

20 May 2025

Committee Secretary  
State Development, Infrastructure and Works Committee  
Parliament House  
George Street  
Brisbane Qld 4000  
Delivered by email: [sdiwc@parliament.qld.gov.au](mailto:sdiwc@parliament.qld.gov.au)

Dear Committee Secretary

**PLANNING (SOCIAL IMPACT AND COMMUNITY BENEFIT) AND OTHER LEGISLATION AMENDMENT BILL 2025**

This submission outlines Q Shelter's input to the draft Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill (the Bill).

**Recommendations**

**Planning**

1. The Queensland Government should clearly articulate in the legislation and regulations the specific types of material change of use development that necessitate a social impact assessment to meet this new community benefit threshold. At a minimum, the legislation should incorporate the term 'significant' in Clause 21 to clearly establish the threshold at which a social impact assessment is required.
2. Workforce housing strategies should also be integrated into other major developments, not just infrastructure projects, as part of a proactive approach to managing housing demands and preventing the displacement of local communities due to a surge in workforce demands.

**Economic Development Queensland (EDQ)**

3. The EDQ Board would benefit from skills in the growth and provision of community housing, inclusive of social and affordable housing, within its Board's skills matrix.

**2032 Olympic & Paralympic Games**

4. The Queensland Government should set targets for social and affordable housing for the legacy of Athletes' Villages housing stock after the games and actively consider the role of Community Housing Providers (CHPs) in managing that stock before and after the games to align with the government's broader housing objectives and ensure a measurable legacy in this respect. The Games will likely cause negative housing market impacts for lower-income households, and a community housing legacy will be one way to offset these impacts.
5. The Queensland Government should link the SEQ Housing Market and Displacement Monitoring Report to the governance arrangements for the Games.

## Background

Q Shelter understands that the proposed legislation has three core features.

- Amendments to the Planning Act 2016, City of Brisbane Act 2010, Local Government Act 2009 and Planning and Environment Court Act 201– seeking to introduce a community benefit system into the Queensland planning framework, providing the ability to identify, avoid, manage, mitigate and counterbalance the indirect and cumulative social impacts from specific development uses.
- Amendments to Economic Development Act 2012– seeking to enhance administrative efficiency and flexibility, enabling Economic Development Queensland (EDQ) to effectively advance government objectives and drive meaningful progress.
- Amendments to the Brisbane Olympic and Paralympic Games Arrangements Act 2021– seeking to streamline governance arrangements of the Brisbane Organising Committee for the 2032 Olympic and Paralympic Games to support efficient and effective decision-making; ensure the functions, powers and composition of Games Independent Infrastructure and Coordination Authority (GIICA) are appropriate for their intended purpose; and, to streamline the planning approvals process for the development of, or relating to, venues or villages and games-related transport infrastructure identified in the Act and aligned to recently announced ‘2032 Games Delivery Plan’.

We have not provided commentary on every aspect of the proposed legislation, but rather those elements that relate directly to our core purpose and objectives as a peak body for housing and homelessness in Queensland, and on behalf of the wider sector.

## General principles

The current housing context poses significant challenges due to an insufficient supply to meet existing demands. Furthermore, Queensland’s population is projected to grow exponentially until 2046, adding even more pressure on demand. Consequently, access to affordable housing options becomes increasingly difficult for individuals with low to moderate incomes, and progressively, for many other demographic groups, which escalates the rates of people experiencing or at risk of homelessness.

Q Shelter has been and continues to contribute to various engagement processes led by the Queensland Government to outline comprehensive housing policies, investment, and reform recommendations. We welcome the Queensland Government’s broader housing reforms and recent announcements and firmly believe that a primary objective should be to achieve a ‘healthy housing system’ where supply adequately meets demand, and housing diversity and choice are accessible to all income groups.

### 1. Proposed introduction of a community benefit system into the Queensland planning framework

In general, we believe the proposal to introduce a ‘community benefit system’ into the planning framework is a valuable endeavour. We understand this feature exists in the planning systems of other jurisdictions, such as the US, Canada, and the UK.

Regarding major infrastructure projects, we recognise that market pressures often impact local housing systems when these large projects come and go. Historically and currently, major infrastructure developments across Queensland have often overlooked workforce accommodation needs in their planning processes, leading to a significant strain on local housing availability and contributing to increased levels of homelessness. Therefore, we believe that key industry groups should require documented workforce housing plans for large-scale infrastructure projects, and this legislation may promote greater formalisation and consistency in that approach. Workforce housing strategies should also be integrated into other major developments, not just infrastructure projects, as part of a proactive approach to managing housing demand.

The proposed legislation would also frontload the new requirement to satisfy a community benefit threshold before a development application is made to an assessment manager. Q Shelter understands the intention here is largely for major infrastructure projects, such as renewable energy projects. However, this intention is only made clear within the proposed regulation—the legislation itself is silent on these details. Our concern is that the regulation could be easily amended in the future to include other types of material change of use developments requiring social impact assessments, without sufficient consultation. If the categories were to expand to include, for example, residential developments, this would raise concerns. An additional cost added to the front of development applications for housing would be a further impediment to the speed and delivery of much-needed dwelling supply. This may also disadvantage certain types of housing serving less visible cohorts in the community of social impact assessments reflect only certain interests vocal against housing density and diversity. We urge the Government to ensure that the legislation and regulations pose no barrier to the development of diverse housing types to meet community needs.

Therefore, we recommend that the Committee and the Queensland Government clearly state in both the legislation and regulations the exact types of material change of use developments that will require a social impact assessment to meet this new threshold and that housing is excluded. At a minimum, the legislation should incorporate the term ‘significant’ in Clause 21 to clearly establish the threshold at which a social impact assessment is required.

