

INDUSTRY ADVOCACY REPORT

Barriers to Secondary Dwelling Approvals

Evidence from development applications and referral agency assessments across South East Queensland

PREPARED FOR	Housing Industry Association (HIA)
PREPARED BY	BCC Homes
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Secondary dwellings should be one of the fastest and least infrastructure-intensive ways to increase housing supply. The evidence in this report shows an approval pathway becoming slower, less predictable and increasingly disproportionate.

Purpose of this report

This report documents recurring approval barriers experienced by BCC Homes in delivering secondary dwellings. It is intended to support HIA advocacy with local and State government and will be updated as remaining project data, costs and supporting correspondence are compiled.

CONFIDENTIALITY NOTE Full street addresses have been omitted to protect client privacy. Properties are identified by BCC Homes job code and suburb. Full addresses, individual RFIs, Action Notices, rectification letters, approval notices, Council correspondence and supporting project records can be supplied to HIA on request for confidential review.

Executive summary

Secondary dwellings should be one of the simplest and fastest forms of additional housing. The cases in this report indicate that the approval pathway is becoming slower, less predictable and increasingly disproportionate to the scale of the development. The result is added professional cost, delayed construction and prolonged housing insecurity for affected households.

CASE RECORDS
23
Current working dataset

RFI / ACTION NOTICE
12 cases
Explicitly documented

DOCUMENTED EXTRA COST
At least \$115,242.28
Above the ordinary BA pathway

HOUSING IMPACT
At least 8 families
2 in caravans; 6 in overcrowded housing

OPEN / PENDING
6 cases
Based on the information currently recorded

RURAL SITES
11 of 23
Most affected projects are on rural properties

Documented minimums based on the records supplied. A mean approval timeframe has not been stated because several source dates require final verification; the individual timelines remain more reliable for advocacy at this stage.

BUILD TIME
14–16 weeks
Slab-on-ground construction

BUILD TIME
16–19 weeks
Pole construction

CORE CONCERN
Approvals can take longer
In some cases, twice the build time

How the approval pathway has changed

The earliest projects in this dataset were approved with our building certifier also preparing the town planning application. As approvals became harder to achieve, we engaged a town planner to prepare and lodge the planning application before returning the approved plans to the certifier. Projects must then proceed through Council plumbing approval. Each additional hand-off adds cost, time and uncertainty.

Methodology and scope

This report covers all 23 BCC Homes projects referred through an additional development or referral pathway between 2023 and August 2026, rather than selecting only the most difficult examples. This reduces selection bias and allows the changing approval experience to be considered across the full referred-job dataset. At the date of publication, BCC Homes' QBCC licence record shows 62 approved projects; the 23 cases in this report represent the proportion of that body of work referred through an additional development or referral pathway. The report draws on project records, approval dates, consultant communications, Council correspondence, documented client impacts and the BCC Homes cost report dated 17 August 2026. Some records and dates still require final verification.

Eleven of the 23 projects are rural. The twelve identified non-rural projects are 003CAS, 037RIV, 020CRU, 054MID, 003MIT, 081GIR, 012VIL, 036JES, 052LAU, 031BAL, 003NEB and 003ROT. The case records are presented in a consistent format to allow comparison of the application pathway, Council response, trigger, required changes, additional cost or delay, client impact and outcome.

Documented cost impact

Our internal cost report separates the financial impact into two categories: Rows 1 – 4 show the total cost, including GST, of additional works and technical material requested during the process; Row 5 records the cost of the additional approval pathway over and above the ordinary Building Approval. This avoids treating the BA itself as an approval-barrier cost. Rows 2, 3 and 4 break Row 1 down by whether the work led to a material change in outcome and are not added again separately; the total below is Row 4 plus Row 5.

Cost category	Total incl. GST
Additional works and technical material requested throughout the application	\$43,031.99
<i>(Of which: 083GLY, a material siting change)</i>	(\$2,728.00)
<i>(Of which: 054MID, a material change in classification, resulting in a net credit)</i>	-\$897.00
<i>Of which: the remaining 21 cases, where no material outcome change is recorded</i>	\$41,200.99
Additional approval pathways beyond the BA	\$74,041.29
Total documented additional project cost, less 083GLY and 054MID required material changes	\$115,242.28

All figures in this section are the costs charged to BCC Homes by Council and by third-party consultants and contractors; they do not include margin. Where these costs are passed on to clients, BCC Homes applies its standard margin of 25%, so the client-facing cost is higher than the figures shown. These figures exclude ordinary BA costs and do not quantify every consequence of delay, including temporary accommodation, holding costs, internal staff time, lost construction capacity, stress or opportunity cost. The detailed cost schedule and supporting invoices can be supplied to HIA on request.

Keeping families together

These projects are not discretionary luxury additions. They allow ageing parents to remain close to their children rather than becoming isolated or entering care prematurely; give adult children an affordable degree of independence; and help families care for one another while making better use of property they already own. At least two families in this dataset are living in caravans while waiting for approval, and six more are recorded as living in overcrowded arrangements with relatives either in the main dwelling or elsewhere.

