Submission on the draft SPP 2026

26 October 2026

Dear Deputy Premier

I make this submission on the draft State Planning Policy 2026.

I support the objectives of improving the clarity of Queensland's planning framework and providing sufficient housing in well-serviced locations. However, the draft requires stronger environmental, climate-resilience, infrastructure, heritage and housing-quality safeguards if it is to produce genuinely sustainable communities.

1. Environmental and climate-resilience aspiration

The six proposed strategic aspirations strongly emphasise housing, economic development, infrastructure and efficient land use. None expressly establishes environmental protection or climate resilience as a comparable overarching aspiration.

Environmental protection should not operate merely as a subordinate consideration to be balanced against growth. I recommend adding an express aspiration along the following lines:

"Protect and restore Queensland's environment, biodiversity and cultural heritage, and create climate-resilient communities."

This would provide an appropriate organising principle for regional planning, local planning instruments and development assessment.

2. Infrastructure delivery alongside development capacity

I support concentrating additional housing around centres, services and public transport. However, additional theoretical development capacity does not necessarily produce well-functioning communities, or even additional housing, unless it is coordinated with infrastructure delivery.

The SPP should require planning for increased development capacity to be accompanied by credible arrangements for the timely provision of:

- public and active transport;

- water, sewerage and stormwater infrastructure;

- schools, health and community facilities;

- parks and public open space; and

- urban canopy and heat-mitigation measures.

Infrastructure should be planned, funded and delivered alongside growth, rather than deferred until deficiencies have become entrenched. The policy should also require cumulative infrastructure capacity to be assessed, not merely the marginal effect of each individual development.

3. Retaining avoidance as the first response

The established "avoid, then mitigate" hierarchy should remain explicit wherever development may cause serious, irreversible or cumulative impacts on natural hazards, biodiversity, ecological connectivity or cultural heritage.

Mitigation and offsets cannot always reproduce the environmental, cultural or protective functions of an intact place. The draft should therefore make clear that:

- development should first avoid areas of unacceptable hazard or significant environmental and heritage value; - mitigation is appropriate only where avoidance is not reasonably achievable and residual impacts are demonstrably acceptable; and - offsets are a last resort, not a routine means of facilitating otherwise unsuitable development.

This principle is particularly important for floodplains, bushfire-prone land, coastal hazards, wetlands, riparian areas, habitat corridors and heritage places whose significance depends upon their setting.

4. “Acceptable” and “tolerable” hazard risk

The proposed risk-based approach allows development in a hazard-prone area where risk can be reduced to an “acceptable or tolerable” level. Those terms require clear and enforceable definitions.

The policy or supporting statutory instruments should specify:

- the probability and consequence criteria used to classify risk; - who determines whether a risk is acceptable or tolerable; - the climate-change scenarios and planning horizons to be applied; - treatment of evacuation constraints and failure of essential services; - whether risk to vulnerable occupants is assessed differently; - the extent to which residual risk may be transferred to future owners, councils or emergency services; and - circumstances in which development must be avoided irrespective of proposed mitigation.

A risk-based framework should not become a mechanism for normalising additional development in locations already known to be unsafe or costly to service.

5. Local heritage and neighbourhood character

The SPP should expressly support the protection of local heritage places, character areas, culturally significant landscapes and the settings that contribute to their significance.

State heritage protection alone is insufficient. Much of Queensland’s identity resides in places recognised through local heritage registers, neighbourhood plans and community knowledge. Growth should be accommodated through context-responsive design, adaptive reuse and carefully located intensification, not through the progressive erosion of character and cultural significance.

Local character should not operate as an indiscriminate barrier to housing. Nevertheless, planning schemes should retain the capacity to identify valued character and require new development to respond meaningfully to scale, setting, streetscape, landscape and established cultural values.

6. Accessible and affordable housing diversity

Housing policy should measure success by the provision of suitable homes, not simply by dwelling approvals or theoretical zoned capacity.

The SPP should seek a diverse supply of:

- social and genuinely affordable housing;

- accessible and adaptable dwellings;

- smaller dwellings suitable for single-person households;

- family housing;

- secure rental housing;

- housing suitable for older people and people with disability; and

- different tenures and dwelling types in well-serviced locations.

Planning for additional capacity should also consider the displacement or demolition of existing lower-cost housing. A proposal may increase the gross dwelling count while reducing the supply of housing affordable to existing residents.

Where substantial additional development rights are granted, the planning framework should seek a demonstrable public benefit, including affordable housing, infrastructure, public realm, open space and environmental improvements.

7. Public scrutiny of relocated assessment benchmarks

The proposal to remove State assessment benchmarks from the SPP and relocate them to the Planning Regulation is potentially significant. It may alter their legal operation, relationship with local planning schemes and application to code and impact assessment.

Before these changes proceed, the Government should publish:

- the complete proposed regulatory amendments; - a benchmark-by-benchmark comparison with the existing provisions; - an explanation of their intended legal effect; - the treatment of inconsistencies with local planning instruments; - proposed transitional arrangements; and - an assessment of whether any existing environmental, heritage or community safeguard would be weakened.

Those detailed benchmarks should be subject to a further, dedicated period of public consultation. Consultation on the general policy direction should not be treated as sufficient public scrutiny of later regulatory drafting.

Conclusion

Queensland needs additional and more diverse housing, but housing delivery should not be separated from infrastructure, affordability, environmental protection, heritage conservation and climate resilience. These are integral elements of sound settlement planning rather than obstacles to it.

I recommend that the final SPP:

1. include an express environmental and climate-resilience aspiration; 2. require infrastructure to be planned and delivered with additional development capacity; 3. retain a clear avoidance-first hierarchy; 4. define acceptable and tolerable hazard risk; 5. strengthen protection of local heritage and neighbourhood character; 6. measure housing outcomes by affordability, accessibility and diversity as well as quantity; and 7. provide further public consultation on the proposed Planning Regulation assessment benchmarks.

Yours sincerely

John

John Brannock LFPIA Residential address: 46 Seventh Ave, St Lucia QLD 4067 Email: brannockjr@gmail.com

John Brannock