

Queensland Productivity Commission

**A response to the Commission's interim report into the
productivity of the Queensland construction industry**

Date	1/09/2025
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Executive Summary

Growing regulatory burdens and counter-productive procurement practices are among the key drivers of a construction industry productivity crisis which is driving dire housing and industrial development outcomes throughout Queensland. This is costing Queenslanders both jobs and homes, leaving no doubt that reform is urgently needed.

The Urban Development Institute of Australia Queensland's (the Institute) initial submission *Grinding to a Halt* outlined 53 recommendations for reform, based on key principles including:

- feasibility mindset: embed a feasibility mindset, recognising that 97% of all new housing is delivered by the private sector which cannot move forward without projects achieving a positive feasibility assessment,
- protect housing delivery: decouple market housing from the widening range of other government goals – from industrial relations outcomes to social housing delivery – to allow the industry to get on with the job of delivering housing and industrial developments so critical to jobs and homes,
- equal collaboration: there is an equal balance to be struck between collaboration with local government, and with new homebuyers and the property industry that serves them

In this second submission (in response to the Commission's Interim Report), the Institute takes note of the Commission's recent statement that *although there are solutions, the pathway to better productivity will not be easy or immediate*. And in response, the Institute offers a nuanced pathway forward, focussed on planning and regulatory reform and based on the following schema:

- immediate: slow the pace of change to end-of-the-line regulation that would impact the delivery of housing and industrial developments in the next one-to-three years
- immediate to mid-term: use this moratorium to vigorously pursue the foundational reforms to the Queensland Planning System necessary to strengthen its future immunity to measures which first fracture the relationships between its various moving parts, and then inevitably extinguish its ability to keep pace with Queenslanders' needs for jobs and homes.

Given the important work already underway on a variety of Queensland Government initiatives including the review of all Regional Plans in Queensland, the further 20 recommendations offered in this submission are also aimed at ensuring those efforts achieve maximum benefit in the timeframe intended.

Introduction

As explained in the Urban Development Institute of Australia Queensland's (the Institute) original submission to the Queensland Productivity Commission's (the Commission) Inquiry into Productivity in the Construction Industry (the Inquiry), productivity in the residential and industrial development industries has ground to halt across Queensland. Productivity has fallen to levels not seen since the 1980s and is not sufficient to meet the demand for the forecast 2.2 million additional people that will call south-east Queensland home by 2046.¹

The dire consequence of these circumstances is Queensland's worst housing crisis in living memory.

In response to this worsening disaster, much needs to change. Additional unconstrained land needs to be urgently made available for new homes. The escalation of construction costs needs to moderate. Community-wide wages growth needs to recover to a point commensurate with the costs of delivering a new home.

And, *critically*, construction productivity needs to substantially improve.

Submission Structure

This submission should be read in conjunction with the Institute's original submission, and in reading this second submission, it should be noted that the Institute continues to support all recommendations made in its original advice.

Further and as discussed at the Institute's meeting with the Commission on 8 August, in the short time available to respond to the Commission's Interim Report *Opportunities to Improve Productivity of the Construction Industry*, the Institute has identified the specific areas of Commission interest where members are well placed to provide further data, evidence, and share an understanding of how a broad range of matters impact the delivery of housing. In other instances, the Institute considers that the data and information provided in our initial submission represents the full suite of evidence available to the Institute, and/or other peak bodies and industry participants will be better placed to respond with the most relevant information.

For this reason, the Institute will respond to the Commission's requests for further information as per:

Requests for Further Information	Institute Response
1 Project Selection and Sequencing 2 and 3 Best Practice Industry Conditions 4 Improving Tendering and Contracting	Nil further information See original submission
5 Design of Planning Regulation 6 Planning and Development Approval Processes 7 Zoning Regulations and Land Supply 8 Community Support for Housing Development and reform 9 Impacts arising from NCC 2022	Additional information provided
10 QBCC Performance 12 Threshold for Insurable Works 13 Deposit Caps 14 Minimum Financial Requirements 15 Trust Account Framework 16 Modern Methods of Construction 17 Workplace Health and Safety 18 Training and Apprenticeships 19 Prioritising Occupational Licensing Reviews	Nil further information See original submission

¹ *ShapingSEQ*, Queensland Government, Brisbane, 2023

Requests for Further Information	Institute Response
20 Opportunities too Better Utilise Skilled Overseas migration 21 Labour Hire Regulation in Construction	
22 Taxes on foreign investment 23 Utility Connections 24 Extension of Energy Queensland's Enterprise Bargaining Agreement Pay Rates to Contractors and Sub- Contractors	Additional information provided

For clarity, the following table also provides a summary of Institute support for the Commission's preliminary recommendations as listed in its Interim Report along with a link to the relevant recommendations made in the Institute's initial response *Grinding to a Halt*.

In reviewing the Table, it should be noted that the Institute was very pleased to see the breadth of issues considered by the Queensland Productivity Commission as this is firmly in keeping with the Institute's long-held view that the solution to the housing crisis must be wide ranging and comprehensive. Having said that, it can also be noted that the Institute is highly supportive of several key foundational reforms suggested by the Commission, including the removal of Best Practice Industry Conditions, minimum financial requirements (until benefit can be demonstrated), the pause on the implementation of future National Construction Code changes, and the review of Project Trust Accounts. Finally, in the face of concerning labourforce data, the Institute fully supports the measures outlined to remove barriers to labour mobility and harness opportunities to utilise skilled overseas migration.

Summary of Institute response to Commission's preliminary recommendations

Table 1 - Summary of Institute response to Commission's preliminary recommendations

Title	Detail	UDIA support?	Related UDIA recommendation
Project sequencing	The Queensland Government should improve the way it prioritises its infrastructure spend by requiring market sounding be undertaken both prior and during the tender process, to ensure projects are staged and prioritised to be commensurate with market capacity. These assessments should be conducted from a whole of government perspective, rather than a siloed or agency perspective	Yes	R 35, 36, 37
Project rationalisation	To reduce pressure on the construction industry and support productivity, the Queensland Government should undertake a full review of its capital program to: <ul style="list-style-type: none"> • ensure the forward work program reflects key priorities, whilst being cognisant of market factors, including impacts on productivity • ensure the scope of works is necessary to achieve the outcomes being sought, for example, the scope does not include any features that add unnecessary costs • consider ways of delivering infrastructure outcomes (such as reduced congestion) at lower cost, including through non-infrastructure solutions (such as a greater focus on demand management) 	Yes	R 35, 36, 37
Queensland Government procurement policies	To ensure the best use of taxpayer money and support construction industry productivity and innovation, the Queensland Government's procurement policy should have a sole objective of value for money, where value for money is defined as the project's i) whole-of-life costs and ii) fitness for purpose, with due consideration for risk and quality outcomes. To reduce administrative burden on tenderers and increase competition, particularly in regional areas, procurement policies should be simplified. Unless it can be demonstrated they provide net benefits to the community, policies that are not directly related to value for money, should be removed as requirements in government procurement. These include: <ul style="list-style-type: none"> • the Ethical Supplier Mandate and Ethical Supplier Threshold • the Supplier Code of Conduct 	Yes	R 40

	<ul style="list-style-type: none"> • the Queensland Government Building and Construction Training Policy • the Local Benefits Test • the Queensland Renewable Energy Procurement Policy. <p>All procurement instruments that are used for the tender process should be reviewed with the aim of achieving administrative simplicity</p>		
Best Practice Industry Conditions	Best Practice Industry Conditions (BPICs) should be permanently removed from the Queensland Government's procurement policy.	Yes	R 44, 45
Design of planning regulation	<p>To reduce uncertainty and unnecessary regulatory impost on building design, improve productivity and allow greater innovation, the Queensland Government should:</p> <ul style="list-style-type: none"> • 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 • ensure the requirements in local government planning schemes are consistent with the Queensland Development Code, including any variations due to climatic or other conditions • 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 • amend the Planning Act to standardise zoning types across all local plans. • continue to progress standardised siting and design requirements for detached housing, secondary dwellings, and smaller townhouse and apartment buildings • ensure that state and local government overlays are consistently applied across planning schemes 	Yes	R 8, 9, 10, 11, 12,
Infrastructure charging	<p>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. 	No	R 38, 25, 26,

Planning and development approval processes	<p>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> <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. 	Yes	R 13, 14, 15, 19, 20, 21, 22, 23, 24, 27, 28, 29
Planning and development approval processes	<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 • require local governments to publish their performance information, including approval outcomes, time taken to approve developments and outcomes from planning disputes taken to court • require a suitable entity to consolidate and publish this local government performance information • consider developing, in collaboration with local governments, a 'service guarantee' to ensure approval processes occur in an efficient and timely manner • investigate digital planning and permitting technologies to improve the efficiency, accuracy and transparency of the approval process. 	Yes	
Zoning regulations and land supply	<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 increased • 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 • 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. 	Yes	R 7, 16, 17, 18, 19

Zoning regulations and land supply	<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 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> <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 • 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 • 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 • improve monitoring and reporting on the implementation and performance of housing supply targets across Queensland • regularly consolidate local and state planning performance information and publish this in a public report • consider applying financial incentives and/or penalties to local governments to incentivise them to meet any new land and housing targets 	Yes	
Impacts arising from NCC 2022	<p>Unless it is demonstrated through consultation that energy efficiency and accessibility standards made as part of NCC 2022 provide a net benefit to the Queensland community, the Queensland Government should amend the Queensland Development Code to opt-out of these provisions (that is, make them voluntary).</p>	Yes	R 3, 4
Future regulatory changes to building codes	<p>The Queensland Government should:</p> <ul style="list-style-type: none"> • only adopt future NCC changes in Queensland codes where these have been through robust regulatory impact analysis to demonstrate they provide net benefits to the community • only adopt other building code changes where these have been assessed as providing a net benefit under the Queensland Government Better Regulation Policy • advocate for improved regulatory processes at the national level, including for NCC. 	Yes	R 3,4

