
QUEENSLAND LOCAL GOVERNMENT'S ROLE IN ADDRESSING THE HOUSING CRISIS.

Report for QCOSS, Under One Roof, etc.

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Executive Summary

Local councils across Queensland have long demonstrated a commitment to improve the housing situation for vulnerable people in their communities. This can be seen to this day in the innovative approaches being adopted to this end by local councils from the Gold Coast to Cape York. In the context of the state's current housing 'crisis', it is important that local governments continue to play an active role in improving housing outcomes for affected population groups.

This report identifies and explores three key roles that local councils in Queensland have pursued to this end. In explaining some of these constructive interventions, we discuss their replicability by other local councils, and reflect on what the research evidence tells us about how to empower local councils to facilitate better housing outcomes for their localities.

Our resulting recommendations are relevant to local councils, to the Queensland Government and to not-for-profit social housing and homelessness support providers. The report draws on interviews with senior staff in three councils identified as exemplifying active engagement with these three roles.

How do leading local councils contribute to efforts to expand affordable housing and prevent/relieve homelessness?

The three roles through which local councils can make a significant contribution to easing the housing crisis, are: supporting rough sleepers; integrating social housing into new developments through planning regulations; and partnering in the direct delivery of social housing, particularly involving council-owned land.

Exemplifying active engagement with the problem of street homelessness, Brisbane City Council has been developing its 'public space liaison officer' roles for over a decade. The team helps connect rough sleepers to government services and to not-for-profit support providers, including housing options. The role is, in an administrative sense, an extension of the council's remit to manage public spaces, but the focus on improving the outcomes for rough sleepers has successfully elevated it from mere enforcement through 'move along' powers.

City of Moreton Bay Council has, in recent years, investigated options for better using planning regulations to integrate below-market-rent housing options in new developments. The council began with a concerted strategic process to identify where such housing options are needed and, equally, can be accommodated through new development. The resulting policy framework sends clear signals to market and community housing developers on what kinds of residential development proposals will be supported. Additionally, through discounts to standard infrastructure charges levied on new development, the council is incentivising the inclusion of sub-market rental accommodation within residential development projects.

Gladstone Regional Council has recently undertaken an audit of council-owned land, to identify opportunities for new housing projects, particularly for housing options unsupplied by the market. This includes diverse and lower-cost options that might be otherwise financially infeasible. Importantly, the audit has been carefully embedded in the council's strategic plans, increasing alignment with the council's broader priorities, and ensuring 'buy in' from across the organisation.

What factors have shaped or limited these contributions (e.g. powers, resources)?

Inadequate funding and/or staff capacity are the main factors that limit the scope for local council contributions in these areas. Many councils are in no position to take on roles beyond their legislated functions, no matter how important they may be, particularly where those roles absorb significant staff time and/or council funds.

However, the contributions to easing the housing crisis exemplified by the case study examples demonstrate that local government can play a positive role in this area.

As noted above, there was an increased willingness for councils to get involved when activities contributing to housing and homelessness objectives helped councils achieve core business goals.



The examples of Brisbane's management of public space, and Gladstone's desire to catalyse economic growth through new housing options, showed the value of integration into council programs and overarching strategic plans.

Another crucial factor was the councils' ability to lean on existing resourcing and to leverage capacity outside their organisation. Connecting with, rather than duplicating, expertise of state government, community housing developers, other not-for-profit service providers and other councils, helped local councils overcome internal resource and capacity limitations.

How can state government support local councils' contributions?

The strength of local councils is their rich appreciation of local context, both in terms of the local housing challenges, but also the solutions most likely to succeed given local context. As such, one avenue is for the Queensland Government to devolve more policy setting to the local level, where those policies align with the state's response to relevant housing challenges. For example, within planning regulations, although statewide consistency is laudable, it was clear some local responses would be suitable in particular contexts. This includes enabling council-led master planning (and upzoning) that mandates the integration of social housing, and the application of broad-base contribution schemes towards the delivery of social housing, as is the case for other distributed local infrastructure.

“The strength of local councils is their rich appreciation of local context, both in terms of the local housing challenges, but also the solutions most likely to succeed given local context.”

Another important role of state government is to formalise links with local council front-line staff, to ensure less friction from those teams to state government services, particularly housing support. This was most evident with the public space liaison officer teams in Brisbane and Moreton Bay. Effectively triaging newly identified cases of rough sleeping requires effective working relationships with state government agencies. While these relationships can build up over time, a more formally structured link to such teams in local government would enable smoother roll out by other councils.

How can less active local councils be encouraged to replicate the contributions of leading councils?

As noted, capacity and resourcing are the perennial challenges for local government. The research highlighted the importance of industry networks and peak bodies to overcome capacity limitations of individual councils. For example, the formulation of local laws to better accommodate supportive responses to rough sleeping in public spaces, is emerging as a role for local councils in the face of increasing scarcity of housing options for those experiencing, or at risk of, homelessness. This is not something each council needs to reinvent from scratch, and something that peak bodies, like the Local Government Association of Queensland, the Council of Capital City Lord Mayors and the regional organisations of councils can facilitate.

Forums such as these can provide opportunities to share lessons and skills. The regional organisations of councils, and other regional forums for local councils retain the ability to remain responsive to local context – whether coastal, inland, or metropolitan regions – whilst providing an economy of scale. These forums currently help set policy agendas – identifying and advocating for shared priorities of the member councils. They can also be important conduits with skills and expertise in other industries, particularly the not-for-profit housing and service provider peak bodies, who themselves have limited capacity to engage with individual councils.

A final note, though, is that there is a limit to anticipating a universal application of local council responses to the housing crisis. If an issue is common across the state, or a solution is expected to be delivered across the state, it should really lie with the Queensland Government to address. Most pertinently, local councils can offer to facilitate social housing, and other below-market-rent housing products; such as, the local land audits, partnerships and discounts to infrastructure charges. However, these do not obviate the need for a steady and sufficient quantum of funding to subsidise the development. Councils cannot be the source of such funding; it needs to come from the higher spheres of government.



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1. Introduction

1.1. Background and purpose

1.1.1. The Pawson Reports

With housing market pressures showing little sign of relenting in second half of 2023, and with a Queensland state election scheduled for October 2024, policy and media continue to be resonant for housing and homelessness reform critiques and proposals during this timeframe.

UNSW City Futures Research Centre, led by Professor Hal Pawson, has been engaged by Queensland Council of Social Service (QCOSS) and Town of Nowhere campaign partners, to produce a pair of research reports into the Queensland Government's policy response to the current housing 'crisis'. Released in March 2023 and June 2024, those reportsⁱ highlighted the scale and complexity of the state's housing challenge. They also evaluated the fast-changing policy responses from the Queensland Government, calibrated against a proposed housing reform agenda.

1.1.2. The role for local government

Unlike the situation in some other countries, local government in Australia has no statutory responsibilities for the provision of housing or the relief of homelessness. Despite this, there are many examples in recent Australian history of local government playing a key role in supporting communities' housing needs, such as Brisbane City Council's early support in establishing the Brisbane Housing Company. Also, some of the councils' statutory roles have direct effects on housing issues. Among more proactive councils, there are also growing concerns about housing and homelessness policy challenges as these affect their localities, and so a growing interest in more directly addressing them.

