

Comment – Brisbane Residents United & Spring Hill Community Group

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BRU has reviewed the QPC's interim report against the background of the numerous submissions prepared by BRU in regard to key planning issues in SEQ during the past few years. We have tracked the issues identified by QPC as being materially consistent with our work in identifying gaps in the current approaches to deliver shelter and infrastructure for Brisbane and SEQ. We have also identified a number of important issues in addition to those already identified by QPC.

The FIRST PART of this report identifies the diagnosis set out in QPC's interim report. We have added a small number issues we believe are apposite to a complete approach to enhancing productivity..

The SECOND PART of this report tracks issues identified from an audit of our submissions and reports [over the last few years] on issues that we have identified that we have then listed under the current 'headings' used by QPC to frame its assessment. To some degree we are simply reiterating the value, benefit and justification for the matters being put forward by QPC.

The THIRD PART of this report summarises the list of actions that would ensure increased efficiency and effectiveness for the planning and construction system in Queensland.

Towards An Efficient & Effective Planning and Construction System for Queensland

Submission to the Queensland Productivity Commission

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Introduction

The Queensland Productivity Commission (QPC) has identified four key areas for preliminary reform directions in its interim report on opportunities to improve productivity in the construction industry:

- **improving government procurement policies,**
- **improving land use regulations including approvals,**
- **improving the regulation of building activity,** and
- **improving labour market operation.**

The Interim Report by the Queensland Productivity Commission (QPC) highlights **significant challenges facing Queensland's construction industry**, including

1. rising demand,
2. a tight labour market,
3. supply chain issues, and
4. declining productivity, particularly since 2018.

QPC's primary objective is to identify ways to increase productivity to meet the needs of a growing population, increase housing supply, and improve housing affordability. Stakeholder submissions generally align with these concerns, emphasising the need for systemic reforms rather than minor adjustments.

QPC has identified a number of key issues relating to the current production of homes, drawing on the interim report and stakeholder submissions, with a particular focus on zoning, densities, approval processes, and planning provisions.

For our part BRU has reviewed the QPC's interim report against the background of the numerous submissions prepared by BRU in regard to key planning issues in SEQ during the past few years. We have tracked the issues identified by QPC as being materially consistent with our work in identifying gaps in the current approaches to deliver shelter and infrastructure for Brisbane and SEQ. We have also identified a number of important issues in addition to those already identified by QPC.

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PART ONE

This provides a consolidated 'diagnosis' of what's not working efficiently or effectively in the planning and construction system. Sections one [1] to three [3] are based on QPC's Interim Report. Section four [4] is based on BRU's working experience within Brisbane and South East Queensland.

Key Issues Affecting Home Production

1. Zoning and Densities

Restrictive and Inconsistent Zoning:

- The QPC's interim report notes that land use regulation, particularly planning regulation, unnecessarily constrains construction productivity. Many stakeholders, including community group 'Greater Brisbane', highlight that **council policies on height limits, lot minimums, and character protections severely limit developable land**, especially in desirable inner-city areas. For instance, nearly 13% of Brisbane's residential zoned land, particularly in highly desirable neighbourhoods within 5 kilometres of the CBD, is subject to character restrictions. These restrictions, combined with measures like Brisbane City Council's 2017 "townhouse ban," actively limit housing diversity and suppress multi-family housing construction, even in areas designated for increased density.

Lack of Density in Well-Located Areas:

- The report identifies that across Queensland, many locations close to jobs, amenities, and existing infrastructure have restrictive zoning. Approximately 69% of the land surrounding high-capacity rail networks in South East Queensland (SEQ) is zoned for low-density or has character overlays, making most development untenable. Community group 'Greater Brisbane' reinforces this, pointing out the "patchwork" of neighbourhood plans, priority development areas, and zones that lead to "islands of exclusivity" and restrict inner-city development without clear social benefit.

Economic Impact of Restrictions:

- Restrictive zoning contributes to **higher development and housing costs**, making many projects, especially affordable housing, untenable. Research cited by community group 'Greater Brisbane' indicates that preservationist planning increases building costs due to lower housing productivity. The QPC's modelling suggests that targeted zoning reforms to increase density in well-located areas could deliver up to 330,000 additional dwellings, reduce dwelling price growth by as much as 64%, and yield net benefits up to \$48 billion. Such reforms are crucial to align with the Queensland Government's target of one million new homes by 2044.

Local Government Incentives:

- The QPC highlights that local governments generally lack strong incentives to increase development opportunities, particularly density, because the costs are concentrated locally (impacts on residents, networks) while benefits (improved affordability, reduced infrastructure costs) are dispersed. We would suggest that Brisbane LGA is a clear outlier on this issue. Because of the enormous size of BCC LGA, the city has chosen a strategy of focusing all of its recent housing infill efforts into HIGH DENSITY. The existing plans make no mention of any other approach and have chosen to concentrate housing infill into 1% of the LGA. There are enormous potential advantages to this strategy but it is proving to be a comprehensive failure for Brisbane's housing problems. It is not

coincidental that Brisbane has the second highest house prices and highest building costs across Australia. This unfortunate outcome is the most accurate assessment of Brisbane's current strategy and leads to the reason that whilst 'market decisions' cannot be adjudicated by government it is critical for achieving housing and construction efficiency and effectiveness there needs to be decisive action on policy levers to moderate the variable but critical impact of the 'market'. This is picked up more fully in the PART THREE of this report.