Minimum financial requirements	Unless it can be demonstrated that Queensland's minimum financial requirements deliver net benefits to the community, the Queensland Government should remove the requirements.	Yes	The Institute notes a detailed response under preparation by the Master Builders Association
Trust account framework	To reduce regulatory burden on the construction industry, the pause on further rollout of Queensland's trust account framework should remain in effect until the Queensland Government undertakes commensurate regulatory impact analysis of the framework in line with the Better Regulation Policy.	Yes	The Institute supports the proposal to undertake a regulatory impact statement and notes the position of the Master Builders Association
Modern Methods of Construction	To remove unnecessary regulatory barriers to the adoption of modern methods of construction (MMC), the Queensland Government should progress commitments under the revitalised National Competition Policy to: <ul style="list-style-type: none"> • adopt a nationally consistent definition of MMC and adopting the national definitions in its relevant legislation • amend building legislation to accept manufacturer's certificates for NCC compliance • ensure regulatory neutrality in planning schemes and consumer protections for MMC. The Queensland Government should also advocate for NCC performance-based provisions to be production-neutral, so they are suitable for MMC or, where necessary, develop MMC specific guidance and advocate with the Australian Building Codes Board and Standards Australia to ensure any standards accommodate MMC. 	Yes	The Institute notes the work of other Industry Associations which are better placed to comment on this recommendation
Workplace health and safety	The Office of Industrial Relations should review the Compliance Monitoring and Enforcement Policy. The review should focus on ensuring that the policy provides adequate guidance and direction on how to ensure that compliance monitoring and enforcement activities appropriately manage risk while minimising unnecessary costs to businesses and society	Yes	The Institute notes the work of other Industry Associations which are better placed to comment on this recommendation
Workplace health and safety	The Queensland Government should expedite the development and rollout of a single, harmonised incident reporting framework, with the ability for single point digital reporting	Yes	The Institute notes the work of other Industry Associations which are better placed to comment on this recommendation
Review of occupational licensing	All of Queensland's construction-related occupational licensing requirements should be reviewed through a multi-year coordinated program of stock reviews by relevant agencies in consultation with relevant stakeholders. At a minimum, each review should consider whether: <ul style="list-style-type: none"> • there is reliable evidence of a market failure 	Yes	The Institute notes the work of other Industry Associations which are better placed to comment on this recommendation

	<ul style="list-style-type: none"> • market failure is better addressed by existing regulation (for example, consumer law) • there is clear evidence the licensing requirement addresses the market failure effectively • licensing arrangements deliver net benefits to the community • licensing requirements deliver the greatest net benefits to the community relative to other options. <p>There may also be opportunities to more fully recognise prior learning and experience in assessing whether licensing requirements have been met.</p>		
Regulatory impact analysis of pending occupational licensing	For any pending changes to occupational licensing that have the potential to increase requirements for the construction industry and have not been subject to an assessment under Queensland's Better Regulation Policy, the Queensland Government should suspend their commencement until that analysis is completed	Yes	The Institute notes the work of other Industry Associations which are better placed to comment on this recommendation
Removing barriers to labour mobility	<p>Unless it can be rigorously demonstrated that Queensland's specific occupational licensing requirements deliver greater net benefits to the community than those of other states and territories, the Queensland Government should:</p> <ul style="list-style-type: none"> • join other states and territories in participating in Automatic Mutual Recognition of occupational licences, at least in relation to the construction industry • automatically recognise equivalent licensing obtained in other states for construction workers 	Yes	The Institute notes the work of other Industry Associations which are better placed to comment on this recommendation
Utility connections	Any requirements or conditions applied by utility providers should align, as far as practicable, with existing agreed standards. Where they do not align, the utility provider should offer clear, transparent, and evidence based justifications for any differing requirements imposed.	Yes	R 33, 25

A Note on the Delivery of Housing-Related Infrastructure

The timely and adequate provision of housing related infrastructure is a critical factor in ensuring sufficient housing is available for the community. It affects all dimensions of housing delivery: where housing is located, the cost of new housing and, increasingly, whether a housing project passes feasibility testing and proceeds. In years past, housing related infrastructure was commonly funded through an infrastructure charges regime which set the maximum adopted infrastructure charges that a local government could levy on a development. Recent Institute research demonstrated that very few projects of scale in South East Queensland are subject to the “capped charges” scheme, as it is known. Rather, the majority of projects are located outside the Priority Infrastructure Area and proceed by entering into an “Infrastructure Agreement” with local government and utility providers which results in proponents paying more, often double, the “capped charge” with examples of payments approaching \$80,000 per lot. This has the result of immediately forcing many new homebuyers out of the market as these amounts pass immediately through to the home’s purchase price and are beyond the budget of many buyers, particularly first homebuyers. Clearly new homebuyers cannot pay more, via infrastructure charges paid by the developer, for the basic infrastructure necessary to live in their home. Further, the local government sector has also stated it is unable to provide additional funding for basic infrastructure from rates revenues. It is a stalemate.

The Institute also notes that the infrastructure funding and delivery conundrum is multifaceted and complex, requiring much deeper review and reform beyond a review of ‘infrastructure charging’. Challenges associated with the current approach are fundamentally underpinned by a lack of infrastructure planning by local governments and utility providers. Without this planning, developers are left to ‘guess’ the infrastructure requirements and corresponding costs in the due diligence/acquisition phase and determine whether the project is viable. That is, can the project be developed and homes offered to the new homebuyers at a price they can afford? Any reform, as opposed to funding initiatives, must start with detailed infrastructure planning for urban areas across the state.

Under these circumstances, the Institute does not support the Commission’s preliminary recommendation #7 for a review of the infrastructure charging regime. This is because the current housing affordability crisis has already demonstrated that a mere increase in the level of funding levied on new homebuyers will not in any way assist more Queensland households into private home ownership, nor boost private sector investment in additional housing supply. In fact, it will achieve the opposite.

Instead, the Institute supports a comprehensive reconsideration of how housing-related infrastructure is funded and supported at both a state and national level, with a specific focus on how entirely new approaches, such as the Crisafulli’s Residential Activation Fund, could be expanded, made permanent, and supported by companion programs funded by the Federal government.

However, should a narrow review of the current regime be unavoidable, it will be *vitally important* to ensure that stakeholder engagement includes deep interaction with potential new homebuyers to guarantee that the community’s concern for housing affordability is taken seriously. Recommendations in this regard will be included in later segments discussing the role of community consultation in housing productivity.

Responses to Requests for Further Information

As noted above, the Institute will respond to the Commission's requests for further information as per:

Item/s	Institute Response
1-4	Nil further information. See original submission
5-9	Additional information provided
11-21	Nil further information. See original submission
22-24	Additional information provided

QPC Request:

- ***our understanding and framing of the issues with planning regulation, including the way it interacts with building regulation***

The Institute draws attention to analysis completed by the Housing Industry Association which highlights examples of significant variation.

Some examples of the significant variations to the Queensland Design Code (QDC) and NCC occurring through planning scheme is provided in Table 2 below. Most of the identified requirements in these council codes relate to unique design and siting provisions for houses and not to climate, hazards, or safety concerns. These variations are increasingly evident in new schemes, as demonstrated by the draft Sunshine Coast Planning scheme, which is currently open for public consultation, prior to final adoption.

Another current example of this is the City of Moreton Bay's '[Better Housing Amendment](#)' which included requirements otherwise covered by the QDC for part of the residential zone. The amendments increased required rear boundary setbacks for new homes reducing viable home types, increased minimum required lot sizes and required carparking, and reduced permitted housing density in various locations, and other changes that reduced the number of homes per hectare that can be achieved.

Table 2- Examples of Planning Scheme Variations

Planning Instrument	Planning Scheme Code	Variations to QDC
Draft Sunshine Coast Planning Scheme	Dwelling House (Small Lot) Code	51 requirements for accepted development
Moreton Bay Planning Scheme 2016	Dwelling House Code	59 requirements for accepted development
Brisbane City Plan 2014	Dwelling House (Small Lot) Code	26 requirements for accepted development
Toowoomba Regional Planning Scheme	Small Lot Housing Design Code	30 requirements for accepted development
Noosa Plan 2020	Low Density Housing Code and Low Density Residential Zone Code	95 requirements for accepted development

In considering the matter of the interaction between planning and building regulation, data from the UDIA Queensland DA (Development Assessment) Monitor reveals:

- Around 25 percent of applications decided (1,000 applications per quarter) by Queensland LGAs are Building works made assessable under the planning scheme. That means that these applications cannot be dealt with under the QDC alone. The approach on these types of applications varies by local government
- Impact assessable applications decided are estimated at around 8 percent of total volume of applications
- Approximately 60 percent of applications are Building Works made assessable, Operational works or plan sealing. There is significant potential for productivity improvements in these application types, which all

lend themselves to exclusion (from the planning system) and/or could be facilitated by third party certification.²

While the *Planning Act 2016* offers statutory timeframes for decision making of development applications, members report that over time, the length of time taken to gain approval for a code and impact assessable development has increased. This increase may not always be obvious through reporting, because of the use of 'stop the clock' provisions which ultimately increase the total time of planning assessments. The extent of additional detailed information requested from applicants through the process adds to the overall time to obtain an approval. Institute research indicates Material Change of Use applications take around 100 total days from lodgement to approval versus a typical legislated period of 35 business days, Sunshine Coast Regional Council having increased for this type of application from less than 50 days in 2020 to 129 in the December quarter 2024.

At different times, local governments and related entities have created systems which focus on increasing efficiencies in the planning system. However, these initiatives are at times short-lived, subject to change reducing their efficiency and/or isolated to a single LGA. Examples of these initiatives are included below. However, these examples demonstrate that greater efficiencies within the system are possible, with direct and positive impacts on assessment timeframes. It is the Institute's view that a review of assessment timeframes should be undertaken by the State Government, alongside a review of any initiatives which have been deployed in the past. Ultimately the goal of this review of this should be to identify areas where the statutory assessment time and 'end to end' total time in the planning assessment phase should be reduced.

