

10 June 2024

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Hon Meaghan Scanlon MP
Minister for Housing, Local Government and Planning
Minister for Public Works
By email: housing@ministerial.qld.gov.au

Dear Minister

OUR PLAN TO DELIVER MORE HOMES FOR QUEENSLAND

I am writing to follow up on conversations we have had on the challenges industry is facing on the delivery of new homes and how we might tackle the housing crisis to achieve our shared goal of delivering more homes, sooner, and more affordably.

As you know, Queensland's building industry is facing unprecedented times, with continuing labour shortages, ongoing regulatory changes and rebuilding work following extreme weather conditions.

We are also facing an unprecedented pipeline of projects to deliver, including for the 2032 Brisbane Olympic and Paralympic Games, the Government's health capital works program, transport infrastructure, social housing, schools plus renewable energy and water projects.

We acknowledge that there is much good work being done by the Government (as well as the federal government) to address these issues, but many are long-term solutions. There are things that can be done to provide immediate relief. With the challenges we are facing, we need the government to pull every lever available to address them.

As part of our own 2024 Queensland Election campaign, we are looking for your support on measures to help address the burden of red tape on housing supply. Specifically, we ask you to confirm a commitment to:

1. **Rolling back the changes to the National Construction Code 2022** that have been found to have imposed a cost with only limited benefit. While inclusivity and sustainability are important to our communities, these changes are driving up the cost of new housing without a sufficient benefit. The specific changes include:

Livable Housing

- Exempt dwellings from the Livable Housing requirements where they are exempt from providing the step-free access path.

- Increase the maximum threshold for enclosed showers from 5 mm to 8 mm so that it is buildable with the 5 mm minimum waterproofing requirement.
- Where owners undertake to supply and install floor coverings after completion, compliance to the step-free threshold requirements becomes the owner's responsibility. (Should this not be possible, allow for diminishing ramps that comply with the Australian Standard for disability access - AS1428.)
- Provide an additional option for the reinforcing requirements to allow studs at 300 mm maximum centres around the toilet and shower areas.
- Remove the requirement for the toilet to be in the centre of the circulation space. (A minimum clearance of 450 mm from the wall is workable.)
- Allow the swing of the door to overlap with the circulation space in front to the toilet as is permitted under Australian Standard for disability access (AS1428).

Energy Efficiency

- Provide concessions to the energy efficiency requirements for raised houses (built on stumps) so that this type of house can continue to be built.
- Require all energy assessors to be accredited and audited.

Bathroom floor falls

- Remove the requirement for the maximum gradient 1:50 gradient in the shower area.

2. **Scrapping project trust accounts.** They simply do not work – they do not protect payments in insolvency. They are a costly, complex and unnecessary regulatory overlay to the numerous other security of payment protections for subcontractors. If they are rolled out to private projects over \$3 million and then \$1 million in 2025 (as is legislated), it will be the end of many small businesses. I should also add that we are keen to explore a national approach of harmonised security of payment legislation.
3. **Applying Best Practice Industry Conditions (BPICs) in a way that is flexible,** enabling greater productivity on construction sites, without compromising worker safety or building quality.

Specific examples include:

- Working overtime and weekends – employers should be permitted to offer voluntary overtime and weekend work, with employees given the choice to work.

Rostered day off (RDO) flexibility – ability to take days off when it suits the worker and the project. Projects should not be shut for all 26 RDOs.
- Union activities - if individuals wish to participate in political rallies, they should be permitted to do so by taking leave. If individuals wish to work instead, they should be permitted to do so. Rallies should not be repeatedly scheduled around RDOs and public holidays with the effect of extending the site shutdowns.
- Inclement weather - unaffected areas must be allowed to continue working. Workers should not leave immediately. In the event of rain, they must be permitted to assist in dewatering.

Projects must open progressively as dewatering occurs and areas are made safe. The mere presence of lightning in the distance should not result in projects being shut.

4. **Supporting the QBCC to work better for and with industry**, starting with:
 - licence applications being processed quickly, consistently and with an online option;
 - Work Health Safety Queensland is the single point for safety notifications and investigations. Builders are not penalised for failing to issue duplicate notices to the QBCC.

5. **Implementing a mandatory state-wide Housing Code** to streamline planning rules and simplify assessment processes at a local government level. This work has been underway for a number of years and is important to replace the out-of-date parts of the Queensland Development Code (1.1 and 1.2). Under the Housing Code local government would continue to manage the size of lots and character and amenity concerns but the basics of the building envelope would be consistent across the State, allowing clarity and certainty in the requirements. And with the 'Distinctly Queensland' design series underway, there is an opportunity to maximise the impact of this initiative with a mandatory Housing Code.

I look forward to your response and to discussing these issues and others at our Industry Leaders lunch on 18 June. I am also keen to report back to the Master Builders Board, who meet on 5 July, on the Government's position for each of these amendments.

Yours sincerely,

Paul Bidwell
CEO