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26 February 2020

David Cunningham
Development Assurance and Outcome Manager
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

BY POST/EMAIL - David.Cunningham@brisbane.gld.gov.au

Dear Mr Cunningham, Dwid

RE: Brisbane City Council's SealSMART – Removal of Building Format Plans

The Urban Development Institute of Australia Queensland (the Institute) writes to Brisbane City Council (council) in relation to Building Format Plans (BFP) and council's SealSMART Initiative. The Institute has been advised by a number of members in the Brisbane region that BFPs have been removed from the SealSMART process, effective 17 February 2020. The Institute holds serious concern about this change, particularly given the decision to do so is effective immediately and without warning, notice, or consultation.

SealSMART is an effective and efficient tool that expedites the delivery of attached residential housing through the use of self-certification by accredited consultants. The Institute is supportive of this approach and is an advocate for strategies aimed at reducing timeframes to enable the industry to deliver housing more efficiently, smoothly, and ultimately, more affordably. Removing BFPs from the SealSMART process will have significant consequences that will place pressure on a project's delivery at its most critical time and will place an unnecessary cost to future and potential homebuyers.

The SealSMART process enables the industry to considerably reduce time and costs during the settlement/handover of the property and it is the most financially critical stage of development. With the ability to manage BFPs through the SEAL Smart process removed, this effectively adds an additional 15 business days and potentially another 20 business days (if more information is required) to seal plans for multiple dwellings. A small-medium constructed residential townhouse project in Brisbane reports that this would equate to an additional \$30,000 in interest. Outside of this financial impact, the Institute highlights that this not only places additional and unnecessary rental and housing stress to the community, but also the personal stress to homebuyers looking to move into their homes.

The Institute strongly recommends council reinstate BFPs into the SealSMART process and consider other mechanisms to achieve council's desired result. Alternative strategies should be considered in consultation with the Institute to ensure any perverse and unintended consequences are avoided.

Thank you for considering the items raised in this submission. Should council wish to consult with the Institute on alternative strategies to work collaboratively and ensure built form outcomes are delivered as per the relevant

development approval, we would be eager to discuss this in greater detail. If you have any question in relation to this letter, please contact Manager of Policy, Martin Zaltron (<a href="mailto:mzaltron@udiaqld.com.au">mzaltron@udiaqld.com.au</a>) on (07) 3229 1589.

Yours sincerely,

Urban Development Institute of Australia Queensland

Kirsty Chessher-Brown

**Chief Executive Officer**