Evidence from Other Jurisdictions:

- The QPC points to **New Zealand's successful experience with upzoning reforms** in Auckland, which led to significant increases in housing supply, improved affordability, and accelerated construction productivity. QPC also notes that Community group 'Greater Brisbane' advocates for similar "broad-based upzoning" in Australia, including a "National Townhouse Accord" to set a code-assessable framework for townhouse development and remove local planning restrictions.
- We offer a note of caution regarding Auckland's results. The material presented by Murray would suggest a less optimistic perspective to the simple action of 'upzoning'. This will be covered further in PART THREE of this report.

2. Approval Processes

- **Excessive Delays and Uncertainty:** The QPC states that approval processes create significant delays and uncertainty, leading to **idling of labour and capital, and higher financing and holding costs**. Major housing developments can take ten or more years for approval, with delays continuing for construction certificates and utility connections. This is particularly acute for multi-dwelling developments, with townhouses in Brisbane reportedly requiring over 30 council approvals.
- **Inconsistent Application and Lack of Accountability:** Stakeholders noted inconsistent application of technical requirements and regulatory processes across local government areas, leading to confusion and costly inefficiencies. The QPC highlights a **lack of publicly available data on local government performance**, which reduces accountability and weakens incentives for improvement.
- **Problematic Pathways for "Significant Developments":** The existing State Facilitated Development pathway for residential projects, which requires an affordable housing component, has seen limited uptake (only 11 projects in 12 months) due to its impact on development feasibility. The QPC suggests any new alternative pathway for significant developments should not include unnecessary conditions like mandatory affordable housing, as evidence suggests this can reduce supply.

3. Planning Provisions

- **Regulatory Overlap and Duplication:** The interim report underscores that the construction industry is weighed down by **excessive regulation that is confusing, duplicative, and unnecessarily prescriptive**. There are significant inconsistencies between the *Building Act 1975* and the *Planning Act 2016*, and between local governments in interpreting and applying legislation. This confusion leads to costly defects, undermines building design, and increases development costs. [We would suggest that the inconsistencies in the treatment of environmental issues [especially at the LGA level] warrants specific action as well as the Building Act and Planning Act issues.

- **Questionable Local Requirements:** Local planning schemes often introduce additional requirements inconsistent with state or national standards, with questionable benefits. The Queensland Law Society (QLS) notes the "overly complex and cumbersome" regulatory regime for dwelling houses and secondary dwellings, which varies between suburbs and regions.
- **Impact on Innovation and Scale:** The fragmented and inconsistent regulatory environment creates delays, increases costs, and undermines innovation, preventing innovative solutions like modular and offsite construction techniques from being widely adopted. This also restricts scale, making it difficult for firms to grow and achieve economies of scale, as highlighted by CEDA and community group 'Greater Brisbane'. BRU reiterates that small scale development opportunities are also being completely sidelined by housing plans that focus only on High Density High Rise development. Brisbane City Council has almost destroyed small scale development as evidenced by its very slow and yet actioned recognition that its approach to Small and Medium Density Zoning has been failing small scale developers as well as home seekers.

4. BRU's Additional Key Points

1. **Increased coordination** between planning authorities and utilities agencies [power and water] is reported as a significant and regular impediment to approvals and occupancy
2. **More forward planning for infrastructure** is required to ensure that significant social [education], environmental [biodiversity] and operational infrastructure[utilities and transport] are available to coincide with development and construction of new facilities [both as infill and in greenfield settings]
3. **Significant integration of updated environmental information** [at the three critical levels - national, state and local matters of environmental significance] is needed to ensure that assessment can be completed in a timely and appropriate manner to facilitate sustainable development. There is an urgent need for standardisation of environmental requirements - especially at the local level.
4. **The market and market conditions play a significant role** in the extent to which development and construction occur at any point in time. This is to say that efficient simplified and coordinated planning cannot 'compel' development to occur. The provision of developed properties to suit community needs involves market critical assessments and for this reason there must be multiple viable pathways always open for development. Diversity of pathways provides diversity of products and reduces the risk for communities, given that there is no way of insulating development from market cycles if the major proportion of supply is to be provided by the private sector.
5. This last point reiterates the need for **consistent access for all parties to be able to understand the outcomes being achieved in different markets [LGAs]**. This means a significant investment in very regular information updates on supply and demand [actuals and projections compared to 'forecasts']. The failure of Brisbane City Council and the SEQ Regional Plan to deliver consistent relevant information is adding 'salt' to the failure of housing strategies to deliver diverse supply into a hungry needful community. The infill expectation in the regional plan is 70% infill and 30% greenfield. We anticipate that BCC's failure to implement a diverse housing strategy is causing significant greenfields developments that are being badly impacted by lack of infrastructure. BCC refuses to provide transparency on housing outcomes.
6. The final point is that it is considered critical for ameliorating housing stress is that there be continued **regular and significant investment by the State and the Commonwealth to be building social housing** at a material rate over the long run.