The approval consequences are therefore human as well as financial. Months of delay postpone safe, stable housing for elderly parents, adult children and growing families. A more proportionate pathway for low-impact secondary dwellings would increase housing supply quickly while supporting intergenerational care and family connection.

Legend

Job code (000AAA)	BCC Homes internal project identifier.
MCU	Material Change of Use—the relevant development application type where planning approval is required for the proposed use or siting.
DA	Development Application—the broader statutory application process.
RRR	Boundary relaxation / referral agency assessment pathway, as used in this report.
BA	Building Approval.
RFI	Request for Information.

HSTP	Household Sewage Treatment Plant.
BOS	Build Over Sewer.
ROL	Reconfiguration of a Lot.
BMP	Bushfire Management Plan.
GCCC	City of Gold Coast.
LCC	Logan City Council.
QBCC	Queensland Building and Construction Commission.
TBC	To be confirmed or completed.

When should an MCU actually be required?

The central reform question is not whether legitimate planning, building or environmental safeguards should be removed. It is whether an MCU assessment adds any material value where a secondary dwelling is otherwise accepted development and the relevant technical requirements have already been satisfied.

Residential properties

On a residential lot, distance from the primary dwelling should not, by itself, convert an otherwise accepted secondary dwelling into assessable development. Greater separation does not necessarily establish a separate or unrelated use, nor does it demonstrate an adverse planning impact. Where a pool, shed or other shared domestic structure is located within the prescribed relationship distance, the property may still function as one integrated residential use even though the two dwellings are farther apart.

The appropriate question should be whether the secondary dwelling remains subordinate to, and genuinely used in conjunction with, the primary dwelling; not whether the walls of the two dwellings satisfy an arbitrary distance measurement. If size, design, servicing, access, parking and other accepted-development requirements are met, distance alone should not require an MCU application.

Rural and semi-rural properties

The same issue is amplified on large rural and semi-rural properties. Where the proposed dwelling is outside relevant overlays, complies with the Bushfire Management Plan and other applicable requirements, and specialist reports confirm that the siting is acceptable, a building certifier should be able to approve the work without a further MCU process merely because of separation from the primary dwelling.

MCU assessment should be reserved for an identified departure or unresolved planning impact; for example, vegetation loss, hazard exposure, servicing constraints or demonstrable effects on amenity, not imposed as a duplicate approval layer after competent specialists and the building certifier have already confirmed compliance.

PROPOSED PRINCIPLE The need for MCU assessment should turn on a demonstrated planning impact or specific non-compliance, not distance alone or the repetition of matters already resolved through technical reports and building certification.

The problem

BCC Homes specialises in delivering secondary dwellings across South East Queensland. These projects provide urgently needed housing for families, ageing parents, adult children, people experiencing housing insecurity and, increasingly, the private rental market.

Secondary dwellings are intended to be one of the simplest and most accessible forms of additional housing. However, our experience is that the approval process (particularly within the City of Gold Coast), is becoming increasingly complex, inconsistent and disproportionate to the scale of the development being assessed.

Builders are being required to interpret planning schemes and predict assessment outcomes at a level ordinarily expected of qualified town planners. Engaging a town planner for every preliminary site assessment is commercially unviable and would add further cost to what should be an affordable form of housing.

The central issues we are experiencing include:

- **Inconsistent assessment outcomes.** A design approach accepted on one application may be rejected or considered non-compliant on the next, without any apparent change to the relevant planning provisions.
- **Increasingly narrow and constrained interpretations** of planning requirements, with limited practical consideration of the scale, purpose or housing benefit of the proposed development.
- **A growing perception** that applications are being assessed with a focus on identifying reasons they cannot proceed, rather than working constructively with applicants to achieve compliant outcomes.
- **Requests for Information and Action Notices being issued very late in the statutory assessment period.** Twelve months ago, this appeared primarily to reflect an under-resourced department seeking additional assessment time. The volume, nature and increasing complexity of recent requests now suggest a more systemic barrier to secondary dwelling approvals.
- **Larger rural and semi-rural properties frequently being subjected to more difficult approval pathways,** despite generally having greater capacity to accommodate a secondary dwelling without affecting neighbours, streetscapes or public infrastructure.
- **Plumbing approval being required for properties serviced entirely by household sewage treatment plants and rainwater tanks.** Applicants are charged on a per-fixture basis despite the development placing little or no additional demand on Council's reticulated water and sewerage infrastructure. This adds cost and weeks to the approval process without an evident corresponding infrastructure benefit.
- **Planning approvals that, in some cases, take twice as long to obtain as the dwelling takes to construct.**
- **Expensive specialist reporting that rarely changes the proposed outcome.** Applicants are required to obtain reports commonly costing approximately \$1,300 to \$6,500 each. Within the current dataset, 083GLY is the only project recorded as requiring a material siting change following specialist assessment. In the other recorded cases, the material outcome remained unchanged, raising concern that some reporting operates as procedural compliance rather than proportionate, outcome-focused assessment.
- **Existing grassed/farm access tracks used by machinery being treated as conflicting with a secondary dwelling application,** even where the proposal satisfies the planning scheme's parking requirements and four car-parking spaces are provided at the primary residence.

