



## 1. INTRODUCTION

The Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide feedback to the State Government on the draft Single Planning Policy (SPP).

CCIQ is the peak business and industry association in Queensland, representing over 25,000 businesses across all industry sectors in the State. Accordingly, CCIQ is well placed to provide feedback to the State Government on the draft SPP.

Planning issues are of fundamental importance to the economic wellbeing of Queensland. Queensland businesses firmly believe the new planning scheme must take a 'big picture' approach.

CCIQ acknowledges the efforts of the State Government and the extensive consultation it has undertaken with key stakeholders in formulating the draft.

The current draft document is a significant improvement on the previous framework and will pave the way for greater efficiency in decision-making regarding development at local and state government levels.

# 2. THREE KEY PRINCIPLES

CCIQs initial submission outlined three key planning principles that should drive the planning vision in Queensland in the future; consistency, transparency and efficiency.

# 2.1 Consistency

Consistency between and within councils is of paramount importance, particularly to businesses that operate across council boundaries. While the State's efforts in promoting consistency are to be commended, CCIQ acknowledges the difficulty in formulating a framework that individual councils are required to heed when working on their own planning frameworks to suit their individual localities.

The application of consistency will be difficult to measure, and will only become apparent when the scheme is fully implemented and operational. CCIQ believes the language and structure of the scheme are a significant improvement on the previous planning framework.

# 2.2 Transparency

Applicants need to be aware of the complexity and number of approvals required by government. Being prepared and understanding what is required prior to lodging applications and what considerations local councils are required to heed when assessing approvals will streamline the process and ensure transparency across Queensland.

The draft plan clearly stipulates the complementary legislation that is intended to be read "into" the scheme. CCIQ favours an approach that combines certainty with transparency and allows businesses ample opportunity to not only be involved in the



planning processes in their local communities, but also an approach that recognises that competing interests are not mutually exclusive and must often work hand-in-hand to achieve a desired economic, social and environmental outcome.

# 2.3 Efficiency

Queensland businesses are resolute in their call for increased efficiency and flexibility in the State's planning scheme.

Efficiency will be easier to achieve in some communities and circumstances than others. However, it is important that the Policy reflect the changing nature of Queensland communities, both within SEQ and regionally. To achieve flexibility without compromising efficiency the draft scheme must minimise the opportunity for duplication of state interests and streamline the way in which state interests are considered.

# 3. POSITIVE OUTCOMES FOR SMALL BUSINESS UNDER THE DRAFT SPP

#### 3.1 Lower levels of assessment

Lower levels of assessment will enable the sustainable development of industries and businesses across Queensland and contribute to a strong business environment. Lowering the levels of assessment will also assist in cutting red tape and expediting development applications to enable positive economic and social outcomes for local Queensland communities in regional, remote and metropolitan locations.

#### 3.2 Guidance materials

Consistency and certainty is a core element of any planning scheme. Without these elements, developments are less likely to occur, and the business environment is likely to stagnate. Knowing what to expect from a planning framework and what is required to proceed with a development will facilitate investment in key locations across Queensland.

Guidance materials should be concise, written in plain English and easily comprehensible to ensure transparency and efficiency in the SPP. Accordingly, more information regarding guidance materials is required. Businesses need to familiarise themselves with the information available, as well as the extent to which these materials will or should be relied upon by decision-makers.

# 3.3 Strategic framework

Painting a picture of what a planning framework will deliver, in conjunction with the guidance materials available, will provide developers and businesses with the consistency required to attract investment and underpin growth in Queensland's regions.

CCIQ urges the State Government to consider the impact of any strategic framework on business. As such, small and medium businesses should be included in the strategic framework that informs the development and operation of the SPP.



The introduction of a Development Assessment Code will further streamline the assessment of developments.

# 4. BALANCING COMPETING INTERESTS

The draft SPP needs to reflect the importance of industry in key locations and communities and enable the development and growth of businesses in a way that is complementary to competing interests under any planning instruments or applications.

The draft SPP in its current form promotes a fair and balanced approach to planning that affords due weighting to competing interests. CCIQ understands state interests will not always be able to work in harmony together and from time to time tension will arise where it is unlikely a development will be able to satisfy all state interests in the required manner and form.

It is important the draft SPP addresses these potential conflicts in a manner that seeks to resolve and amalgamate these tensions in an efficient and transparent resolution that will enable development to proceed.

## 5. FUTURE IMPROVEMENTS TO THE DRAFT SPP

CCIQ commends the State Government on the improvement of the SPP to date. The document reflects the change in attitude and perception of the new State Government, with simplified language and procedures that will result in the more effective application of the scheme. The Queensland business community is hopeful these improvements will see more efficient approvals that will in turn encourage and drive investment and development in key regions in line with the State Government's economic priorities.

While the improvements to the scheme are significant and commendable, there remains scope for further reform. CCIQ is keen to see a revised purpose of the Sustainable Planning Act 2009 that better reflects the State Government's economic, social and environmental objectives.

CCIQ is concerned the current draft does not explicitly reference the importance of a strong planning scheme to the business community and future investment in the State.

There needs to be a stronger linkage between the interests and goals set out by the draft SPP and its implementation by local councils without unnecessarily encumbering local government with additional red tape. This will require technical and sensitive analysis to avoid the politicisation of local planning instruments and procedures.

CCIQ commends the Government on their planning reform agenda and welcomes the draft SPP in its current form, subject to some minor changes as outlined above. CCIQ looks forward the State Government's continued engagement with the Queensland business community on the future of planning in the state.