Summary

In summary, improving home production in Queensland hinges on addressing the systemic issues of

- **overly restrictive and inconsistent zoning that limits density in well-located areas**
- **streamlining cumbersome and opaque approval processes, and**
- **harmonising fragmented and duplicative planning and building regulations**
- **regular comprehensive reporting of performance** at the same time as
- **ensuring a diverse housing options and delivery methods** are in play, underpinned by
- **long term engagement in the planning and construction of social housing by governments**

It is apparent from the recent QPC roundtable that community groups [including BRU and SHCG] along with QPC and numerous industry stakeholders concur that significant, coordinated reforms [legislation, policy and operations] are essential to restore productivity and meet Queensland's urgent housing needs.

PART TWO

This section is built on the ingredients of

Several years of advocacy for improvements in the planning and construction system

QPC's interim report

QPC's roundtable

The QPC organised the 'roundtable' to bring together informed participants to discuss the direction and detail of the issues in QPC's interim report. From BRU's perspective, the direction and intent of QPC's thinking is well founded. I say this because there are signs of strong compatibility between three perspectives about enhancing State productivity around development and construction. These three dimensions are

- The lines of action proposed in QPCs interim report
- The needs of industry for clearer pathways to approval
- The concerns of community groups that what is 'happening' [in development and construction] is not consistent with the 'plans' [putatively] in place at the local and regional level.

There is a shared and strong desire to align

- the machinery of planning design and construction
- The inter operability of local state and commonwealth planning mechanisms [both legislative and operational]
- The intersections between economic, social and environmental dimensions of planning and construction

In this context **BRU has undertaken an audit of the work undertaken by two community groups [BRU and SHCG] over the last 5 years and identified a range of particular recurring issues. We have organised these findings under the headings in the QPCs interim report.** We have done this to illustrate that the specific areas that these communities have been advocating for over this time are generally consistent with the direction being laid out by QPC.

Drawing on the submissions from Brisbane Residents United (BRU) and Spring Hill Community Group (SHCG), we have prepared a series of dot points that highlight the most critical issues under the headings

employed by QPC in its interim report. **The information source for this analysis has been garnered from a multiplicity of reports prepared by BRU and SHCG** and these are set out at **Attachment One** of this report

Because of the location [and interests] of BRU and SHCG there is a particular emphasis on Brisbane City Council's (BCC) housing plans and the Queensland Government's SEQ regional planning. We believe many of these issues are relevant to broader geographical settings across the State and it is also important to bear in mind that the **Queensland Government is anticipating that Brisbane Local Government Area will comprise more than 50% of Queensland's total population before the end of this decade.**

Alignment of BRU and SHCG Issues with QPC Headings

Attachment One is a series of links to submissions and reports prepared by BRU and SHCG over the past few years.

1. Improving Government Procurement Policies

This category addresses how the Queensland Government selects, tenders for, and contracts projects, and its influence on the broader construction sector.

The long list below provides examples identified by BRU and SHCG which support the issues identified in QPC's interim report. Our work has not covered all of the areas identified by QPC and we have 'faded out' these areas. They are still included because our community groups do support the direction of these QPC findings.

- **Lack of Transparency and Robust Project Selection:**

- *The Queensland Government and Brisbane City Council's project selection lacks transparency, with large projects often announced or approved without robust business cases or despite failing cost-benefit analyses. Benefits are frequently overstated, and costs understated.*
- *Specific examples: The **Cross River Rail project** faced "material concerns" regarding its business case, with estimated benefits "significantly overstated". Upgrades to stations like Lindum, Bundamba, and Banyo occurred despite their locations in low-density or flood-prone areas. Poor project selection was a primary cause of cost overruns and delays in the **Queensland Health's Capacity Expansion Program (CEP)**.*
- *Specific example: The [Kangaroo Point Green Bridge](#) that did not countenance non asset based solutions, purported to be 'green' without any evident credentials, and experienced a cost blow out from \$190m to \$290m. There is also no evidence of any significant project evaluation process in place given that, thus far, the 'Green' bridge does not appear to have had any material impact on road traffic into the city and the BCC has been particularly reluctant to provide the needed traffic data to enable such analysis.*

- **Poor Project Sequencing and Market Capacity Issues:**

- *There is no clear agency or governance committee responsible for overseeing and coordinating the Queensland Government's capital program to ensure it aligns with market capacity. This can lead to the government's demand "overheating the market".*
- *Specific example: Health Infrastructure Queensland proceeded with the simultaneous procurement of 15 CEP projects despite market soundings identifying significant capacity constraints, leading to skills shortages and project bottlenecks.*