Building on the body of UNSW research for QCOSS as recently published, this report commissioned by QCOSS and their Town of Nowhere campaign partners, and Under One Roof investigates the scope for local councils to make a greater contribution to alleviating housing and homelessness pressures in Queensland – subject to the funding, legal powers and responsibilities that might enable them to do so.

1.1.3. Research questions

The research investigated four specific questions, to garner insights into the possible roles local government could play:

1. How do leading local councils contribute to efforts to expand affordable housing and prevent/relieve homelessness?
2. What factors have shaped or limited these contributions (e.g. powers, resources)?
3. How can state government support local councils' contributions?
4. How can less active local councils be encouraged to replicate the contributions of leading councils?

1.2. Scope and method

1.2.1. Identifying 'best practice'

Queensland's 77 councils vary significantly in scale, geographical context, financial situation and political make-up. The approach of this research is to identify and analyse positive examples of local council actions, in terms of responding to their local housing system issues. The research comprised a series of online interviews with senior staff members of selected Queensland councils that were identified as being (a) subject to relatively high levels of housing stress, and (b) noted as having a relatively active/ambitious stance in seeking to address associated problems. The interviews with local council contacts were augmented with a review of their policy structure and content, as well as a further interview with the local government peak body, to better understand the diversity and challenges across the sector.

The chosen case study councils were also selected to reflect a diversity of contexts, and were:

- A capital city council
– Brisbane City Council
- An urban council
– City of Moreton Bay Council
- A regional council
– Gladstone Regional Council

1.2.2. Participants

Case study fieldwork involved semi-structured recorded online interviews with 2-3 senior council staff, typically across strategic and social planning teams, and operations teams involved in delivering housing and homelessness services.

1.2.3. Interview themes

A semi-structured interview topic guide, based on the above research questions, was used, ensuring the interviews followed key themes to elicit relevant information. The following summarises the interview scope:

1. What role does your council currently play in responding to these issues? What specific policies or actions have you developed? (Prompts: expanding affordable housing; zoning and private housing supply; homelessness responses; rental regulation; short-term rental)
2. How successful have these policies or actions been?
3. What barriers have you faced in responding to housing and homelessness issues? (Prompts: limited powers (vis-à-vis other levels of gov); adequate resourcing; local politics/community resistance)
4. How could the state and/or federal governments facilitate/support local government to play a more active role in responding to housing and homelessness issues?
5. What opportunities are there for you to learn from the best practice of other councils?

1.2.4. Future possible research

The research has a finite scope, and further investigation would enhance the findings. First, the project is primarily focussed on the experience of local councils. The perspectives of other affected stakeholders, such as recipients of council support services, the state government, not-for-profit social service, community housing and development sectors would all offer further insights into the role of local government. Second, the project focuses on case study councils, which will not capture the full diversity of local government contexts. High-cost coastal councils with more short-term rental accommodation strains, remote councils, culturally diverse councils, and councils with a large First Nations population would all embody additional perspectives.

1.3. Report structure

Three key roles of local government emerged through the interviews, and form the structure of this report:

- Responding to rough sleeping
- Setting planning controls to integrate social housing
- Partnering to develop social housing

These roles were not unique to one council, and the report synthesises lessons from across the fieldwork. However, each of these sections focuses on one of the case study councils, to demonstrate the actual experiences of these roles. The sections each outline challenges, opportunities and recommendations for future changes within local government, state government and the community housing sector.

A final section reflects on other possible roles of local councils, how best practice can be promulgated across the state, and some limitations to local councils taking on a greater role in responding to the housing challenges of Queensland.



2. Responding to rough sleeping

2.1. What's the role of councils?

2.1.1. Public space management is within council remit

One of the common roles played by local councils in recent years, in terms of addressing housing issues, is an increasingly proactive response to the most acute form of homelessness – rough sleeping. This role has emerged, to some extent, because this is also the more visible form of homelessness thus demanding a response, irrespective of any formal function of local government. It is also undoubtedly due to councils seeking to fulfil their role in supporting community wellbeing. However, it is also because councils have an established remit in the management of the public spaces in which people are rough sleeping.

2.1.2. The incidence of rough sleeping is increasing

As recently reported,ⁱⁱ growing numbers are experiencing homelessness, as evidenced by the increasing demand for specialist homelessness services, not to mention media reports of tent cities emerging in Brisbane.ⁱⁱⁱ

Local government participants similarly reported that, in their experience, there were new features in the rough sleeping landscape. This included more diverse groups rough sleeping, more public parks and spaces being used for rough sleeping, more permanent (relatively) tent setups, and a perceived preference for 'camping' as a tolerable alternative to other temporary accommodation, at least in the short term.

"We've got people that ... can't afford their rent, obviously, we've got people that don't have any place else to go or have exhausted their options with family and friends like if they're fleeing domestic and family violence. Then we've got people... basically there's just not enough supply, so they're not able to find anything, even if they could afford something. So, there's a real mix of people."

The incidence of rough sleeping evidently has a seasonal dimension, with increased levels in milder months with fewer storms. But it is also a function of the dearth of suitable alternatives without occupancy conditions some consider onerous:

"There is a percentage of people that are sleeping in tents that possibly could have found somewhere else... There are people leaving boarding houses and so forth, because they would rather be in a tent. A tent is like your own house; a boarding house, you've only got your own room, and you're subject to the conditions."

2.1.3. Desire to balance the priorities of public space management and social wellbeing

To be abundantly clear, none of our interviewees conceptualised rough sleeping in a crude sense of being a 'public space management issue' – something to be figuratively or literally swept aside. On the contrary, the evidence is that proactive councils, seeking to improve rough sleeper outcomes through thoughtful and nuanced support, are simply leveraging their capacity in public space management to get involved in such cases and to help in delivering support. This primarily involves monitoring public spaces for changes to patterns in rough sleeping, identifying new cases, and connecting people with state government or other not-for-profit social services.

"Our team members [encounter] people staying in public spaces. Our local law rangers will then go out and assess the situation. If it is assessed as being one of people experiencing homelessness, then they collect their details and consent to be referred to the Department of Housing and to a specialist homelessness outreach... We then facilitate that referral process and we then regularly meet with the Department and the specialist homelessness service to advocate for ongoing support needs of people who are sleeping rough around the area."

It was evident, however, that council interactions with people rough sleeping manifest as part of councils' enforcement of 'move along' orders for illegal camping or sleeping in vehicles. As discussed below, this 'reverse engineered' approach to homelessness support involves some challenges. But application of such local laws has become increasingly nuanced. For example, these nowadays more explicitly specify exemptions to move along orders for those connected with specialist homelessness services. And council enforcement teams often also formalise internal processes to contact homelessness liaison teams rather than enforcing any move along orders.

