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

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Submitted by: Squadron Energy

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State Development Infrastructure and Work Committee
Queensland Parliament
Via submission portal

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

Dear Madam/Sir,

Squadron Energy welcomes the opportunity to respond to the Inquiries consultation on *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025*.

Squadron Energy is Australia's leading renewable energy company that develops, operates and owns renewable energy assets in Australia. We have 1.1 gigawatts (GW) of renewable energy in operation 900MW under commission and construction. Our development pipeline has projects at differing stages of development and includes wind, solar and firming capacity such as batteries and gas peaking plants with dual fuel capability. With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

We are currently developing Stage 1 the 450MW Clark Creek Wind Farm located 150km north-west of Rockhampton. Stage 2 of the project is expected to have a capacity of 564MW and is in the advanced planning stage. We are also actively engaging with landholders on further projects across Queensland, including the proposed 1GW Pikedale Wind Farm spanning the Southern Downs Regional Council and Goondiwindi Regional Council.

We are supportive of the Queensland Government's commitment to ensure energy infrastructure is developed responsibly and supports, strong, sustainable energy communities across regional Queensland. We encourage the Queensland Government to continue fulsome engagement and consultation with industry to support the best outcomes for community and regulatory certainty for investors.

Our submission focuses on:

- adjustments to the community benefit agreement (CBA) process required to ensure the transparent and timely assessment of projects and community benefits
- the need for a flexible and proportionate approach to (i) appeal rights and (ii) transitional arrangements
- where requirements in the social impact assessment (SIA) should be reviewed and/or further guidance provided to ensure it is fit for purpose and practically achievable.

Further guidance on the approach to negotiating a CBA, including the timing of mediation and the types of benefit contributions accepted, is needed to reduce regulatory uncertainty and enable developers to deliver better outcomes for communities.

We strongly support the overarching intent of the proposed community benefits framework, including the CBA and SIA. These tools are important to ensure that the communities in which energy projects are developed see meaningful and lasting social and economic legacies from the transition. However, the current approach risks undermining that objective due to several design issues that could weaken social licence outcomes and increase project delays. Key issues in the proposed approach are:

- **Attribution of benefits** - the proposed model does not sufficiently recognise the importance of the community being able to directly attribute benefits to the developer and the specific project. Social licence is built when communities can clearly see who is making the contribution and why. When councils or governments control the funds, communities often assume the benefit is unrelated to the project. This weakens trust in both the developer and the transition process, and risks reinforcing the perception that industry delivers minimal value locally.
- **Misalignment with shared government-industry goals** - Government and industry both want a smooth and supported transition. But that support will only be earned if local communities understand and value the role projects play in delivering tangible benefits. A model that sidelines developers in the benefit-sharing process does not help governments achieve this outcome - in fact, it may do the opposite by making contributions less visible and less relevant in the eyes of the community.
- **Regulatory risk from council negotiations -** the requirement to negotiate with local councils prior to signoff of the CBA and lodgement of the development application (DA) creates an imbalance between proponents and councils. It introduces the potential for perceived or actual conflict of interest if payments are committed to decision makers ahead of formal project determinations.
- **Limited recognition of regional or developer-led benefits** - the framework does not yet provide a clear or flexible pathway for recognising regional initiatives or additional community-led funding outside of the council process. If CBA obligations crowd out other investment that is valued locally, it could reduce the overall impact of benefit-sharing and miss opportunities to build broader support.
- **Mediation risk -** The proposed non-binding mediation process under the CBA risks indefinite delay if agreement can't be reached. While we appreciate that the CEO reserve powers offer a backstop, relying on this as the sole regulatory lever to realise a decision introduces uncertainty and undermines the goal of a timely, transparent mediation process.

We recommend the following improvements to strengthen outcomes and provide greater clarity:

- **A clear regulatory guideline for CBAs**, including:
  - a clear definition of what types of community benefits will be recognised under the framework, such as direct funding for local Initiatives, regional infrastructure, in-kind contributions, sponsorships or First Nations programs. This clarity will help avoid confusion, ensure consistency across projects, and give proponents confidence that meaningful, contributions valued by the community will count towards their obligations.
  - a cumulative cap on expected contributions to ensure fairness, transparency and predictability in the negotiation process between developers and councils.
  - recognition that community awareness of the source of funding is critical to securing social licence.

- **Support for developers to directly fund and deliver visible benefits in parallel with any council-led process**. This should include mechanisms for community co-design and flexible delivery based on local needs. Benefit-sharing should be a genuine partnership that directly involves communities, developers, and local stakeholders to maximise social licence outcomes. This process should focus on meaningful, long-term contributions rather than being seen as a way to supplement council budgets.
- **Defined timeframes for dispute resolution** within the CBA process to ensure procedural certainty and avoid protracted project delays.