- *Specific example: BRU has noted in its feedback to the Queensland Government in relation to the [Woolloongabba PDA](#) that there appears to be lack of regime management across Brisbane given the concurrence of State PDAs, Cross River Rail Projects, Olympic Projects, Private Development Projects - all competing with a relatively small number of builders capable of carrying out the required 'high density' level of work.*
- **Complexity and Multiple Objectives in Procurement Policies:**
 - We agree the Queensland Government Procurement System is overly complex, with discretionary decision-making mechanisms (such as the Prequalification System, Ethical Supplier Mandate, and Local Benefits Test). Procurement policies often include conditions unrelated to value for money, increasing costs. Local procurement policies can disadvantage interstate resources and add costs for unclear benefits.
- **Outdated and Cumbersome Contracting Arrangements:**
 - Contracting arrangements are criticised for being excessively long, costly, and complex, acting as barriers to innovation. Rigid specifications, focusing on means and methods rather than desired outputs, stifle innovation and increase costs. There is a growing trend to heavily modify standard contracts or draft bespoke ones, leading to inefficiencies and disputes.
- **Impact on Small and Medium Enterprises (SMEs):**
 - We agree that practices like "bid shopping" (where a head contractor reveals one subcontractor's bid to another) systematically disadvantage SMEs. Project bundling can also disproportionately impact SMEs by reducing their ability to tender for work. The BCC's singular High Density strategy has effectively 'frozen out' many SMEs from the opportunity to gain both development and construction work in Brisbane.
- **Brisbane 2032 Olympic Games Related Issues:**
 - BRU has made submissions concerning the **governance and oversight of infrastructure decisions** for the Brisbane 2032 Games, including correspondence with the Chairman of GIICA, feedback on Olympic legislation, and analysis of venue reviews. These submissions highlight concerns about project selection, sequencing, and the planning framework for such large-scale public initiatives.
 - Site selection decisions have been made that render the venue inconsistent with [a] the contract terms with the IOC and [b] the binding original bid. Both these matters are inconsistent with the State Purchasing Policy.
 - Failure to hold true to the original bid and make use of existing facilities has further reduced the efficiency of making the most of what we already have.
- **SEQ City Deal Information and Action Request:**
 - SHCG's request for information and action regarding the **SEQ City Deal** points to issues within significant multi-government procurement and funding for urban and infrastructure development, which falls under the purview of the SEQ Council of Mayors. But there has been no evidence of the promised improved governance arrangements set out in the Shaping SEQ regional plan.
- **Unclear Project Definition and Multiple Reporting Repositories:**
 - The ShapingSEQ Update lacks a clear definition of what constitutes a project. There is a potential for at least four separate and different repositories for reporting (Infrastructure plan, SEQ Regional Plan, SEQ City Deal, and State Departments). This fragmentation leads to inconsistent formats and a lack of aligned budgets for initiatives.

2. Improving Land Use Regulations, Including Approvals

This area focuses on how land use planning impacts development, amenity, and infrastructure coordination, particularly concerning housing supply and affordability.

- **Inconsistencies in Planning and Building Regulation:**
 - *There are significant inconsistencies between the Planning Act 2016 and the Building Act 1975, and in how local governments interpret and apply legislation. This results in confusion, unnecessary complexity, increased costs, and reworks. Different standards across local government areas, [such as Brisbane City Council's approach to gravel in pavement construction], create unnecessary costs. BRU has regularly seen individual home owners overwhelmed by the 'nit picking' approach by BCC that requires excessive investment in consultants to respond to what appear to be almost inconsequential requirements.*
- **Restrictive Zoning Regulations and Limited Land Supply:**
 - *The long understood failure of the Low to Medium Density Zoning in Brisbane, the restrictive nature of residential zoning and the City Council's 2017 "townhouse ban" significantly impacted innovative mid-sized firms. BCC's Sustainable Growth Strategy (SGS) is criticised for prioritising "major upzoning projects in inner Brisbane" that inevitably increase affordability issues.*
 - *BCC's Sustainable Growth Strategy proposes excessive hyper-upzoning **flood-prone property at Kurilpa**, despite the existing oversupply of inner-city development sites and the inevitable delay such excessive upzoning will cause to the actual delivery of housing on these sites. This highlights the narrow focus and limited accountability that applies to BCC's shunning of the housing expectations set out in ShapingSEQ 2023.*
- **"Over"-Upzoning Leading to Delayed and Unaffordable Development:**
 - *BCC has demonstrated that if upzoning occurs too far in advance of actual demand, the increased land value becomes embedded in the cost of new homes, making them unaffordable. This leads to approved developments sitting idle for years. Brisbane has "hundreds of storeys of building which have had the development approved but the developers keep being granted extensions to delay development".*
 - *The Queensland government's excessive hyper- upzoning of the Woolloongabba PDA suffers from the same problem - it will increase the end price of housing and slow down delivery.*
- **Backlog and Extensions of Development Approvals:**
 - *Regulations alone cannot solve 'market' created circumstances. However, because BCC has limited its housing strategy to High Density only, it has now meant that there is very little likelihood that BCC will achieve either its housing numbers or housing diversity targets. And at this stage BCC has avoided any reporting of its housing performance given its comprehensive failure to apply an approach consistent with the Shaping SEQ Regional Plan..*
- **Convolutd and Slow Approval Processes:**
 - *Developers argue that the convoluted approval processes make it impossible to construct affordable housing. Townhouse developments in Brisbane reportedly require over 30 approvals from various bodies, making them far more complex and time-consuming than detached houses. The system is plagued by a lack of accountability, confusing processes, and uncertainties that lead to delays and re-worked designs.*
- **Lack of Publicly Available Data and Accountability on Local Government Performance:**

