

## Economic Development and Other Legislation Amendment Bill 2024

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Secretary for the Committee  
Cost of Living and Economics Committee

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Dear Committee

**Re: The Economic Development and Other Legislation Amendment Bill 2024 (the Bill).**

Thank you for the chance to comment on this Bill.

I have commented on PDAs and EISs at Flagstone PDA for a decade..

In urban footprints and periurban areas in SEQ, the target for another 2.2 Million migrants, there are areas of market failure., landbanking, marginal land, koala habitat, 40,000ha of remnant vegetation in UUF and Biodiversity Hotspots, with UDIA. PCA developers and now EDQ -all competing for brownfield and residential, greenfield; gentle density, multirise and industrial development ..

The current limited structure and standard of EDQ masterplans, EISs and processes are in conflict with, but largely overriding -Logan planning scheme standards, the SEQ Koala Conservation Strategy 2020, Qld Planning Provisions 2016, SEQ Regional Plan 2017 (Regional Biodiversity Values mapped), aspects of the planning acts and aspects of the EPBC Act and Public Consultation generally. (see `Beaudesert Shire rejection and decision against, on proposed North Maclean Industrial PDA 2007 and submissions from Greenbank residents against Covella PDA in Harbinger Report 2011).

The impacts of PDAs/MDAs on LGAs and affected communities and the natural environment have not been costed in EISs etc and it appears LOGAN CITY and IPSWICH CITY are just social and economic experiments for the state government for residential and industrial gluts in koala habitat, maximum migrant intake and limited services and infrastructure provided, only supported and subsidised by the ratepayer and taxpayers for future migrants and developers profits. Even infrastructure australia pinpoints Residual Impacts -ENVIRONMENTAL & ECONOMIC IN Coomera connector stage one.

The big social goods of regional open space (ROSS) undertaken by Bruce Boyes, ICC and others in Ipswich on the FGK CORRIDOR and the 1,000 ha of Karawatha Forest by the Karawatha Forest Protection Society & BCC and similar sized reserves around Daisy Hill and Cornubia in Logan City by the WILDLIFE PRESERVATION SOCIETY & LCC are not matched by REGIONAL OPEN SPACE by DSDILGP and EDQ IN PDAs (except 200 ha ungazetted EKH & ERE and not fenced at Everleigh by MIRVAC.)

we do need greater Government involvement, but given that we are experiencing combined housing, climate and biodiversity crises, EDQ must function as a model developer and set the standard for housing and development that will also improve the liveability and sustainability of our towns and cities, and better prepare us for future climate impacts.

As drafted, this Bill creates huge scope for unanticipated, arbitrary, partisan, deleterious and capricious outcomes. It opens the door to further behind the scenes lobbying by the development industry and offers no checks or balances to reduce the likelihood these activities will occur. It also fails to guarantee the actual delivery of increased social and affordable housing and offers nothing in the way of improved resilience, reduced carbon impacts and improved nature positive outcomes for the built environment and in major development areas.

As such it is of critical importance that the following aspects be improved:

- **Purpose:** The purpose clauses in the Bill must enshrine the goals we as a community really want to achieve
  - social and affordable housing; improved climate resilience, reduced carbon emissions, enhanced liveability and nature positive outcomes integrated into the built environment; and
  - it must recognise the need for all future development to be cognisant of the best climate science and forecasts that will be impacting our communities.
- **Content of schemes:** Other clauses throughout the Bill should be consistent with the above. They ought to provide for requirements “relating to the achievement of objectives stated in s3 of this Act” or incorporate similar wording to “to improve climate resilience, reduce carbon emissions, enhance liveability and integrate nature positive outcomes into the built environment” and to “integrate climate science and forecasts.” At minimum this should apply to cl28 (Content of development scheme), cl34 (Matters to be considered in making a decision) and cl35 (PDA development conditions).
- **Consistency with other planning:** There needs to be consistency and reference to other planning frameworks. For instance the DRAFT \$30MSEQBioregional Planning processes, as agreed between Queensland and the Commonwealth are a shambles.especially given the State’s current commitment to prioritise mapping of Potential Future Growth Areas (PFGAs).
- **Community involvement: MERIT APPEALS ARE MISSING.**There should be mandated opportunity for communities to meaningfully contribute prior to the declaration of PDA’s, and merit reviews, and in the development of plans and frameworks - this is an Act about development for community purposes. Yet no community organisations have been consulted in its drafting, and the opportunities for communities to participate in development have been reduced and squeezed out.
- **Housing & offsets:** We are supportive of measures to ensure the timely delivery of social AND affordable housing. However these must be delivered within the areas of urban renewal, where land is best densified. Not pushed out to other LGAs and (likely) peri-urban areas, which threaten more habitat and important agricultural land. The existing environmental offsets system is horribly broken. So it is worrying to see this concept expanded to social and affordable housing. There needs to be absolutely no wriggle room to postpone or substitute on these outcomes. We need transparent targets, continuous monitoring and regular reporting to the community on progress in implementing this and the other objectives of this Act. These measures will help ensure the Act’s objectives are actually implemented and enforced in a timely fashion.
- **Good Governance:** Diverse representation must be guaranteed on the Board, including from each of the social and affordable housing, community and environmental sectors.

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