- **Referral of routine matters to third-party statutory authorities extending assessment timeframes.** In one case, a routine boundary relaxation was referred to Seqwater for comment due to a water-supply buffer zone, adding approximately three months to the approval process without any change to the proposed outcome.
- **Inconsistent measurement points for distance-based triggers.** In one case, Council initially indicated planning approval was required based on distance measured from an existing Class 10 shed rather than the primary dwelling, before confirming a different measurement basis after further enquiry.
- **Inconsistent approaches to vegetation overlays between local government areas.** Logan City Council may accept replacement planting, such as a 1:2 or 1:4 offset, where vegetation must be removed. Comparable solutions are not consistently accepted by the City of Gold Coast, making already constrained sites unnecessarily difficult or unviable.
- **Action Notices and development approval conditions expressly stating that a secondary dwelling must not be rented to an unrelated person.** This is directly inconsistent with the Queensland Government's removal, effective 26 September 2022, of restrictions on who may occupy a secondary dwelling. The State expressly confirms that secondary dwellings may be rented to anyone.
- **Prolonged and unpredictable planning processes also transfer significant financial risk to builders operating under fixed-price contracts.** While an application remains unresolved, builders may be exposed to increases in material, labour and subcontractor costs, together with additional administrative work and unanticipated specialist reports requested during assessment. These costs may not be recoverable from the client under the contract and must therefore be absorbed by the builder. At a time when construction businesses are already operating on constrained margins, approval delays and unpredictable regulatory costs that may contribute to cash-flow pressure, contract losses and the broader risk of builder insolvency. The cumulative financial impact on builders, and not only homeowners, should therefore be considered when assessing the proportionality and efficiency of the planning framework.
- **The Australian Government should consider providing targeted financial incentives to local governments that demonstrably improve development-assessment timeframes and reduce unnecessary regulatory barriers.** Funding could be linked to measurable outcomes, including faster approval periods, earlier identification of information requirements, fewer late RFIs and Action Notices, consistent interpretation of planning provisions, and increased delivery of secondary dwellings and other low-impact housing. This would help councils invest in assessment capacity while ensuring that additional public funding produces measurable improvements in housing supply.

These are not isolated administrative inconveniences. Collectively, they increase costs, extend project timeframes, create unacceptable uncertainty for builders and homeowners, and prevent or delay the delivery of legitimate housing during a recognised housing shortage.

The industry needs a clear, consistent and proportionate approval framework; one that can be understood and reliably applied by builders, certifiers, planners and Council assessment officers alike. The current system is producing unpredictable outcomes and placing unnecessary barriers in front of one of the quickest and least infrastructure-intensive ways to increase Queensland's housing supply.

Policy reference: Queensland Government, "What is development assessment?" (updated 4 December 2025), confirming that development approval is not required where proposed development falls within the accepted development category.

Case evidence

The following cases demonstrate changing thresholds, repeated RFIs and Action Notices, additional professional costs, extended approval periods and avoidable impacts on households waiting for housing.

01 003CAS | Pacific Pines

APPROVED

Application pathway	Express DA (MCU Code Assessment) – GCCC.
Lodgement	BA lodged 19 April 2023; enquiry sent to GCCC 26 April 2023 to confirm the correct application pathway; Express DA lodged 10 May 2023.
Council response	GCCC confirmed on 2 May 2023 that an MCU Code Assessment applied due to siting on a medium-density lot, but that an Express DA pathway could be used. Lodgement-ready letter received 19 May 2023.
Issue / trigger	Siting requirements on a medium-density lot.
Required changes	Nil beyond the Express DA process itself.
Additional cost / delay	No additional works cost recorded; the certifier did not charge for the MCU assessment, as the requirement had only recently changed. Additional MCU cost beyond the ordinary BA: \$0.00.
Client impact	Dwelling constructed on the clients' daughter and son-in-law's property.
Outcome / current status	Express DA approved 5 June 2023 — BCC Homes' first secondary dwelling project; construction handed over 18 October 2023.

02 037RIV | Oxenford

APPROVED / DID NOT PROCEED

Application pathway	Express DA – GCCC.
Lodgement	Lodged to the certifier 5 April 2024; Express DA lodged 15 May 2024, fully lodged 4 June 2024.
Council response	The certifier's initial assessment found no planning trigger when measuring from an existing Class 10 shed, but Council's plumbing referral on 24 April 2024 advised planning approval was required. Following further enquiries, GCCC's head planner confirmed on 14 May 2024 that Council measures secondary dwellings from the primary dwelling, not from a shed. Lodgement-ready letter received 31 May 2024; DA decision received 8 July 2024.
Issue / trigger	Whether distance should be measured from an existing Class 10 shed rather than the primary dwelling itself.
Required changes	None once the measurement basis was confirmed.
Additional cost / delay	No additional works cost recorded. Additional MCU cost beyond the ordinary BA: \$4,889.60. Approximately five weeks elapsed resolving the measurement-point dispute before the Express DA could be lodged.
Client impact	The clients intended to rent the dwelling out for retirement income but terminated the contract for unrelated personal reasons before construction began.
Outcome / current status	DA and plumbing approval received 8 July 2024; the clients subsequently terminated the contract and the project did not proceed.

