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

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The Secretariat
State Development, Infrastructure and Works Committee
Parliament House, George Street, Brisbane QLD 4000

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

Dear Committee,

Introduction

Strata Community Association Queensland ("SCAQ") is the peak industry association supporting Queensland's professional strata management sector, with more than 1,200 individual and corporate members who help oversee, advise and manage assets worth in excess of $280 billion for Queenslanders. Our industry generates around $1.75 billion worth of economic activity annually and employs circa 60,000 people directly and indirectly.

SCAQ understands the strata sector from a broad array of viewpoints owing to our diverse membership. We pride ourselves on our ability to advocate from a "whole of industry" perspective.

As of 2025, there are over 530,000 lots in more than 53,000 community title schemes across Queensland.

This number is expected to grow exponentially as strata living – apartments, townhouses and other shared developments – become an increasingly critical and affordable component of our housing mix into the future. As Queensland grapples with our current housing crisis, efficient forms of housing and land use, plus well-located housing close to existing infrastructure are central to the solution.

SCAQ is pleased to make a submission to the Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025 (henceforth "the Bill"). SCAQ is generally supportive of the Bill in its current form though believes there are some changes that are needed to engender confidence in the overarching planning system.

The Bill

SCAQ understands this Bill is an omnibus Bill of sorts in that it is changing multiple pieces of legislation. As a stakeholder in the property sector, we have a primary focus on the elements of the Bill which relate to real estate and the urban environment. Critically, we have a few structural concerns about the nature of this Bill, even if they are not yet alive.

It is important, in our view, that legislation does not have loopholes which can be exploited. It is also important that any legislation not grant unfettered power to the Minister to potentially have scope to introduce further red tape on developments which become socially unpopular, or a source of division or disruption in the community. Investors crave certainty and leaving important decisions up to regulation is antithetical to this goal. SCAQ is concerned that strata may potentially fall afoul of this regulation making power in certain instances where there is community concern.

Regulation About Development Requiring Social Impact Assessment

Division Two of the Bill implements a series of procedures and criteria with regards to developments requiring a social impact assessment. Specifically, this section allows the Minister, by Regulation, to prescribe the kinds of developments which are required to fulfil criteria around social impact assessment

reports and community benefit agreements. SCAQ acknowledges the intent is to better integrate community outcomes into Queensland's planning framework, however, we have significant concerns about the regulatory powers granted to the Minister under this Division.

By giving the relevant Minister such broad discretionary power, there is a real risk that well-prepared and compliant development proposals could be used as political leverage, either to support unrelated policy objectives or to give disproportionate weight to minority local opinions when a proposal is contentious.

Such a wide-ranging power undermines efforts to encourage the development Queensland urgently needs. We strongly believe that if these types of requirements are to be introduced, they should be embedded in legislation, ensuring transparency, public consultation, and proper Parliamentary scrutiny.

While the concept behind the proposed changes has merit, particularly the idea of incorporating certain conditions into the planning process, the decision to implement them via regulation places too much power in the hands of the Minister. This introduces unnecessary uncertainty, driven by the personal or philosophical views of the individual in office, and risks discouraging much-needed investment at a critical time.

We strongly believe that:

- Classes of development requiring a Social Impact Assessment and Community Benefit Agreement should be set out in legislation, not left to regulation.
- Parliamentary scrutiny is critically important in ensuring a healthy democracy to reflect long term strategic policy, not short term or subjective considerations that vary by Minister or political cycle.
- Planning legislation is meant to be inclusive and encourage public participation in the process of community shaping. Changes to these requirements should be subject to consultation with stakeholders such as SCAQ and the broader community.
- Parliamentary scrutiny ensures accountability for Government decision making and helps protect fundamental rights (in this instance property rights) and delivers policies more closely aligned with the needs of Queenslanders.

Social Licence and the Bill

Social licence refers to the community's acceptance of an organisation or activity, grounded in trust and aligned with community expectations. It goes beyond mere compliance with legal or regulatory requirements, reflecting the belief that an organisation will act in the broader public interest[1].

While the Bill appears to aim at facilitating the acquisition of social licence for certain types of development, particularly where the Minister perceives it to be lacking, the approach raises serious concerns. If left to regulation, this power could be used as a political bargaining tool rather than a genuine mechanism for community engagement.