"[Under] our local law that relates to illegal camping, people who have been assessed by our local laws officers as experiencing homelessness, are actually exempt from our local law. There is an assessment framework as part of that and some responsibilities people staying in public spaces need to follow. Such as keeping the area clean, safe and tidy and that they remain engaged with the Department of Housing and support services to facilitate a housing outcome."

2.1.4. Homelessness services not within council remit

Councils saw their role as to facilitate the connection between those experiencing rough sleeping and existing services, rather than replicate anything that is already provided. This includes connecting people with state government agencies to place them in temporary accommodation and with not-for-profit, and other philanthropic, organisations that also provide support services.

To some extent, the ideal role of local councils is best seen as a form of concierge – acting as a directory of potential services, helping people identify the kinds of supports that are needed and then connecting them with those services.

"The first step is to check their welfare. So, if they were unwell and needed medical attention, then we'd arrange that either through... outreach or getting this person to a hospital... [If] they have no connection to food, for example, we will refer them to the local food service... After they go, 'yeah, I'm okay', second question we ask is, 'are you connected to a housing support service?'"

The extent to which this concierge role can be formalised and resourced is a key consideration of this section of the report. However, it should be noted that not all rough sleepers welcomed intervention by the council, meaning there are limitations to such efforts:

"Where they say, 'I'm not connected [to services], bugger off', then that's what we do."

2.2. Case study response – Brisbane City Council

2.2.1. Policy context

Brisbane City Council (BCC) has a long history of programs to support those rough sleeping, and experiencing homelessness more generally. The current growth strategy^{iv} articulates the council's priorities regarding housing supply, diversity, affordability and homelessness support. The latter of these areas includes various programs to support not-for-profit homelessness service providers, including community housing providers (CHPs). It also includes two particular activities that result in council staff directly working with people experiencing homelessness and support service providers. The first is the 'public space liaison officers' (PSLOs) and the second is the regular series of 'Homeless Connect' events.

2.2.2. Intervening with rough sleepers in relation to public space management

The PSLOs, according to the growth strategy, have the explicit purpose of working in "public spaces daily, with people experiencing or at risk of homelessness, to assist in linking them with necessary support services."

The approach is threefold. First, the PSLOs proactively visit public spaces regularly, particularly known hot spots for rough sleeping, to monitor levels and conditions of rough sleeping. Second, the council's enforcement teams will identify cases of rough sleeping, and refer the PSLOs to follow up. And third, the PSLOs are responsible for pursuing any inquiries or complaints from other members of the community about instances of rough sleeping.

“There's a local law that says you can't camp on the side of a roadway. So that team says, 'well, these guys are breaching the local law, but they say that they're homeless, no place to go, can your team check in with them?' We go and have a chat. Where are you at? Are you connected to services? Are you on a housing waitlist? We give a bit of leniency around that, as opposed to people that are 'no, I'm an international backpacker'”

One participant noted that the division of pro-active and re-active (to complaints) cases is increasingly skewing to the latter, with high visibility of some instances of rough sleeping – with larger tents or more belongings kept on site – leading to more complaints.

Once the PSLOs identify cases requiring attention, they will talk directly with the person to find out which services they have connected with – particularly Queensland's Department of Housing, Local Government, Planning and Public Works specialist homelessness services to find temporary accommodation. There is a small but significant proportion who are actively disinterested in alternative accommodation options available, but most cases of prolonged rough sleeping are a function of the lack of alternatives.

“We've always managed rough sleeping in public space. But we're a lot more relaxed about it now in terms of either issuing compliance notices, or fines, or moving people on... Because we understand that there's actually just not the [rental housing] supply to move people into.”

The council tends to be 'relaxed' about rough sleeping in the first instance, so long as it does not simply involve unauthorised camping. Anybody can use the public spaces, including for rough sleeping to some extent. Enforcement of council powers to remove belongings is only a factor when high volumes of personal belongings become a hazard or nuisance, cause damage or obstruct access to the public spaces. Similarly, prohibition of sleeping in cars is mostly enforced only when roadways are considered obstructed.

2.2.3. Connecting people rough sleeping with services

The PSLOs work closely with service providers to help people move out of rough sleeping situations. This is through long-established relationships with key not-for-profit agencies, including some provided financial support by the council.

The other key means of connecting people experiencing homelessness, including rough sleeping, is through the series of regular Homeless Connect events. These are, in broad terms, sessions that bring together a variety of support agencies, both within government and charity sectors, as well as wider sources of philanthropic support from the community.

“It provides everything that you need, like whether you need to be immunised or you need housing support, employment information. You just want to connect with other people and meet volunteers. You need clothing, all that kind of stuff.”

These events are held approximately every eight months, and – from the council's perspective – can be an effective way of ensuring rough sleepers are connected with support services and can begin to move out of their rough sleeping situation. It is also a high-profile way for the council to raise awareness of rough sleeping issues and, of particular value, to identify and establish connections with various support services. These relationships can then be drawn upon throughout the rest of the year by the PSLOs.

“Because of the scale, it starts to attract interest from private [individuals], so donation of shoes or whatever it is, clothing, food and so forth. So, hopefully, there's a flow on effect there that more of the broader city connection kind of starts to support some of these causes, hopefully in local areas as well”



2.3. Challenges

2.3.1. Applying local ordinances consistently

Despite success in integrating homelessness referral teams into the management of public spaces, it can evidently create challenges. For example, when people who were rough sleeping were reluctant to engage with support services, or to comply with council staff efforts to ensure rough sleeping was not impinging on other uses of public space, there was a tacit threat of punitive eviction. In practice, this was not typically employed unless there was a matter of safety or nuisance that needed to be addressed.

“That’s usually about public safety. For those... that are holding out for long-term accommodation; they don’t want temporary short-term, they want that housing waitlist offer. We will just say, ‘well, what’s important then at this stage of the game is that you don’t impact the community’s use on surrounding assets’. ... We’ve had sites where there’s been rubbish or needles or something, so we’ll arrange cleanup at that site, and if it keeps happening, and impacting broader community use, then we’ve got to take another tactic.”

However, there were instances of multiple people rough sleeping in a space being evicted en masse, since move along orders could not be selectively enforced, even when some of those concerned had been cooperating with council staff. Or, more generally, perceptions of differential treatment of people rough sleeping, because the fact that the response was due to neighbour complaints rather than mapped out in a strategic policy.

“Where you’ve got multiple people camping in a space, you need to tell them all the same thing; you can’t just have the guy who’s using drugs, you can’t tell them to get off the land, but not someone else.”

2.3.2. Local sentiment and perceived role

A large part of the homelessness referral team’s work was responding to requests from the public to enforce move along orders. In many cases, complainants were satisfied with the council’s response – to connect people rough sleeping with support services rather than evict them. In some cases, however, there was a perception by complainants or other community members that the council was failing to effectively manage public spaces. This made the council’s approach more difficult to maintain.

“The hardest part I think of our job is we get incoming correspondence from residents equal part get rid of the homeless and equal part can you do more for the homeless? So really our two client groups, I suppose, are those people using public space as a place to sleep, and those that now can’t use that public space because there’s someone sleeping there.”

