



HIA Submission

Draft State Planning Policy 2026

**DEPARTMENT OF STATE DEVELOPMENT,
INFRASTRUCTURE & PLANNING**

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About HIA

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. Our members are involved in delivering more than 170,000 new homes each year through the construction of new housing estates, detached homes, low and medium-density housing developments, apartment buildings and completing renovations on Australia's over 11 million existing homes.

HIA members comprise a diverse mix of businesses, including volume builders delivering thousands of new homes a year through to small and medium home builders delivering one or more custom built homes a year. From sole traders to multi-nationals, HIA members construct over 85 per cent of the nation's new building stock.

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into the manufacturing, supply and retail sectors.

Contributing over \$100 billion per annum and accounting for 5.8 per cent of GDP, the residential building industry employs over one million people, representing tens of thousands of small businesses and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA exists to service the businesses it represents, advocate for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building development industry. HIA's mission is to:

"promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct."

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. New policy is generated through a grassroots process that starts with local and regional committees before progressing to the National Policy Congress by which time it has passed through almost 1,000 sets of hands.

Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing industry data and insights for members, the general public and on a contract basis.

The association operates offices in 22 centres around the nation providing a wide range of advocacy, business support services and products for members, including legal, technical, planning, workplace health and safety and business compliance advice, along with training services, contracts and stationery, industry awards for excellence, and member only discounts on goods and services.



Overview of industry concerns

HIA welcomes the opportunity to provide feedback on the Draft State Planning Policy 2026 (SPP) and the accompanying discussion papers on Natural Hazards and the Future of Assessment Benchmarks.

Queensland continues to face significant housing challenges, including extremely low rental vacancy rates, ongoing workforce shortages, escalating construction costs and rising land prices. Together, these pressures are constraining housing supply, undermining project feasibility and placing home ownership and rental accommodation beyond the reach of many Queenslanders. While recent initiatives such as the Residential Activation Fund and new Priority Development Areas are positive steps, housing affordability remains under considerable pressure, and the delivery of new homes continues to fall short of what is needed to improve choice and affordability across the market.

Looking ahead, the residential building industry faces an increasingly challenging operating environment. In addition to ongoing cost pressures, major infrastructure projects and preparations for the Brisbane 2032 Olympic and Paralympic Games are expected to place further demand on labour, materials and construction capacity. Recent changes to housing investment settings at the Federal level have also introduced additional uncertainty at a time when encouraging private sector investment in new housing remains critical.

HIA considers one of the most important roles of the planning system is to facilitate the delivery of housing by providing a clear, efficient and predictable pathway from land identification to housing construction. The planning framework should provide confidence that land identified for residential purposes can be developed for that purpose, and that regulatory requirements are applied consistently, proportionately and transparently across Queensland. Where development is appropriate and aligns with established planning objectives, the system should support timely decision-making and avoid unnecessary cost, complexity and delay.

HIA supports the overall direction of the draft SPP, particularly its increased focus on housing supply, infrastructure coordination and the review of natural hazard policy settings. However, a recurring concern raised by industry is that state planning objectives are not always translated into consistent outcomes on the ground. Matters identified as state interests are frequently interpreted and implemented differently through local planning schemes, resulting in varying assessment methodologies, development standards and approval outcomes across local government areas. Similarly, the approach to natural hazard planning has become increasingly restrictive in some parts of Queensland, constraining housing opportunities in areas that may otherwise be suitable for development and serviced by existing infrastructure.

HIA considers one of the greatest opportunities for improvement lies in strengthening the implementation, consistency and accountability of state interests. While the SPP clearly identifies the outcomes the State seeks to achieve, there is limited guidance on how those outcomes should be applied, measured and monitored across Queensland. Greater consistency between state and local planning frameworks, clearer performance expectations and more measurable outcomes would improve certainty for industry, support investment and help ensure state planning objectives are achieved in practice.

1. Feedback on the Draft State Planning Policy

Improving Housing Delivery Through Measurable Outcomes

HIA supports the continued recognition of housing supply as a matter of state interest and welcomes the Draft SPP's focus on facilitating housing delivery, housing choice and well-located communities.

