

20 September 2023

Minister of Planning
Shaping SEQ 2023 Update Project Team
Department of State Development, Infrastructure, Local Government and Planning
PO Box 15009
City East QLD 4002

By email: ShapingSEQSubmissions@dSDLGP.qld.gov.au

Dear Minister

Draft Shaping South East Queensland Regional Plan 2023 Update

Thank you for the opportunity to provide feedback in relation to the above.

About QCOSS

Queensland Council of Social Service (QCOSS) is the peak body for the social service sector in Queensland. Our vision is to achieve equality, opportunity, and wellbeing for every person, in every community.

QCOSS leads the [Town of Nowhere](#) campaign advocating for change to end the housing crisis in Queensland, and is a partner of the national [Everybody's Home](#) campaign.

In March 2023, QCOSS, Tenants Queensland and The Services Union, along with the [Town of Nowhere](#) campaign partners commissioned the report '[A blueprint to tackle Queensland's housing crisis](#)' (The Pawson Report), which clearly outlines the unprecedented housing crisis in Queensland.¹

QCOSS' position

QCOSS welcomes the Shaping South East Queensland Regional Plan 2023 Update (The Plan) and the opportunity to provide feedback.

Queensland's current housing crisis has laid bare the vulnerabilities that exist in the housing system. Our frontline services are currently witnessing distressing levels of housing need and the human impacts of the same.² The Pawson Report found approximately 100,000 households in Queensland have an unmet need for affordable housing, and areas within the South East Queensland region have some of the highest rates of unmet need in Queensland, including one in ten households in the Logan and Gold Coast LGAs.³

QCOSS welcomes the Department of State Development, Infrastructure, Local Government and Planning's commitment to update The Plan to address existing housing shortages and respond to predicted increased demand for housing due to population growth in South East Queensland.⁴

¹ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

² Queensland Council of Social Service, (2022), [State of the Sector Report](#).

³ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 66-73.

⁴ Queensland Government, (2023), [Draft Shaping SEQ Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 11.



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QCOSS strongly supports aspects of The Plan intended to increase supply of social and affordable housing. The Plan must be driven by an ambitious goal of ending housing need in South East Queensland within a decade, incorporating initiatives to accelerate delivery of a significant increase in supply of safe and secure social and affordable housing that meets the diverse needs of the community. QCOSS' feedback is focused on aspects of The Plan that relate to achieving this goal and includes support for:

- increasing the target for social (public and community) and affordable housing to accommodate population growth and match the percentage of households who on average require social and affordable housing - 7.5 – 8 per cent of all housing in South East Queensland, rather than the current lesser target in The Plan of 20 per cent of new dwellings⁵
- incentivising approaches to deliver build to rent projects, in particular projects that increase supply of affordable housing for people on low and limited incomes
- implementing meaningful inclusionary zoning to obligate private developers to increasing the supply of social and affordable housing
- developing energy efficiency social and affordable housing
- developing social and affordable housing in liveable spaces using in-place design principles
- incorporating diversity in the types of dwellings delivered, including increasing medium density development that delivers social and affordable housing connected to communities, such as affordable build to rent developments
- establishing transparent and regular reporting mechanisms for clearly specified planned outcomes for social and affordable housing
- adding an element to the plan that enables the region to monitor the impact of short-term rentals, and to respond if it demonstrates a significant impact on affordability and availability of housing.

Further details about elements and strategies that QCOSS supports and is recommending improvements are outlined below.

Strategic goal 'Grow' – Sustainably accommodating a growing population

QCOSS supports the following overarching key changes identified in relation to the Grow strategic goal:

- updated dwelling supply targets to reflect fit for purpose population, demographics and household projections
- adding new sub-targets including dwelling diversity targets and social and affordable housing targets
- new and focused measures for monitoring and reporting to better inform implementation and ongoing policy refinement.

Grow Element 1 Efficient Land Use

Environmental characteristics associated with housing, such as access to transport, shops, social networks, services, education, and employment, are important factors in contributing to positive health and wellbeing for people living in social and affordable housing as these

⁵ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), A blueprint to tackle Queensland's housing crisis, Queensland Council of Social Service, 79.

characteristics enable connection and engagement with community.⁶ Medium density housing development is a method that can be used to provide access to these environmental characteristics as well as providing an opportunity to broaden choice of housing, and provide sustainability and productivity benefits.⁷

QCOSS supports efficient land use for the development of social and affordable housing that includes medium density development, described in The Plan as “well-located places – places with access to employment, services and amenity, where land is supported by appropriate infrastructure.”⁸

Element 2 Housing Supply

In the face of population growth, the chronic undersupply of housing in South East Queensland has contributed to an unprecedented housing crisis.