03 020CRU | Nerang**APPROVED**

Application pathway	RRA – GCCC, with referral to Seqwater.
Lodgement	Certifier's RFI sent 16 May 2024; RRA lodged 17 May 2024.
Council response	GCCC requested additional plans and code-template forms on 29 May 2024, provided 31 May 2024. On 17 July 2024, GCCC advised the application had been referred to Seqwater for comment due to a water-supply buffer zone; GCCC requested a late referral response from Seqwater on 13 August 2024.
Issue / trigger	Water-supply buffer zone triggering a referral to Seqwater.
Required changes	Additional plans and code-template forms; no change to the proposed outcome.
Additional cost / delay	No additional works cost recorded. Additional relaxation cost beyond the ordinary BA: \$1,949.00. Approval took approximately three months, largely attributable to the Seqwater referral.
Client impact	Property held by an interstate investor; the delay caused no personal living inconvenience but did delay the start of construction.
Outcome / current status	Relaxation approved 19 August 2024; construction handed over 7 January 2025.

04 014WHI | Maudsland**APPROVED**

Application pathway	MCU / DA pathway – GCCC.
Lodgement	Project dated 14 November 2024; certifier lodged with Council 15 January 2025.
Council response	No RFI is recorded.
Issue / trigger	Distance from the main dwelling only.
Required changes	Nil
Additional cost / delay	Additional certifier/approval pathway cost beyond the ordinary BA: \$4,971.20.
Client impact	Dwelling constructed for the clients' daughter and her partner.
Outcome / current status	Approved 21 February 2025; construction handed over 31 July 2025.

05 003NEB | Helensvale**APPROVED**

Application pathway	RRA – GCCC.
Lodgement	Initial lodgement 29 April 2024; certifier lodgement date recorded as 27 June 2024.
Council response	GCCC RFI received 5 August 2024. Council requested approximately \$1,200 in rear-boundary privacy planting despite existing landscape screening, plus privacy screening to a bedroom balcony overlooking the main residence driveway.
Issue / trigger	Boundary relaxation and privacy/overlooking concerns.
Required changes	Rear-boundary planting and balcony privacy screening, despite sufficient landscape already provided on the rear property.

Additional cost / delay	Cost report: \$550.00 including GST for additional works (Council-requested design amendment). No material change in the ultimate outcome is recorded. Additional relaxation cost beyond the ordinary BA: \$1,949.00.
Client impact	Dwelling was constructed for the clients' mother and father who were living in continued house-sitting arrangements until the approval was received.
Outcome / current status	Approved 4 October 2024; construction handed over 19 December 2024.

06 007GIN | Maudsland**APPROVED**

Application pathway	MCU / DA pathway – GCCC.
Lodgement	Project commenced 21 October 2024; certifier lodged with Council 29 November 2024.
Council response	No RFI recorded.
Issue / trigger	Distance from main dwelling only.
Required changes	Nil
Additional cost / delay	Cost report: \$825.00 including GST for additional works (overlay/environmental assessment). No material change in the ultimate outcome is recorded. Additional certifier/DA pathway cost beyond the ordinary BA: \$5,609.00.
Client impact	Initially constructed for the owner's mother, with the intention that the owner may later occupy it when her children take over the main house.
Outcome / current status	Stamped 6 January 2025; construction handed over 18 June 2025.

07 031BAL | Upper Coomera**APPROVED**

Application pathway	MCU following BA lodgement – GCCC.
Lodgement	BA lodged 30 January 2025; certifier lodged with Council 25 March 2025.
Council response	No RFI recorded.
Issue / trigger	Distance from the main dwelling only.
Required changes	Nil.
Additional cost / delay	Additional costs and approximately three months added to the approval pathway. Cost report: \$2,217.00 including GST for additional works (town-planning/certifier work). No material change in the ultimate outcome is recorded.
Client impact	Dwelling constructed for the clients' daughter and her partner.
Outcome / current status	MCU stamped plans received 2 May 2025; construction handed over 30 October 2025.

08 052LAU | Ormeau**APPROVED**

Application pathway	RRA – GCCC.
Lodgement	BA lodged 30 January 2025; RRA lodged 3 March 2025.

Council response	RFI received 12 March 2025. Council requested that the extension be relodged as a secondary dwelling unless the kitchen was reduced, despite the proposed space not including a laundry.
Issue / trigger	Proposed wall 900 mm from the side boundary; build-over-sewer issue with 965 mm from wall to pipe edge. The proposal extended an existing bedroom to add a separate living area, kitchen and bathroom for an ageing parent, while retaining internal access to the main house.
Required changes	Application treated as a secondary dwelling at Council's request.
Additional cost / delay	Cost report: \$6,873.00 including GST for additional works (new sewer connection and CCTV). No material change in the ultimate outcome is recorded. Additional relaxation cost beyond the ordinary BA: \$2,041.00.
Client impact	Extension intended for the clients' mother.
Outcome / current status	Town planner approved the plans 9 May 2025; Council approval recorded 12 May 2025; construction completed 17 October 2025.