Again, there was little desire to formalise the council’s position and approach, because doing so would reduce the capacity to tailor its response to the specific circumstances of any single instance of rough sleeping. But, in the absence of a clear position articulated in a policy or similar, there was an ongoing risk of tensions within the community, or difficulties in the council’s ability to effectively support people rough sleeping.

“We always talk to complainants and explain the situation. [Sometimes] they’re not interested in any justification about why someone may be there; they’re just wanting to know what we’ll do about it. [The response will] vary on a case-by-case basis based on a range of factors, including number of complaints, risk to community, risk to that person, and so forth around the type of camping or location or materials that they have on the land.”

2.3.3. Relationship with state is good, but not formalised

One of the pivotal features of the success and longevity of the BCC case, and indeed instances of local government providing support for people rough sleeping generally, is the connection with service providers in state government and the not-for-profit sector. BCC has developed strong connections, and a good working relationship, with state government agencies.

“We connect them with the state government, and those that want it, get accommodation. It’s not long-term, but it’s temporary. It’s better than a park. Whether it’s supported accommodation, or hotel accommodation, whatever it is, the state does provide that. That’s getting better. I would say they’re making more offers than they ever have, in our view.”



Councils who are active in homelessness advocacy were confident that their referrals would lead to alternative temporary accommodation and pathways to more secure housing. This had developed over time, and at an individual – or, at most, team – level.

“We’re seeing improvements in people having applications for housing assistance completed... Again, we continually try to provide some advocacy to prioritise people who are sleeping in our public spaces to be offered those housing allocations as well... It’s been good working with the Department, the local housing service centre and the specialist homelessness service to be able to try and get some better outcomes.”

It was not evidently a formal or standard structure on the state government side, so not something that would be necessarily replicated with other councils if they initiated similar programs.

2.3.4. Resourcing – staff and money

It is unlikely that councils beyond BCC will be able to resource a service as extensive as is in place there. There are some developments in other councils of Southeast Queensland, including Moreton Bay Regional Council who also participated in this research. And there is a greater focus on homelessness and housing in forums of local government collaborations, involving sharing lessons from BCC (described later in this report).

In addition to being a larger organisation, BCC also experiences higher levels of rough sleeping than most other local councils. A smaller service could mean less resourcing is required, but the lack of economy of scale – in terms of staffing – will likely mean any service is more costly for a given outcome in most councils, and hard to replicate.

2.4. Recommendations

There are some practical steps that could increase the potential for local councils to further their role in supporting people sleeping rough, both at the local and state government level.

2.4.1. Support for local laws: templates and processes

As noted above, there are examples of local laws formalising exemptions from ‘move along’ orders, for people who can demonstrate that they are experiencing homelessness and connected to social services. These local laws could readily be duplicated and adopted, where appropriate, by other local councils. This is an example of the kinds of function the local government networks, described later in this report, would be well placed to facilitate.

Beyond the replication in policy, it was evident that an important aspect of the success in BCC’s case was the necessary level of capacity within the enforcement teams, in identifying potential cases of rough sleeping that warrant a different approach to enforcement than public nuisances that are policed under the same local laws. Similarly, enforcement teams had established procedures for responding to public complaints through referral to the PSLOs. Building this capacity, and the necessary operational structures to enable that capacity, will be more onerous than adjusting the local laws. But this is also something that would translate from councils that have successfully implemented such steps.

2.4.2. State government-local government liaison

As noted, there could well be limits to subsidiarity of having local council staff responding to rough sleeping, where those councils are not experiencing as significant volumes as BCC. This could, in the first instance, be overcome with more financial support from the state to help councils establish similar programs to BCC (and Moreton Bay Regional Council, which also has PSLOs).

There is also potential for, in the absence of a dedicated team of PSLOs within councils, the state government – through its Specialist Homelessness Services or similar – to more directly interface with councils’ enforcement teams. Such a structure would still require capacity building within the local councils’ enforcement teams, and significant resourcing to increase the capacity of state-funded services. But, in principle, such a structure could improve the pathway of connecting people experiencing rough sleeping with the required support services.



3. Setting planning controls to integrate social housing

3.1. What's the role of councils?

3.1.1. Shortage of social housing

Councils are increasingly recognising that housing available through the open market is not meeting the needs of all parts of their community. And, as such, there is an increasing effort to see the development of more social housing. (For the purposes here, 'social housing' is any housing made available to lower-income households at a discount to market prices.)

In the broadest terms, councils have an established role in allocating land to desired uses through the land-use planning system (that is, zoning private land to permit/prohibit different land-use patterns). And councils are looking to extend their use of the planning system to deliver social housing.

3.1.2. Housing targets and more new supply

One universal feature across all councils is a housing 'supply target'. That is, an identified number of new dwellings that are sought over a specified timescale in the immediate future. Participants were understandably keen to stress that councils do not build housing (social or market), so have limited ability to guarantee targets are met. The target is catalysed by: (a) an infrastructure program to ensure sites targeted for new housing have sufficient infrastructure capacity to maintain a level of demand for living there; and, more prominently, (b) zoning capacity to ensure sites targeted for new housing permit feasible scales of development.

One participant highlighted how, under existing zoning, BCC had sufficient capacity for much more than its housing target and had even already approved enough development (which had not commenced construction) to meet its currently applicable housing targets.

"[BCC has] over nine years of supply of multiple dwellings that have been approved... [and] well over 15 years of supply, according to [capacity under existing zoning controls]."

Clearly, this account is at odds with assertions frequently voiced in media^v that councils' reluctance to 'release' sufficient land is the key limiting factor restricting the volume of housebuilding actually occurring.

Many approved developments were not getting built, with a reported increase in requests to extend approvals beyond the four-year time limit before they expire. And, as such, there was limited faith that market-led supply alone would meet the communities housing needs:

"Local governments can and have zoned for more housing, but there are certainly market constraints to actually delivering on that zoned supply. In terms of what local governments are doing, I think a lot of them have got their zoning right, to facilitate housing supply."

3.1.3. Housing 'diversity' through planning systems

As we outlined in *Breaking Ground*,^{vi} one means to address the barriers to market supply is to encourage more diverse – in particular, lower cost – housing products. This is primarily through more apartment development, but also through products like seniors housing and rooming accommodation (e.g. student and boarding houses). Participants highlighted that this strategy was also, however, yielding very little housing that could be afforded by – and given the smaller dwelling size, suitable for – households on lower incomes.

As such, there is a danger in conflating cheaper market housing and genuine social housing in more recent housing targets – an issue discussed in Section 4.2 of *Breaking Ground*.

3.1.4. Planning mechanisms and social housing

In Queensland's planning system, social housing is not, in terms of land-use categories, distinguished from other forms of housing in the way that, say, industrial uses are. As such, zoning, the established planning mechanism to allocate land for uses that command lower land values (and so would otherwise be priced out of a region), are not available for social housing. Similarly, Queensland's planning system does not treat social housing like other forms of 'trunk' infrastructure (e.g. roads, parks, community facilities). Accordingly, the established mechanisms for funding such infrastructure, through levies on new development ('infrastructure charges'), are not available for social housing.