Recommendation 1

It is recommended that the State Government review of assessment timeframes with a view to substantially reducing the **total time** taken to determine both code and impact assessable applications. The review should include identification of successful measures and recommendations as to how their replication across high growth councils

² UDIA Queensland Research Foundation Development Assessment Monitor Research Dashboard

Table 3- Initiatives designed to expedite approval/assessment times

Local government/entity	Initiative	Short description including associated benefits for approval timeframes	Current Status
EDQ	Self-certification of Operational Works	Allows the certification of operational works by a RPEQ providing a streamlined process from approval to delivery	Members report a declining acceptance of this initiative by EDQ
Brisbane City Council	RiskSMART	Express development application assessment service for low-risk decision-ready applications. Decision within 10 business days	Arrangements and scope of development applications accepted through the process are limited
Unitywater	A&C Framework	Allows developers to engage a registered certifier through an Accredited Entity to certify their applications for water and sewerage network connections on Unitywater's behalf	Changes to this process have rendered the initiative ineffectual and inefficient. The initiative is accompanied by duplicative processes and processing delays
Urban Utilities	Third Party Certification Scheme	An engineering consultant must be engaged to develop and certify designs, as well as certifying the construction process	There has been review of endorsed consultants leading to uncertainty and at times, a reduced pool of certified consultants
Brisbane City Council	SealSMART	Enabled a streamlined plan sealing process through a self-certification process via accredited consultants	Abolished in 2020, resulting in significant disruption and delays in plan sealing at a time of peak debt
Energy Queensland	Accredited Service Providers (ASPs) Framework	Consultants undertaking electricity infrastructure design and construction works for real estate developments	Having worked effectively under Energex, substantial changes were made to the framework in 2025. As a result of these changes, there has been a reduction in the scope of works permitted and a substantial increase to costs as private consultants are now required to pay employees per Energy Queensland rates
Toowoomba Regional Council	Customer Service Charter	Committed to clear timeframes and communication standards for applicants	Appears to have been replaced by a broader and more high level customer service promise
Toowoomba Regional Council	Delegation to Officers	Number of Councillors required to request review of a delegated application for it to be reviewed by Council altered from 4 to 6. Reduces delays and uncertainty for some applications	New change
Gold Coast City Council forum for flood hazard	Regular stakeholder forums	Fora for engaging developers, planners and other consultants to refine processes and share	Existing

Local government/entity	Initiative	Short description including associated benefits for approval timeframes	Current Status
		feedback on development assessment or topic matter specific	
Interstate / international examples			
Victoria	VicSmart Permits	Fast track assessment system for low impact, straightforward planning applications. Key features of VicSmart include: <ul style="list-style-type: none"> • a 10 day permit process • applications are not advertised • information to be submitted with an application and what council can consider is pre-set • the Chief Executive Officer of the council or delegate decides the application 	Existing
City of Casey (Victoria)	Bespoke stakeholder service	Payment by development partners of additional internal LGA resources for an accelerated assessment and processing service	Existing
Western Australia	Local Government Town Planning Standard Development Conditions Guideline	Provided by the WA local government association the guideline helps with councils drafting consistent and legally sound conditions for approvals.	Existing, likely requires updating
Waikato, New Zealand	Waikato Local Authority Shared Services (WLASS)	WLASS is owned by 12 Waikato local authorities and established in 2005 as a vehicle which these councils could collaborate and identify opportunities for undertaking activity on a shared basis. The forum was established to: <ul style="list-style-type: none"> • align the consent (i.e. DA process) across councils • standardise application forms and decision letters • promote best practice and reduce duplication • improve customer experience by making the process more predictable and consistent Key improvements:	Existing

Local government/entity	Initiative	Short description including associated benefits for approval timeframes	Current Status
		<ul style="list-style-type: none"> • shared learning and training for council staff • consistent expectations for applicants across the region • reduced bureaucracy for developers working across the region • improved efficiency in consenting process 	

QPC request:

- ***stakeholders' experience of complying with planning regulations, including how regulatory differences across Queensland impede construction productivity and innovation***

Queensland has 77 local government areas, each with its own bespoke planning scheme provisions. In practice, the development types addressed are often similar, with only the physical location differing. Many planning schemes are also out of date, with limited compliance with the requirement that they be reviewed within ten years of adoption. Across councils, schemes vary widely in structure, format, and provisions, creating unnecessary complexity, higher costs, and inefficiencies for councils, businesses, and communities.

Key issues with the current system:

- High variation across councils: each plan has unique structures, formatting, and content
- Compliance costs: businesses and individuals operating across council boundaries face duplication, complexity, and uncertainty. For example, a developer working across council boundaries in South East Queensland must understand multiple different sets of planning rules despite projects being similar
- Slow and inconsistent implementation of state interests (e.g. State Planning Policy and regional plans): state interests are often applied differently and at different times across councils reducing their effectiveness
- Escalating costs: developing bespoke plan structures and content for each council duplicates effort and resources, this is particularly burdensome for smaller councils.

There are several productivity benefits of planning standards, and standardised content:

- Improved usability and accessibility: Standard structures, formats, and definitions make plans easier to prepare, understand, and apply
- Consistency across jurisdictions: Reduces compliance costs and risks for businesses and organisations operating in multiple council areas
- More effective state direction: aligning plan content ensure state interests are implemented consistently, strengthening their intended outcomes
- Efficiency and cost saving: eliminating duplication in plan drafting allows councils to focus resources on where variation in content is appropriate.

Standardisation increases productivity by removing inefficiencies, lowering costs, and speeding up both plan-making and development outcomes, while still leaving room for local variation where it truly matters.

The Institute strongly supports greater consistency in the structure, format, and content of local planning schemes as a means of improving productivity in Queensland's planning system. Standardisation reduces duplication of effort, lowers compliance costs, and enables more efficient implementation of state directions, while still allowing for local variation where it is genuinely required.

To achieve this, Queensland should assess options for reintroducing and building upon the former *Queensland Planning Provisions* framework or alternatively consider the adoption of a model similar to *PlanSA*. Either approach would create a more consistent and user-friendly planning framework that supports councils, industry, and the community, while improving the state's ability to deliver housing and economic development outcomes in a timely and coordinated way.

The implementation of planning reforms is just as important as the design of the framework itself. Even the best standardisation model will only succeed if it is effectively rolled out, embedded, and maintained.

The New Zealand experience illustrates the benefits of this approach. Its National Planning Standards—focused on structure, format, zones, and definitions—were underpinned by a [cost-benefit analysis](#). While New Zealand is now reforming its system, the new framework builds on these foundations, introducing nationally standardised land-use zones applied through combined district plans. This approach:

- enables councils to adopt consistent solutions to common issues,

- preserves local decision-making where bespoke requirements are needed, and
- delivers system efficiencies while reducing financial burdens on communities.

QPC Request:

- ***stakeholders' experience of interacting with regulators, i.e. how well regulators have performed and what factors contribute to better performance***

Members report that their experience of interacting with state and local government and utility providers is highly variable and often dependent on the skills and approach of individual officers, rather than a consistent organisational model. Members note that there is no clear exemplar of regulatory performance to point to but highlight several factors that contribute to a better experience. These include the establishment of meaningful KPIs, transparent reporting of performance, and genuine engagement with industry. A positive organisational culture that empowers officers to make timely and balanced decisions is also critical, as is the availability of robust IT systems—such as GIS platforms and customer portals—that streamline processes and improve accessibility.

QPC Request:

- ***examples of where regulations have been applied flexibly to achieve better outcomes and conversely where an outcome was worse due to inflexibility.***

Planning scheme provisions regularly apply standards that render housing development projects unviable. One illustration that the planning settings are not consistent with development feasibility reality is where the maximum allowable height is not taken up by industry, illustrating that scheme provisions render 'highest and best use' unviable. In some local government areas, some zones receive few development proposals even though they have been in place for many years. An industry review of zones and any planning scheme amendment in terms of its viability in achieving its objectives is needed. Too often this not undertaken. The initial Woolloongabba PDA Development Scheme in 2024 was of significant concern to industry, mandating extensive public streetscaping and minimum component of social or affordable housing in each project. A review of the development scheme and proposed infrastructure plan this year (currently undergoing public consultation) created a much more efficient scheme with the coat cut according to the cloth. The viability or likelihood of new housing occurring in the location is now much increased.

Recommendations

Recommendation 2

Create more consistency in the structure, format and content of local planning schemes by developing models for the standardisation of Planning Schemes.

Recommendation 3

Assess options for the re-introduction and elaboration of the Queensland Planning Provisions framework, or alternatively consider the adoption of a model similar to *PlanSA*.

Appendix 1 provides information about a range of other standardisation options in use in other Australian jurisdictions.

QPC Request:

- ***on what types of development and what criteria should be set for assessing whether a development is sufficiently significant to qualify for an alternative development assessment pathway, and which body should be responsible for coordinating and making assessments***

The Institute supports the Commission's suggestion of a Significant Development Pathway, including for housing projects. It is clear, given Institute members' experiences, that the multiple layers of approval from different levels of government is a key inhibitor to a more efficient approvals system. Members often report difficulties in wading through the regulatory maze, particularly on projects of scale. The Institute suggests that this approach be recommended to government and would suggest that the following thresholds or characteristics of such a pathway would include:

- Large scale industrial, residential, mixed use, and commercial projects
- Thresholds which are consistent with the Western Australia Significant Development pathway, i.e. Projects valued at \$20 million or more located in South East Queensland and \$5 million or more in other parts of the state, where these figures are construction cost, not gross development value
- Projects which do not meet the value threshold but offer housing of significant value to the local area can also be authorised for entry into the pathway by the Deputy Premier (or relevant Minister for Housing)
- The pathway must offer 'end-to-end' approvals including a streamlined process with associated utility providers and related agencies including Titles Queensland.

QPC Request:

- ***what performance information would be useful to collect and make public***

The Institute supports the Commission's Preliminary Recommendation to require local governments to publish their performance information, including approval outcomes, time taken to approve developments and outcomes from planning disputes taken to court. The Institute supports the Commission's recommendation that this information be published and that a service guarantee also be established to ensure approval processes occur in an efficient and timely manner.

The Commission's approach and recommendation in relation to the above, mirrors systems in place in other Australian states including New South Wales. The New South Wales government publishes a '[Council league table](#)' which was launched in 2024 and provides an interactive dashboard monitoring performance for lodgement and determination of development applications. The dashboard provides an overview of assessment timeframes by council, geographic region, development types, and includes data relating to state agency referral timeframes.

