

Addressing Community Benefit System Requirements Under the *Planning Act 2016*

Introduction

In July 2025, the Queensland Government introduced a community benefit system (CBS) into the Queensland planning framework under the *Planning Act 2016* (Planning Act). This system requires proponents of development types prescribed in the *Planning Regulation 2017* (Planning Regulation) to prepare a Social Impact Assessment (SIA) report and enter into a Community Benefit Agreement (CBA) with relevant councils, before lodging a development application (DA).

The CBS provides the ability to identify, manage, mitigate and counterbalance the direct, indirect and cumulative social impacts of the prescribed development types.

Currently, the CBS applies to the following development types, as defined in the Planning Regulation:

- **Wind farms**
- **Solar farms** with a maximum instantaneous electricity output of one megawatt (MW) or more
- **Battery storage facilities** with a maximum instantaneous electricity output of 50MW or more.

Key points:



A DA for development subject to the CBS must be accompanied by:

- any SIA report relevant to the project, and
- each CBA entered into for the project.



Appeal rights regarding development assessment decisions are available to applicants, as well as submitters who make properly made submissions during public notification. Appeals are made to the Planning and Environment Court.

Social Impact Assessment (SIA)

Social impacts for development subject to the CBS are defined by the Planning Act, and refer to the wellbeing, livelihood, values or provision of services to a community. This is separate to development impacts which are considered as part of a development assessment process, and may include matters such as vehicular access, glint and glare and hazard mitigation.

A SIA is a process that helps identify how a development might affect the people living and working nearby, both the positive and the negative. It ensures that local communities are meaningfully considered and identifies how any potential negative impacts can be managed and positive opportunities can be enhanced.

Proponents are required to prepare a SIA report for development subject to the CBS, in accordance with the [SIA Guideline](#). The [SIA Guideline supplementary material](#) assists in providing additional detail and guidance to assist the SIA process.

The SIA Guideline provides a clear process for how a proponent should carry out a SIA, and details what must be considered in a SIA including requirements for community and stakeholder engagement. It covers the identification and assessment of social impacts, and management and monitoring considerations, resulting in a SIA report.

Council's role in the SIA process

Council's level of involvement in the SIA process can vary at its discretion, as identified in the SIA Guideline. As part of the SIA process proponents must, as a minimum:

- Provide a notice of intent to commence the SIA to the relevant council/s
- Provide a notice of intent to commence community and stakeholder engagement and submit it to the council/s prior to commencing engagement activities
- Provide the finalised SIA report to the council/s

The proponent may wish to seek council acceptance of the content of the SIA report as the basis for negotiating a CBA.

Examples of council involvement in the SIA process

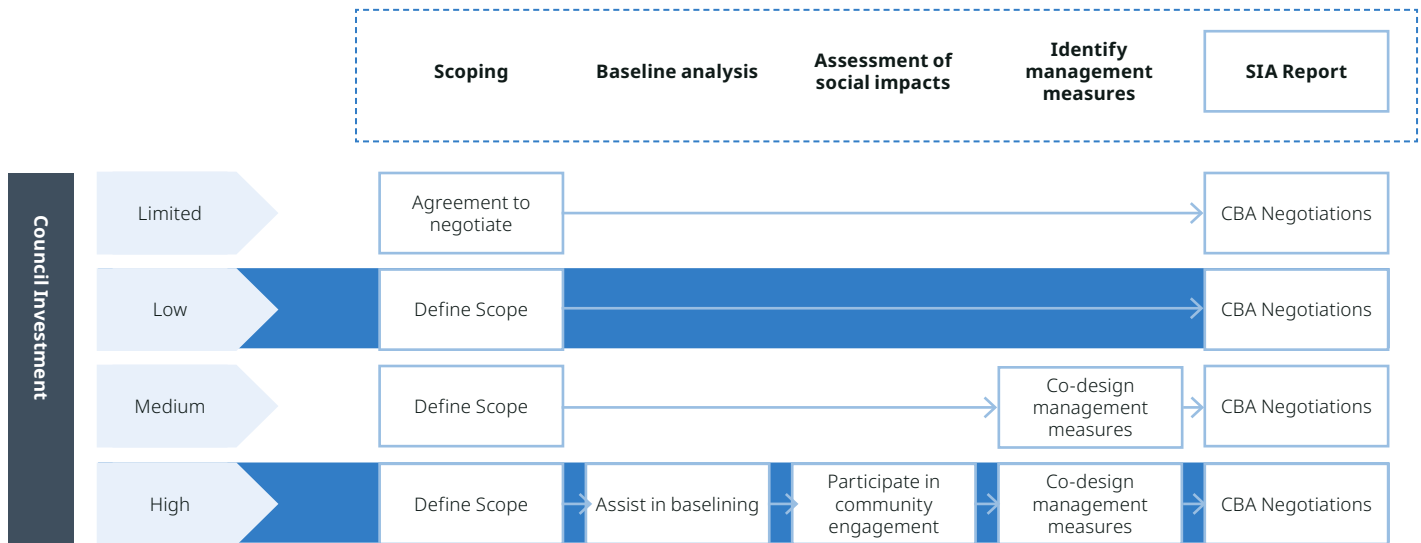


Figure 1: SIA - council involvement



The role of a council in the SIA process may vary between councils and projects, depending on the circumstances of each council and the details of each project.