Social licence is undoubtedly important, but it is also an imperfect and subjective metric. Its value lies in it being earned through transparency, responsible practice, and meaningful engagement, not imposed or "manufactured" through regulatory discretion. For this reason, we believe any requirements relating to social licence should be embedded within the legislative framework itself. This ensures consistent expectations for developers, enables proper public scrutiny, and allows for future changes to be debated openly through the Parliamentary process.

[1] https://infrastructure.org.au/wp-content/uploads/2021/07/IPA__Building_Trust___Social_License_for_Infrastructure__FINAL.pdf

Strata as the Future of Development

Numerous studies[2] and surveys[3] have shown that many residents in urban environments hold strong views against high-density development. This widespread sentiment reinforces our concerns with the Bill's proposal to delegate, by regulation, the decision about which developments must undergo Social Impact Assessments (SIAs) and enter into Community Benefit Agreements (CBAs).

Leaving such a significant determination to regulation, without the rigour of Parliamentary scrutiny, raises legitimate concerns. We are particularly uneasy about the possibility that strata developments, which are essential to Queensland's urban growth, may be disproportionately burdened by these processes. Strata development must be supported and encouraged, not subjected to additional regulatory uncertainty driven by fluctuating community sentiment.

Although high-density developments often suffer from negative public perception, they are widely recognised, both professionally and academically, as offering significant advantages over detached housing. These include greater land use efficiency, housing affordability, sustainability, and proximity to services. With the right policy environment and community education, strata housing can gain broader social acceptance. However, we are concerned that SIAs and CBAs, while well-intentioned, may inadvertently introduce overly complex obligations, particularly around the integration of public and private spaces such as green corridors, community hubs, or shared infrastructure.

These mixed-use components raise two major challenges:

1. **Operational complexity and liability**: Strata managers, as trusted advisors to bodies corporate, will be expected to oversee and maintain increasingly diverse spaces that blur the lines between private ownership and public access. This creates more complex governance structures, higher maintenance demands, and increased exposure to legal risk for owners and committees.

2. **Ongoing stakeholder coordination**: Beyond the development phase, sustained engagement will be required between developers, local councils, strata professionals, and resident communities. This includes coordination of service delivery, funding responsibilities, and access protocols for shared spaces—none of which are simple or cost-neutral.

Given these implications, we urge the government to carefully consider the long-term consequences of placing conditions related to social impact under regulatory discretion. If SIAs and CBAs are to be introduced, their scope and obligations must be clearly outlined in legislation. Importantly, there must be explicit recognition of how such requirements affect strata-managed communities and clarity on who is ultimately responsible for implementation, governance, and ongoing stewardship.

The Benefits of Strata and High-Density Housing

SCAQ is committed to ensuring that the broader public understands the significant societal benefits of high-density, strata-titled housing. We believe that with greater public awareness—and a proactive approach from Government—strata can be embraced as a powerful tool to shape more liveable, affordable, and sustainable cities.

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[2] https://onefinaleffort.com/blog/how-popular-is-zoning-reform-actually-

[3] https://joeornstein.github.io/pols-4641/readings/Trounstine%20-%202021%20-%20You%20Won't%20be%20My%20Neighbor%20Opposition%20to%20High%20Densi.pdf

There is clear and growing evidence that high-density housing deserves to be promoted as the preferred accommodation choice for an increasing number of Queenslanders. However, these benefits will not be realised unless policymakers actively champion strata and create an environment where it can thrive. Without strong leadership and public narrative, outdated perceptions will continue to hinder progress.

The Queensland Government was elected on a platform that included "A Place to Call Home" as a central promise. SCAQ maintains that this goal cannot be achieved without a deliberate strategy to promote strata housing and implement favourable planning and regulatory settings.

Historically, city planning has prioritised material needs, metrics such as employment rates, commute times, congestion, and housing supply. These indicators are easier to measure, and expert opinion[4] consistently shows high-density housing contributes positively to each. However, the broader social and psychological benefits of strata living, though harder to quantify, are just as important.

For Queensland to meet its housing targets and maintain its enviable lifestyle, strata must not only be accepted but actively embraced. Government has a key role to play in leading this by proactively promoting the benefits of strata.

Social implications beyond policy metrics

Green Space

Strata law is in substance a framework to ensure the preservation of property rights in conjunction with the harmonious functioning of high-density housing communities. Green space is broadly taken to mean things like parks and vegetation cover. A city or town with more strata dwellings will be able to accommodate more green space with the same population than one of the same area and population size which is made up of more detached housing.