Councils are, therefore, turning to more unusual planning mechanisms to facilitate the delivery of social housing. These include efforts to negotiate project-specific agreements with proponents and to incorporate yield bonuses (e.g. more generous floor space limits). When integrated into project-specific planning, yield bonuses are equivalent to negotiated contributions, given they are identified and calibrated to reflect the site's conditions, they have the same effect on the outcome, and represent the same costs to all actors.

While providing some benefit through increased transparency and predictability, universally applied yield bonuses were less appealing to councils because it is not possible to calibrate overall development levels or social housing requirements to individual site conditions. As such, broad 'bonus schemes' risk poorer outcomes on some sites (e.g. leading to more development in areas growth is not desired) or simply do not incentivise the desired development outcome that integrates social housing.

3.2. Case study response – City of Moreton Bay Council

3.2.1. Policy context

Across City of Moreton Bay Council (CMBC), there has been a concerted push to address housing challenges. Flowing from two out of five 'pillars' of the council's primary strategic policy (its 2022 corporate plan^{vii}), has been a 'housing needs investigation'^{viii} to review planning functions with the aim to foster better housing development outcomes; and a 'community wellbeing strategy'^{ix} within which its 'housing and homelessness action plan'^x sits.

One key outcome, which aligns with efforts in both these pillars, has been the 'Attraction of Affordable Social Housing Development Policy'.^{xi} This policy's stated objective is to "establish an efficient, effective, transparent and accountable system to facilitate the development of Affordable Social Housing".

The policy incentivises development of social housing by reducing or waiving application fees and infrastructure charges for any component of a residential development used as 'affordable social housing'. There are two key aspects of the policy, aimed to ensure its outcomes align with the stated objective.

3.2.2. Targeted precincts

The first is that the policy specifies which parts of the local government area the policy applies in. The policy was developed to align with a wider strategic desire within MBRC – outlined in its growth management strategy^{xii} – to increase the proportion of housing growth that is within its existing urban footprint. To this end, the policy largely applies to existing residential areas.

Given the desire to see more infill development generally, the council was satisfied that application to this area would align with other planning controls and council strategies. That consistency with council strategy was an important 'selling point' for this policy.

"We've made it very clear that we obviously didn't want to promote building out – where there is no infrastructure. There was just no point in doing that. So, we've just [applied the incentives] as close to infrastructure as possible."

The policy also establishes two tiers to which the policy applies: 'priority' areas that are eligible for a full waiver of application fees and infrastructure charges, for any affordable social housing component; and other areas that are eligible for a waiver of application fees and a 50% discount on infrastructure charges, again for any affordable social housing component.

The priority areas broadly align with the town centres, which are close to public transport, schools, shops and other amenities, and so are targeted for more significant infill developments. Again, the fact that this policy is aligned with growth plans generally meant that there was wider support for measures, such as this, that sought to catalyse development.

3.2.3. Targeted product

The second aspect of the policy is that it targets a specific product. To be eligible for the financial incentive, developments must include 'affordable social housing'. This is explicitly defined in the policy as being affordable to low to moderate income households, and being owned (or head leased) and managed by a registered CHP.

"Where it is not a community housing provider that owns the building, we actually have a covenant in place that says that it has to be used for affordable social housing for no less than 15 years."

The council was keen to ensure the product being incentivised is something that would (a) not otherwise be feasible, and so something not otherwise delivered by the market, and (b) something where the product is provided to and affordable to, the targeted section of the community.

Council interviewees were generally comfortable relying on the existing apparatus of CHP registration, to ensure management, tenant sourcing and price setting would meet the council's objectives.

“Because there is no [universal] definition of social affordable housing, we've linked that through to, it has to be, at least, managed by a community housing provider that is registered with the Government. So then that way they can ensure that the right tenants, et cetera, are coming through and it's all being managed within legal means”

3.2.4. CHP/development sector response

Only having been introduced in March 2023, the policy is quite new. And, at the time of interviews with participants, had not yet translated to affordable housing on the ground. Some charges had been waived under the program for some new developments, and the council was satisfied with the level of interest, and pleased with the response from the community housing and development industry generally.

“We have seen a lot of interest and we've actually been working towards linking the community housing providers directly with interested developers. So that we can try and foster those relationships to try and move those buildings forward”

This level of interest and support highlights a second-order impact of a policy like this. That is that the council is sending market signals that it is supportive of development in these areas, and supportive of developments that incorporate affordable social housing. Signals like this, and related strategic plans, can 'de-risk' developments, from the proponent's perspective; and such perceptions of refusals or delays during the assessment process is an oft-cited deterrent to development.

3.3. Challenges

3.3.1. A small subsidy will have a small influence

The scope of the CMBC program is limited to specific precincts, albeit precincts targeted for housing growth. Even within these precincts, the council was unable to predict the extent to which the incentives would actually deliver social housing. Infrastructure charges account for a very small proportion of development costs – land, materials, labour, financing costs and professional fees all account for much larger shares of costs. As such, any 'savings to developers' were recognised to be relatively inconsequential for most projects. One participant highlighted that difficult conditions for the construction sector is typically not shaped by infrastructure charges:

“At the end of the day, if the market is willing to pay \$700,000 for an apartment that costs \$1.2 million to build, waiving a \$30,000 infrastructure charge is really not going to see anything actually change on the ground”

That is not to say that the program won't have an impact, as evidenced by the early interest from industry, described above. The savings will make the difference for community housing projects that are close to being able to compete for particular development sites (based on other revenues and subsidies). Similarly, for-profit developers will, in some circumstances be looking to diversify their development revenue sources or contribute to their own 'triple bottom line'. The savings could help get development models that incorporate social housing across the line.



3.3.2. Contributions will skew to least affordable

Given the relatively small financial difference fee waivers represent, the program is anticipated to deliver, where it is adopted, social housing that has relatively higher revenues. That is, social housing provided to moderate (cf. low) income households – such as those able to afford 75% of market rents. The program's specific parameters for what attracts the incentive helps projects that contribute to the council's objectives, even if it does not deliver the full spectrum of sought-after non-market housing products.

As noted above, there is a common conflation with, and so desire for eligibility for fee waivers to be available for, products delivered at market prices but at the cheaper end of the market (e.g. studio apartments or build-to-rent developments), or products provided below market prices for a more limited period of time. This is likely consistent with policy objectives to increase market housing diversity, and so merited. However, expanding incentives to such products would further erode the potential for the fee waivers to improve the relative feasibility of developments that incorporate genuine social housing.

3.3.3. Market reliance carries risk

A third limitation of CMBC's program, and really any mechanisms that seek to incentivise the integration of social housing in new developments, is the reliance on the wider development industry to continue to bring projects to market. It was remarked that existing economic conditions are leading to fewer commencements and completions. Thus, if the delivery of social housing were reliant on those completions, the program would not be delivering social housing either.

3.3.4. Fee waivers represent a cost to council

Other planning mechanisms, in effect, help cover (or 'subsidise' in a broad sense) the costs of social housing through lower land costs, or higher windfall profits for developments, for the site that is delivering social housing. Removing infrastructure charges, in contrast, means the 'subsidy' is derived from other sources. Depending on how infrastructure charges are set, this could be other developers paying a larger share of the cost of delivering infrastructure or, more typically, the council, who must make up the shortfall to cover the costs of infrastructure that would otherwise be funded through the foregone charges.