Council's role may include:

- determining if one council will lead the SIA process with proponents when multiple councils are involved, and defining roles and responsibilities
- defining the SIA scope, including the study area
- contributing to the preparation of community and stakeholder engagement plans, including the extent, format and approach to engagement activities
- participating in community engagement activities
- working with the proponents to identify potential social impacts and review or refine management measures
- providing information on existing infrastructure and strategic social and economic development plans
- identifying mitigation measures

- reviewing outputs at various stages of the SIA process
- identifying gaps or areas of concern
- advocating for specific social priorities to be addressed.

With consideration to resources, council may consider establishing a dedicated liaison protocol or contact with proponents in the development of the SIA. Council may participate by reviewing SIA documents, attending proponent meetings, tracking commitments and using community feedback to inform negotiations.



To support the SIA process, council may wish to talk with other councils to share lessons learnt or engage a specialist consultant to support their participation in the SIA process, such as reviewing SIA reports and management plans, or identifying potential benefit enhancement.

SIA internal procedure example

Objective: provide councils with a consistent approach for assessing SIA submissions.

Context: applicable to team members involved in reviewing and assessing SIAs.

References: include internal and external documents, for example, council's renewable energy community benefit scheme policy (if relevant) and links to legislation.

Indicative roles: while roles and staff vary from one council to another, broadly the below tasks may be undertaken by appropriate team member/s in council, including:

- **renewable energy project proponent** – submit Notice of Intent to commence the SIA, share associated documents with council, prepare SIA, submit final SIA report
- **council SIA contact person** – coordinate SIA contact with proponent on behalf of council, advise on SIA process and outcome expectations, review the SIA at various stages and coordinate review of the final SIA report
- **economic development** – assess the SIA from an economic development perspective and provide recommendations on whether its key components and criteria have been addressed
- **utilities** – provide additional commentary where relevant and necessary
- **engineering/technical services** – provide input (as required)
- **planning and environment** – provide input (as required)
- **infrastructure projects** – provide input (as required)
- **communities and liveability** – provide input (as required), indicate support in response to recommendations in the SIA report and include any additional comments
- **CEO or council** – accept or reject the final SIA report.

Role of a Social Impact Management Plan

While a Social Impact Management Plan (SIMP) is not a mandatory requirement of the SIA Guideline for development under the Planning Act, it is an existing best practice tool and can form part of the SIA report.

A SIMP can provide details on proposed management measures, timeframes for implementation and roles and responsibilities. It may include processes to ensure the effectiveness of management measures are monitored and amended where necessary throughout the project lifecycle.

Subject to agreement between the parties, a SIMP can be part of a CBA, or inform the content of a CBA. Notwithstanding this, it is important not to conflate the role of a SIA and CBA, with other aspects of the development process (such as a DA or an infrastructure agreement). For instance, a development may require the upgrade of a road in order to accommodate construction vehicles. If this road upgrade is to serve the development, it may not be considered a 'community benefit'. Equally, mitigating impacts to restore a 'net neutral' impact is not a community benefit. Community benefits are those which go above and beyond impact mitigation, and leave a lasting positive legacy for host communities.

Inclusion of a SIMP in a SIA report or a CBA may require additional monitoring and have resource implications for councils. Circumstances where council may decide a SIMP is not needed in the SIA include:

- small-scale projects, instances with little to no identified impacts
- situations where a decision has been made not to manage some or all of the identified impacts through a CBA (for example, when a decision is made to accept the impacts in exchange for unrelated contributions or benefits)
- where councils are well-prepared for large projects, taking a collective approach, or when a higher-order plan for managing and monitoring social impacts is in place.

Where a SIMP is prepared as part of the SIA report, the CBA may specify additional requirements – for example:

- review or evaluation of the SIMP at a specified interval (for example, every five years) by the proponent
- criteria, thresholds or other triggers for when the CBA can be reviewed and re-negotiated between the parties.



Once the SIA is complete, proponents and council have the option to collaboratively develop, review or refine management measures.

Further information to determine legislative and regulatory responsibilities is available: [Queensland Planning Legislation](#).

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