09 036JES | Helensvale**APPROVED**

Application pathway	RRA – GCCC.
Lodgement	BA lodged 12 August 2024; RRA lodged 15 August 2024.
Council response	RFI date is recorded as 21 August 2024. Council requested privacy screening to the northern end of a balcony overlooking an adjoining front yard and a further setback.
Issue / trigger	Second-storey setback referral arising from construction over an existing garage.
Required changes	Privacy screening accepted. BCC Homes successfully resisted the requested further setback because the dwelling was constrained by the existing garage and only one small bathroom window faced the affected boundary.
Additional cost / delay	Additional relaxation cost beyond the ordinary BA: \$2,041.00.
Client impact	Dwelling was constructed for the clients' daughter.
Outcome / current status	Approved 12 October 2024; construction handed over 2 April 2025.

10 054MID | Pacific Pines**APPROVED**

Application pathway	RRA – GCCC.
Lodgement	Lodged 21 November 2024.
Council response	Initially lodged as a detached extension (not a secondary dwelling) with no laundry and a small galley-style kitchen (31 m ² floor area, no oven, rangehood or dishwasher, only a two-burner electric hob). The clients requested a particular boundary position they considered the best outcome for the layout near the pool, requiring a boundary relaxation. GCCC would not accept the second kitchen; plans were amended to comply with setbacks and the application was relodged as a secondary dwelling once the kitchenette was accepted as meeting the relevant threshold.
Issue / trigger	Classification threshold between an “extension” and a “secondary dwelling” turning on kitchen facilities. This is the second recorded case in the dataset involving a material change to the proposed outcome (see Documented cost impact).
Required changes	Reclassification from extension to secondary dwelling, re-siting; setback compliance amendments.

Additional cost / delay	Cost report: a net credit of \$897.00 (a \$1,117 refund of the relaxation fee, offset by a \$220 redesign fee). Additional relaxation cost beyond the ordinary BA: \$1,957.00.
Client impact	The client's mother was waiting in New Zealand to relocate once approval was received.
Outcome / current status	RRA withdrawn once reclassified; BA received 10 February 2025; construction handed over 20 June 2025.

11 012VIL | Shailer Park

APPROVED

Application pathway	RRA for a front-boundary relaxation – LCC.
Lodgement	BA lodged 27 February 2025; RRA lodged 1 April 2025.
Council response	RFI received 29 April 2025.
Issue / trigger	Front boundary setback.
Required changes	Minor items rectified and returned within approximately two weeks.
Additional cost / delay	Cost report: \$1,485.00 including GST for additional works (slope-stability report). No material change in the ultimate outcome is recorded. Additional relaxation cost beyond the ordinary BA: \$3,000.00.
Client impact	Dwelling constructed for the clients' son.
Outcome / current status	LCC approval received 2 June 2025; construction handed over 17 October 2025.

12 093SAN | Worongary

APPROVED

Application pathway	MCU / DA pathway – GCCC.
Lodgement	BA lodged 30 January 2025; DA lodged 3 March 2025.
Council response	RFI received 18 March 2025. Application considered lodgement-ready 9 September 2025 after an extended environmental and covenant process.
Issue / trigger	Trees removed by the client before approval to make way for the secondary dwelling (eight small trees). Rather than accepting a replanting offset, GCCC required most of the property to be protected by a registered vegetation covenant.
Required changes	Detailed environmental report, detailed survey and Titles Office covenant registration. The surveyor advised this process was ordinarily associated with development rather than private residential land.
Additional cost / delay	Approximately six months' delay and <u>approximately \$20,000 in reported client cost</u> . The adjoining land forms part of a 3,500-lot development where vegetation had already been cleared for civil works. Cost report: \$2,805.00 including GST for additional works (slope-stability report and ecological assessment). No material change in the ultimate outcome is recorded. Additional certifier/approval pathway cost beyond the ordinary BA: \$5,609.00 + \$20,000 private costs to the resident.
Client impact	Dwelling intended for the clients' mother and father.
Outcome / current status	Approval pathway completed after the covenant process; construction handed over 13 March 2026.