- *There is a lack of publicly available data to formally assess the efficiency of approval processes, which reduces accountability and incentives for improvement. Simple queries to councils can take up to a month for a response. A significant proportion of planning appeals by developers against council refusals are successful (56%), indicating inconsistencies in council approval processes.*
- **Inadequate Infrastructure Charges Regime:**
 - *BCC has reduced infrastructure charges and as well, concerns exist regarding the timing of infrastructure charges and whether contributions during development are credited against future charges, impacting project viability. The QPC recommends an independent review to ensure efficient charges.*
- **Inconsistent Environmental Overlays:**
 - *Discrepancies exist in how state and local government environmental overlays (e.g., for flooding, bushfire risk) are applied. BRU's submission on Koalas in SEQ highlights environmental concerns impacting land use, and a submission on the Performance Framework for Biodiversity Conservation Strategy in Queensland also points to issues with environmental regulation. There must be a major effort made to synchronise the application of MNES, MSES and MLES across all Councils and for State Environment to establish the basis for regular updating of mapping that is applicable across each region [incl. SEQ].*
- **Lack of "Gentle Density" Implementation:**
 - *BCC's Housing Supply Action Plan (HSAP) makes no reference to "gentle density", and the Council is not supporting "3 x storey walk-ups". BCC's move to review Low to Medium Density is appropriate - there is much doubt at present as to whether it will adopt a position that will be sufficiently forward looking to meet the regional plan's expectations for numbers and diversity of infill. BRU actively advocates for gentle density across the city. The SEQ Final Plan explicitly identifies "gentle density as a foundational policy" requiring local governments to remove barriers. So far BCC has made no discernible move to respond to these requirements of the SEQ Regional Plan.*
- **Housing Affordability Exacerbated by Planning:**
 - *The BCC's SGS, by focusing on larger-scale developments, is predicted to cause more affordability problems, making it difficult for ordinary families on good incomes to afford housing in Brisbane. BRU highlights "high levels of housing stress" as an indicator of systemic failure.*
- **Lack of Explicit Information/Methodology for Housing Supply Statements:**
 - *A critical issue is the absence of explicit information and methodology for LGA housing supply statements, strategies, and implementation plans in the final update of the Shaping SEQ regional plan.*
- **Failure to Connect Population, Income, Viability, and Timing:**
 - *Development extensions are granted without requirements to align projects with housing demand profiles and specific timeframes, indicating a fundamental disconnect in planning. This delays projects and provides owners with an incentive to keep delaying their construction.*
- **Lack of "Robust Evidence Base" for Community:**
 - *There is no evidence provided to the community for the "robust evidence base" claimed by the SEQ Regional Plan, hindering the development of a reliable forecasting system for housing needs. BRU considers withholding this information "inappropriate from a planning perspective and unethical".*
- **Misleading Use of "Sustainable":**

- *Terms like "sustainability" and "sustainable development" are used in plans without clear explanation or adherence to national/state commitments, leading to a request for these terms to be removed if not genuinely reflected.*
- **BCC as a "Third Party" Advocate for Development Industry:**
 - *BCC is seen as a "prosthetic to the business/development industry," favouring regional and national developers over local capacities and genuine place-oriented creativity.*
- **Lack of Green Infrastructure and Parks:**
 - *BRU identifies a lack of green infrastructure plans for each suburb and a need to add new parks as densification occurs. This will inevitably lead to a deterioration of the amenity of inner city areas and this will inevitably lead to further failures of the BCC to comply with the Regional Plan.*
- **New Environmental Laws (NEL):**
 - *BRU's submission on NEL highlights environmental regulations affecting land use and approvals, which the QPC notes as needing greater consistency. The failure of BCC's housing strategy is causing more unjustified greenfields development in SEQ.*
- **Economic Development Queensland (EDQ) Legislation:**
 - *BRU's submission on new EDQ Legislation is relevant to QPC's recommendation for EDQ to remove unnecessary or duplicative requirements from plans in priority development areas.*
- **National Urban Policy:**
 - *BRU's submission on the Draft National Urban Policy addresses broader urban planning strategies that influence land use regulation. The integration of environmental planning requirements with regional planning would reduce excessive urban sprawl - which was one of the primary justifications for introducing regional planning in the first place.*

5. Other Matters

This category includes additional issues raised by BRU and SHCG.

