

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

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State Development, Infrastructure and Public Works Committee
Parliament House,
George Street
BRISBANE QLD 4001 Australia

Submission via SDIPW [online portal](#)

Dear Committee,

PIA's response to Inquiry into Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025

The Planning Institute of Australia (PIA) is Australia's trusted voice on planning, and is the national association representing the town planning profession. PIA is committed to advocating for sustainable and evidence-based planning practices that shape resilient, inclusive, and prosperous communities.

PIA thanks the committee for the opportunity to provide feedback on the *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025 (the Bill)*, to support the committee's consideration.

This submission contains feedback on two key parts of the Bill:

1. The social impact and community benefit amendments; and
2. Brisbane Olympic and Paralympic Games amendments.

Please note, PIA has opted not to provide feedback on the Economic Development Queensland (EDQ) changes, which form part of the Bill.

Summary Statement

PIA supports the intent of the Bill, which seeks to reset the assessment processes for both Renewable energy projects and the Brisbane 2032 Games. However, PIA recommends further changes are made to the Bill to ensure good planning outcomes can be achieved.

Social impact and community benefit amendments

PIA supports making prescribed renewable energy projects, including wind and solar farms, impact assessable by the State government.

However, PIA believes there are key improvements that would enhance the implementation and function of the Bill, including:

Brisbane Olympic and Paralympic Games amendments

PIA supports the need to streamline planning, delivery, and management processes for Olympic venues and villages to enable timely delivery.

However, it is essential that good planning outcomes remain embedded within the Games planning framework to uphold community trust and confidence

- Enabling local governments to assess and determine the assessment level for non-prescribed, minor renewable energy facilities; and
- Establishing a clear and direct link between Social Impact Assessments (SIA) and Cost-Benefit Analyses (CBA), including requirements for monitoring and reporting.

in the planning system. To achieve this, PIA recommends:

- Establishing clear processes to ensure stakeholders are informed and involved in the planning and delivery of 2032 venues and infrastructure; and
- Including mechanisms to manage the post-2032 transition effectively, avoiding the complexities often associated with dismantling temporary planning frameworks.

Introduction

PIA's submission has been prepared in two parts, responding to the two key parts of the Bill:

PART A: Social impact and community benefit amendments, including:

1. Proposed amendments to the Planning Act
2. Proposed amendments to the Planning Regulation
3. The statutory SIA Guideline
4. The draft State Code 23: Solar Farm Development

PIA continues to advocate for the importance of good planning in leading our transition to net zero, and welcomes the opportunity to provide input into the statutory planning process for the assessment of renewable energy projects.

PART B: Brisbane Olympic and Paralympic Games amendments, including:

1. Streamlined assessment process for Games venues and villages
2. Managing the Legacy Transition Under the BOPGA Act

PIA has been actively involved in preparing for Brisbane 2032, including contributing to the Games Legacy Consultation Paper in 2023, and detailed submissions to both the 2024 master plan review and the 2025 100-day review. Together with partnering peak bodies, PIA has developed the [Green Pathways Gold Places Report](#) advocating for an ambitious legacy which leveraging opportunities for strategic investment in place-based outcomes.

Detailed Submission

PART A: Social impact and community benefit amendments

PIA provides the following feedback for the revised Renewable Energy Framework components as follows:

1. Proposed amendments to the Planning Act
2. Proposed amendments to the Planning Regulation
3. The statutory SIA Guideline
4. The draft State Code 23: Solar Farm Development

PIA thanks the Department for undertaking a detailed briefing with PIA and our members on the Bill's changes. This has enabled PIA to have a deeper understanding of the Bill in relation to the Social impact and community benefit amendments.

1. Planning Act 2016 amendments

PIA supports the ability for local governments to apply cost recovery fees to participate, review, negotiate and enter into mediation if required under section 106ZM. Recommendations for changes to the Planning Act are provided in Table 1.

Table 1: PIA's Recommendations for changes to the Planning Act

| Issue | | Discussion | PIA Recommendation |
|------------|---|--|--|
| 1.1 | Amendment of the CBA in the instance of an approval given that differs from the original proposal | As discussed in PIA's webinar on 14 May 2025, questions were raised regarding the pre-preparation of the CBA, and the likelihood of proposal undergoing some change during the assessment process or an approval requiring substantive change. | Review section 106ZA to make it clear that CBAs can also be amended in the circumstance of an approval that differs from the proposal presented for the CBA negotiations. |

2. Planning Regulation 2017 amendments

PIA understands local stakeholders are concerned about projects already progressed and the degree of consultation occurring that is not adequately informing or involving impacted communities. This goes to the heart of the new SIA requirements to be completed prior to application lodgement.