However, the proposed policy framework remains heavily focused on aspirational outcomes without establishing measurable expectations regarding land supply, housing capacity or housing delivery. While the draft SPP identifies the importance of housing supply, there is limited guidance as to how local governments, industry or the community can determine whether planning systems are successfully delivering these outcomes.

A recurring challenge across Queensland is the gap between theoretical housing capacity and actual housing delivery. Land identified for future housing may remain undeveloped for extended periods due to rezoning requirements, infrastructure constraints, environmental approvals, fragmented ownership patterns or development feasibility challenges. Similarly, land that is zoned for housing does not necessarily translate into developable housing supply if supporting infrastructure, approvals or servicing arrangements are not in place.

If housing supply is genuinely a matter of state interest, HIA considers the State Planning Policy should establish clearer expectations regarding the quantity of housing capacity local governments are required to maintain and monitor.

Housing Supply, Capacity and Development Feasibility

HIA recommends the SPP establish a statewide framework requiring local governments to monitor and maintain housing supply at multiple stages of the development pipeline.

Across Queensland, significant differences can exist between:

- Land identified for future housing;
- Land zoned for housing;
- Land with development approval;
- Land capable of being serviced;
- Land that is economically feasible to develop; and
- Housing that is ultimately delivered.

As a result, planning schemes can demonstrate substantial housing capacity on paper while communities continue to experience housing shortages, worsening affordability outcomes and extremely low rental vacancy rates.

HIA considers that planning systems should be measured not only by the amount of housing capacity they identify, but by their ability to facilitate housing delivery.



This issue has recently been recognised in New South Wales through the introduction of the **Feasible Housing Capacity Policy**, which shifts the focus from theoretical housing capacity towards capacity that has a realistic prospect of being delivered.

The policy acknowledges that historical planning approaches often identified sufficient theoretical capacity to meet housing targets, however much of that capacity was never realised because infrastructure constraints, planning controls, market conditions or development economics meant housing was not commercially viable to deliver

Introducing Statewide Housing Supply Benchmarks

HIA recommends the SPP establish measurable expectations regarding housing supply and land availability across the housing delivery pipeline.

Specifically, local governments should maintain:

- **A minimum 10-year supply of feasible housing capacity**, being housing opportunities with a realistic prospect of delivery based on infrastructure availability, planning settings and market conditions.
- **A minimum 5-year supply of serviceable residential land**, where infrastructure planning and servicing requirements have been planned, this would require Local Governments to expand the Priority Infrastructure Area in their Local Government Infrastructure Plans.
- **A minimum 4-year supply of approved residential lots**, providing a clear pipeline of development-ready housing opportunities.

These benchmarks recognise that housing delivery is constrained by different factors at different stages of the development process. Establishing benchmarks across the entire housing pipeline would provide a more accurate picture of housing availability and assist in identifying future supply issues before they become housing affordability problems.

Reducing Regulatory Duplication

HIA supports the continued role of the State Interest Review process in ensuring local planning schemes appropriately reflect state interests and remain focused on land use planning matters.

Previous versions of the SPP explicitly recognised that building assessment provisions should not be included within planning schemes unless authorised under the Building Act 1975. This principle remains important and reflects the broader distinction established by the Planning Act 2016 between planning regulation and building regulation.

HIA acknowledges the Queensland Productivity Commission's Recommendation 23 requiring a review of the interaction between planning and building legislation. However, regardless of future legislative



reforms, the SPP should continue to recognise the important role of the building assessment framework and discourage unnecessary duplication within planning schemes.

The National Construction Code, Queensland Development Codes and Australian Standards already regulate a broad range of building-related matters, including flooding, bushfire resilience, structural design and building safety outcomes. Where planning schemes seek to regulate matters already addressed through these frameworks, unnecessary duplication, increased costs and regulatory uncertainty can arise.