- **Utility Connections:**
 - *Securing utility connections is a "key pain point" that hinders the timely delivery of residential and commercial projects, leading to significant unplanned costs. Issues include inconsistent application and interpretation of standards by utility providers (e.g., Energy Queensland). There is poor coordination and delays between utility providers, developers, and local governments.*
 - *Specific example: Energy Queensland has "significantly expanded the locations that a chamber pad-mounted transformer is required" in inner-city Brisbane and the Gold Coast, perceived as a cost-shifting exercise onto new apartment buyers. Some developments planned for over a decade are still awaiting key utility connections for handover.*
- **"Constant Growth is Unsustainable":**
 - *BRU argues that the regional plan's foundation on "constant growth" is an "irrational belief" and that SEQ must progressively move towards a "metastable situation that is not dependent on ongoing population growth". This is a fundamental critique of the underlying logic of current regional planning.*
- **"Net Gains Sustainable Development is Not Explained":**
 - *BRU has sought a clear explanation of how SEQ will achieve "net gains" in sustainable development across economic, social, and environmental pillars, in line with national and*

state commitments. Its intended approach sees the 2017 regional plan's ambition for "net gains" outcomes as unachievable.

- **Bioregional Planning Critique:**
 - *The application of consistent approaches to MNES, MSES and MLES must be coordinated within Environmental and Town Planning actions at National, State and Local level. The application of consistent standards including the application of Regional Biodiversity Values into each Local Government's planning scheme needs to be implemented.*
 - *The Pilot SEQ Bioregional Plan must be undertaken so as not to add another 'SEQ' region to the existing 3x SEQ regions that are causing overlaps and confusion in regard to the resolution of the inclusion of Priority Future Growth Areas into the SEQ Urban Footprint.*
- **Lack of Independent Data and Governance for Regional Planning:**
 - *BRU argues that the function of bringing governance and assurance material together for the regional plan should not reside within the department setting town planning targets, due to the potential for "distorted reporting" where the "poacher" and "gamekeeper" are the same. They advocate for independent data providers and expert consolidation of data. The previous "Measures that Matter" were deemed "meaningless synthetic rubble" and often "fabricated" to achieve superficial compliance. Comprehensive Growth Monitoring information must be widely deployed along with regular reporting on key projects in the Shaping SEQ regional plan and infrastructure plan.*
- **Need for Increased Expertise and Skills in Regional Governance:**
 - *There is a clear need for an "upgrading of the expertise and skills needed to ensure effective governance of a region as large, as critical and as complex as SEQ". BRU also requests a commitment to training for the community in this regard.*
- **Need for Diverse Supply Chain ("Missing Middle"):**
 - *BRU advocates for stopping the "overdosing on corporations" and engaging the "missing middle" (small enterprises and entrepreneurs) to build "gentle density," which would open up supply chains and reduce bottlenecks associated with large corporate entities.*
- **Lack of Community Engagement and Transparency of Information:**
 - *BRU highlights the critical need to "invest in mechanisms to embrace more openly and actively with the community and use contemporary data methods and technologies to provide transparency of information", stating that a smart, sustainable region requires smart, engaged people.*
- **Local Government Maturity Levels for Natural Hazards:**
 - *Local governments across SEQ are at differing levels of maturity in practice, capacity, and data/intelligence regarding floodplain risk, coastal hazards, and bushfire risk, with no substantive progress reports available on actions.*
- **Lack of Coordinated Regional Park System/Open Space Network:**
 - *Despite over 25 years of recommendations, SEQ still lacks a coordinated regional park system or network of recreational open space.*

PART THREE

The Way Forward

We have established through this report that there is a high level of consistency between the issues being raised by community groups in recent years with a large number of the issues identified by QPC's interim report. We have set these out under the headings of

1. **Opportunities for Consistency**
2. **Opportunities for Streamlining and**
3. **Opportunities for Connectivity**

The first two headings are QPC's. The third one is intended to convey the underlying reality that housing is subject to an array of market forces that operate through different mechanisms. High density, greenfield residential, low to medium density [walk ups and townhouses] and individual or shared housing are triggered by different factors at different times.

It is impossible to gain efficiency without understanding that each of these markets are inter related and that through time, diversity of housing is fundamental to efficiency of housing.

It is also critical that 'up zoning' has proven to be a 'poison chalice'. What appears on the surface to a 'boon' for the development industry can in fact be the opposite.

Brisbane City Council's *myopic-high-density-only* housing strategy is a significant indicator of how over zoning in the absence of genuine demand and in the absence of genuine diversity can slow down delivery, increase prices and reduce delivery efficiency.

This is salutary because it also means that any blanket 'upzoning' cannot be assured of success unless it is founded on development conditions and building requirements that deliver genuine options for the delivery of competitive housing products.

By designing zonings that offer genuine capacity for each 'housing market' to compete with one another means governments have the opportunity of having multiple channels for triggering supply and at the same time there are multiple options for home owners.

Additionally, it means that different levels of 'technical and operational' capacity are required by these different markets. This means that supply chain channels [in regard to labour, materials etc] are expanded with the impact of ameliorating 'bottlenecks' in the overall housing supply chain.

We commend the QPC to more fully consider the issues identified under 'Connectivity' below.

Opportunities for Consistency

The QPC's preliminary recommendations include:

- Commissioning an **independent review to remove inconsistencies between the *Planning Act* and *Building Act***, and to provide clarity on local government powers regarding building matters.
- Ensuring requirements in local government planning schemes are **consistent with the *Queensland Development Code***, and require any variations to demonstrate net benefits to the community through a formal regulatory assessment.
- **Standardising zoning types across all local plans** and ensuring state and local government overlays are consistently applied.