This approach should also be adopted by other related entities involved in the development process, including:

- The State Assessment and Referral Agency (SARA)
- Economic Development Queensland*
- Queensland Titles Office
- Energy Queensland
- Water Utilities including Urban Utilities and Unitywater

The Institute notes that at the time of writing that Economic Development Queensland have commenced publishing [reporting](#) against a range of metrics. SARA has also advised that new performance data is to be released imminently.

Relatedly, water authorities operating within local governments should separately report on timeframes.

While transparency is critically important as a general principle in any system, it is particularly important within the context of productivity in the building and construction industry. The Institute publishes its own metrics on development assessment timeframes, courtesy of data provided by local government partners. It is the Institute's experience that this data is a useful tool for developers when initially project planning a development. It allows developers and their consultant teams to plan for assessment timeframes, based on live experiences. Of course, any reporting should be carefully designed and monitored to ensure it does not create behaviours or cultures

which appear to demonstrate better performance but come at the result of using 'stop the clock' provisions, overly complex and contradictory requests for information or similar.

QPC Request:

- ***possible housing designs or services where pre-approval could be given or the need for approval could be removed***

We note and support the Commission's observations in relation to the potential for expedited approvals through pre-approval processes or entirely removing the need for approval. The Institute notes that the Distinctly Queensland Design Series has not progressed, nor has it evolved to offer an expedited pathway.

While the New South Wales pattern book is a step in the right direction, it will be important to monitor its success. The Institute also notes that a redirection of focus from single dwelling designs to more complex product requiring a more complex system of approvals (e.g. dwellings in masterplanned communities) or typologies experiencing severer feasibility challenges (particularly medium density dwellings) may offer a greater productivity benefit. Currently the application of the pattern book designs is largely limited to recently rezoned infill areas.

QPC Request:

- ***whether and how technology could be used to help improve approval processes.***

ePlanning is a key lever for improving planning practice and streamlining approvals. The experience of *PlanSA* demonstrates its value in delivering greater consistency in planning decisions, with centrally managed legislative amendments and standardised interpretations. Importantly, ePlanning also simplifies how communities, developers, and decision-makers engage with the planning system.

If ePlanning requirements in Queensland were centralised—or at least standardised—this would create significant opportunities to improve data consistency across councils and enable access to real-time information on development activity and council/state government performance.

ePlanning reduces delays caused by manual processes, missing or inconsistent information, sequential referrals, and lack of data visibility, while increasing consistency, transparency, and efficiency—ultimately speeding up approvals without compromising quality.

QPC Request:

- ***the adequacy of current reporting on land supply***

The Institute has long held concerns of accuracy of the State Government's Land Supply and Development Monitoring report and by association, local government growth models. In short, the industry's concerns relating to current land supply and growth monitoring include:

- The reliability of the data used in these models, which quite often does not reflect the complexity of overlays, land fragmentation, infrastructure requirements, or development/market realities
- The models tend to 'bake in' or assume net residential densities which are rarely achievable or confuses net and gross densities
- The models offer little opportunity to absorb developer intelligence, which can provide an additional layer beyond what any spatial dataset is able to capture, providing real time feedback about the developability of individual sites and yield.

Having noted the above concerns, the industry does support best practice land supply monitoring and reporting and believes that it is a very important tool which, once developed to an appropriate standard, could be used to assess land supply impacts of government policy and changes. The Institute supports further work and

independence in this area, noting that previous attempts to provide greater levels of consistency in how land supply is measured at a local government level have been unsuccessful.

The difference between approvals, and supply

Some stakeholders often cite the number of 'approved dwellings' as a means of demonstrating that the planning system is effective and each stakeholder involved with housing (and employment) is being 'productive'. Approvals do not measure housing supply and are a misleading measure of the effectiveness of the planning system for several reasons. First, there are varying levels of approval needed from different levels of government. A developer may obtain a material change of use approval from a local government yet still require approval from the Federal Government for Matters of National Environment Significance. Approval from the Federal Government may take in excess of five years, as is currently being experienced by the industry.

Second, there are no assurances that the 'approval' will be built. In the current context, significant difficulties in securing a builder means that many approvals may never be built, or at least at the scale of the initial approval. In many cases, some sites which are unfeasible may be sold, the scheme reworked and represented to the market (and council for approval) at a vastly reduced scale.

Third, there are some markets which have a very low conversion rate from approval to completion. This is due to a range of factors including market size and saturation and the source and structuring of the capital. It can also occur because of reducing land values or sharp increases to construction costs. For example, on the Gold Coast, around 6% of existing approved Multiple Dwellings are built each year. More broadly, around 7.5% of the approved multiple dwelling stock is delivered each year in South East Queensland.

Finally, financing arrangements for developers can also hinder the timing of delivery of stock to market. Many apartment projects require a certain percentage of pre-sales which occur after approval but prior to commencement of the project.

Considering market conditions, where stock is highly sought after from buyers in the midst of a housing crisis, it is clear that there are significant impediments with bringing housing to market. These impediments require carefully considered reforms including catalytic infrastructure funding and the reconsideration of restrictive planning requirements, rather than blunt instruments to 'force' housing delivery. It should be noted that blunt instruments, including higher levels of taxation for these sites, is likely to have a range of unintended consequences including deterring legitimate future investment in Queensland and in extreme cases, increased industry insolvencies.

Instead, it is recommended that the State Government and relevant related bodies including local government measure and track housing completions. This information, which is readily available, when coupled with the timeframes on development assessment and utility connections, will provide a far more meaningful picture of 'supply'.

QPC Request:

- ***whether and how land and housing targets should be set for individual local governments***

The Institute supports the articulation of housing targets by typology for each local government area and notes again that performance against these targets should be based on housing commencements / completions. The Institute also supports existing requirements for local governments to have four years of approved land supply and 15 years of planned supply, however notes previous statements regarding concerns relating to the reliability of these figures currently.

The Institute also believes that performance against these targets could act as a means of assessing local government performance and could be tied to infrastructure investment and funding.

The National Policy Statement for Urban Development (New Zealand) directs certain local government (i.e., medium and high growth) to ensure their planning documents provide sufficient development capacity to meet expected demand for housing (categorised by type and location) in the short, medium, and long term. The same requirement exists for business capacity, but demand must be categorised by business sector. It is important to note these requirements are not a target, but a minimum that local authorities must provide. Local authorities with jurisdiction over tier 1 or 2 urban environments must produce housing bottom lines. A housing bottom line is the amount of development capacity that is sufficient to meet demand plus the competitiveness margin. For regional councils this means inserting housing bottom lines into regional policy statements for the short, medium, and long term. For territorial authorities the same is required but for district plans.

Recommendations

Recommendation 4

Regional Plans should articulate specific housing targets (including by typology) in collaboration with local government and industry (so as to ensure feasibility a lens).

Recommendation 5

Local planning schemes (critically including the Local Government Infrastructure Plans) need to be amended to ensure the target is monitored and achieved within in a timely delivery horizon, using an expedited process where necessary.

Recommendation 6

Requirements should be established be to ensure relevant utility provider plans such as NetServ plans are updated highly timely fashion within in the same planning phase.

QPC request:

- ***whether there are likely to be significant costs with the public reporting of local government performance in achieving any targets***

While there may be some costs associated with the public reporting of local government performance in achieving housing targets, these are not likely to be significant when weighed against the benefits. Most councils already collect much of the required data for internal reporting and state government monitoring; the key additional cost lies in standardising and publishing it. Importantly, transparent reporting drives better accountability, enables benchmarking across councils, and supports more efficient allocation of resources. Over time, consistent reporting will reduce duplication, improve data quality, and provide government, industry, and the community with greater confidence in the system. In this sense, the relatively modest costs of public reporting are more than offset by the value of better decision-making, earlier identification of bottlenecks, and improved housing delivery outcomes.

Engagement with communities is essential if reporting on local government performance is to have real impact. Public reporting alone risks being a compliance exercise; what matters is that councils use the information to have meaningful conversations with their communities about housing needs, infrastructure delivery, and planning outcomes. Transparent reporting, combined with proactive engagement, builds trust, ensures communities understand the trade-offs and challenges councils face, and creates an opportunity for councils to demonstrate accountability and responsiveness. This engagement also helps shift public perception—turning performance reporting from a punitive measure into a tool for collaboration and continuous improvement.

QPC Request:

- ***whether monitoring and reporting of land supply targets should be undertaken by an independent body***

The Institute is supportive of monitoring and reporting land supply targets by an independent body. The Institute has long advocated for the establishment of a Queensland Growth Areas Authority (QGAA), creating a central authority to bring all parties together to bring better, proactive planning, and certainty to growth areas (refer recommendation 6 of the Institute's original submission). A key responsibility of the QGAA could include monitoring and reporting of land supply targets.

It will be important that the QGAA, or similar independent body, has the tools necessary to undertake 'enforcement' and direct certain actions to be undertaken where local governments are not achieving targets.

This monitoring and reporting should complement requirements for each local government to monitor, and publish quarterly reports on housing demand, supply, prices, rents, affordability, and where new development is occurring (infill or greenfield), as well as business land availability. Larger councils such as those within South East Queensland must also break this down by zone, and results must be published at least once a year.

Monitoring by councils is essential because it provides a clear, evidence-based picture of local housing and business land markets. Councils are well placed to observe how demand, supply, and affordability are changing on the ground, and whether planned development capacity is being realised. This information enables more responsive and targeted planning interventions, ensures infrastructure and zoning decisions align with actual needs, and supports consistency across regions. It also builds a transparent evidence base that state agencies, industry, and communities can rely on for coordinated decision-making.

QPC Request:

- ***the efficacy of any financial incentives or penalties for improving performance, and how they could be applied***

There are a range of incentives and penalties which could be utilised to improve performance. The Institute is supportive of tying infrastructure funding to performance and notes the operation of other schemes in other jurisdictions with the express aim of improving efficiencies. For example, under New Zealand's Resource Management Act 1991 (RMA), local councils are required to process resource consent applications within statutory timeframes (generally 20 working days). If a council fails to meet those timeframes, it must refund a portion of the application fee to the applicant. This penalty was introduced to encourage timeliness and accountability in consent processing, ensuring applicants are not unfairly disadvantaged by council delays.