Retaining this principle within the SPP would support better integration between planning and building regulation while ensuring the State Interest Review process continues to identify and address inappropriate overlap between planning scheme provisions and building assessment requirements.

Recommendation 1: Feedback on State Interests

HIA recommends that:

- State Interests be supported by measurable outcomes rather than aspirational objectives alone.
- Planning Schemes should maintain:
 - a minimum **10-year supply of feasible housing capacity**;
 - a minimum **5-year supply of serviceable and infrastructure-ready housing land**; and
 - a minimum **4-year supply of approved residential lot supply**.
- Local governments regularly monitor and report on housing supply and delivery indicators, including land capacity, approvals, commencements and completions.
- The SPP retain recognition that planning schemes should not regulate matters relating to building work unless specifically permitted under the *Building Act 1975*.



2. Response to Discussion Paper on Natural Hazards

A balanced approach to risk management that recognises the role of other legislation

HIA supports the proposed shift away from a strict "avoid then mitigate" approach towards a framework that recognises development can occur where risks are appropriately managed.

The existing approach can unnecessarily constrain housing opportunities by prioritising hazard avoidance, even where contemporary engineering, building standards and mitigation measures can achieve acceptable safety outcomes.

Importantly, land use planning is only one component of Queensland's broader hazard management framework. Significant risk mitigation outcomes are already achieved through the National Construction Code, Queensland Development Code and relevant Australian Standards.

For example, flood mitigation is addressed through QDC MP 3.5 and supporting guidance material, bushfire construction standards are addressed through Bushfire Attack Level requirements, and geotechnical risks such as landslip are regulated through established building approval process of soil tests and Australian Standards for slab and footing design. These frameworks are specifically designed to manage building-level risks and should be recognised when determining the role of planning controls.

Planning schemes have an important role to ensure appropriate land use outcomes through rezoning, settlement patterns and subdivision design rather than seeking to replicate matters already addressed through the building regulatory framework.

While planning policy frequently refers to a risk-based approach, industry experience is that planning schemes often trend towards increasingly risk-averse outcomes over time. This can result in relatively minor development, such as bedroom extensions, carports, patios and other modest improvements to existing dwellings, being unnecessarily constrained or prohibited, despite the lawful establishment of the dwelling and the ability of such works to be undertaken without materially increasing risk.

Recommendation 2: Improving the Approach to Natural Hazards

HIA recommends that:

- The Draft SPP support development where risks can be reduced to acceptable or tolerable levels through planning, engineering, construction or operational measures.
- Greater recognition be given to the role of the NCC, QDC and Australian Standards in managing building-level hazard risks.
- Existing lawful dwellings be afforded greater flexibility to undertake minor alterations and additions where these works do not materially increase risk.



Defining Acceptable, Tolerable and Intolerable Risk

One of the key challenges within the current framework is the absence of a clear and consistent understanding of what constitutes acceptable, tolerable and intolerable risk for each natural hazard.

In practice, this has resulted in varying interpretations across local government areas and, in some instances, different planning outcomes for developments exposed to comparable levels of risk.

A more consistent statewide framework would improve certainty for applicants, councils and the community. It would also help ensure planning responses remain proportionate to the risks being managed.

However, defining risk is only part of the solution. There is also a need to provide greater guidance regarding the types of mitigation measures that are considered appropriate for common natural hazards and common forms of development. While planning policy frequently references risk mitigation, there is often limited direction regarding the circumstances in which mitigation is considered acceptable and the standards that should be applied.

This can result in similar developments receiving different outcomes depending on the assumptions, risk tolerances or assessment approaches adopted by individual councils. Greater statewide consistency regarding acceptable mitigation measures would improve certainty, reduce assessment complexity and support more proportionate decision-making.

Where risks can be adequately managed through design, engineering solutions, construction standards, site planning or operational measures, the planning system should support development rather than defaulting to avoidance. This is particularly important for land already identified, zoned or serviced for urban development.