13 1487TAM | Wongawallan**APPROVED / CHARGE UNDER REVIEW**

Application pathway	BA and MCU, including Council pre-submission and Express MCU pathways; subsequent infrastructure charges matter – GCCC.
Lodgement	Preliminary agreement signed 15 January 2025. BA and planning material submitted to the certifier 31 March 2025. Council pre-submission lodged 23 April 2025. Express MCU lodged 8 October 2025.
Council response	GCCC rectification letter dated 13 May 2025 and received 15 May required site and soil evaluation, bushfire, vegetation and slope-stability material. Further environmental review later raised the dwelling setback and requested an updated bushfire assessment and amended plans. Council issued its lodgement-ready letter on 7 October 2025. The approval documentation was emailed to BCC Homes on 27 October without the owner included, despite the infrastructure documentation indicating she had been copied. The charge was not clearly brought to the owner's attention until later.
Issue / trigger	Environmental overlay requirements, specialist-report adequacy, setback of the dwelling, bushfire assessment methodology and, after approval, an infrastructure charge under Charges Resolution No. 1 of 2025. The resolution commenced on 1 July 2025 while the matter was already in pre-submission. The proposed dwelling was 84 m ² ; the applicable exemption threshold was less than 80 m ² .
Required changes	Additional acoustic, bushfire, vegetation, site and soil, and slope-stability material; amended siting plans; a Method 2 bushfire assessment after the first consultant confirmed it could complete only Method 1.
Additional cost / delay	167 days elapsed between pre-submission lodgement and Council's lodgement-ready letter. Further consultant, report and redesign costs are to be quantified. If the changed threshold had been communicated while amendment remained practical, reducing the dwelling by approximately 4 m ² may have avoided the infrastructure charge. Cost report: \$2,365.00 including GST for additional works (acoustic report and ecological assessment). No material change in the ultimate outcome. Additional certifier/approval pathway cost beyond the ordinary BA: \$4,492.00.
Client impact	Terri is a pensioner and lived in a caravan for 15 months from lodgment to handover. She had committed to the design before the new Charges Resolution commenced and was not directly alerted to the changed 80 m ² threshold while there was a practical opportunity to amend the plans.
Outcome / current status	Express MCU approved 27 October 2025. Building and plumbing approval received 30 October 2025. Infrastructure charges notice received on 26 November 2025. A full exemption and management review have been requested; the charge remains disputed. Separate advocacy timeline and correspondence are available. Construction handed over 17 April 2026. BCC Homes is still working with the client to request that her charges are reversed.

14 081GIR | Pimpama**APPROVED**

Application pathway	RRA - GCCC
Lodgement	BA lodged May 2025; lodged with Council 29 May 2025.
Council response	No RFI recorded.
Issue / trigger	Front boundary setback.
Required changes	Nil.
Additional cost / delay	Additional MCU cost beyond the ordinary BA: \$7,864.00.
Client impact	Dwelling constructed for the clients' parents.

Outcome / current status

Approved 18 June 2025; construction handed over 5 December 2025.

15 125TIE | Currumbin Waters**APPROVED****Application pathway**

DA – GCCC.

Lodgement

Lodged to the certifier 25 February 2026.

Council response

On 27 February 2026, the certifier advised Council would not accept the proposed media room being read as a potential third bedroom; the design was amended to open the room fully into a living/dining area. Council also queried an existing structure recorded online as including a bathroom; a statutory declaration was obtained confirming it was used only as a garden shed. Council requested a site inspection on 8 April 2026 and confirmed on inspection that the clients' statutory declaration was accurate.

Issue / trigger

Media room capable of being read as a third bedroom; an existing structure queried as a possible second dwelling.

Required changes

Media room opened into a living/dining area; statutory declaration confirming the existing structure's use as a garden shed.

Additional cost / delay

Cost report: \$5,940.00 including GST for additional works (slope-stability report and identification survey). Additional MCU cost beyond the ordinary BA: \$4,889.00.

Client impact

Acreage property.

Outcome / current status

DA approved 1 May 2026 — 66 days (44 business days) from lodgement.

16 003ROT | Elanora**APPROVED****Application pathway**

RRA – GCCC.

Lodgement

Lodged to the certifier 25 March 2026.

Council response

On 10 April 2026, Council requested a slope-stability report and required trees to be marked on the plans with separation distances to the proposed building. The report was obtained and returned; when BCC Homes queried which trees were being referred to, as none existed in the proposed building area, Council responded with out-of-date site photographs. BCC Homes supplied current photographs confirming the tree in question no longer existed. Council nonetheless requested a site visit on 22 April 2026.

Issue / trigger

Slope stability and tree-separation requirements based on outdated site information.

Required changes

Slope-stability report; updated site photographs to correct Council's outdated records.

Additional cost / delay

Cost report: \$1,650.00 including GST for additional works (slope-stability report). Additional relaxation cost beyond the ordinary BA: \$2,137.00.

Client impact

Nil recorded.

Outcome / current status

RRA approved 5 May 2026 — 42 days (27 business days) from lodgement.