“While recent years have seen sharply rising rental unaffordability and homelessness in Queensland, these developments only compound more long-running and deep-seated negative housing system trends – notably declining home ownership and the increasingly inadequate capacity of the social housing system.”⁹

QCOSS supports implementation of strategies identified in The Plan to deliver adequate housing supply based on detailed modelling of predicted housing demand. Priority must be given to taking immediate action to accelerate implementation of Strategy 2.3 to “support residential opportunities on publicly owned land to accommodate growth in the short term (including temporary uses that respond to acute demands)” to immediately address the significant unmet need for social and affordable housing.¹⁰

Additional consideration must also be given to the potential impact of short-term rentals in key areas within South East Queensland where short-term rentals are more prevalent, such as the Sunshine Coast and Gold Coast areas. This could be achieved by incorporating a method to monitor and understand the impact of short-term rentals, and to respond if it demonstrates a significant impact on affordability and availability of housing.¹¹

Element 3 Housing Diversity

Enhanced housing system diversity and choice is required to deliver solutions to meet community needs and to create further opportunities to increase the supply of safe, secure and affordable housing.¹²

QCOSS supports housing diversity strategies described in Strategy 3.5 to “unlock new models and diverse forms of homes (size and form) for housing delivery, including build to rent” solutions.¹³ Encouraging build to rent construction through tax concession is one way to

⁶ Australian Government, (Updated October 2022), [National Social Housing Survey 2021](https://www.aihw.gov.au/reports/housing-assistance/national-social-housing-survey-2021/contents/introduction), Australian institute of Health and Welfare, <https://www.aihw.gov.au/reports/housing-assistance/national-social-housing-survey-2021/contents/introduction>

⁷ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 11.

⁸ Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 74.

⁹ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 4.

¹⁰ Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 74.

¹¹ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 95.

¹² H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 48.

¹³ Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 74.

immediately encourage increased diversity of supply.¹⁴ Supporting not-for-profit community housing organisations to develop build to rent properties is a mechanism that could be used to increase and diversify affordable housing using existing tax-advantaged and regulated status of community housing organisations.¹⁵ Further, concession could be introduced to incentivise delivery of social and affordable build to rent properties, including increased investment in the Housing Investment Fund. QCROSS supports the Brisbane City Council initiatives outlined in The Plan that is designed to prioritise affordable build to rent accommodation delivered by not-for-profit housing providers.

QCROSS also acknowledges that the Queensland Parliament passed legislative amendments in 2023 to encourage growth of build to rent construction by providing tax concessions for properties that allocate ten per cent of the number of dwellings to affordable housing. However, the current income and asset eligibility test (e.g. \$91,556.92 income and assets of \$450,000 for a single person) to access build to rent subsidised properties will likely result in the housing being inaccessible for people living on low and limited incomes as the income and assets thresholds are so high.¹⁶ The eligibility income and asset thresholds must be decreased to enable subsidised build to rent dwellings to be more accessible and affordable for people on low and medium incomes.

Element 4 Social and affordable housing

Social housing in Queensland has seen a continuing decline in capacity, both in absolute terms and in relation to need since the 1990s.¹⁷ Recent social housing figures confirmed there are more than 15,600 households in South East Queensland who are in need of social housing.¹⁸ Vacancy rates for rentals in some areas of South East Queensland have also been at critically low levels at just 1.1 and 1.2 per cent in the Greater Brisbane and Gold Coast regions respectively.¹⁹ The demand for affordable housing and low vacancy rates has resulted in significant increases in rental costs across South East Queensland, creating high levels of housing stress and further increasing the unmet need for affordable housings.²⁰

4.1 Social and affordable housing targets

QCROSS supports Strategy 4.1 (a) to establish a target for social (public and community housing), and Strategy 4.1 (b) to establish a target for affordable housing for people with low and moderate incomes.²¹ However, the 20 per cent target in The Plan for all new dwellings to be social and affordable housing is inadequate. With the population expected to grow to 6 million by 2046 and the current average estimated representation of social housing across Queensland at just 3.4 per cent of all dwellings, a significantly higher target for social and

¹⁴ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 87.

¹⁵ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 96.

¹⁶ *Land Tax Act 2010*, Queensland Australia, <https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-2010-015#:~:text=Land%20Tax%20Act%202010%20An%20Act%20about%20land,in%20defines%20particular%20words%20used%20in%20this%20Act.>

¹⁷ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 17.

¹⁸ Queensland Government, Social Housing Register 30 June 2023, Department of Housing, <https://www.data.qld.gov.au/dataset/social-housing-register>

¹⁹ REIQ, Residential Vacancy Rate Report June Quarter 2023.

