

## Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025

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| <b>Submission No:</b>      | 435  |
| <b>Submitted by:</b>       | Australian Energy Producers                |
| <b>Publication:</b>        | Making the submission and your name public |
| <b>Attachments:</b>        | See attachment                             |
| <b>Submitter Comments:</b> |  |

**20 May 2025**

Ms Stephanie Galbraith,  
Committee Secretary  
State Development, Infrastructure and Works Committee  
Parliament House, George Street, Brisbane  
QLD 4000

via email: [SDIWC@parliament.qld.gov.au](mailto:SDIWC@parliament.qld.gov.au)

Dear Committee Secretary,

**RE: Inquiry into the *Planning (Social Impact and Community Benefit) and Other Legislative Amendment Bill 2025***

Thank you for the opportunity to make a submission on behalf of the members of Australian Energy Producers on the draft [Planning \(Social Impact and Community Benefit\) and Other Legislative Amendment Bill 2025](#) (the Bill) which was tabled on 1 May 2025.

AEP represents companies that supply both natural gas and low-emission energy solutions across Australia. Our members recognise that the future integration of large-scale wind and solar will rely on firm, dispatchable gas generation for grid security.

The *Planning (Social Impact and Community Benefit) and Other Legislative Amendment Bill 2025* (the Bill) is designed to give regional communities a stronger voice in the roll-out of large-scale renewable energy. However, it is regrettable that a reform intended to embed consultation has been developed without engagement with industry prior to the Bill being introduced. This lack of early engagement means that key assumptions have not been tested, and practical implementation issues have not been explored. We are concerned that the Bill could inadvertently introduce unintended consequences into project assessments in Queensland.

Assigning local councils as decision-makers for major project approvals raises many questions and concerns from our members. Some local councils may lack the technical expertise and regulatory resources required to assess the complex considerations involved in large project applications. This shift could lead to inconsistent or overly cautious decisions rather than balanced, evidence-based evaluations aligned with state and national energy strategies. There is also potential for disconnect in decision-making pathways if resource projects (which deliver substantial royalty revenues to the State) are assessed at the state level and renewable projects by local councils. This bifurcated approach could create competing priorities and fragmented assessment.

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The Government should also deal with the growing number of instances in which large-scale solar and wind proposals overlap existing resources tenure. There are several live examples where a large renewable project has appeared in the middle of resource tenure, with no requirement to consult or negotiate co-development terms with underlying tenure holders. Exclusion zones and operational impacts can be significant<sup>1</sup> and risks locking away gas reserves and undermining billions of dollars of investment in the infrastructure that underwrites Queensland's economic and energy security, including through substantial royalty revenue.

We respectfully make three recommendations to the Committee:

1. The Bill should require mandatory **consultation** between resource tenure holders and each overlapped renewable proponents *before* they lodge a Development Application.
2. Best practice management of **overlapping resource interests** would see each renewable proponent sign a co-development agreement with their overlapped resource tenure holders *before* they lodge a Development Application. Coexistence Queensland has commenced consultations around this approach, and peak industry bodies are working on a proposal for consideration in a future amendment.
3. The Government should undertake **genuine consultation** in accordance with the Queensland Government Better Regulation Policy. The draft Bill would benefit from the development of rigorous Impact Analysis Statement (IAS) as the basis of a thorough iterative public consultation process.

Thank you again for the chance to provide a submission on the reforms proposed to Queensland's planning framework and associated legislative amendments. None of the content in our submission is confidential and you are welcome to publish it on your website. We would welcome any opportunity to speak with the Committee about the issues raised in our submission.

Yours sincerely,



Keld Knudsen  
General Manager States & Territories, and Queensland Director  
**Australian Energy Producers**

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<sup>1</sup> For example, an exclusion zone for 50 x 247m wind turbines could set an exclusion radius of 11.5 km<sup>2</sup> (roughly 1,150 hectares).