QPC Request:

- ***other factors the Commission needs to consider.***

The notion that local governments' role in housing delivery ceases with the zoning, of land grossly misrepresents the role of local governments and the complexity of the Queensland planning system. Local governments zoning an area for urban uses does not necessarily provide a pathway to approval, nor housing (or other related uses). There are many factors which often render zoned land 'unfeasible' or require a landowner/developer to embark on a complex journey of approvals to deliver land to market. Often, the pathway towards approval and delivery is made complex by a range of factors including:

- A myriad of overlays, placed on top of the land earmarked for urban uses
- Overly complex planning requirements which make delivery unviable
- A lack of infrastructure planning and delivery
- An uncoordinated systems approach, where the underlying zoning or sequencing of development is unsupported by a utility provider e.g. energy or water utilities.

The Institute is currently conducting its annual research into land supply, as part of a UDIA National research project. The methodology applied by this project assesses and tallies the amount of land zoned for urban uses across South East Queensland and then applies a ‘filter’ of overlays to assess the amount of land which is ‘unconstrained’. The project then goes on to assess infrastructure requirements and developers’ intentions, categorising the likely timeframe of delivery of housing for each land parcel. Interim results from the current round of research illustrate the above point relating to the difference between ‘zoned’ and ‘developable’ land. Table 4 includes a summary of the amount of land, which is constrained by overlays, as a proportion of total land zoned for urban uses, across six high growth Councils in South East Queensland.

Table 4 Amount of Constrained Land Zoned for Urban Uses

Local government area	Total land zoned for urban uses (hectares)	Land Constrained by Overlay (hectares)	% of urban zoned land constrained by overlays
Brisbane City Council	1,070	158	15%
Ipswich City Council	4,939	1,769	36%
Logan City Council	8,914	4,232	47%
City of Moreton Bay	3,480	872	25%
Redlands City	1,012	257	25%
City of Gold Coast	734	335	46%

Planning Requirements and Feasibility

Planning requirements play a crucial role in determining the viability of development. Given the well documented challenges since COVID relating to constructability, the importance of reviewing planning settings to ensure that it is commercially viable for the industry to deliver housing has never been more important.

Restrictive planning controls play a direct role in restricting feasibilities to a point where projects are unviable. In particular, the cumulative impact of macro factors (including labour shortages and industrial relations etc), coupled with planning controls and timeframes, has created an almost untenable environment for apartment development in South East Queensland. The most raised planning impediments included a prescriptive approach to building height, site cover and setbacks, despite a performance based planning system, and carparking requirements.

There are recent examples of where, as a result of Institute advocacy, local government or Economic Development Queensland has acknowledged the role of some requirements in project viability and made changes to improve housing supply.

Similarly, changes made by Brisbane City Council in 2025 to carparking rates across the city recognised the cost of carparking in residential apartment buildings. These changes have the potential to significantly reduce the construction cost of buildings located in specific areas and reflect the actual usage of apartment residents, as measured by the Institute in 2021. However, there are opportunities for more reform in Brisbane’s carparking requirements, and the Institute continues to work to highlight the feasibility impacts of council requirements.

Conversely, changes made to the Moreton Bay Planning Scheme in 2024, introduced restrictions of dwelling typologies, neighbourhood design, lot sizes, and rear setbacks. These changes impact the yield possible on development sites and for many lot sizes, the increase in rear setbacks and site covers means that many homebuyers will now be forced to build two storey homes on smaller lots, significantly increasing the build cost. The changes are counterintuitive to increasing housing supply and improving housing affordability. These changes also illustrate the disconnect apparent between the regional plan’s stated outcomes and local planning schemes. The changes, approved by the State Government, are also contradictory to the requirements including in *ShapingSEQ* in relating to a requirement for net residential densities of 20-30 dwellings/ha.

While the Institute supports a greater focus on the preparation of cost benefit analysis for legislative changes at a State level, this lens must also be applied to proposed changes to local government planning schemes. Changes made to planning schemes, while well intended, often render future development sites unfeasible or significantly reduce housing affordability. While planning scheme amendments and new schemes are assessed by the state government, against state interests, a more formal process is required to measure and integrate the impacts of changes on housing supply, housing affordability, yield (and therefore development feasibilities) and available land supply. This process should also extend to companion uses including the impacts of scheme changes on employment lands.

QPC Request:

- ***The Commission is also interested in whether it is possible to enable more local control over land use, and what arrangements might align local and broader community interests. The Commission would like to encourage stakeholders to provide quantitative evidence on the impacts, costs and benefits of planning reforms to further inform the Commission's analysis.***

Greater local discretion over land use, such as Houston's localised controls, can create significant uncertainty for both the development industry and the community. A well-functioning planning system relies on providing a degree of certainty and predictability. This underscores the importance of ensuring community engagement is embedded upfront in the development of planning schemes, rather than left to ad hoc or case-by-case decision-making.

There are many avenues for greater levels of efficiency within the planning system, including but not limited to:

Delivering and requiring a far more expedited and coordinated process between regional planning and planning schemes	For example, when land is brought into the urban footprint, the recognition of this change at a regional plan level often takes years to be replicated in the relevant planning scheme
A requirement for high growth local governments to review levels of assessment for each zoning type	Many simple applications for uses in zones which are anticipated by the community are often forced into impact assessment. The property industry actively avoids impact assessable development applications because of the level of risk associated with impact assessment, including the potential for third party appeals and a lengthy and uncertain court process
provide greater clarity around the role and intent of the Emerging Community zone, and ensure land is efficiently sequenced for development	The Institute recommends the following actions: <ul style="list-style-type: none"> - Short term: Require local governments to clearly determine and articulate the intended future use of land zoned as Emerging Community (or equivalent) prior to the release of the next SEQ Regional Plan. - Medium term: Amend the planning regulation and associated guidance to ensure that the Emerging Community zone (or equivalent): <ul style="list-style-type: none"> o cannot be applied within the Priority Infrastructure Area (PIA); and o where applied outside the PIA, cannot remain in place for more than two years.
A thorough review of areas of regulatory duplication which exist across the planning system	For example, the identification matters of environmental assessment and potential for offsets is now active at all three levels of government, with many examples of occasions where a developer has had to find or pay offsets for effectively the same species at two different levels of government. The categorisation of ecological matters at three levels of government (MLES, MSES, and MNES) occurs without evidence and at a local government level; there is no transparency on the collection and expenditure of offsets, nor whether the measures, process or financial costs are resulting in positive ecological outcomes

Adopt a more flexible approach to the urban footprint	<p>Refer recommendation 7 from the Institute's original submission.</p> <p>Under <i>ShapingSEQ 2023</i>, the urban boundary is 'fixed', that is the State Government retains control over when and how the urban boundary is amended.</p> <p>The Institute suggests that the environment, and needs of the community are constantly changing, and that the planning system needs to be responsive to change. The current rigid process for setting the urban boundary is unnecessarily restrictive and a barrier to effectively responding to the land supply challenges facing SEQ.</p> <p>The Institute supports the method of an urban boundary, however recommends that a process is developed that enables it to be changed by way of an application by any person.</p> <p>For example, the Independent Hearings Panel for the development of the Auckland Unitary Plan, the Panel acknowledged the Rural-Urban Boundary (RUB) as an essential planning mechanism to manage urban expansion while safeguarding rural areas and guiding infrastructure provision. Importantly, the Panel recommended relocating the physical RUB from the regional policy statement into the district plan as a map-based rule. This adjustment enables contestability—landowners or developers can propose boundary changes via private plan changes—making the system more responsive to evolving circumstances.³ The report additionally includes high level content on the impact of the RUB on land values.</p> <p>Note: The RUB is a planning mechanism similar to the urban boundary.</p>
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QPC Request:

- ***community views and preferences on housing development and the need for reform and mechanisms that can be used to ensure consultation mechanisms are representative of broader community views***
- ***how outcomes can be shaped so that communities are more accepting of change, including of higher densities***
- ***whether there are practical measures that can be taken to allow more local involvement in shaping how development, including those aimed at increasing density, occurs in neighbourhoods***
- ***whether there are options that would enable or facilitate more direct negotiations between developers and neighbours (for example trading off height restrictions for greenspace) without compromising development costs or timeframes***
- ***how the benefits of development can be shared with the community.***

The Institute has been conducting in-depth qualitative research program for over 10 years on matters relating to property and planning. This research involves understanding the view of the community in relation to their level of understanding and awareness relating to planning concepts and changes to support highly levels of housing diversity and densities.

The Institute's research has found that:

³ Auckland Independent Hearing Report <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/ihp-designations-reports-recommendations/Documents/ihpoverviewofrecommendations.pdf>

- There is a very low level of understanding amongst the community relating to the planning system and principles including zoning, levels of assessment, the assessment process, relevant legislation and regulation, and the role of the community throughout the development and planning process
- The community has an understanding of the challenges of accommodating a growing population and the role of housing supply in alleviating some of current housing affordability pressures. However, this understanding rarely translates to a desire to see increased densification of their existing neighbourhood
- The community has a poor level of understanding of the roles and responsibilities of each level of government and professions associated with the delivery of housing. For example, the community (and media) often conflate the role of a developer, as opposed to a builder
- The community is not aware of the importance of providing input to significant planning consultations, particularly those at a regional level (e.g. Regional Plans), nor the city level, often being surprised by zoning changes or development proposals when the site is cleared.
- Community opposition to development is intrinsically linked to a subconscious fear that change will de-value their current property investment and restrict an individual or family's ability to move to a property in the future that may better suit their needs
- The community finds the language that the industry and government use in relation to planning confusing, which creates a sense of mistrust

The Institute has responded to these findings by:

- Holding training sessions for our membership to highlight best practice community engagement techniques
- Producing three guides to assist our members in better engaging with the community, including measures to better identify and describe the 'community dividend' associated with a project
- Advocating for the State Government to fund and deliver an 'always on' campaign and platform which presents a common set of definitions and themes, to provide the community with more resources to understand the system and what planning and property changes mean for them at an individual level.

The Institute has also launched a 'Made for People' initiative which provides a platform for sharing planning facts and importantly, profiling the community outcomes that are delivered as part of development. The platform is playing an important role in communicating the benefits of development with the community.