The University of New South Wales has recently published a study which found that there was a strong correlation between green space levels and a reduction in loneliness. The study found that adults who are resident in neighbourhoods with 30% or greater green space had vastly lower odds of being lonely than their peers living in areas where there is 10% or less green space. This effect was even more pronounced when individuals were living alone-with the odds of feelings of loneliness in these people being halved when living in a high green space area[5].

Embedding this perspective into planning policy is essential for balancing urban growth with environmental preservation and community wellbeing. By putting more residents in a smaller share of the urban footprint, more of an area can be preserved to serve the goal of ensuring there is more "green space "in a region. Southeast Queensland's development future is constrained to the urban footprint outlined in ShapingSEQ[6] . Pleasingly, the two largest city councils within this region (Gold Coast and Brisbane) have green space targets in excess of 40%.[7] These targets cannot be achieved without a sensible, pro strata development

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[4] https://www.unsustainablemagazine.com/benefits-of-high-density-housing/
[5] Astell-Burt, T. and Feng, X., 2021. *People's odds of loneliness could fall by up to half if cities hit 30% green space targets*. [online] UNSW Newsroom. Available at: <https://newsroom.unsw.edu.au/news/social-affairs/peoples-odds-loneliness-could-fall-half-if-cities-hit-30-green-space-targets> [Accessed 20 July 2021].
[6] Department of Infrastructure, Local Government and Planning, 2017. *ShapingSEQ*. South East Queensland Regional Plan 2017, p.101.
[7] City of Gold Coast, 2021. *Our Natural City Strategy*. Gold Coast: City of Gold Coast . Brisbane.qld.gov.au. 2021. *Our clean, green and sustainable city*. [online] Available at: <https://www.brisbane.qld.gov.au/about-council/governance-and-strategy/vision-and-strategy/brisbane-vision/our-clean-green-city> [Accessed 28 July 2021].

policy. Green space can only remain as the population grows if intelligently designed strata property makes up the bulk of new housing stock.

These targets are unachievable without a deliberate, pro-strata development policy that guides all levels of government. As our population grows, only well-designed, higher-density housing, particularly strata developments, can support this growth while protecting and expanding green spaces.

Incorporating green space as a core pillar of state planning policy offers long-term social dividends. Access to green space has been shown to reduce loneliness, social isolation, and poor mental health outcomes. As Queensland's population ages and single-person households become more common, the role of thoughtfully integrated green space becomes even more critical.

By ensuring that there is appropriate green space for residents within Southeast Queensland and of course the rest of the State as part of State planning policy, the government can clearly make a long-term impact in the reduction of loneliness, social isolation and poor mental health outcomes.

Putting this as a key consideration of planning policy may play a significant role in the longer-term mitigation of social problems, particularly as the population ages and single person households become increasingly common[8]. We acknowledge strata in and of itself does not create more green space, but rather it encourages and gives opportunity to councils and private individuals to preserve and curate space as such.

Home Ownership

In the final quarter of 2024, the disparity between the price detached houses in Brisbane and strata properties (townhouses, units) was approximately $300,000.[9]. This means, by default, that strata properties

help allow a broader demographic of Queenslanders to own their own home. Home ownership is critical to a stable retirement, and in the view of many financial experts is critical to ensuring financial success, and personal security.

Whilst home ownership at face value may do little to mitigate feelings of loneliness or improve personal well-being, there is demonstrated evidence that owning a home delivers emotional and social benefits beyond improving an individual's balance sheet. Home ownership is demonstrated by research to have meaningful positive effects on feelings of inclusion and community[10].

Homeowners are also demonstrated to have stronger social networks, are more likely to see friends and relatives and more likely to be active members of clubs and associations[11]. All of these activities help improve loneliness, build social connection and cohesion, and ensure that people have positive human interactions. These benefits are believed to come through feelings of greater stability and security which are associated with home ownership.