In the case of CMBC's program, this cost was considered and accepted, mostly because it was limited in scope and, so, anticipated to have limited financial implications for the council.

"We do lose [income from] infrastructure charges... So, we've weighed that up and that's why we've relegated it to those specific areas. Because we know that those areas are close to transport, close to work, close to retail."

It is not something the council was countenancing expanding to all areas or more types of development. Anything perceived as reducing a council's ability to deliver required local infrastructure would have more limited appeal.



3.4. Recommendations

3.4.1. State government subsidy for social housing

It is noteworthy that the Queensland Government has begun to similarly cover the infrastructure charges for some development, under the Incentivising Infill Development Fund,^{xiii} which would include developments that incorporate social housing. Although it explicitly states that developments eligible for fee waivers under local schemes cannot apply, the state government covering such costs instead of councils will go some way to overcoming the potential impact on council funds, noted above, that could otherwise limit the appeal of this mechanism to councils.

However, the result is a convoluted path through which the Queensland Government subsidises social housing delivery. Providing grants to a CHP, say, could have the exact same effect – where grants cover infrastructure charges that are the barrier to feasibility. But direct grants would be more effective by also being able to overcome other financial barriers for social housing developments.



3.4.2. More flexibility on precinct planning

Within the realms of genuine planning mechanisms to deliver social housing, one necessary shift is to accommodate councils integrating more direct means of integrating social housing into precinct planning. That would mean, rather than incentivising an integrated development with, say, a 30% yield bonus, the council could simply set the base yield 30% higher and require the integration of social housing. As outlined above, negotiating such a contribution is materially the same as offering a yield bonus, but embedding it in the planning controls (rather than a separate agreement with the proponent) provides more transparency, consistency and certainty for all parties.

3.4.3. Broader base for development contributions towards social housing

The final two recommendations are reiterating those we made in *Breaking Ground*.^{xiv}

The first, building on the above point, is for a wider use of mandated contributions towards the funding of social housing. This could be through in-kind delivery within specific precincts. But could also include more widely applied contributions, akin to the charges used to fund other distributed local infrastructure, including roads, parks and libraries.

3.4.4. Distinguish 'low cost' and 'below market' housing

The second is relevant to the above commentary that incentives have the same 'value', irrespective of the 'cost' of the contribution. Any financial boost will only improve the relative feasibility of developments that receive them against those that do not. As such, eligible developments targeting lower-income households will not have any advantage over – and so not be able to compete with – eligible developments targeting medium-income or smaller households. In short, conflating low-cost 'diverse housing' with below-market 'social housing' when offering incentives will reduce the delivery of social housing. It is noteworthy, and perhaps something that should be replicated, that CMBC required involvement of registered CHPs to satisfy themselves that concessions were translating to public benefits. The Incentivising Infill Development Fund, mentioned above, makes no such distinction.



4. Partnering to develop social housing

4.1. What's the role of councils?

4.1.1. Integrating housing considerations across council business

There are growing community expectations that all activities across local councils should better consider the shortage of adequate housing for all sections of the community. Under the Queensland Government's 2021 action plan,^{xv} local councils are preparing 'local housing action plans' (LHAPs) that go some way to formalise this wider involvement. Not all councils had completed their LHAPs at time of writing, and some participants were unclear whether further steer – such as the recently released SEQ Regional Plan – was needed before implementing them, but there was, at least among participants, support for the LHAPs.

Support was partly because, although templates exist, councils were given leeway to structure their LHAPs in line with local priorities, and because only councils financially supported to produce them are being held to specific timeframes. Councils were also able to use existing housing strategies/policies to meet LHAP requirements. However, the state government's push for LHAPs has had the effect of bringing housing to a more prominent part of the local government agenda, and of improving collaboration between councils on such matters (described further below).

One common LHAP focus is councils' planning function (relevant to an earlier section) – planning scheme reviews, master planning opportunities and identification of under-developed sites, and other barriers to development. Another common focus is local government roles in response to climate disasters and longer-term homelessness challenges (also relevant to an earlier section). A third common focus, though, primarily relates to the potential *direct local government role* in the development of social housing: through land audits and partnerships.

4.1.2. Land audits

Councils, as significant landowners, have long been called upon to audit their land assets for sites that are (a) surplus to the council's needs and (b) suitable for housing development. Further, consistent with their public purpose, councils are called upon to make those sites available for social housing or similar. The LHAPs further this call, with one consistent expectation and, of those prepared, common feature is a land audit.

“There's great support from most local governments for community housing. We've seen a lot of local governments do an audit of all of their landholdings to figure out what land could be developed for community housing, and they've put EOI's out for that to offer it to the sector”

4.1.3. Development partnering

Beyond simply providing land for social housing developments, typically at a discount to market costs, councils are encouraged through the LHAP process to identify sources of capital for new social housing developments. (Again, this term is broadly defined in this report, including specialist disability accommodation and other such below-market housing.) Councils can then work in partnership with CHPs, and others, to pursue those opportunities, using land assets as means to leverage other sources of subsidy for social housing.



4.2. Case study response – Gladstone Regional Council

4.2.1. Policy context

Gladstone Regional Council (GRC) was one of the first councils to finalise their LHAP,^{xvi} having developed it with the support of the Local Government Association of Queensland, who in turn were funded by the state government to assist councils in the preparation of the LHAPs. Although the actions within the LHAP largely aligned with what GRC was already doing, there was value in mapping out those actions explicitly.

“So, the plan itself did actually go to Council twice, because the first time, our councillors really weren’t comfortable with endorsing something that was so templated. So, we have tweaked it a little bit to match the way that we do things... I think where we’ve landed is aligned to where we were going anyway.”

GRC’s LHAP notes that, in line with its stated 2023/24 strategic priorities:

Council have identified suitable land for housing and conducted an Expression of Interest (EOI) process for the development and provision of social or affordable housing. The process returned interest from multiple parties and Gladstone Regional Council is working through next steps and solutions with the preferred proponent.^{xvii}

4.2.2. Market context

As a regional council, land costs were not as significant a barrier to new housing development as would be typically true in SEQ. Yet, the council was finding significant levels of developer land-banking of approved development sites. There are perceived risks of future economic growth in the region, which could translate to lower developer revenues. But also, other costs were prohibitive to development feasibility.

“The biggest barrier... the stuff that we’re just hearing constantly is around costs of building and availability of workers and supplies.”

As such, providing land, whilst undoubtedly valuable, did not infer the same scale of effective subsidy that would be true of similar action in high land value areas. It was not likely to be sufficient for some social housing products to be able to be delivered and operated in a cost-neutral way. However, there was support for council to investigate options and identify opportunities for development on council-owned land.