In terms of the Commission's request for information relating to community support for housing development and reform, the Institute would support:

- An increase investment and commitment to providing an 'always on' platform, focussed on providing easily understood context relating to population growth, planning concepts, and language
- Local governments and industry committing to a common narrative around housing and growth, rather than delivering separate resources which do little other than offer a confusing landscape for the community to navigate
- More investment in communicating the importance of 'up front' community input and buy-in on planning matters including regional plans and planning schemes.

The Institute believes that the current system offers sufficient opportunities for community engagement and local involvement, however these opportunities are usually missed or misunderstood by the broader community.

Before leaving the topic of the incorporation of community views on the delivery of housing and its impact on productivity, it must be noted, as mentioned above that an urgent assessment of new homebuyer views on appropriate sources of infrastructure funding needs to be conducted and incorporated into any decision making related to the infrastructure charges regime as referred to in the Commission' preliminary recommendation #7.

Recommendation 7

Should a review of the infrastructure charges regime be necessary, the views of prospective new homebuyers in Queensland must be sought and considered in any assessment of viable source of additional infrastructure funding.

QPC Request:

- Impacts Arising from NCC22

The Institute supports any measures to increase the safety of occupants of housing and buildings. The Institute has also played a key role in supporting its membership to adopt sustainable building practices since 2006. However, the Institute did not support the full adoption of NCC 2022 in Queensland due to a range of concerns relating to the impact of these changes on housing affordability, in the absence of a clear cost benefit analysis. The changes caused significant disruption to the industry, including building certifiers, and rendered the delivery of product on smaller lots (i.e. less than 350sqm) unviable.

Equally, while supportive of voluntary and incentivised measures across the built environment to increase energy efficiency, the Institute does not support the continued escalation in energy efficiency requirements in residential product. By the Institute's recommendations, the additional cost associated with complying with the increased NatHERS rating is not offset until the occupant has owned the home for around 11 years.

The Institute would support a 'rollback' of the NCC 2022 provisions in Queensland, with the express aim of increasing flexibility and ultimately, improving affordability. While the impact of the changes to detached buildings including housing are well documented, the changes have also had a substantive impact on apartment product, requiring increased energy efficiency measures and the roughing in of electric vehicle charging. The provision of electric vehicle charging in basements is fraught, with Queensland Fire and Emergency Services (QFES) increasingly unwilling to sign off on the design due to fire risk and 'increased intervention difficulty'. As a result, developers are required to "rough in" under the NCC, for technology which is not clearly supported by QFES. This again illustrates the lack of coordination within the planning system. Equally, the roughing in for electric vehicles then necessitates the need for Energy Queensland to assume increased system load if EV charging is required by all residents. This increased load necessitates additional electrical infrastructure in the form of padmount transformers and or substations, to be delivered at the developer's and ultimately, home owner's cost.

The Institute accepts that the industry has had to absorb the NCC changes into designs and notes that there has been a significant amount of 'sunk cost' in doing so. While on face value, it may seem 'unproductive' to reverse changes made, the Institute believes this is necessary in the instance of NCC 2022 because it:

- will allow developers of future apartment projects to carefully consider the costs and potential benefits of NCC measures;
- will allow house builders to determine whether a continuation of the requirements is more efficient than reverting to original designs and make this decision based on their own business and market merits; and
- would enable small lots (i.e. lots smaller than 350sqm) to proceed with certainty, with clarification that a single storey house could once again be accommodated with the removal of the accessibility requirements.

Recommendations

Recommendation 8

Rescind the mandatory application of NCC 2022 to all relevant dwelling types making these initiatives voluntary.

Recommendation 9

(As per NSW Productivity and Equality Commission Report) Pause further building reforms that add to construction cost, unless they can demonstrate an overriding public interest such as addressing building defects or risks to public safety.

QPC Request:

- **Taxes on Foreign Investment**

The Institute notes the analysis provided by the Queensland division of the Property Council and lends it support to the recommendations contained its response to the Commission's interim report.

QPC Request:

- **Utility Connections**

The performance of Government Owned utility providers including Unitywater, Urban Utilities, and Energy Queensland is frequently referenced as a pain point and a 'project risk'. In particular, Energex is referenced as a key source of project risk, with both builders and developers citing extraordinary delays on project connections. Industry participants commonly note that on most occasions, Energex delays run between 6-12 months.

Increasingly the performance of water utility providers is cited as a source of project delay. Examples provided to the Institute include project delays because of:

- No presence of or adherence to statutory timeframes and poor customer service
- The establishment of processes which determining the most appropriate site-specific solution difficult, confusing, and time consuming. Often, these processes have been established in lieu of applicants being able to directly speak to a utility representative
- Lengthy and duplicate requests for information (RFI), resulting in multiple variations, often to arrive back at the original submitted design
- Difficulty obtaining clear, upfront advice via pre-lodgement services which can be relied upon during the assessment process
- Bringing payment of infrastructure charges forward, with little appreciation of the impacts of such a decision on cashflow, financing arrangements and ultimately the financial sustainability of the project and developer
- An overtly risk-averse approach which fails to facilitate pathways for innovation or the resolution of a site-specific outcome
- High staff turnover, making it very difficult for consultants and developers to be able to identify the correct person within the provider to be able to deal with directly and with confidence throughout the project.

The cumulative effect of these problems was well described by then Opposition Leader, David Crisafulli in his Budget Reply speech of 13 June 2024:

Another drag on supply that falls at the feet of government is a lack of timely provision of utility services in new developments. I have been made aware of reports of temporary generators being installed to allow families to move in or, even worse, homes lying dormant while waiting for a utility connection. While currently EDQ can direct utility providers to accept, provide and maintain services within PDAs, most development occurs outside of these.⁴

A range of projects across Queensland are currently feeling the effects on these problems.

⁴ Queensland Parliament, [Hansard](#), p. 28 Brisbane, 13 June 2024

Case Study 1

The delivery of 13 dwellings is currently being delayed by Energy Queensland. During the development application process, the developer engaged an electrical engineer to assess the need for the site to include a padmount transformer. The developer engaged with Energex through their portal to undertake a Pre-Planning Feasibility Study (at a cost). The timeframe for these studies is 4-6 weeks, however in this instance, Energex took 3.5 months to confirm that the site does need a padmount transformer. By this point, the development application was in the decision stage with Council and therefore, a minor change application was required because it required the loss of deep planting to accommodate the transformer. The result of the delay and inclusion of a transformer is a loss of saleable land (around 25m²), has impacted on site holding costs and the delivery of dwellings to market.

Case Study 2

The delivery of townhouses has been delayed, following significant delays in dealing with Energy Queensland. Development approval for 56 townhouses was obtained from Council in late October and included the delivery of a padmount transformer. A supply availability request was lodged with Energex in early December. No response from Energex (despite follow-up) was received until mid-February. In mid-May 2025, Energex advised that their preference was to have the padmount transformer located on the opposite side of the site, given broader network issues and advised an additional cost of \$750,000+ for cabling works to maintain the transformer in its original position (and DA approved position). The developer is unable to pass on this cost to homebuyers and therefore will need to amend the original development approval through a minor change. The townhouses cannot be listed for sale until the minor change is received. This issue has delayed the project by at least three months and an estimated cost impact of \$200,000 to-date.

Case Study 3

Energy Queensland delayed the delivery of 62 lots to market by two months, requiring written confirmation by the electrical design consultant that no structures including future dwellings would be constructed within the padmount transformer exclusion zone. The request resulted in additional consultant costs and shifted the responsibility of Energy Queensland's documentation and drafting inaccuracies to the electrical engineer. The total delay impacted project costs by around \$90,000.

Case Study 4

A developer experienced a nine week delay in delivering 197 lots because of a utility provider delaying the scheduling and holding of a pre-start meeting. The contractor could not meaningfully commence works, delaying pipe crews programmed based on reasonable approval and pre-start timeframes. Despite two packages being lodged, one pre-start meeting was held five weeks after approval was granted, while the other package was delayed by a further two weeks. There were also de-mobilisation costs and machinery sat idle until the pre-start meetings were held.

However, it is not only housing projects which face open-ended delays with connections and completions. High needs community services such as child care have not been immune to the difficulties.

Case Study 5

In delivering a childcare centre, the developer had to relocate a small green boy (by 2m). The relocation request was lodged with Energex in December 2024. Energex assigned a project planner in February who required the payment of a fee (around \$4,000) to investigate the relocation. After visiting the site in March in 2025, the developer was informed that the cost to relocate the green boy would be \$42,000 and was expected to have occurred in November. The childcare centre was due to open in October 2025. After querying the cost and timeframe, Energex confirmed in April that the relocation cost was now \$22,000, but the target completion date

would be January 2026, delaying the opening of the centre by at least three months. The developer is currently awaiting a further update. Given the timing of the delay (when the developer is at peak debt), the estimated total cost of the delay is \$150,000.

Recommendations

Recommendation 10

The Institute strongly supports the now Premier's proposed response: The LNP in government would combine shareholder directions to government owned utility providers and legislation to institute the enforceable KPIs needed to address these issues.

Recommendation 11

In doing so, give consideration to the establishment a new suite of developer customer KPIs, including timeliness KPIs, for inclusion in reporting frameworks required of utilities by the relevant Ministers. The KPIs would focus on measures which are currently impeding the timely delivery of new housing and/or the delivery of affordable housing

- Ensure developers are a relevant customer under the *Energy and Water Ombudsman Act 2006* enabling the Ombudsman to take industry complaints and use existing powers to direct resolutions
- Establish new suite of developer customer KPIs, overseen by Queensland Energy and Water Ombudsman, including penalties for utility providers in instances of failure to achieve housing-related KPIs
- Ombudsman to conduct systemic issues investigation into delays and other obstacles to rapid housing delivery.

Another issue plaguing the performance of the utility sector in Queensland is the poor condition of network mapping which, were it of a higher quality, would drive housing delivery into locations of lowest cost new infrastructure provision delivering savings for both government and new homebuyers.

