

28 July 2017

Ms Megan Bayntun  
A/Executive Director  
Policy and Statutory Planning

Mr Logan Timms  
Executive Director  
Building Industry and Policy

Dear Ms Bayntun and Mr Timms

**Subject: Working Group on Improvements to Legislative Arrangements for Planning and Building Approvals**

Thank you for the invitation to provide input into the process for improvement to the legislative arrangements for planning and building approvals.

Master Builders strongly supports reform that provides greater certainty and consistency of outcomes for both planning and building approvals and improves the efficiency of the process.

The *Local Government Electoral (Transparency and Accountability in Local Government) and Other Legislation Amendment Act 2017* contained amendments to the planning and building approval system that were hastily put together and were not subjected to wide consultation. The result has been to introduce new regulatory provisions that are unclear and inconsistent with other requirements. The conclusions in the summary report of the Working Group provide an opportunity to redress these concerns by considering how the building certification and the planning processes can be better aligned and made more efficient.

Master Builders therefore offers its support to the conclusions of the Working Group where they seek to examine and review the relationship between building certification and planning approval with the intent to improve clarity, consistency and efficiency in the system.

Specifically, we welcome further consideration of how the roles and responsibilities between planning approval and building certification can be clearly delineated in the *Planning Act 2016* and the *Building Act 1975*. Where definitions and requirements are shared, they must be made consistent across the two Acts.

The examination and review must look to ensure that approval processes are efficient in achieving the desired outcomes. In the context of the recent legislative changes, this means

reconsidering the role of the preliminary approval. The building certifier should not be required to seek both a preliminary approval and a development permit from the local council.

Should the review process fail to result in legislative change that achieves this end we urge you to adopt a sunset clause to the LGEAOLA amendments as a priority.

Further, we strongly support the establishment of a standing forum of local governments, certifiers and industry groups. Our planning system is complex and has many stakeholders, each experts in different aspects of the system. No single stakeholder can hope to identify all the issues. We believe that such a forum would have helped resolve the current concerns before they came into legislation.

Also important is the assessment of regulatory impacts through the lens of efficiency and affordability criteria. The Regulatory Impact Statement is a long held, fundamental principle of good government. Master Builders therefore supports any efforts to improve the depth and scope of this essential tool.

Thank you for consideration of these issues. We look forward to continuing to work with you on the ongoing reform of the Queensland planning system.

Regards,



Paul Bidwell  
Deputy CEO