Opportunities for Streamlining:

The QPC proposes several reforms, including:

- **Amending planning regulation to reduce procedural complexity** by clarifying the role of private building certifiers, potentially allowing them a greater role in development applications for building work, acting as initial gateways for the approval process.
- **Providing an alternative development assessment pathway for significant housing developments**, potentially expanding the remit of existing bodies like the State Assessment and Referral Agency (SARA) or using independent assessment panels.
- **Reviewing the Building Act and Planning Act to ensure adequate statutory timeframes**, as approvals lapsing due to time limits cause further project delays.
- **Improving public information on approval processes** and requiring local governments to publish performance data.
- **Investigating digital planning and permitting technologies** to enhance efficiency, accuracy, and transparency.

BRU and SHCG propose key issues that need to be recognised if long term 'efficiency' is to be achieved. In essence, efficiency without effectiveness can only be short lived.

Opportunities for Connecting with the Market

- **Increased coordination** between planning authorities and utilities agencies [power and water] is reported as a significant and regular impediment to approvals and occupancy. Service standards and joint engagement arrangements must be put in place between LGAs, Utilities providers and key Infrastructure Agencies.
- **Cumulative impacts forward planning** is required to ensure that significant infrastructure is available to coincide with development and construction of new facilities [both as infill and in greenfield settings]. This requires the capacity [for infrastructure agencies] to react to 'actual performance' in each LGA. At the moment the failure of BCC to achieve infill targets is impacting the scale of greenfield development. The 'system' must respond in two directions -
 - 1. Modify performance of the underperforming LGA
 - 2. Modify infrastructure planning to recognise actual performance [as per 1. above]
- **Significant integration of updated environmental information** [at the three critical levels - national, state and local matters of environmental significance] is needed to ensure that assessment can be completed in a timely and appropriate manner to facilitate sustainable development. The hierarchy of environmental instruments at each level must be standardised and the link between 'town' planning systems and 'environmental' planning systems must be matured and made 'efficient'.
- **The market and market conditions play a significant role** in the extent to which development and construction occur at any point in time. This is to say that efficient simplified and coordinated planning cannot 'compel' development to occur.
 - The provision of developed properties to suit community needs involves market critical assessments and for this reason there must be multiple viable pathways always open for development.
 - Diversity of pathways provides diversity of products and reduces the risk for communities, given that there is no way of insulating development from market cycles if the major proportion of supply is to be provided by the private sector.
- This last point reiterates the need for **consistent access for all parties to be able to understand the current performance and operation of different housing markets**. These different 'housing markets' is what is meant by the 'housing diversity' - high density apartments, low density, townhouses, residential etc... This means a significant investment in

very regular information updates on supply and demand [actuals and projections compared to 'forecasts'].

- The failure of Brisbane City Council and the SEQ Regional Plan to deliver consistent relevant information is adding 'salt' to the failure of housing strategies to deliver diverse supply into a hungry needful community.
- The final point is that it is considered critical for ameliorating housing stress that there be continued **regular and significant investment by the State and the Commonwealth to be building social housing** at a material rate over the long run.

ATTACHMENT ONE

Submissions and reports from BRU and SHCG in recent years that bear on the issues of development and construction efficiency.

Brisbane Centric

2025

- [National Aquatic Centre](#)
- [Gabba PDA 2](#)
- [Victoria Park : Summary of Cultural Heritage Features](#)
- [A Letter to Mr Stephen Conroy AM, Chairman GLICA](#)
- [A Further Assessment of Victoria Park - What Little Might Remain](#)
- [E Mobility Submission to Parliamentary Enquiry](#)
- [Feedback to the Parliamentary Enquiry into Olympic Legislation](#)
- [BRU Feedback to the Planning Department in regard to the Olympic Legislation](#)
- [A Preliminary Analysis of Previous Olympic Venue Reviews](#)
- [BRU Submission to Parliamentary Enquiry on Olympic Legislation](#)
- [BRU 'cut the mustard report' in regard to the 100 Day Review](#)
- [BRU Submission To 100 Day Review](#)
- [Entities and Obligations Associated with the Olympic Games](#)
- [Oral Presentation to the Queensland Heritage Council](#)
- [Heritage Application for Victoria Park Barrambin](#)

2024

- [BRU Response to BCC's Stones Corner Draft Suburban Renewal Precinct Plan](#)
- [BRU Response to BCC's Inner City Affordability Initiative](#)
- [BRU Questions to McConnel Candidates about the Epicentre of Australia's 2032 Olympics](#)
- [State Facilitated Developments Starting to Get Approved](#)
- [BRU Submission re Consultation Paper on Performance Framework for Biodiversity Conservation Survey](#)
- [Brisbane Temperature Forecasts for 2032](#)
- [SEQ Regional Summary of Climate Change Impacts](#)
- [BRU Submission on Gabba PDA](#)
- [BRU Submission on the Proof of Concept for Environmental Zoning](#)
- [QUT's Data Care for Smart Cities Project](#)
- [BRU Submission on new EDQ \[Economic Development Qld\] Legislation](#)
- [BRU Submission on NEL \[New Environmental Laws\]](#)
- [BRU Submission on Housing](#)
- [BRU Submission on Draft National Urban Policy](#)
- [BRU Submission on Moorooka Nathan Salisbury Neighbourhood Plan](#)
- [BRU Submission on BCC proposal for Heritage 'AREAS'](#)
- [BRU Submission on Koalas in SEQ](#)