As noted above, network mapping is in poor shape in Queensland, and to the extent that some [mapping](#) is available, its usefulness is marred by factors such as for example, it does not always indicate the residual capacity in a pipe or wire or its impending obsolescence. These are just two of many factors which will trigger an upgrade should any more development proceed and would cancel out the advantage aimed for in this recommendation. In other cases, the map shown to public and developers alike on the utility provider's [external facing website](#) is not the same map it uses to issue approvals or confirm infrastructure contributions charges. However, improvements to utility provider network mapping systems would improve dwelling output in Queensland by making projects more feasible and faster to deliver. One model for investigation could be that operated by [Auckland](#) city in New Zealand.

Recommendation 12

Design and launch a preparatory program designed to deliver a free, accurate, and publicly available mapping product which overlays the full capacity network maps of various providers and clearly highlights where infrastructure capacity exists or could be augmented at low cost. It should also reveal where fully-funded/fully committed/fully programmed upcoming capital works projects will boost reserve capacity.

Recommendation 13

Other incentives such as local government infrastructure charges incentives schemes and fast-track approval methodologies should then be wrapped around these locations to ensure all other barriers to housing delivery are removed and new dwellings come to market swiftly. At the state level, these areas would also be an ideal target for expenditure from an expanded and permanent Residential Activation Funding.

Relatedly, but separately to the issue of the operational performance of utility providers, a range of other participants in the housing and industrial construction industry would also benefit from greater levels of transparency and performance monitoring. Currently, the Institute does not have clear visibility of the customer services performance outcomes for Developer Customers of any of the following agencies:

- SARA
- DTMR
- Titles Queensland

Case Study 6

A developer required approval of watermain replacement works, as part of the delivery of a residential subdivision. The water utility and Department of Transport and Main Roads issued the approval (after many months). However, the approval cannot be actioned, due to an encroachment into the DTMR road reserve by a neighbour's fence and vegetation. DTMR refuse to require the neighbour to relocate the fence and remove the vegetation. This issue has been ongoing for six months and while a portion of the site can proceed, the replacement watermain cannot be installed, delaying the provision of an upgraded water service for the immediate area.

The Institute strongly supports the Crisafulli government's intention to:

*... give industry and councils confidence by setting timeframes and sticking with them. Whether they are for simple approvals or complicated infrastructure agreements, industry must be able to rely on the timeframes set—and they will.*⁵

Recommendation 14

Deliver legislation to establish enforceable KPIs for the Department of Transport and Main Roads, State Assessment and Referral Agency and Titles Queensland, ensuring this framework includes accurate measurement of “stop the clock” periods (during Requests for Information or Requisitions, etc) and key post-approval timeframes.

QPC Request:

- ***Extension of Energy Queensland's Enterprise Bargaining Agreement Rates of Pay to Contractors and Subcontractors***

Members throughout Queensland report that changes to Energy Queensland's Accredited Service Provider Framework are resulting in project delays and cost escalations in the order of between \$5,500 and \$11,000 per lot in Energex territory. In Ergon territory, industry has attempted to engage with Ergon to work through percentages of time spent on the components of electrical install that would attract higher rates, noting that in northern Queensland civil contractors are doing the conduit installations, not Accredited Service Providers. The plan was to set a percentage of the day spent on items that would attract higher rates and apply it to actual hourly rates. At this point its most likely to be 56 % of the day the higher rate is paid, with the actual rate dependant on the level of worker. Very early cost estimates received by a regionally based member in late August indicate a cost per lot increase of \$2,500 + GST in an instance where no High Voltage work is required in the stage. Costs will escalate further once High Voltage works are required for future stages.

These are early figures which are anticipated to worsen in Ergon territory as the full effects of long-standing electrical contractor firms withdrawing from residential work come into play.

It should be further noted that members are very concerned that the likely future trend is that these increases in costs and loss of productivity will, in time, permeate into adjacent contracting fields like certain civil packages (pipe crews and the like) where the circumstances are that labour, plan, and work methods cross over with electrical, in the manner of the knock-on effects of BPIC arrangements.

The changes occurred across two dimensions – list of affected works and rates of pay - offering the opportunity to enact reform across both dimensions.

Contestable and non-contestable works – a complete schedule of works considered “contestable” compared to those which a “non-contestable” has not been visible to industry. At a meeting with the Institute on 18 August, Energy Queensland Limited (EQL) committed to provide this information along with a link to the relevant legislative or regulatory driver which governs whether works are considered contestable or non-contestable. Where a safety or regulatory driver is not apparent, works should be removed from the list of works captured within the Accredited Service Provider Framework.

Recommendations

Recommendation 15

Narrow the range of works from the schedule of “Core Works” captured by the Accredited Service Provider Framework.

⁵ Queensland Parliament, [Hansard](#), p. 28 Brisbane, 13 June 2024

Recommendation 16

EQL should expand internal resourcing and capacity to complete works where no private sector contractor is available due to the withdrawal of firms from this area of work.

Recommendation 17

EQL should introduce a “Customer Commitment” to ensure it completes such works as referred to in the recommendation above, at market rates.

Recommendation 18

Enterprise Bargaining Agreements – EQL’s current Enterprise Bargaining Agreement is due for re-set in July 2027, with negotiations usually commencing 12 months ahead of this date. The re-negotiation of these Agreements should include removal of works carried out by non EQL personal from the Agreement’s remit.

Recommendation 19

Remove non-EQL staff pay rates from upcoming Enterprise Bargaining Agreements in July 2027.

Recommendation 20

Ahead of these negotiations, EQL should work with the electrical contractors’ segment and the development industry to identify any opportunities for more flexible application of the Framework without compromise of safety or quality.

Summary of recommendations

New Recommendations and recommendations from the Institute's original submission (marked "O") made in this submission include:

R No.	Recommendation
3 (O)	<p>Pause the implementation of all future NCC changes in Queensland until a comprehensive review of the impact on NCC 2022, NCC 2025, and upcoming NCC changes has been undertaken. The review should cover:</p> <ul style="list-style-type: none"> its aims and objectives, its governance arrangements implementation details including approvals, certification, compliance and enforcement, and local government rules that relate directly to the construction of dwellings, such as those related to the design of houses <p>quantification of 1.) the increase to house prices caused by the changes and 2.) the quantum of forecast dwelling supply lost to reduced housing yield.</p>
4 (O)	Commission a broad ranging review of the implementation of NCC 2022 to examine the impact of these reforms on the cost of new housing and the impact on the delivery of more affordable housing options e.g. small lots.
7 (O)	Adopt a more flexible approach to the urban footprint, allowing market-led proposals for the development of land which is located outside the footprint boundary.
8 (O)	Design and implement a centralised process whereby all amendments being proposed by any department are assessed by the State Planner for its impact on housing supply. It is essential the methodology for this assessment incorporates a feasibility lens that identifies where requirements for buffers have made the residual parcel of land so small as to be unfeasible for development and therefore the full yield of the block will need removal from land supply estimates, rather than simply the yield in the buffer zones.
9 (O)	Amend the template for the Impact Analysis Statement and the full Impact Assessment to ensure that the above advice from the State Planner regarding the impact of a proposed regulatory change on housing supply is included in the information provided to decision-makers.
10 (O)	Design and implement an overarching regulatory change monitoring and management tool in the style of the Regulatory Grid operating in the United Kingdom.
11 (O)	Improve processes and resourcing to ensure implementation of Regional Planning goals through the rejection of planning scheme amendments that counteract the Queensland Government's housing output targets.
12 (O)	<p>Streamline the process for making and amending a planning scheme, amending the Minister's Rules and Guidelines:</p> <ul style="list-style-type: none"> Tailored amendment process to include more delegations to local government chief executive Expedite Priority Action 1 – Streamlined <i>ShapingSEQ 2023</i> alignment planning scheme amendments <ul style="list-style-type: none"> The Queensland Government will facilitate streamlined (3, 6 and 12-month) planning scheme amendment processes for local governments to undertake where policy requires recalibration with the outcomes sought by <i>ShapingSEQ 2023</i>. The streamlined processes will be available to local governments where proposed planning scheme amendments align with and advance the outcomes and strategies of the <i>ShapingSEQ 2023</i> Grow theme.
13 (O)	Refocus the efforts of Economic Development Queensland (EDQ) in the facilitation of housing outputs and on becoming an exemplar for approval timeframes.
14 (O)	Amend the <i>Planning Act 2016</i> and Planning Regulation 2017 to enable a self certification system to be established for Operational Works.

15 (O)	Deliver legislation to establish enforceable KPIs for the Department of Transport and Main Roads, State Assessment and Referral Agency and Titles Queensland, ensuring this framework includes accurate measurement of “stop the clock” periods (during Requests for Information or Requisitions, etc) and key post-approval timeframes.
16 (O)	Ongoing improvement of the LSDM program should address: <ul style="list-style-type: none"> ▪ Ongoing engagement with the industry regarding mapping, capacity, dwelling yield, fragmented ownership of land, underutilised urban footprint, and methodology ▪ Reporting of detached and attached dwelling potential in the dwelling yield figures and identification of the actual detached dwelling yield possible in local government areas’ (LGA) present Priority Infrastructure Areas (PIA) ▪ Articulation of the effects of planning scheme changes on the planned dwelling supply.
18 (O)	Local Governments should issue a Guideline which outlines what can be deemed as GIA and allow for self-assessment by planners and certifiers.
19 (O)	Local Government should invest in process improvement project and adequate resourcing to ensure critical steps in the development process such as plan sealing does not unduly delay finalisation of housing outputs.
20 (O)	Ensure the <i>Property Law Act 2023</i> changes regarding easements come into effect on 1 August 2025, namely Division 2 Easements and rights of use, section 180 Power of court to impose statutory right of use and section 181 Power of court to modify or extinguish easement or covenant. The Local Government Department should provide a simple policy for use by local government on relevant easement powers – state, utility, local government, and land owner and when they should be exercised.
21 (O)	Streamline processes and set KPIs for the Queensland Government to approve local government planning scheme amendments faster, while preserving a rigorous community consultation process.
22 (O)	Establish a Timeframe KPI for Queensland Government decision-making on proposed planning scheme amendments and report annually on achievement against the performance framework.
23 (O)	The Institute strongly supports, the now Premier’s proposed response: <i>The LNP in government would combine shareholder directions to government owned utility providers and legislation to institute the enforceable KPIs needed to address these issues.</i>
24 (O)	In doing so, give consideration to the establishment a new suite of developer customer KPIs, including timeliness KPIs, for inclusion in reporting frameworks required of utilities by the relevant Ministers. The KPIs would focus on measures which are currently impeding the timely delivery of new housing and/or the delivery of affordable housing <ul style="list-style-type: none"> ▪ Ensure developers are a relevant customer under the <i>Energy and Water Ombudsman Act 2006</i> enabling the Ombudsman to take industry complaints and use existing powers to direct resolutions ▪ Establish new suite of developer customer KPIs, overseen by the Energy and Water Ombudsman Queensland, including penalties for utility providers in instances of failure to achieve housing-related KPIs ▪ Ombudsman to conduct systemic issues investigation into delays and other obstacles to rapid housing delivery.
25 (O)	Design and launch a preparatory program designed to deliver a free, accurate and publicly available mapping product which overlays the full capacity network maps of various providers and clearly highlights where infrastructure capacity exists or could be augmented at low cost. It should also reveal where fully-funded / fully committed / fully programmed upcoming capital works projects will boost reserve capacity.