²⁰ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

²¹ Australian Government, (Updated October 2022), [National Social Housing Survey 2021](#), Australian Institute of Health and Welfare, <https://www.aihw.gov.au/reports/housing-assistance/national-social-housing-survey-2021/contents/introduction>, 75.

affordable housing is required to meet the housing needs of people living on low to moderate incomes.²²

The target for social (public and community) and affordable housing must accommodate population growth and match the percentage of households who on average require social and affordable housing, therefore 7.5-8 per cent of all housing in South East Queensland must be social and affordable housing, rather than the current lesser target in The Plan of 20 per cent of all dwellings to accommodate the predicted six million people living in South East Queensland by 2046. This target should also be informed by the independent modelling being completed by the Australian Housing and Urban Research Institute (AHURI).²³

Determining an appropriate specific target for affordable housing is dependent on confirmation of the definition of affordable housing, which as indicated in The Plan is currently under review. Clarity of this definition is fundamental to the effectiveness of the target. In principle, the definition of affordable housing must be focused on meeting the housing needs of people with low to moderate incomes. For example, the Australian Bureau of Statistics uses the definition “rent payments less than or equal to 30 per cent of household income.”²⁴

Targets must be managed and administered as commitments that are supported by clear plans, funding, initiatives and incentives to enable the targets to be delivered.

Inclusionary zoning is one way to increase supply of social housing in South East Queensland. QCOSS supports introducing meaningful inclusionary zoning to obligate private developers to increase the supply of social and affordable housing in Queensland.

“There is strong evidence of inclusionary zoning policies being an effective mechanism to deliver large-scale affordable housing contributions in Australia. Inclusionary zoning has been implemented in South Australia, New South Wales, and the Australian Capital Territory through a variety of mechanisms across developments taking place on private and public land. Inclusionary zoning policies are used in the United Kingdom and the United States to augment affordable housing supply. In 2015-16, 43 per cent of affordable housing built in England was delivered due to inclusionary planning requirements.

Ideally, inclusionary zoning should be implemented in Queensland in alignment with a National Framework. The Queensland Government is encouraged to pass legislation in Queensland, and also seek action and alignment at a federal level.”²⁵

QCOSS supports work being undertaken by state agencies, including the Department of Housing to investigate introducing inclusionary planning requirements into the planning framework. Phasing in inclusionary zoning must result in obligating private developer social and affordable housing contributions.

4.2 Partnerships

Implementing policies to move toward a diversified housing market structure is an important element to creating a more efficient, less volatile housing system. One way this can be achieved is through policies to expand the role of governments, not-for-profits and build to

²² H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 20.

²³ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 17.

²⁴ Australian Government, (September 2023), Rent Affordability Indicator (RAID), <https://www.abs.gov.au/census/guide-census-data/census-dictionary/2021/variables-topic/housing/rent-affordability-indicator-raid>

²⁵ Queensland Council of Social Service, (2023), Submission to Planning (inclusionary zoning strategy) Amendment Bill 2023 (the Act), 1.

rent developers.²⁶ The demand for new social and affordable housing is so great that governments cannot address the need without partnership. A combination of the Commonwealth and state governments, not-for-profit and for-profit organisations must finance, develop, and manage social and affordable rental housing.²⁷

QCOSS supports Strategy 4.2 to support partnerships between the development industry and financial providers, housing and homelessness service providers and local, state, and federal governments and the community to provide further housing opportunities, such as supported accommodation, community housing and housing assistance opportunities.²⁸

4.3 Repurposing of underutilised spaces and buildings

Accelerated delivery of housing supply is required at scale to address the housing crisis. QCOSS supports Strategy 4.3 to support repurposing of underutilised spaces and buildings, where appropriate for people's needs, for multipurpose emergency short-term accommodation options.²⁹

4.4 Increase access to housing for Aboriginal peoples and Torres Strait Islander Peoples

Aboriginal and Torres Strait Islander people are over-represented among people experiencing homelessness in Queensland. In 2021-22, people of Aboriginal or Torres Strait Island background accounted for 35 per cent of persons assisted by Supportive Housing Service agencies. This is partly associated with disproportionately large numbers of Aboriginal and Torres Strait Islander people experiencing serious overcrowding. According to the 2021 Census, no less than 38 per cent of Aboriginal and Torres Strait Islander households in Queensland were occupying homes with insufficient bedrooms, as compared with only 16 per cent of non-Indigenous households.³⁰