PIA also understands that some stakeholders have raised concerns that pausing of applications may trigger new requirements by assessment managers. It should be clear to all stakeholders that the community interface is the primary concern and grounds for the pausing of

applications so that proponents can focus on that single matter of strengthening the community input through a CBA development. PIA is satisfied that this is the case with reference to the new section 51J and Ministerial direction provided to applicants under s51J (2) and (3) advising the SIA and CBA must be submitted in order to restart the assessment.

In the spirit of the Chief Executive having the ability to decide if a CBA is required (s106ZE), PIA believes that the renewable energy facilities (small scale solar farms) which do not fall under the definition of a *prescribed renewable energy facility*, should be assessed by local government and should have the category of assessment set by the local planning instrument (this recommendation is captured in row 2 of Table 2 below).

This also serves as capacity building for local government planners in a landscape where renewable energy and changes to the way energy is generated and distributed in our communities will continue to change over time. Ultimately PIA aspires to have energy transmission (where it is evolving into multiple tenure, methods and processes) would be fully integrated into regional land use plans over time.

Further recommendations for changes to the Planning Regulation are provided in Table 2.

Table 2: PIA's Recommendations for changes to the Planning Regulation

| | Issue | Discussion | PIA Recommendations |
|------------|--|--|--|
| 2.1 | Amendment of Schedule 10, Part 14A, renewable energy facilities | Table 1 - Assessable development under Schedule 10, makes the category of assessment for all renewable energy facilities impact assessable and the Chief executive the assessment manager. Facilities on land smaller than 2 hectares and less than 1 megawatt are better handled by the local governments | Amend the regulation Schedule 10, Part 14A to be applicable to <i>Prescribed renewable energy facilities</i> only. |
| 2.2 | Amendment of schedule 22 s1 (1) (Documents a local government must keep available for inspection | The conditions of approval legally bind the CBA to the land. Community outside local government can be stakeholders and beneficiaries to the CBA. Implementation and progress of the CBA | Insert (wc) and any progress, monitoring and reporting in relation to the agreed SIA or CBA to which the local government is a party. |

| | Issue | Discussion | PIA Recommendations |
|--|-----------------|---|---|
| | and purchase) – | should also be publicly available. The conditions of approval should require the monitoring and reporting of the CBA or SIMP to be publicly available. | Amendment of sch 22, s 3 (Documents local government must or may publish on website) Schedule 22, section 3(1), after '(r) to (v),'— insert— (wa), (wb),(wc) |

3. Social Impact Assessment (SIA) Statutory Guideline

The Statutory SIA Guideline 2018 is currently in place to guide SIA's for any large resource project under the SSRC Act, the SDPWO Act or the EPA Act. It is proposed to extend its application to proposals under the Planning Act requiring SIAs.

The current SIA Guideline 2018 is 21 pages and is accompanied by a non-statutory *Supplementary material for assessing and managing the social impact projects under the Coordinator General' Social Impact Guideline March 2018* dated 2023 at 103 pages. PIA understands this non-statutory guideline is also to be updated to assist all stakeholders with information about the SIA and CBA process. Current feedback indicates that local government will be appreciative of guidance on entering into the CBA process in the revised guideline.

The draft SIA Guideline 2025 adds information to draw in relevant projects under the Planning Act. There is little change to the content and intent of the SIA and PIA notes the Department has taken the opportunity to expand and clarify some sections for the better, which is commended. Recommendations for amendments are provided in Table 3 below.

Table 3: PIA's Recommendations for changes to the SIA Guideline

| | Issue | Discussion | PIA Recommendations |
|------------|---|---|---|
| 3.1 | The SIA process is frontloaded prior to development application lodgement with the Queensland Government (section 1.4). | PIA is concerned that given the nature of our planning system where flexibility is enabled and proposals change throughout the assessment process, that locking in a CBA prior to lodgement may confuse the community | Provide guidance and fact sheets to the community clearly articulating that proposals, as presented prior to assessment may not be approved as lodged and that conditions of approval may also |