4.2.3. Land audit and key sites

The audit process was fruitful, although the nature of regional councils is that many council-owned sites are unsuitable for social housing. Commenting on a state government audit, one example given was:

“The state government did a land audit not long ago to try and find unused parcels of land that they could build housing on. One of them that they found was in an area [that] literally has a pub and that’s about it. So, where do you wrap the services around there?”

Ultimately, GRC identified two sites which it had progressed to an EOI process. One within a health precinct, considered for ‘key worker’ housing to support the health service provision. And a separate, larger, site adjacent to a newly established hub of community services.

“We’ve done an expression of interest for those out to the market to gift those land - those parcels of land to people that will build affordable housing. So, we’re working with a proponent at the moment, who is going to build some over 55s affordable housing, between 100 and 200 dwellings on this piece of land.”

4.2.4. Development models and partners

The EOI process sought information on how access to the council-owned sites would enable proponents to access other funds, as the council wanted to ensure its contribution resulted in a greater value than what, as it were, came off the council’s books.

“We’ve tried to align that with when the federal government funding has been available. We had four or five proponents respond to that expression of interest, which was quite positive.”

Ultimately, the council was not looking to partner on the development of the sites, but did want to retain a stake during the process, to ensure that the desired development outcomes were realised. This was done by leasing the site up to the point of operation, at which stage the title would be transferred.

“Council’s role in that is, we’ll gift you the land, and we’ll make, ideally, the planning process as simple as possible. You build, we lease it until such point that the development is built, so that we know we’ve still got some control over that. Then we will gift the land once it’s there and ready to go”

There was a sense that, by avoiding a more active role as a development partner, the council was taking risks. Not so much through the development process, as it retained ownership during that phase, but once the project was operational.

“We’re taking a bit of a risk... in terms of what they charge in future, once we hand over that land, and sign a contract, we don’t have a great deal of control over it.”

It was early in the process, and contracts had not yet been signed. But it was evident that, from the council’s perspective, gifting the land to a not-for-profit would help ameliorate some of that risk. The EOI was not restricted to CHPs, but a CHP was better placed to identify other funding sources necessary to stack up a feasible social housing project, and better regulated to ensure outcomes were targeting those in need of housing support.

“Some of the responses were from NFPs, in particular local ones, and it’s a community housing provider that we’re working with”

4.3. Challenges

4.3.1. Cost to government will limit appeal

Land audits are appealing prospects for housing providers that are constantly priced out of land sales and in need of development sites. Participants across local government, though, highlighted that the desire to gift land is more vexed from a council perspective.

The first barrier is the reluctance to declare land to be ‘surplus’ to their needs. Councils also struggle to procure land, leading to a conservative attitude to divesting existing assets. The second barrier is that sites that are surplus to a council’s needs are, in many cases, unsuitable for housing development. And the third barrier is that, if a site is both surplus and suitable for housing development, it is going to be a valuable asset. As such, forgoing sale at market price is going to be a large financial hit for cash-strapped councils, and a lost opportunity to fund any number of priorities that are more core to its business.

The cumulative effect of these barriers is that there will not be more than a handful of prospective sites identified in a given audit. And, ultimately, an audit is a one-off prospect rather than a potential ongoing source of land for social housing. This should not be seen to discourage councils from undertaking audits, so much as to lower expectations for how fruitful such audits will be. Even identifying one or two sites however, as was the case in GRC, is a valuable opportunity to pursue. There are also some ways, discussed below, to

present the value of land gifts as being much higher than any ‘cost to government’, which can further increase the appeal of council land contributions.

4.3.2. Partnerships and scalability

A key objective is for land audits to be used to increase opportunities to secure federal or state government subsidies. That is, councils should be looking to develop programs of land divestment wherein it retains a role as a partner – in funding applications and, potentially, in the development itself.

However, the limited scale of any land audit, and so of any council partnerships for developments, is also a challenge. Each project is likely to be a unique arrangement of partners, funding sources and housing products. And each will have a steep learning curve for the council, offering little efficiency or prospect for ‘scalability’ to increase the dividend from council’s resource sunk into a given project.

Conversely, if councils instead prioritised scalability, and identify a preferred model, they risk missing opportunities that fall outside that model. The scale of surplus sites suitable for housing lends itself to being flexible and open to offers from other partners, but will not offer economies of scale.



4.4. Recommendations

The research revealed some lessons for how to achieve a successful audit of council land, and for councils to embrace their role as a partner in the direct delivery of social housing.

4.4.1. Position use of land for housing within strategic policy

The first is to position the audit within the council's corporate plan or strategic plan. The consistent message was the importance of getting 'buy in' from councillors and the executive team across the council.

Financial implications are more readily accepted, with one participant commenting more generally (not about a land contribution specifically):

"I don't think that we have been immune to some of the financial pressures like other councils... I think [housing and homelessness] was put as a really high priority... We had this long-term strategy around wellbeing and inclusion... So, I think it has come down to essentially that things are juggled and money is found."

The LHAP process has been an opportunity to elevate housing to an executive-level priority across council business. This enabled a real commitment and a unified response across the organisations.

"I do believe in the actions that have come out of the [LHAP], and very comfortable now that we have assigned those responsibilities as well.... I think where we've landed is aligned to where we were going anyway. So, we also have an advocacy plan for what we're asking for from the other levels of government, and what we're committing to as a local government"

Positioning actions like a land audit for housing opportunities in broader strategy can also be an opportunity to align the land contributions to other strategic objectives of the council, such as economic development (in the case of GRC, the diversification/transition of its economy from LNG) or social service delivery (in the case of GRC, workers for health services in the health precinct). This more strategic integration of land audits can also increase the potential for consideration of using sites *not* surplus to council needs for housing, over and above (perhaps literally) council services provided on those sites, whether carparks, libraries, community centres or similar.

4.4.2. Demonstrate 'value add' created by use of land for housing

In a similar vein, it was evidently important to demonstrate that – viewed within a sufficiently broad perspective – the value created by councils gifting land was greater than the value forgone by the council itself. This is most evident in the expectation that any sites also draw upon other sources of government funding.

In addition to funding sources, where possible the use of land for housing should be positioned as a 'pilot' project, that will offer lessons for future projects that don't rely on council land contributions. For example, where councils are looking to use the planning system to integrate social housing into private developments, the product mix, development process or financial structure of any 'pilot' can be instructive for prospective private, for-profit development partners. Similarly, council land could be used to demonstrate demand for more diverse housing options – such as seniors housing – as viable market products. The use of council land is therefore being used to overcome the first mover problem and demonstrate financial models that are feasible, but might not get built in the absence of a demonstration.

Finally, it is possible to position land divestment as a means to internalise planning windfalls for public benefit. That is, identifying land that is zoned for limited land-uses, and so of limited book value, but which could be rezoned for residential uses by the recipient, increasing the value of the contribution to the recipient.

4.4.3. CHPs bringing capital to limit cost to council

A final means of overcoming the perceived financial implications to councils is an extension of the above recommendations, but worthy of explicit mention. If councils can – instead of gifting land – offer land at a discounted price, or potentially a market price but sold off-market through an EOI process (based on public benefit, not offering price), this will increase the quantum of sites councils are willing to make available for social housing. That is, CHPs could offer to bring capital, or otherwise demonstrate a model – such as cross subsidising with market housing – that enables councils to receive some value for the sites.