We also note that the new requirements under the benefits framework need to be met with additional resourcing at Local and State Government levels to support proponent endeavours to comply in DA preparation stage.

With these relatively minor changes, the proposed framework can better align with the shared goals of government, industry and communities, ensuring that the benefits of the transition to renewable energy are not only real, but seen and understood.

Changes are required to ensure a flexible and proportionate approach to (i) appeal rights and (ii) transitional arrangements

Appeals rights should be restricted to those directly impacted by the projects

We acknowledge the proposed appeal provision in the Bill, which would:

i. allow properly made submitters to appeal approvals or conditions to the Planning and Environment (P&E) Court
ii. limit the ability of third parties to appeal matters related specifically to CBAs or associated contribution conditions in the absence of a CBA.

While we are supportive of parties that are directly affected by projects to have appeal rights (e.g. not a neighbour, landowner, or community stakeholder), the Bill provides overly broad rights to any submitter regardless of geographical location to make an appeal. This significantly increases legal and regulatory risk to projects, and we consider a more proportional approach should be taken. For example, this has recently played out in New South Wales with the proposed Pottinger Renewable Energy Hub being redirected to public hearing because of the objections of long distance opponents and despite no objections from the local community.

Pre-existing applications should not be captured retroactively

We understand that under the proposed Bill, pre-existing development or change applications (i.e. those lodged before new regulations come into effect) will be subject to the new requirement. This raises significant concern for projects currently progressing in good faith under the existing framework and presents the risk of significant delays. More broadly, such an approach undermines regulatory certainty for investors in Queensland.

We encourage a revision of the proposed transitional approach to only apply to new projects (not those already under assessment). This approach is consistent with best regulatory practice and approaches adopted by other jurisdictions.

Early planning, engagement and standardised benefits will support meaningful community outcomes and protections

Effective community engagement is a critically important aspect of any project to secure social license and meet the needs of impacted communities. In our experience this is best achieved through early but

measured engagement at the concept and prospecting stages. Providing communities with early opportunities to shape projects helps build and maintain trust, avoid extreme community opposition and identify risks at a stage where there is more design flexibility and changes are likely to be less costly.

Our commitment to responsible and community-focused project delivery

Squadron Energy consistently exceeds industry standards in project development by prioritizing early and ongoing engagement with communities, landholders, and First Nations groups. Our dedicated teams - covering First Nations, Community Investment, and Regional Economic Development - drive tailored strategies to ensure projects deliver lasting local benefits. Key initiatives include:

- Early and meaningful consultation – engaging with communities from the outset to shape projects and address concerns proactively.
- First Nations leadership – embedding cultural, social, and economic considerations into project planning through dedicated First Nations engagement.
- Fair and flexible neighbour payments – providing financial support to nearby landholders, even where not mandated, to ensure shared benefits.
- Farmer-friendly project delivery – designing projects that respect agricultural activities, minimise disruptions, and create opportunities for co-existence.
- Regional economic contributions – Investing in local training, infrastructure, and community-led initiatives to leave a positive long-term legacy.

This commitment strengthens community relationships, accelerates project delivery, and ensures our developments contribute meaningfully to the regions where we operate.

Various requirements in the social impact assessment (SIA) should be reviewed and/or further guidance provided to ensure it is fit for purpose and practically achievable

In general, we support the requirement to prepare an SIA. This forms part of SQE's minimum standard approach to approvals as outline above. However, various requirements in the SIA should be reviewed and/or further guidance provided to ensure it is fit for purpose and practically achievable. The key areas to be considered include:

Item	Comment/proposed approach
General	The guideline should clearly distinguish the SIA requirements that apply for different assessment pathways (e.g. the Social Impact Management Plan (SIMP) for EIS assessment vs DA assessment).
General	We suggest the SIA incorporate further elements of the Coordinator General EIA Guideline (April 2017) or require projects to complete an Economic Impact Assessment (EIA) to ensure the triple bottom line is equally weighted in DA assessed projects. (i.e. EIS assessed projects would benefit from having an SIA that has inputs from the required EIA).
Section 2.2.1	The SIA study area should be set as a nominal boundary of the LGAs based on the project area. This should clearly exclude the LGAs that are travelled through. Traffic impact assessments will address the Over size over mass (OSOM) route impacts and upgrades.
Section 2.2.2	Additional guidance is required on the source data/expectations for two new requirements; (i) travel and access profile and (ii) community values.

We look forward to the opportunity to continue to support the rapid uptake of renewable generation. If you would like to discuss this submission or any related content, please contact Rupert Doney, Director - Policy at [redacted]

Yours sincerely,

[redacted]

Dan Newlan
EGM – Corporate Relations and Community
For and behalf of Squadron Energy Pty Ltd (ACN 127 205 645)