Green Building Council Australia

Building a sustainable future

9 October 2026

The Hon Jarrod Bleijie MP
Minister for Economic Development Queensland
Minister for State Development, Infrastructure and Planning
Deputy Premier
Queensland Government

Via email: **contact@edq.qld.gov.au**

Dear Deputy Premier

RE: Proposed Amendment to the Bowen Hills Priority Development Area Development Scheme

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the Bowen Hills Priority Development Area (PDA) Proposed Amendment (the Proposed Amendment). We acknowledge the Queensland Government's commitment to stimulating development and expanding the number of potential homes that can be delivered within the Bowen Hills PDA. We agree that this is a once in a generation opportunity and urge the Queensland Government put all the right measures in place to ensure that development in the Bowen Hills PDA is future ready and will deliver both immediate and long-term benefits for the Queensland community and economy.

We encourage the Queensland Government to consider the legacy the Proposed Amendment will help to create. Success should not be measured solely by how many dwellings are delivered, but by whether they are accessible to diverse households (including families, key workers and households with lower incomes), remain safe, healthy and affordable to operate in a changing climate, and are integrated into high-quality, resilient communities.

Furthermore, whether through rezoning, new infrastructure investments or the release of public land, governments often create significant uplift in land value. It is important to consider how the public value is captured and leveraged when public decisions create private value.

About GBCA

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star is developed by industry, for industry, and aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- supporting and rewarding the development and use of sustainable products and materials
- contributing to market transformation and a sustainable economy.

Removal of requirements

GBCA acknowledges that the Queensland Government is eager to maximise the opportunities for building more homes, especially in areas in proximity to the city centre. We support actions that stimulate sustainable development and opportunities for growing the construction industry and related supply chains. However, we urge the Queensland Government to consider how it will balance maximising development with its responsibilities for minimising a range of long-term risks and opportunities to deliver benefits to Queenslanders beyond those directly involved with development within the Bowen Hills PDA.

As the Queensland Government itself notes, stimulating development in the Bowen Hills PDA is a once in a generation opportunity. Given the potential and profile of this area, and noting the proposed increased height provisions, the Queensland Government and the Queensland community should reasonably expect that development in this precinct will deliver outcomes beyond minimum requirements. Without setting expectations for leading or best practice – and a method for verifying this is achieved – the Bowen Hills PDA risks not measuring up to urban renewal precincts of this nature elsewhere in Australia.

GBCA is disappointed that the Proposed Amendment removes the requirements for:

- buildings to achieve a sustainability certification through EnviroDevelopment, Green Star or an alternative, equivalent rating system.
- a minimum of 5 per cent of total residential GFA as either or a mix of public housing, social housing or affordable housing
- appropriate value uplift charges to be paid.

The Bowen Hills PDA is a government-controlled asset that should deliver benefits for many more than those directly involved with its development. By removing key requirements from the Bowen Hills PDA Development Scheme, the Queensland Government risks losing significant opportunities to deliver benefits to the wider Queensland community and economy. These include:

- **Value uplift charges:** The Proposed Amendment increases building height provisions in parts of the Mixed-Use Zone to maximise housing opportunities, but at the same time removes value uplift charges. Given the significant state investment to date, and earmarked for future investment in the Bowen Hills PDA, it is reasonable for Queenslanders to expect that those who stand to gain the greatest profits from this investment should contribute an appropriate amount back to government for reinvestment in the public good as demand in Queensland for future-ready infrastructure continues to grow.

- **Housing diversity:** Australia, including Queensland, is struggling with a profound shortfall of housing, especially public, social and affordable housing. Governments have a responsibility to exercise all the levers and opportunities at their disposal to increase housing supply and housing diversity. This should include requirements for a mix of public housing, social housing or affordable housing in Priority Development Areas. Especially when building height provisions have been increased to maximise housing opportunities.

- **Delivering greater sustainability:** The removal of the requirement for certification with EnviroDevelopment, Green Star or an alternative, equivalent rating system means that the anticipated development in the Bowen Hills PDA may miss a range of opportunities to deliver better outcomes for the future owners and inhabitants, the Brisbane community and Queenslanders more broadly.

