

2014 CORPORATE  
PARTNERS



Greg Chemello  
Deputy Director-General  
Department of State Development, Infrastructure and Planning  
PO Box 15009  
City East, Qld 4002



Dear Mr Chemello



**Amendments to the State Planning Policy**



Thank you for the opportunity to provide feedback on the draft amendments to the State Planning Policy (SPP).

As the proposed amendments make minor changes to align with recent shifts in State Government policy, the Property Council raises no concerns with the changes proposed.



With several of the draft amendments intended to align the SPP with changes introduced through the *Queensland Government Environmental Offsets Framework (QGEOF)*, we take this opportunity to raise the issue of local government interpretation of the SPP's provisions relating to net gain for koala habitat.



It has been our members' experience that since the introduction of the SPP, local governments in South East Queensland (SEQ) have been broadly applying requirements for 'net gain' for koala habitat for development applications that previously were not captured under the *South East Queensland Koala Conservation State Planning Regulatory Provisions (SPRP)*.



The issue has emerged for new Material Change of Use (MCU) or Reconfiguration of a Lot (RoL) applications, as well as for ancillary applications, such as Operational Works, where the original MCU or RoL application was approved with no offset conditions.



Local governments are using the development assessment code in the SPP and its link to the *Draft SPP Guideline: State Interest- Biodiversity* to condition offsets in accordance with the *Net Gain in Bushland Koala Offset Policy*.



This interpretation of the SPP is costing our members millions of dollars in additional offsets, on sites which previously were not captured- nor intended to be captured- by the policy.



As part of the review of the SPP and the introduction of the QGEOF, we request the Department revise the SPP and its associated guidance material to ensure its correct interpretation, and that it does not lead to the imposition of additional offsets for development.



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As always, if you have any questions regarding the Property Council or this submission, please do not hesitate to contact me on [kmacdermott@propertyoz.com.au](mailto:kmacdermott@propertyoz.com.au) or 07 3225 3000.



Yours sincerely



Kathy Mac Dermott  
Executive Director