17 6870SAI | Glenlogan

OPEN / PENDING

Application pathway	MCU/DA - LCC
Lodgement	Provided to town planner 18 May 2026; lodged with LCC 1 July 2026.
Council response	Application advised properly made 27 July 2026. An RFI was received on 11 August 2026 requesting that the secondary dwelling be relocated within 20 metres of the main dwelling and outside the moderate flood overlay.
Issue / trigger	Distance greater than 20 metres from the main dwelling (proposed at approximately 25 metres) and a Melaleuca overlay, with no trees within the building envelope; the RFI also raised a moderate flood overlay affecting the alfresco area only.
Required changes	Basic arborist report obtained despite no proposed tree removal. In response to the RFI, BCC Homes is contesting the requested relocation on the basis that the sub-floor height sits above the medium flood zone level and that the compliant external laundry access satisfies the low-level flood zone requirements; the siting also preserves privacy and useable yard space for the family in the main dwelling.
Additional cost / delay	Arborist report took approximately three to four weeks. Cost report: \$2,112.00 including GST for additional works (arboricultural impact assessment). No material change in the ultimate outcome. Additional MCU cost beyond the ordinary BA: \$4,560.00.
Client impact	The clients intend to relocate to their daughter's acreage property due to ongoing medical needs and are living in a caravan while awaiting the Granny Flat.
Outcome / current status	RFI response under preparation; outcome ongoing as at 11 August 2026.

18 102CRE | Wongawallan

OPEN / PENDING

Application pathway	MCU - GCCC
Lodgement	Planning lodged 25 May 2026; prepared and lodged with Council after checks on 15 June 2026.
Council response	First "Action Notice – Not Properly Made" received 14 July 2026. Second Action Notice received 29 July 2026. Council then attended an onsite meeting on 10 August 2026.
Issue / trigger	Size and distance from the main dwelling; existing studio considered capable of use as a self-contained secondary dwelling as it included a small kitchenette, despite no laundry; informal grass machinery access; inclusion of a study; and whether the proposal remained subordinate to the main dwelling.
Required changes	Decommission studio kitchenette; amend the informal machinery access to demonstrate shared access; add a pathway between dwellings; and open the study further so it could not be used as a third bedroom.
Additional cost / delay	Additional drafting expenses, including further demolition and access documentation. Cost report: \$1,870.00 including GST for additional works (slope-stability report and updated plans). No material change in the ultimate outcome thus far. Additional MCU cost beyond the ordinary BA: \$4,889.00.
Client impact	The Granny Flat is intended to allow the owner and his partner to establish their forever home on family property and raise a family close to relatives.
Outcome / current status	Following an onsite meeting, Council accepted the proposed location and kitchenette decommissioning in principle. Amended plans were still required before the application would be deemed properly made.

19 003MIT | Currumbin

OPEN / PENDING

Application pathway	RRA - GCCC
Lodgement	File lodged to private certifier on 16 June 2026, due date 17 July 2026.
Council response	Chased an outcome on 17/07/26 and was advised on the 20/07/26 that due to the complexity of this site, further time is needed to assess this application. It is anticipated that they will be issuing an RFI in the next 10 business days. RFI received on 8 August 2026. Council has confirmed that the BOS can be processed under this current RRA application. An MCU will be required for the dwelling. Council has noted that the intended use is a secondary dwelling, given that the existing dwelling is sited over both lots, despite being on a separate titled lot to the primary dwelling referenced.
Issue / trigger	Front boundary setback due to existing 5m EMT running through middle of property.
Required changes	House needed to move further away from EMT to negate need for BOS, however job will still be referred to plumbing engineers for approval for final stay, despite compliance with code.
Additional cost / delay	Cost report: \$2,462.18 including GST for additional works (EER, new drawings and certifier amendment). Additional relaxation costs beyond the ordinary BA: \$1,609.90. Costs are ongoing and not finalised.
Client impact	Nil – at this stage.
Outcome / current status	Project information remains to be completed.

20 007MAR | Worongary

OPEN / PENDING

Application pathway	Preliminary contract assessment complete; application not yet lodged – GCCC.
Lodgement	<i>To be completed.</i>
Council response	<i>To be completed.</i>
Issue / trigger	Distance from main dwelling, with a dam separating the proposed location and the primary dwelling location.
Required changes	<i>To be completed.</i>
Additional cost / delay	Cost report: \$1,650.00 including GST for additional works (slope-stability report).
Client impact	Nil.
Outcome / current status	Not lodged; Council response not yet available.

21 033MAJ | Upper Coomera

OPEN / PENDING

Application pathway	BA followed by MCU after a reconfiguration-of-a-lot issue was identified by plumbing – GCCC
Lodgement	BA lodged 21 April 2026; provided to town planner 29 June 2026; submitted to GCCC 10 July 2026.
Council response	GCCC issued an Action Notice stating that the application was not properly made.
Issue / trigger	Reconfiguration of a lot identified by plumbing; environmental overlay and proposed siting.

Required changes	Minor-change supporting reports obtained, including BMP, arborist report, and wastewater design. Although the reports supported the proposed location and indicated no tree removal, Council required the dwelling to move within 3m of the main dwelling.
Additional cost / delay	New survey, new soil testing, redesign fees to locate the property within 3m of the main dwelling on a 4,016 m ² property. Cost report: \$6,149.00 including GST for additional works (ecological site assessment and contour survey). Cost report: for re-siting, still being quantified, expected to <i>be approximately \$2,310.00 including GST</i> . Additional MCU cost beyond the ordinary BA: \$5,024.59. ROL information withheld from client, until a fee was paid and located from offsite; despite the plumbing department having this information – 1-week delay.
Client impact	A father and mother, and their daughter and son-in-law purchased the property intending to build the secondary dwelling for the parents, allowing them to all live close. Currently all living in the same house until construction is handed over.
Outcome / current status	Approval status to be completed. Costs still incomplete.

