result of strategic planning which failed to educate and communicate effectively.</i></p> <p>Submission: <i>PIA recommends the draft SEQRP leads to more investment in authentic and meaningful ongoing community engagement about matters of growth, change and housing diversity. These conversations need to talk to the growth task, provide clear direction to our local communities about the extent of change likely in their neighbourhoods, communicate what benefits are expected, and give examples of good development for the typologies likely to be supported in key areas in local areas. We would like to see education on the options for accommodating growth and that a sustainable growth model focusses on providing more diversity and housing choice in terms of typology and affordability for local communities.</i></p> <p><i>The metrics used at council and regional level could be used at a neighbourhood level so that people can understand if their neighbourhood is going to accommodate, for example, 30 new dwellings per year or 300 under the plan.</i></p>

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<ul style="list-style-type: none"> increase the allowable densities in appropriate areas by amending local planning schemes or setting rules for locations that local governments must implement in their planning schemes. 	<p>PIA is unclear what the QPC means by ‘allowable’. There is no limit to density or permission required for zoning per se. PIA would support best practice guidance for appropriate densities in locations with certain characteristics.</p> <p>The current process for demonstrating adequate housing supply and diversity (largely through zone allocation) is set during the drafting of a planning scheme, local government must demonstrate expected growth and a land supply suitable to accommodate that growth for the life of the planning scheme. This is required under the State Planning Policy, <i>State interest or Liveable communities and housing – Housing Supply and Diversity</i>.</p> <p>All planning instruments must demonstrate compliance with:</p> <ol style="list-style-type: none"> (1) Land for housing development and redevelopment in areas that are accessible and well-connected to services, employment and infrastructure are identified. (2) The development of residential land is facilitated to address and cater for all groups in the current and projected demographic, economic and social profile of the local government area, including households on low to moderate incomes. (3) A diverse, affordable and comprehensive range of housing options in accessible and well-served locations, is facilitated through: (a) appropriate, responsive and proactive zoning (b) supporting an appropriate mix of lot sizes and dwelling types, including housing for seniors and people requiring assisted living (c) considering incentives to promote affordable and social housing outcomes, particularly in areas in close proximity to services and amenities. (4) Best practice, innovative, and adaptable housing design and siting is provided for and encouraged. (5) Sufficient land for housing is provided in appropriate locations to support the projected non-resident workforce population associated with approved largescale mining, agriculture, industry or infrastructure projects <p>These are reviewed by the State during the State Interest Review period prior to approval of a planning scheme.</p>
<p>Recommendation 10</p> <p>To ensure that local governments have sufficient incentives to deliver new housing supply in well-located areas, the Queensland Government should set annual targets for the</p>	<p>Support. PIA supports the intent of this recommendation to enhance accountability and improve transparency in the housing supply chain. We agree that setting clear, measurable targets is a critical step towards achieving a more productive planning system.</p> <p>However, PIA is firmly of the view t that holding local governments solely accountable for the <i>delivery</i> of new housing is problematic. While planning plays a crucial role in enabling supply, it does not, on its own, deliver housing. Housing delivery is reliant on a wide range of factors largely outside of local government control,</p>

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<p>supply of construction-ready land and for the construction of new housing for each local government area and hold local governments accountable for meeting these targets. To enact this, the Queensland Government should:</p>	<p>including development feasibility, access to capital, workforce availability, and the timely provision of infrastructure.</p> <p>As detailed in our PlanTech Strategy, in the absence of a coordinated, state-wide monitoring initiative, many LGAs have developed their own data portals and monitoring systems. This has resulted in a fragmented and inconsistent approach to data across the state. In the first instance, a robust, state-wide monitoring system must be properly scoped and established to provide a reliable evidence base.</p> <p>PIA asserts that a more effective approach is to measure the factors that planning can control, such as land supply capacity, planning approval timeframes and ensuring there is a sufficient pipeline of development-ready land. Without a coordinated data system and an appreciation of the full range of market actors, holding LGAs accountable for outcomes beyond their direct control is not a viable or equitable solution.</p>
<ul style="list-style-type: none"> set targets that include desired outcomes for low, medium and high-density housing, and include short- and long-term targets to zoned supply, development rights, approvals and new land and dwelling supply 	<p>Support. This aligns with existing best practices in strategic planning across the state. We note that many local governments have already embarked on this task through initiatives such as the development of Local Housing Action Plans (LHAPs), which set specific targets for housing supply and diversity. In the South East Queensland region, targets are already a key feature of the SEQ Regional Plan, supported by ongoing land supply and development monitoring.</p> <p>The ability of local governments to demonstrate compliance with State Planning Policy (SPP) and state interests in housing supply is underpinned by their sophisticated land supply and growth models. PIA endorses this recommendation to expand this approach by formalising targets that include a range of housing types and cover the entire supply pipeline—from zoned land to completed dwellings. This will provide greater clarity for both government and industry about where blockages in the system are occurring, and help to ensure housing supply keeps pace with demand.</p>
<ul style="list-style-type: none"> require local governments to report against these targets in their annual reports, including whether targets have been met, and, where they have not been met, the reason 	<p>Not Supported. PIA supports enhance accountability through improved measurement and monitoring. However, we consider that the State Government must take the lead on this initiative.</p> <p>Many local governments across Queensland do not possess the necessary in-house technology, skills, or budget to independently develop and implement such a reporting system. A fragmented approach would inevitably result in a range of inconsistent data sets, hindering our collective ability to gain a true, state-wide understanding of housing supply.</p> <p>PIA recommends a more strategic and coordinated approach where the State Government:</p>

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	<ul style="list-style-type: none"> • Takes the lead in scoping and developing a real-time, statewide monitoring dashboard using digital planning technologies. • Establishes a suite of universal and consistent data sets that can be applied across all jurisdictions. • Ensures the gradual introduction of state-wide applicability to allow local governments time to adapt. <p>By doing so, the State can create a robust and reliable system that provides the evidence base for effective policy while ensuring local governments have the tools and support they need to comply.</p>
<ul style="list-style-type: none"> • require reporting on development and building approval outcomes, including acceptance/ refusal, time taken to complete approvals and outcomes for cases brought to the planning court 	As above
<ul style="list-style-type: none"> • improve monitoring and reporting on the implementation and performance of housing supply targets across Queensland 	As above
<ul style="list-style-type: none"> • regularly consolidate local and state planning performance information and publish this in a public report 	As above
<ul style="list-style-type: none"> • consider applying financial incentives and/or penalties to local governments to incentivise them to meet any new land and housing targets. 	As above