2023

- [A Resident's Perspective](#)
- [Local Issues](#)
- [Regional City Issues](#)
- [Request for Evidence of Governance to Support SEQ Regional Plan](#)
- [Brisbane's Future?](#)
- [Finding your way around the SEQ Regional Plan 2024](#)

2022

SEQ

- [SEQ Regional Plan Review](#)
- [SEQ Protected Landscapes Report](#)
- [How the Commonwealth Government facilitates urban intensification projects](#)
- [SEQ City Deal Information and Action Request](#)
- [South East Queensland Report](#)

Brisbane

- [BRU Submission on Gabba PDA](#)
- [BRU Submission on Moorooka Nathan Salisbury Neighbourhood Plan](#)
- [BRU Submission on BCC proposal for Heritage 'AREAS' Brisbane: Welcome to the 200km City?](#)
- [BRU Submission on Housing](#)
- [Consolidated Documents for the Lord Mayor covering BCC and Qld Govt Housing Plans](#)
- [Urban Sparks to Improve Planning in and across Brisbane](#)

Regional Centric

- [BRU Submission to Consultation Paper on Performance Framework for Biodiversity Conservation Strategy in Queensland](#)
- [QUT's Data Care for Smart Cities Project](#)
- [BRU Submission on new EDQ \[Economic Development Qld\] Legislation](#)
- [BRU Submission on NEL \[New Environmental Laws\]](#)
- [BRU Submission on Housing](#)
- [BRU Submission on Draft National Urban Policy](#)
- [A Resident's Perspective](#)
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- [Regional City Issues](#)
- [Request for Evidence of Governance to Support SEQ Regional Plan](#)
- [Finding your way around the SEQ Regional Plan 2024](#)

- [SEQ Regional Plan Review](#)
- [SEQ Protected Landscapes Report](#)
- [How the Commonwealth Government facilitates urban intensification projects](#)
- [SEQ City Deal Information and Action Request from SHCG](#)
- [South East Queensland Report](#)

Spring Hill Centric

Preliminary

- [Spring Hill 2035 Vision Project : Initiation Document](#)
- [Project Methodology Document](#)
- [The Urban - Why is it relevant now?](#)

Commonwealth

- [How the Commonwealth Government facilitates urban intensification projects](#)
- [SEQ City Deal Information and Action Request from SHCG](#) *[We approached the Commonwealth & State Government Regarding this City Deal - no material response received. This City Deal is in full swing.]*

State & Regional

- [South East Queensland Report-](#)
 - Reviews the long term history of the region and highlights the difference in [pace and scale of] development since 1800, compared to the 25,000 years prior to that
 - Questions whether the governance of the region has the demonstrated capacity to deal with the long term competing demands of the Plan.

Brisbane

- [Brisbane: Welcome to the 200km City?](#)
 - What is apparent is that it is not hard to grow - our community and our governments have enabled massive growth in the last 20 years - but it does require concerted effort and resources
- [Brisbane's Unsustainable Growth Strategy:](#) *This report reviews the BCC's latest Sustainable Growth Strategy for Brisbane. BCC is not prepared to answer the issues raised in this report and is proceeding without understanding why we have ended up in the situation that means young families on the median income in Brisbane are unable to afford housing in Brisbane.*
- [A Brief Review of BCCs Housing Action Supply Plan - Its All Bad News Sorry](#)
- [Request to BCC Lord Mayor for Explanation of Why Brisbane's Housing is at Odds with the SEQ Regional Plan](#)

Spring Hill

- [Which Future?](#)
- [A Brief Review of Developments Approved So Far Under the Spring Hill Urban Renewal Plan](#) [We have approached our local Councillor Vicki Howard regarding progress with the BCC Urban Renewal Strategy investments for Spring Hill.]
- [Inner Sparks](#) - Ideas for improving the planning framework for Spring Hill and other Suburbs
- *SEQ Regional Plan Update - Our group has played a role in the following submissions about the SEQ Regional Plan 2023 Updated*
 - [A Resident's Perspective](#) [in regard to the SEQ Plan 2023 Update]
 - [Local Issues](#) [in regard to the SEQ Plan 2023 Update]
- [Spring Hill History Project](#)
 - [Spring Hill History Project Presentation](#)
- [Spring Hill Green Walkways](#) project is a first step towards a Green Infrastructure Plan for Spring Hill. This is being sponsored by our elected represented for [Brisbane](#) [\[Mr Stephen Bates\]](#) and we are working with RGSQ on developing our thinking to IMPROVE Spring Hill