QCOSS supports Strategy 4.4 to increase access to safe, secure, and affordable housing choices for Aboriginal peoples and Torres Strait Islander peoples, including partnering with Aboriginal and Torres Strait Islander peoples. QCOSS acknowledges Aboriginal and Torres Strait Islander Housing Queensland and Aboriginal and Torres Strait Islander community-controlled housing providers as experts who can provide the best inputs into the development of strategies to provide safe, secure and affordable housing. QCOSS supports strategies that aim to:

- increase the supply of high-quality social and affordable housing to meet current and future need
- increase the capacity of community controlled Aboriginal and Torres Strait Islander Community Housing Providers in Queensland. This should include transferring housing assets to community-controlled Aboriginal and Torres Strait Islander Community Housing Providers and increasing investment in these organisations to respond to local housing challenges.³¹

²⁶ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

²⁷ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

²⁸ Australian Government, (Updated October 2022), [National Social Housing Survey 2021](#), Australian Institute of Health and Welfare, <https://www.aihw.gov.au/reports/housing-assistance/national-social-housing-survey-2021/contents/introduction>, 75

²⁹ Australian Government, (Updated October 2022), [National Social Housing Survey 2021](#), Australian Institute of Health and Welfare, <https://www.aihw.gov.au/reports/housing-assistance/national-social-housing-survey-2021/contents/introduction>, 75.

³⁰ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

³¹ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

Strategic goal ‘Sustain’ – Promoting ecological sustainability and resilience

Element 7 Climate Change

Energy efficiency measures help to assist tenants in managing their energy bills and make homes safer and healthier to live in, however due to limited rental property choice and restrictions on making modifications to homes, tenants can experience increased energy costs and poor environments (too cold or hot).³²

QCOSS supports Strategy 7.2 to incorporate “affordable renewable energy, low emissions technology, energy efficiency and zero waste/circular economy measures into the design, planning and development of communities and building...to facilitate the uptake of relevant certifications of ratings.”³³

Strategic goal ‘Live’ – Achieving better design and place-making outcomes

Element 4 Fairness

With reference to feedback provided for strategic goal Grow, QCOSS supports strategies in element 4 Fairness to ensure “communities are places where people can access transport, education, jobs, services, green spaces, and family and friends in a way that is fair and equitable to all.”³⁴ QCOSS supports changes to refine strategies relating to fairness and affordable living and supports Strategy 4.3 to “provide various affordable living options, accounting for the cost of housing and transport and consideration of household energy and the real costs of the broader community.”³⁵

Governance and delivery

Enhanced governance, transparency and reporting about social and affordable housing commitments are welcomed. QCOSS supports inclusion of specific targets with associated detailed actions that are quantified and time specific, costed, resourced, and monitored, with outcomes reported frequently and transparently. As discussed in relation to Strategy 4.1 *Social and affordable housing*, definitions used for measures, such as the definition for ‘affordable housing’ must be clearly defined to establish targets that effectively achieve the desired outcome.

Conclusion

More than 15,600 households are waiting on the social housing register in South East Queensland, and the majority of these households have been assessed as high or very high need for housing.³⁶ With more than 100,000 households in Queensland with an unmet housing need for affordable housing, inadequate supply of housing has exposed the need to improve planning and regulation to deliver significantly more social and affordable housing across Queensland, and within the South East Queensland region. Without long-term planning and government intervention, the housing crisis will continue to worsen, and many

³² Healthy Homes for Renters, Community Sector Blueprint: A National Framework for Minimum Energy Efficiency Rental Requirements, (November, 2022).

³³ Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 145.

³⁴ Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 170.

³⁵ Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 171.

³⁶ Queensland Government, Social Housing Register 30 June 2023, Department of Housing, <https://www.data.qld.gov.au/dataset/social-housing-register>

people in South East Queensland will not have access to affordable, safe and secure housing.

QCOSS welcomes strategy updates incorporated into The Plan to significantly increase social and affordable housing and to establish specific targets to deliver this. The government must set ambitious targets to end the unmet need for affordable housing and to take a whole of government approach to end the housing crisis across Queensland using a comprehensive mission driven housing plan to deliver accelerated affordable housing supply. Consideration must also be given to regions outside of South East Queensland, as the unmet need for housing impacts people across Queensland, with regional areas such as Gladstone and outback communities significantly impacted by the housing crisis.³⁷

Thank you again for the opportunity to provide the submission.

Yours sincerely

A handwritten signature in black ink that reads "Aimee McVeigh". The signature is written in a cursive, flowing style.

Aimee McVeigh
Chief Executive Officer

³⁷ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), *A blueprint to tackle Queensland's housing crisis*, Queensland Council of Social Service.