HIA also considers a broader "no net loss" principle should be explored where planning changes reduce the availability of residential land. Where environmental overlays, hazard overlays or other planning controls reduce the development potential of land intended for housing, consideration should be given to identifying equivalent serviced land elsewhere within the planning framework to maintain overall housing supply capacity.

Recommendation 3: Establish a Clear Natural Hazard Risk Framework

HIA recommends that:

- The State establish clearer guidance regarding acceptable, tolerable and intolerable risk.
- Hazard avoidance only be required where risks cannot be appropriately mitigated.
- Housing supply impacts be explicitly considered when introducing new hazard constraints.
- A "no net loss" principle for residential land supply be investigated where planning changes reduce housing capacity.



Consistency in Methodologies, Mapping and Implementation

HIA supports greater consistency in natural hazard mapping, assessment methodologies and planning responses across Queensland.

One of the most common concerns raised by industry is the significant variation in hazard mapping methodologies, climate assumptions, assessment triggers and planning responses between local government areas. This can result in materially different planning outcomes for developments exposed to comparable levels of risk and creates unnecessary uncertainty for homeowners, builders, developers and landowners.

Inconsistent Technical Methodologies for Mapping Natural Hazards

The increasing complexity of hazard modelling reinforces the need for stronger state leadership. Decisions regarding flood modelling assumptions, climate projections, acceptable risk thresholds and mitigation measures are highly technical matters with significant implications for housing supply, property rights and development outcomes.

Industry has observed circumstances where neighbouring local governments apply different versions of technical guidance, rainfall datasets and modelling assumptions despite assessing the same hazard.

For example, councils have progressively adopted different versions of Australian Rainfall and Runoff (ARR) guidance, rainfall intensity data and climate change assumptions, resulting in different flood extents, flood levels and planning controls being applied to comparable land.

In practice, the same type of development can be supported in one local government area and prohibited in another due solely to differences in methodology rather than differences in risk.

Inconsistent Triggers for Assessing Development

The problem extends beyond mapping methodologies. There is also significant inconsistency in the way planning schemes trigger assessment within hazard overlays.

HIA has previously identified examples where comparable flood hazards are regulated very differently across South-East Queensland:

- Brisbane City Plan permits up to 20m² of building work in some flood overlay areas without triggering assessment.
- Ipswich City Plan permits up to 50m² of additional gross floor area before assessment is triggered.
- Logan Planning Scheme triggers assessment for any building work within some mapped flood hazard areas.

While the hazard may be fundamentally the same, homeowners are often subject to entirely different planning requirements depending on which side of a local government boundary they reside.



Inconsistent Planning Responses (Assessment Benchmarks)

Similarly, different planning schemes apply different assessment benchmarks to the same hazard:

- Brisbane requires access and driveways not be inundated by the 10% AEP flood event.
- Ipswich applies hazard-based access requirements.
- Logan has adopted different flood immunity requirements linked to access to essential goods and services.
- Other councils continue to apply entirely different risk thresholds and mitigation expectations.

This creates uncertainty for industry and the community and undermines confidence in natural hazard planning outcomes.

Need for Greater State Government Guidance

HIA is also concerned that increasingly complex technical decisions are often being translated into planning controls without sufficient understanding of the broader implications for homeowners, housing supply and property rights.

While hazard mapping may be informed by detailed technical modelling, the consequences can be significant. Changes to flood mapping, risk tolerances or modelling assumptions may affect whether a person can extend an existing home, construct a carport, undertake renovations or develop residential land that was previously considered suitable for housing.

Recent experiences in Queensland have demonstrated that the practical implications of adopting new methodologies and risk assumptions are not always well understood by decision-makers or the community at the time planning controls are introduced. Matters such as the treatment of extreme flood events, climate assumptions and modelling approaches can fundamentally alter planning outcomes despite being highly technical concepts that are difficult for non-specialists (councillors) to decide.

Recommendation 4: Greater consistency in natural hazards should start with the SPP

Natural hazards are a key state interest and there should be substantially greater consistency in:

- Hazard mapping methodologies.
- Climate change assumptions.
- Risk classifications.
- Assessment triggers.
- Mitigation expectations.
- Planning responses to comparable levels of risk.