22 083GLY | Riverbend**APPROVED**

Application pathway	MCU/DA - LCC
Lodgement	Provided to town planner 14 January 2026; lodged with LCC 28 January 2026.
Council response	RFI received 6 March 2026. Multiple discussions occurred regarding location.
Issue / trigger	Environmental overlay and distance from the main dwelling. Council guidance focused on siting within 20 metres, despite the seven-acre property and physical constraints near the house.
Required changes	Alternative siting investigated. New soil testing, survey and siting plans completed for a location 23 metres from the main dwelling.
Additional cost / delay	Further consultant work and delay from January to July 2026. Cost report: \$2,728.00 including GST for additional works (water, updated plans, soil testing, repeat contour survey and bushfire report update). This is the one recorded case in which specialist assessment led to a material siting change. Additional MCU cost beyond the ordinary BA: \$4,560.00.
Client impact	Client, who is in her late 70s and living alone in Gatton, is relocating closer to her daughter and son-in-law so they can support her. Closer locations conflicted with tanks, septic infrastructure, cleared land constraints or would have required driveway relocation.
Outcome / current status	Relodged 8 June 2026 and approved 30 July 2026 at 23 metres from the main dwelling. Without the DA trigger, BA could have been approved in January.

23 008TAN | Tallai**OPEN / PENDING**

Application pathway	BA followed by minor-change application - GCCC
Lodgement	BA lodged 18 May 2026; minor change lodged 7 July 2026.
Council response	Plumbing RFI received 22 May. GCCC RFI issued 29 July 2026. Council later indicated a full planning application might be required because the media room could become a third bedroom.
Issue / trigger	Historic reconfiguration of a lot not visible on Council's website or identifiable by the surveyor, certifier or client; proposed extension of the building envelope; media room interpreted as a potential third bedroom.

Required changes	Historic report purchased; media room removed and opened as living/dining; all depictions of and references to the proposed secondary dwelling removed and relabelled as “additions”.
Additional cost / delay	\$180 historic report with an advised three-week wait; delay while Council’s offsite record was obtained. Cost report: \$2,247.81 including GST for additional works (Minor Change fee/lodgement). No material change in the ultimate outcome is recorded, other than a redesigned ROL for the property. ROL information withheld from client, until a fee was paid and located from offsite; despite the plumbing department having this information – 3-week delay.
Client impact	Unable to start shed construction until secondary dwelling approval is received.
Outcome / current status	Council has advised the decision package would be issued within five business days, then requested additional time after the five-day period lapsed. Final outcome to be completed.

Requested action and recommendations

BCC Homes requests that HIA raise these matters with the Queensland Government and affected local governments, and advocate for the measures below. The objective is a proportionate, transparent and repeatable pathway that allows compliant secondary dwellings to be delivered without unnecessary cost and delay - not the avoidance of reasonable assessment.

- A clear and consistent State-wide assessment framework, including progression of a State secondary dwelling code capable of producing predictable outcomes across Queensland.
- Published guidance that reduces inconsistent local interpretation and provides a reliable preliminary assessment checklist for residents, builders, certifiers and planners.
- Review and withdrawal of approval conditions that restrict secondary dwellings from being rented to unrelated occupants.
- Greater accountability and transparency where RFIs and Action Notices are issued late in statutory assessment periods.
- Transitional protections and direct applicant notification where a new charge, exemption threshold or policy change commences during an active pre-submission or assessment process, including a reasonable opportunity to amend the proposal before the new financial consequence is imposed.
- A proportionate plumbing approval pathway for rural properties serviced by HSTPs and rainwater tanks.
- A risk-based and proportionate threshold for specialist reports, with Council required to explain how each report is reasonably necessary and capable of informing the assessment outcome. Planning assessment and specialist reporting should not be required for accepted development unless a specific assessable-development trigger is identified.
- Removal or relaxation of distance from the primary dwelling as a standalone trigger for MCU assessment, particularly on large rural or semi-rural properties where the proposed siting presents no demonstrated amenity, environmental or infrastructure impact.
- Consistent vegetation-offset principles across local government areas.
- A formal escalation process for recurring, inconsistent or contradictory assessment decisions.
- Assess the financial impact of planning delays and unanticipated assessment requirements on builders delivering fixed-price contracts, including whether these regulatory costs are contributing to business failure and reduced housing-sector capacity.

- Introduce Commonwealth funding incentives for local governments that achieve measurable improvements in approval timeframes, assessment consistency and housing delivery, particularly for low-impact and otherwise accepted development. Incentives should reward genuine reductions in total approval time and regulatory burden; not simply faster administrative processing that transfers additional cost or responsibility to applicants, and not issuing an RFI on the due date.