Councils also recognised that regulated CHPs are a means of ensuring any foregone revenue is translating to public benefits. Both through land transfers and, as per the previous section of this report, any waiving of infrastructure charges, the NFP sector was a valued participant. As such, council should also develop relationships with this sector as part of any land audits.

5. Other insights and conclusions

5.1. Hyper-local issues and resourcing of local councils

The research project did not set out to purposively explore the specific council roles that have been presented in this report. The interviews incorporated lines of discussion around other possible roles, but which the participating councils did not highlight as key priorities. Although not universal, there was a sense that such issues affected very specific cohorts, or very specific locations, and had not become prominent enough to warrant a more concerted council response. This included questions around private rental support, informal tenures or informal dwellings (e.g. garage conversions let out as granny flats), more diverse housing products like rooming accommodation, and short-term rentals.

The last of these was the most commonly recognised among participants:

“There’s probably pockets of the region that... tourism is their main industry, and they’re definitely being impacted by short stay accommodation. It’s a very hot topic for them... We’re certainly not leading the way, by any means, in that sort of space, but it is of interest to Council.”

BCC had, at the time of fieldwork, already taken some steps, setting up a taskforce, but also identifying dwellings used for short-term rentals and charging commercial rates, but was also waiting for the state government’s response. And, subsequently has announced a number of other measures^{xviii} to manage the impacts of this form of accommodation. However, there are some parts of the community that are quite supportive of short-term accommodation, meaning that ‘stamping it out’ was not a clear policy option:

“[Brisbane is hosting] the Olympics in 2032, which is another thing that we’re actually planning for, in terms of making sure we’ve got enough housing [but also] short term accommodation that’s needed for when we get the Olympics”

Councils have finite resources, so there was an overall sense that they were not able to play a role across all the different hyper-local issues that are adversely affecting the housing system.

5.2. Replicability and collaboration among local councils

Another line of questioning through the research was the extent to which local councils could learn from, and replicate, ‘best practice’ in areas of housing and homelessness. Participants identified a number of fruitful channels.

The most explicit, perhaps as it was commissioned to help councils prepare their LHAPS, was the Local Government Association of Queensland (LGAQ).

“Our mayor and CEO are incredibly connected to our whole state. Our mayor is on the board of LGAQ and on the board of Australian Local Government Association, and yeah, it’s very well connected. So, in terms of sharing lessons learned, we’re a pretty open book on those.”

“[LGAQ are] actually very active, in terms of when new policy is released from the state government, or draft policy’s released from the state government, working with councils all across Queensland to get feedback.”

It was also evident that regional organisations of councils (ROCs) provided forums for discussion of policy considerations around housing and homelessness. These groups were particularly valued in that they typically shared similar challenges, given the regional nature of the organisations, as well as providing a channel for very practitioner-specific discussions around how to navigate the issues of policy development and efficient practice.

“We’ve also got groups like our [Central Queensland] region of councils... So, we’ve got a really good connection there with people that face the similar sort of challenges to us.”

“There’s a newly established...Southeast Queensland Councils catch up on housing initiatives. Yeah, I like to understand housing, because it does impact on how we manage homelessness.”

“There’s a lot of informal discussions as well. So, there’s a lot of people calling each other up going, ‘hey, I’ve got a this. What do you think? What did you do?’ ‘We’ve got a draft X. Can you have a look at it and let us know your thoughts?’”

And, in BCC, a lot of value was placed on the Council of Capital City Lord Mayors (CCCLM) forum, as an opportunity to learn from other Australian cities, particularly when it related to specific challenges of a capital city 'downtown' or surrounds.

"Council of Capital City Lord Mayors... have a housing and homelessness working group... All the capital cities meet pretty regularly... and we look at what each other are doing."

The overarching experience is that local councils are quite well connected with each other, through formal channels and more informally at an individual level. It meant, for example, there were a lot of lessons shared – and so common responses between – CMBC and BCC, in terms of the PSLOs and the infrastructure charges discounts. It was also suggested that, where responses differed between councils, it was a function of different geographical contexts, rather than a lack of knowledge of how other councils had responded.

There also potential avenues for such forums to expand their role in sharing best practice. It was not pursued explicitly in the fieldwork, but, for example, LGAQ and ROCs could facilitate formal secondments of staff from one council with an established and successful program, to another that is just setting one up.

There are lessons here for how other actors can better use these forums to connect with local councils. The best example of this was the Queensland Government's engagement of LGAQ to assist in the preparation of the LHAPs. But forums like ROCs, LGAQ and the CCCLM should be used as channels for engagement with the development sector, the community housing sector and the homelessness support sector, particularly through more formal collaboration with those industries' peak bodies. This would further the purpose of these forums to enable efficiency and consistency in reforms to local council policies and practices, particularly as resourcing makes it difficult for not-for-profit sectors to develop relationships with each council individually.

5.3. State steer and consistency across local councils

The final consideration of this report is how the Queensland Government can better deploy local governments to housing and homelessness. In particular, how 'best practice' among local councils can be fostered across all local governments.

Not all councils have the same issues. The housing 'crisis' is multifaceted, and some facets have a clear geography – whether short-term rentals in tourist hotspots, rough sleeping in major centres, or development feasibility hurdles in low-value markets when costs exceed price. Local councils are best placed to respond to local context, and tailor solutions to that context.

The corollary of this is that seeking uniformity in council roles will not be effective. There are clear opportunities to encourage best practice to be replicated between local councils. But there is also clear evidence that uniform responses, if appropriate, are a role for state government to implement.

"It's not that [council activities are] going to replace some of these State initiatives or the funded services. But it will complement what they're doing... it can be a very disjointed sector. So, to promote different methods and initiatives that will have the sector working more collaboratively"

Not all councils have the same capacity. This includes financial capacity, but also human resources. And the limited resources will be directed to core business first and local priorities second. If the Queensland Government wants to devolve responsibility for addressing state priorities to local councils, it will require commensurate resourcing. Again, the LHAP process is a good example of the Queensland Government providing those resources – both financial, but also human through agencies like LGAQ. The pervasive assumption that councils can afford to hand over land assets, though, will mean expectations of land audits will not be met.

This means that, when state and local priorities do align, local councils are a capable ally in addressing them. One common thread across the participants comments – including the reported case studies – was that successful implementation relied on both tiers of government working together. Given that local councils are eager to contribute to the housing challenges of Queensland, they should be included wherever possible.

"[There is value in] further inclusion of local government in decision making policy. So, for example, we've got the State Housing Investment Fund... there was talk about bringing local government on board. So, giving us information on who's applying to build within our area so that we can go through and help make those decisions in conjunction with State. Now, that hasn't happened."



References

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- ⁱⁱⁱ E.g., [Tent cities sprawl across Brisbane as thousands sit on social housing waitlist](#) (24-April 2024) by R Masters & C Todhunter, published by *Nine News*
- ^{iv} [Brisbane's Sustainable Growth Strategy](#) (2023) published by *Brisbane City Council*
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