## **2. Proposed amendments to the Economic Development Act (ED Act)**

In line with our submission to the Economic Development and Other Legislation Amendment Bill in 2024, Q Shelter remains supportive of Economic Development Queensland (EDQ) as a vital tool in delivering more housing supply across the state, including new social and affordable housing. In the years following the 2022 Queensland Housing Summit, we have recommended the need for greater capacity and speed to deliver housing supply through appropriately structured state agencies with the remit to provide housing and succeed through implementation as quickly as possible. Our view on this has not changed.

The changes proposed in this draft Bill regarding the ED Act are presented as improvements in administrative efficiency and flexibility, enabling EDQ to effectively advance government objectives, and the bulk of those changes seem to account for the Minister’s ability to remove the Chief Executive at any time. Q Shelter has not encountered any issues in engaging with EDQ on these matters.

We also strongly support the continuation of an appropriate, skills-based decision-making board at EDQ that is accountable to the Minister. Given the sharp focus on new and diverse housing supply within PDAs, we continue to advocate that the board would also benefit from skills in the growth and provision of community housing, inclusive of social and affordable housing.

### **3. Proposed amendments to the Brisbane Olympic and Paralympic Games Arrangements Act**

We note that the Bill proposes several changes concerning the governance arrangements for the Organising Committee, the functions and powers of the Games Independent Infrastructure and Coordination Authority (GIICA), and the integration of findings and priorities identified from the 100-day Review and the 2032 Games Delivery Plan.

Our comments primarily relate to the delivery of the Athletes' Villages and associated accommodations.

A general observation, however, is that the proposed legislation aims to ensure the timely delivery of infrastructure development and venues, Athletes' Villages, and the construction of games-related transport infrastructure. Our interpretation of the bill suggests it effectively removes these types of developments from the usual planning approvals required, which appears to be justified by the need to deliver infrastructure in time for the games. While we do not dispute the necessity of delivering this infrastructure promptly for the games, which is both a financial and reputational imperative, we believe the community deserves a voice in its intended uses before and after the games, particularly regarding legacy.

Before the release of the 2032 Delivery Plan, the approach to the Athletes' Villages explicitly referenced the need for a legacy focused on social and affordable housing. The latest documentation, which outlines transactions with the private sector to deliver the villages, is less clear about the exact mix of housing types that will be provided.

Essentially, the construction and post-Games legacy use of Athletes' Villages is facilitated through a legislative framework that significantly streamlines standard planning and approval processes. This new framework sets aside compliance with many typical Acts but retains requirements under the Building Act 1975. A key issue arising from this approach is the potential limitation on human rights and existing rights, particularly regarding public consultation and review. One might conclude that without adequate consultation, such as what would normally be required by the Planning System, some of these discussions and arguments may not have the chance to be properly heard and considered. We encourage the Queensland State Government to consider the housing legacy opportunity of Games-related infrastructure, including the Athletes Villages, and leverage the great opportunity that has been created by hosting the games.

More specifically, Q Shelter would urge the Queensland Government to set targets for social and affordable housing established for the legacy of Athletes' Villages housing stock after the games. Additionally, we advocate for the role of Community Housing Providers (CHPs) in managing that stock both before and after the games to align with the government's broader housing objectives and ensure a measurable legacy in this respect. In addition, Q Shelter supports Queenslanders with Disability Network (QDN)'s call for strong accessibility and design standards, including adoption of the Liveable Housing Design Gold Standard, to ensure long-term usability for people with disabilities and older Queenslanders.

Outside of the Athletes' Villages, we expect housing market pressures to intensify due to hosting the games. We know that hosting mega events tends to expedite major urban renewal and infrastructure projects. Without early planning for social and affordable housing, the delivery of new infrastructure and facilities bids up real estate prices and exacerbates displacement pressures, particularly for low-income renter households. In the context of a

sustained housing crisis in Queensland, a further escalation in housing costs and rents risks pushing more households toward housing insecurity and homelessness.

Released in October 2024, Q Shelter, with the support of the Australian Housing and Urban Research Institute (AHURI), developed its first SEQ Housing Market and Displacement Monitoring Report. This wide-ranging report looks at a range of factors, including the resulting impact on local housing systems, such as housing market prices, stock movements, evictions and increasing community displacement. It will be measured annually in the lead up to the Games, and in the years following, to better understand the impact of the Games-related pressures on the housing system.

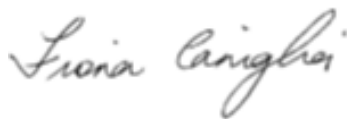
We strongly urge the Queensland Government to consider linking the SEQ Housing Market and Displacement Monitoring to the governance arrangements for the Games.

### **Further contact**

Q Shelter appreciates the opportunity to provide input to this draft Bill and would welcome the chance to provide further feedback or speak at the public hearing. We have also linked below recent submissions to related bills and inquiries for the committees per usual.

For further questions or contact, please liaise with our Manager, Policy & Strategic Engagement, Jackson Hills at [Jackson.Hills@qshelter.asn.au](mailto:Jackson.Hills@qshelter.asn.au).

Yours sincerely



Fiona Caniglia  
Chief Executive Officer  
Q Shelter

## Attachments

Attached below are recent submissions to related bills and inquiries, where Q Shelter has sought to make similar proposals –

1. [Submission on Economic Development and Other Legislation Amendment Bill 2024](#)
2. [Submission on the Brisbane 2032 Games Arrangements Bill](#)
3. [Economic Development \(Affordable Housing\) Amendment Regulation 2024](#)
4. [Submission to the 200 Day Review: Brisbane 2032 Olympic and Paralympic Games Infrastructure and Planning](#)
5. [Q Shelter / AHURI SEQ Housing Market and Displacement Monitoring Report, 2024 edition](#)