| Issue | | Discussion | PIA Recommendations |
|------------|---|--|--|
| | | where a proposal is amended. | alter components of the development. As a result, further iterations of the CBA may be required. |
| 3.2 | Figure 1 SIA. Process notes “pre-lodgement” of the DA where the SIA is a step prior and the CBA is a step post pre-lodgement. | <p>It is unclear what the pre-lodgement step is, as it is not mentioned elsewhere in the material.</p> <p>It is understood that an SIA is required for an application to be properly made.</p> | Provide an explanation of the pre-lodgement step as distinct from lodgement and achieving properly made status in information and fact sheet diagrams. |
| 3.3 | The SIMP (section 2.2.6) may reference strategies in the CBA | <p>PIA is concerned that the amendment proposes to rectify gaps in community understanding and consultation but the connection between the CBA and SIA is not clear or mandated.</p> <p>PIA understands that communities can request assistance with matters outside direct impacts, however these matters should still be identified as community needs (rather than impacts) and a connection made to ensure transparency.</p> | Change the word may to must |
| 3.4 | Lifecycle matters are noted in section 2.2.6 and are a core principle in section 2.2, but not in section 2.2.4. | The large-scale projects have impacts across scale and spatial boundaries depending on life stage of planning, construction, | For completeness and clarity, the assessment of impacts (section 2.2.4) must include matters of scale and time and clearly identify time frame with corresponding |

| Issue | | Discussion | PIA Recommendations |
|-------|--|--------------------------------|--|
| | | operations and decommissioning | impact mitigation and benefit enhancement. Ensure lifecycle matters are included in section 2.2.4 |

4. State Code 26: Solar Farm Development

PIA has reviewed the draft State code 26 for Solar farms. Overall, the code is comprehensive, and PIA supports the ongoing provision of extensive guidance material such as the accompanying Guideline to State Code 23. PIA looks forward to issue of a revised edition of the guideline for the industry and practitioners use.

PART B – Brisbane Olympic and Paralympic Games amendments

PIA applauds the insertion of a new purpose to the BOPGA Act in **(d) provides that a purpose of the Act is to maximise the legacy benefits from the games** and this feedback centres on post games transfer of that legacy.

PIA understands that time is now of the essence. Venues and villages have been the topic of much public awareness and multiple reviews by respected experts in their fields having considered all feasible options. PIA recognizes the detailed planning inherent in the 2032 Olympic and Paralympic Games venues and villages announcement and the importance of achieving timely delivery of the 2032 Olympic and Paralympic Games venues and villages.

1. Streamlined assessment process for Games venues and villages

PIA supports the designation of the Games venues and villages as accepted development, recognising their significance as matters of State interest. While streamlined approval pathways are appropriate in this context, PIA emphasises the critical role of the Games Independent Infrastructure and Coordination Authority (GIICA) in ensuring these developments are responsibly planned, delivered, and operated in the public interest. In essence, the removal of formal approval requirements must not come at the expense of planning intent or rigour.

Recommendation: To uphold the public interest, PIA recommends that clear processes be established to ensure stakeholders are informed and involved in the planning and delivery of 2032 venues and infrastructure, including but not limited to:

- Working with local government for integration with local planning schemes, infrastructure plans, and maximising legacy outcomes for the community;
- Providing a public statement of intent identifying how development responds to its context, and how it addresses key planning issues, such as environment and infrastructure;
- Provide notice of the proposed plans for each development so that the community are kept informed; and
- Maintain a publicly available register of development that lists what development has been exempted from the Acts.

2. Managing the Legacy Transition Under the BOPGA Act

The current Bill presents an important opportunity to introduce further amendments to the *Brisbane Olympic and Paralympic Games Arrangements Act* (BOPGA Act) and Regulation to ensure a smooth post-Games legacy handover. Specifically, sunset clauses or equivalent mechanisms should be included to clearly manage the transition and avoid the complexities the planning industry has previously encountered when dismantling temporary planning frameworks.

Before the execution of Dissolution Day under section 53CJ of the Act, the BOPGA Act and Regulation should clearly define how Games-related assets are transferred—whether to local government, new venue owners, or operators—and how legacy is to be managed.

This process should be seamless and address the following key matters:

- Evidence of compliance with all relevant building and safety regulations (e.g. certificates, licences)
- Tenure, survey plans, and other land arrangements secured for the Games should be transferable or able to be amended for ongoing use
- Maintenance and availability of records typically required for seller disclosure or due diligence
- Consideration of ongoing operational costs and responsibilities within Games planning
- Provision for administrative changes to local planning schemes post-2032, allowing zoning or designations to be amended, restored, or updated to reflect the future use of venues
- Transfer of ownership or operational responsibilities to occur at no cost to new stakeholders

These provisions will ensure that, after 2032, venues can continue to operate lawfully and efficiently within the existing planning and building frameworks. In some cases, venues and villages may require additional approvals or modifications outside the jurisdiction of the GILCA to support alternate uses, as contemplated in section 53DA.