As discussed above, government has placed restrictions on the release of land where the majority of the population of Queensland currently lives (SEQ). Strata is a mechanism to allow more dense dwelling construction. Without expanding the number of strata schemes approved (perhaps even in excess of present targets) there is little doubt that home ownership may be financially out of reach for an increasing number of

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[8] https://cityfutures.ada.unsw.edu.au/documents/769/Australasian_Strata_Insights_2024_Report.pdf
[9] https://www.news.com.au/finance/real-estate/where-a-house-is-now-300k-more-expensive-than-a-unit/news-story/c9e5df3a9069aed0ae0d58d9d781ae93#:~:text=But%20new%20research%20from%20Nuestar,$300%2C000%20cheaper%20than%20a%20house.
[10] Stillman, S. and Liang, Y., 2010. Does Homeownership Improve Personal Wellbeing?.
[11] Dockery, A. and Bawa, S., 2019. Why Do Home-Owners do Better?. *State of Australian Cities Conference and PhD Symposium*.

Queenslanders, particularly in the Southeast. If this occurs, feelings of isolation, and lower social engagement in the forms outlined above are likely to increase based on the available data. Thus we strongly advise the committee to place housing policy, particularly affordability at the heart of their suggested whole of government decision making, particularly when scrutinizing this Bill.

Transport and Commuting

Strata title properties allow for higher density of population closer to services, jobs and recreational facilities. Despite moves to remote working, Central Business Districts ("CBD's) remain a key feature of our cities, a social and economic hub. Employment opportunities are still more numerous near CBD's. Obviously, land is at a premium the closer it is to the CBD. Inner city suburbs are more densely populated than outer suburban areas. If the population continues to grow and there are not more strata schemes constructed near these 'job rich' areas, commutes to work and social activities will increase.

Commuter suburbs springing up on the outskirts of major cities to accommodate growth because of a failure to increase density (strata schemes) will inevitably lead to longer travel times, higher stress levels and further social isolation. Commuting overwhelmingly has negative effects on mental wellbeing, social isolation and loneliness.

Harvard Political Scientist Robert Putnam, who's year 2000 book "Bowling Alone: The Collapse and Revival of American Community" is considered a seminal work on the declining social capital in America has noted "[he] was shocked to find how robust a predictor of social isolation is… a simple rule of thumb: Every ten minutes of commuting results in ten percent fewer social connections.

Commuting is connected to social isolation, which causes unhappiness[12]. With the population of Queensland poised to boom[13], without strata, commutes to jobs, facilities and amenities could explode and a resultant boom in social isolation can quickly be expected to follow. This is unacceptable from a social and economic standpoint.

If the government is to ameliorate loneliness and social isolation in the long term, then appropriate planning must be a core priority, with specific reference to ensuring low commute times to work and essential services as an important measure to improve the epidemic of loneliness. This is an intelligent measure both economically and socially. This cannot be achieved without a deliberate policy to sensibly and strategically grow the strata sector.

Conclusion

SCAQ supports the integration of social outcomes into the planning process. However, we hold serious concerns about the discretionary powers proposed in this Bill. The current approach lacks transparency, undermines investment certainty, and risks inconsistent decision-making driven by short-term or unrepresentative community sentiment.

High-density, strata-based development is not only central to Queensland's housing future, it is a key enabler of core government objectives. These include improved housing affordability, reduced urban sprawl, better access to jobs and infrastructure, lower carbon emissions, and stronger social cohesion. The risks this Bill poses to strata developments must be urgently and thoughtfully addressed.

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[12] Paumgarten, N., 2007. There and Back Again The soul of the commuter. *The New Yorker*, [online] Available at: <https://www.newyorker.com/magazine/2007/04/16/there-and-back-again> [Accessed 22 July 2021].

[13] Department of Infrastructure, Local Government and Planning, 2017. *ShapingSEQ*. South East Queensland Regional Plan 2017

To preserve the integrity of Queensland's planning system and support the delivery of housing that meets the needs of a growing population, we strongly urge the Committee to:

- **Embed in legislation** the classes of development subject to Social Impact Assessments (SIAs) and Community Benefit Agreements (CBAs), rather than delegating these decisions to regulation;
- **Ensure Parliamentary scrutiny and public consultation** accompany any changes to planning requirements that affect property rights, investment confidence, or development feasibility;
- **Recognise and actively promote strata** as a preferred model for delivering the government's housing commitments under *A Place to Call Home* and broader strategic planning frameworks.

We welcome the opportunity to continue working with government and key stakeholders to ensure Queensland's legislative and planning frameworks reflect these shared goals and deliver real outcomes for our communities.

Yours sincerely

Laura Bos - General Manager and Company Secretary SCAQ

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