GBCA acknowledges the PDA-wide criteria included in the Proposed Amendment which include considerations for:

- Urban Design
- Sub-tropical Design
- Building Form
- Streets and Public Realm
- Connectivity
- Housing Diversity
- Responsive Design, such as water management, energy efficiency, waste management and transport efficiency
- Infrastructure Planning and Delivery
- Heritage Places
- Environment
- Managing Development Impacts

These are all important elements to assist in ensuring that the anticipated buildings, and the whole Bowen Hills PDA precinct, will be healthy, liveable and resilient to a changing climate. However, firstly, removing the requirement to achieve a certification means that it becomes subjective and/or difficult to understand what benchmarks development projects should aim for, which creates market uncertainty and an uneven playing field. Secondly, with a commitment to certification, it also becomes very difficult for the Queensland Government to know if a development will actually achieve what is required of it.

The Green Star Building rating tool provides best practice benchmarks that relate to almost every PDA-wide criteria included in the Proposed Amendment. Green Star certification provides independent verification that those benchmarks have been achieved. More information about the Green Star rating system can be found on the GBCA website. We note that the Green Star Buildings Apartment Pathway offers guidance that will be of particular interest to developers of residential and mixed-use towers.

Additional opportunities

GBCA also wishes to highlight significant missed opportunities not captured in the PDA-wide criteria that Queenslanders should reasonably expect from development on this scale:

- **Embodied carbon and circularity:** Without intervention, embodied emissions will go from 16 per cent in 2019 to 85 per cent of Australia's built environment total carbon footprint by 2050[1]. Addressing embodied carbon is essential to achieving legislated net zero targets. Upfront carbon, released before a building is occupied through material production, transport and construction, is especially important because these emissions cannot be reduced through better building operations later. Cutting upfront carbon requires choosing lower-carbon and more circular products and materials, including those that are reused, recycled, responsibly sourced or designed for future recovery. This creates a significant opportunity to strengthen Australian supply chains by increasing demand for locally made, low-carbon materials, supporting innovation, investment and

[1] GBCA & thinkstep-anz. 2021. Embodied Carbon and Embodied Energy in Australia's Buildings https://gbca-web.s3.amazonaws.com/media/documents/embodied-carbon--embodied-energy-in-australias-buildings-2021-07-22-final-public.pdf

skilled jobs – a priority of the Queensland Government. With the proposed increased height provision in the Bowen Hills PDA, embodied carbon reduction becomes even more critical.

- **All-electric development:** Requiring all buildings in the PDA to be all-electric is a practical and cost-effective way that the Queensland Government can protect future owners and occupants from rising gas prices and uncertain supply, while ensuring new development is ready for a net zero future. Designing buildings to be all-electric from the outset is significantly easier and cheaper than retrofitting gas-powered equipment later.

Recommendations

Ideally, GBCA seeks a reinstatement of the requirements for:

- buildings to achieve a sustainability certification through EnviroDevelopment, Green Star or an alternative rating system.
- a minimum of 5 per cent of total residential GFA as either or a mix of public housing, social housing or affordable housing
- appropriate value uplift charges to be paid.

At a minimum, we urge the Queensland Government to:

- Include a requirement in the PDA-wide criteria for all new developments to be all-electric.
- Include a requirement in the PDA-wide criteria for developments to demonstrate how they will achieve 10% reduction in upfront carbon and encourage them to consider practices and materials that will improve circularity.
- Encourage developers to consider using a rating tool such as Green Star, EnviroDevelopment or an alternative, equivalent rating system. This could be achieved by noting in section 2.5 PDA-wide Criteria that committing to achieving independent certification with a trusted and robust rating tool will assist developers to deliver on the PDA-wide criteria.
- Offer an incentive for provision of public housing, social housing or affordable housing.

To arrange further discussion, or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely



Davina Rooney
Chief Executive
Green Building Council of Australia