26 (O)	Other incentives such as local government infrastructure charges incentives schemes and fast-track approval methodologies should then be wrapped around these locations to ensure all other barriers to housing delivery are removed and new dwellings come to market swiftly. At the state level, these areas would also be an ideal target for expenditure from an expanded and permanent Residential Activation Funding.
27 (O)	Deliver budgetary funding to resource the appointment of an additional Registrar to the Queensland Planning and Environment Court to speed up the process of delivering housing outputs.
28 (O)	Increase the benchmark or bar for an appeal to require the submitter to demonstrate that they have financial capacity to support the appeal through to the preparation of expert reports.
29 (O)	Issue shareholder instructions to Titles Queensland to work with industry to improve, monitor and publish results of a performance framework including visibility across “stop the clock” requisitions periods.
33 (O)	Amend <i>Planning Act 2016</i> , Ministers Guidelines and Rules, <i>South-East Queensland Water (Distribution and Retail Restructuring) Act 2009</i> , relevant regulations and guidance material to align: <ul style="list-style-type: none"> ▪ planning horizons ▪ the timing of reviews ▪ the relationship between various planning and infrastructure planning and budget documents assumptions and methodology for flood mapping and assessment.
35 (O)	Review to ensure the adequacy of the monitoring and management system supporting the delivery of the Queensland Government’s construction program and ensure the process includes an assessment of industry’s residual capacity to build houses, in the model of New Zealand’s Construction workforce projections tool https://tewaihanga.govt.nz/the-pipeline/understanding-market-capacity .
36 (O)	Complete Regional and Infrastructure Planning and consolidate into a statewide ten year plan.
37 (O)	Re- prioritise and sequence government infrastructure spending to deliver infrastructure projects which will support the delivery of housing outputs.
38 (O)	Make the Residential Activation Fund permanent and expand its funding allocation to \$1 billion per year.
40 (O)	Consider changes to the Queensland Procurement Policy with the aim of ignoring “buy local” requirements where the local sector is already fully utilised/exhausted.
44 (O)	Given the impact of BPIC is already at work in Enterprise Bargaining Agreements (EBA), introduce reasonable flexibility in the day-to-day implementation of EBA conditions, particularly in regard to Rostered Days Off (RDOs), working hours, and the support of innovation as outlined below.
45 (O)	Launch a business attraction program run by Queensland Treasury to attract new Head Contractors to set up permanent operations in Queensland.
1	It is recommended that the State Government review of assessment timeframes with a view to substantially reducing the total time taken to determine both code and impact assessable applications. The review should include identification of successful measures and recommendations as to how their replication across high growth councils.
2	Create more consistency in the structure, format and content of local planning schemes by developing models for the standardisation of Planning Schemes.
3	Assess options for the re-introduction and elaboration of the Queensland Planning Provisions framework, or alternatively consider the adoption of a model similar to <i>PlanSA</i> .
4	Regional Plans should articulate specific housing targets (including by typology) in collaboration with local government and industry (so as to ensure feasibility a lens).

5	Local planning schemes (critically including the Local Government Infrastructure Plans) need to be amended to ensure the target is monitored and achieved within in a timely delivery horizon, using an expedited process where necessary.
6	Requirements should be established be to ensure relevant utility provider plans such as NetServ plans are updated highly timely fashion within in the same planning phase.
7	Should a review of the infrastructure charges regime be necessary, the views of prospective new homebuyers in Queensland must be sought and considered in any assessment of viable source of additional infrastructure funding.
8	Rescind the mandatory application of NCC 2022 to all relevant dwelling types making these initiatives voluntary.
9	(As per NSW Productivity and Equality Commission Report) Pause further building reforms that add to construction cost, unless they can demonstrate an overriding public interest such as addressing building defects or risks to public safety.
10	The Institute strongly supports the now Premier's proposed response: The LNP in government would combine shareholder directions to government owned utility providers and legislation to institute the enforceable KPIs needed to address these issues.
11	<p>In doing so, give consideration to the establishment a new suite of developer customer KPIs, including timeliness KPIs, for inclusion in reporting frameworks required of utilities by the relevant Ministers. The KPIs would focus on measures which are currently impeding the timely delivery of new housing and/or the delivery of affordable housing</p> <ul style="list-style-type: none"> • Ensure developers are a relevant customer under the <i>Energy and Water Ombudsman Act 2006</i> enabling the Ombudsman to take industry complaints and use existing powers to direct resolutions • Establish new suite of developer customer KPIs, overseen by Queensland Energy and Water Ombudsman, including penalties for utility providers in instances of failure to achieve housing-related KPIs <p>Ombudsman to conduct systemic issues investigation into delays and other obstacles to rapid housing delivery.</p>
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19	Remove non-EQL staff pay rates from upcoming Enterprise Bargaining Agreements in July 2027.
20	Ahead of these negotiations, EQL should work with the electrical contractors' segment and the development industry to identify any opportunities for more flexible application of the Framework without compromise of safety or quality.

Conclusion

Productivity in the construction industry is a critical factor in the current housing crisis and must be addressed. However, at least three other factors outside the scope of the Terms of Reference for this Inquiry should be noted as also requiring resolution to meaningfully resolve the housing crisis:

- Construction costs need to come down, noting labour is the biggest cost
- Potential new homebuyers across all occupations will need to see sustained wages growth to be able to afford a new home
- Significantly more land needs to be made available for residential and industrial development, particularly in areas of high feasibility.

As evidenced by many parties, productivity in the Queensland residential and industrial construction industry is poor and declining. Further, it is a key factor propelling the housing crisis, particularly in recent years since COVID-19. The factors which have driven this outcome are many, multi-layered, and often exert a multiplier effect on each other, with the result of producing cascading failures in the housing and construction process which simply cannot be overcome at the project level. Taken together, as they must be, these factors are causing the system to grind to a halt.

It follows then, that just as the causes to the current crisis have been multiple, the solutions – and they are available – must be similarly multi-faceted. At the highest level the solution to this issue is at least three-fold:

- slow the pace of regulatory change until the construction industry catches up
- reverse the regulatory trend of making market housing a “policy cash-cow” whereby its delivery by the private sector has become conditional on the delivery of other societal or government goals (for example industrial relations outcomes, public housing delivery, housing related infrastructure) and
- allocate to a central agency core responsibility for managing the residential and industrial construction process as a system until a satisfactory productivity improvement is achieved

Ongoing engagement and a collaborative “pro-housing” mindset shared by all parties to construction productivity is another essential ingredient, and one to which Institute members are ready to lend the highest support.

Options for standardisation of planning instruments:

- **Victorian ResCode, Townhouse and Low-Rise Code (one to three storeys) (clause 55) and 4 Storey Apartments Standards (clause 57)**
Residential development in Victoria is controlled by residential development provisions which are included in clauses of all planning schemes and building regulations. A deemed to comply assessment applies if a development meets all of the applicable objectives contained in the relevant clause.⁶
- **NSW Housing Pattern Book**
A selected collection of architects designed infill designs are provided and if used offer a faster-tracked planning pathway in areas where low- and mid-rise housing types are already permitted with consent. Design changes require an architect engagement. Approval may be possible in 10 days. LGAs are encouraged to take up the initiative.⁷
- **NSW complying development certificate system for subdivisions**
As understood, this an outsourced certification process for approved development. If the LGA allows engineering details are completed by a registered engineering consultancy. Building regulation and certification provisions in the updated Environmental Planning and Assessment Act 1979 (EP&A Act) underpin the design, construction and safety of buildings in NSW.⁸ Certification is available for subdivision works, separating subdivision from construction works. Eg East Leppington 'Willowdale Precinct' by Stockland.⁹
- **PlanSA amendment of planning schemes**
In addition to LGAs the State Planning Commission and minister can amend planning schemes relevant to LGAs or parts. This enables key policy to be updated at once (rather than the many years long process in Qld) or introduce new features to keep planning schemes consistent and up to date. The system also allows for three developer led scheme code amendment complexity streams – simple, moderate, and complex subject to agreement and cost recovery fees.¹⁰
- **Western Australia, "R-Codes" (Residential Design Codes), which are a set of planning and design guidelines used for residential development.**
The R-Code number (e.g., R20, R40, R60) indicates the density of development allowed. Local governments are responsible for administering and applying the R-Codes in their respective areas. The codes are updated by the state government with the latest version 2024. LGs can vary the code for specific areas if warranted due to a specific need.¹¹

⁶ <https://www.planning.vic.gov.au/guides-and-resources/guides/all-guides/residential-development>

⁷ <https://www.planning.nsw.gov.au/government-architect-nsw/housing-design/nsw-housing-pattern-book>

⁸ <https://www.planning.nsw.gov.au/policy-and-legislation/environmental-planning-and-assessment-act-1979/building-and-subdivision>

⁹ <https://subdivisioncertifiers.com.au/project/east-leppington-willowdale-precinct/>

¹⁰ https://plan.sa.gov.au/__data/assets/pdf_file/0017/1420262/Guide-Planning-and-Design-Code-Amendments.pdf

¹¹ <https://www.wa.gov.au/system/files/2024-07/r-codes-volume-1-2024-mar2024.pdf>