Recommendation: PIA recommends GILCA manage the post-2032 transition effectively, avoiding the complexities often associated with dismantling temporary planning frameworks, including, not limited to:

- in Section 53DA insert further words:
Section 53DA (c) to facilitate legacy uses of authority venues, other venues and villages including transfer from the Authority to future venue and village owners and operators after the games.
- Amend the BOPGA Act to include the requirement to satisfy and obtain (irrespective of exemptions) the required benchmarks, standards, licenses and certificates that any future operator, owner or stakeholder will require to demonstrate compliance for the ordinary operation of that venue in the future. For example, Section 53DD should include a new clause (5):
(5) Despite sections 53DD (1), (2) or section 53DE and 53DF, all necessary evidence of compliance must be obtained where that evidence is required for the ongoing operation of the venue or village after the games

Summary of PIA Recommendations

Through this submission, PIA makes the following nine (9) recommendations for the Committee's consideration:

Social impact and community benefit amendments

1. Review section 106ZA to make it clear that Community Benefit Agreements can also be amended in the circumstance of an approval that differs from the proposal presented for the Community Benefit Agreement negotiations.
2. Amend the regulation Schedule 10, Part 14A to be applicable to *Prescribed renewable energy facilities* only. Renewable energy facilities (small scale solar farms) which do not fall under the definition of a *prescribed renewable energy facility*, should be assessed by local government and should have the category of assessment set by the local planning instrument.
3. Provide guidance and fact sheets to the community clearly articulating that proposals, as presented prior to assessment, may not be approved as lodged and that conditions of approval may also alter components of the development. As a result, further iterations of the Community Benefit Agreement may be required.
4. Provide an explanation of the pre-lodgement step as distinct from lodgement and achieving properly made status in information and fact sheet diagrams.
5. Change the word *may* to *must* in section 2.2.6 where it says Social Impact Management Plans **may** reference strategies in the Community Benefit Agreement.
6. For completeness and clarity, the assessment of impacts (section 2.2.4) must include matters of scale and time and clearly identify timeframe with corresponding impact mitigation and benefit enhancement.
7. Ensure lifecycle matters are included in section 2.2.4

Brisbane Olympic and Paralympic Games amendments

8. Clear processes should be established to ensure stakeholders are informed and involved in the planning and delivery of 2032 venues and infrastructure, including but not limited to:
 - Working with local government for integration with local planning schemes, infrastructure plans and maximising legacy outcomes for the community;
 - Providing a public statement of intent identifying how development responds to its context, and how it addresses key planning issues, such as environment and infrastructure;

- Provide notice of the proposed plans for each development so that the community are kept informed; and
 - Maintain a publicly available register of development that lists what development has been exempted from the Acts.
9. Include mechanisms to manage the post-2032 transition effectively, avoiding the complexities often associated with dismantling temporary planning frameworks, including, not limited to:
- in Section 53DA insert further words:
 - *Section 53DA (c) to facilitate legacy uses of authority venues, other venues and villages including transfer from the Authority to future venue and village owners and operators after the games.*
 - Amend the BOPGA Act to include the requirement to satisfy and obtain (irrespective of exemptions) the required standards, licenses and certificates that any future operator, or owner will require to demonstrate compliance for the ordinary operation of that venue in the future. For example, Section 53DD should include a new clause (5):
 - *(5) Despite sections 53DD (1), (2) or section 53DE and 53DF, all necessary evidence of compliance must be obtained where that evidence is required for the ongoing operation of the venue or village after the games*

Conclusion

PIA supports the overall intent of the Bill to reset assessment processes for both renewable energy projects and the Brisbane 2032 Games. However, to ensure good planning outcomes, PIA recommends the amendments outlined above be considered.

PIA remains committed to working collaboratively with the State Government to support the effective integration of these changes into the broader planning framework.

PIA representatives are available to attend and speak at the upcoming Public Hearing, and would welcome the opportunity to further assist the Committee. For further discussion, please contact me on [REDACTED] or via email at qld@planning.org.au.

Yours sincerely,

[REDACTED]

Nicole Bennetts RPIA
PIA Qld State Manager