A person exposed to a comparable level of flood, bushfire or landslide risk should reasonably expect similar planning outcomes regardless of the local government area in which the property is located.



3. Response to Future of Assessment Benchmarks

Assessment Benchmarks should promote greater consistency

HIA supports the proposal to relocate State assessment benchmarks from the SPP into the Planning Regulation.

A central objective of Queensland's planning framework should be to achieve greater consistency in development assessment across the State. Applicants should reasonably expect that broadly similar development proposals are assessed against broadly similar benchmarks regardless of local government boundaries.

The proposed relocation of assessment benchmarks provides an opportunity to improve accessibility, transparency and consistency while allowing the SPP to focus on its primary role of establishing State planning policy and strategic direction.

Importantly, HIA considers this reform should be viewed as more than an administrative relocation of existing provisions. It presents an opportunity to strengthen the implementation of State interests and reduce the growing divergence that exists between local planning schemes.

While Queensland has a State Planning Policy, the practical experience of industry is that many matters identified as State interests are implemented very differently by individual local governments through varying assessment benchmarks, overlay provisions, technical assumptions and policy responses.

If a matter is considered a State interest, there should be a much greater degree of consistency in how it is regulated throughout Queensland.

Moving beyond the Model Code Approach

HIA supports previous efforts by the Queensland Government to improve consistency through model codes, guidance material and best-practice examples. However, experience suggests these initiatives have had little success.

The Bushfire Overlay Model Code has frequently been modified by local governments to the extent that implementation varies substantially between planning schemes. Similarly, HIA is not aware of any local governments having comprehensively adopted the model code for Community Housing in the Community Facilities Zone which was released in July 2025.

While model codes and guidance material can assist regulators, statewide planning outcomes are unlikely to be achieved where implementation remains entirely voluntary.

Where the State has determined that a matter is of sufficient importance to be recognised as a State interest, consideration should be given to mandatory benchmark provisions rather than relying solely on non-statutory guidance and model provisions.

This is particularly relevant to:

- Natural hazards;
- Environmental overlays;



- Housing supply;
- Residential design outcomes;
- Infrastructure planning; and
- Common forms of residential development.

Avoiding unnecessary or inappropriate technical requirements

HIA continues to observe examples where technical guidance developed for particular purposes is being applied inappropriately during development assessment.

One example involves the application of Queensland Fire Department (QFD) – Fire Hydrant and Vehicle Access Guidelines for Residential, Commercial and Industrial Lots which regulators will often attempt to apply fire truck turnaround requirements to townhouse developments and community title subdivisions while this guidance was initially created for public roads.

In some cases, the required turnaround dimensions can exceed the physical width of the development site itself, making compliance impractical and unnecessarily constraining housing outcomes.

HIA supports appropriate emergency service access requirements. However, assessment benchmarks should remain focused on achieving appropriate planning and safety outcomes rather than creating de facto development prohibitions through the rigid application of operational or technical guidance.

The Planning Regulation and any supporting guidance should clearly distinguish between requirements intended for public road infrastructure and those applicable to private residential developments.

There is also an opportunity for the Queensland Government to work more closely with industry, councils and referral agencies when developing future assessment benchmarks to ensure they remain practical, proportionate and capable of supporting housing delivery outcomes.

Recommendation 5: Assessment Benchmarks Should Improve Consistency

HIA recommends that:

- State assessment benchmarks be relocated to the Planning Regulation as proposed.
- Assessment benchmarks be expanded beyond the current scope where necessary to support consistent implementation of State interests.
- Assessment benchmarks include both consistent assessment triggers and assessment criteria to reduce variation between planning schemes.
- State interests requiring a consistent statewide outcome be implemented through mandatory assessment benchmarks rather than relying solely on model codes, guidance material or voluntary adoption.
- Any new assessment benchmarks be developed in consultation with local government, industry and relevant agencies to ensure they are practical, proportionate and capable of supporting housing delivery.