



Q SHELTER
SUBMISSION TO THE SEQ REGIONAL PLAN UPDATE

SEPTEMBER 2023

Contents

1. Overview and context	2
2. The important role of a plan with housing targets	2
3. Risks and challenges.....	3
Infrastructure projects and mega events driving housing affordability and supply risks.....	3
The need for scale and speed to deliver additional housing now.	3
Place-making and gentrification	4
Strengthening the community housing industry as delivery partners	4
Defining affordable housing.....	4
Housing responses that address the needs of First Nations peoples	4
The voices of people with lived experience of homelessness and unmet housing needs	5
Implementation assurance	5
Downward pressure on targets due to delivery constraints	6
4. Overview of endorsements and recommendations	6
4.1 Support for housing targets and consolidation	6
4.2 Sustainability, connectivity and liveability.....	8
4.3 Strengthening the role of community housing providers.....	8
4.4 Governance and implementation assurance	8
5. Responses to priority goals	10
5.1 Housing growth provisions	10
5.2 Other considerations	15
Place-making and wellbeing	15
Inclusive decision making	15
Affordable living.....	16
Urban footprint principles	16
Location of additional housing.....	16
More homes in high-amenity areas.....	16
6. Conclusion.....	18
7. Contact.....	18

1. Overview and context

This submission sets out Q Shelter's response to *Shaping SEQ 2023 Update*. This Update includes proposed measures which are important to both housing affordability generally and the provision of social and affordable housing more specifically.

The context for housing provision in Queensland is challenging. There is well-documented information about unmet housing need and Q Shelter members and stakeholders describe rising demands for assistance to find, get and keep housing. This demand is distributed state-wide.

Other contextual factors include:

- High migration to Queensland
- Significant projected population growth
- Reducing household size
- Significant infrastructure programs attracting a workforce.
- Construction industry challenges including workforce availability, skills, supply chain issues and overall rising costs.
- Historically low levels of social and affordable housing which have not kept pace with population needs.
- An over-reliance on the private rental market which provides little security of tenure and is also undersupplied.

2. The important role of a plan with housing targets

Overall, Q Shelter commends the foresight within the *Shaping SEQ 2023 Update* and supports the Queensland Government's introduction of overall housing targets, targets for social and affordable housing, and targets for housing diversity.

The SEQ Regional Plan is an important framework for ensuring the delivery of housing. Setting housing targets helps to provide certainty and guidance for local governments as a critically important tier of government in the facilitation of housing supply. It also creates a planning framework for other key delivery sectors such as community housing providers, development and construction industries.

Q Shelter sees this Update as a crucial step in a wider set of policy reforms to address unmet housing need and to create a healthier housing system overall. The settings for Southeast Queensland will have significant implications for the whole State because of the potential to reduce push factors that draw people with housing affordability challenges away from employment, infrastructure and services into areas with greater concentrations of poverty and disadvantage.

Where there is migration from SEQ into other local government areas it is important that this is supported by a planned approach to infrastructure development, workforce requirements and local economic development. As such, the settings for SEQ will have an important relationship to other regional planning mechanisms so that population growth is managed and negative socio-economic impacts for some populations and locations are prevented.

Clear mechanisms for delivering social and affordable housing will help to meet the needs of vulnerable Queenslanders. Broader housing targets will prevent growth in the number of people

experiencing housing affordability barriers. A healthy housing system is vital to economic growth and participation and will underpin Queensland 's ambitious infrastructure program.

Q Shelter is strongly supportive of several key directions and underpinning assumptions in the Update including:

- The identification of housing as a human right
- The focus of the plan on housing targets and delivery
- Genuine population-based targets to address medium-longer term needs.
- Reduction in the complexity and restrictions imposed by planning to improve housing delivery.
- That homes are well-located close to jobs and services and therefore the prevention of urban sprawl. Reduced reliance on greenfield-style development will support affordability and environmental sustainability.
- Establishing a regional planning framework in which national government initiatives optimally help Queenslanders.
- Acknowledgement of changes in household size driving the need for greater housing density and diversity in locations where people need and want to live.
- Acknowledgement that changes and growth can meet community resistance which needs to be addressed through leadership, unity and collaboration if the needs of people who are homeless or in housing stress are to be met.
- The inclusion of an implementation assurance framework to ensure delivery.
- Additional measures to include and involve Aboriginal and Torres Strait Islander peoples which could extend to engagement and involvement in planning for housing growth that meets the needs of First Nations' households.

3. Risks and challenges

Infrastructure projects and mega events driving housing affordability and supply risks.

The Update includes acknowledgement of Brisbane 2032 as a potential catalyst for long-term and sustainable growth of cities and regions by bringing forward infrastructure and urban development plans. The acceleration of a 10-year pipeline of development and construction projects, as well as the 'pull-factors' associated with mega-events can have unintended consequences for housing affordability and for social and economic inclusion. This is a rationale for urgently considering how to scale the supply of housing now to meet current needs.

Significant pull factors for population growth such as Brisbane 2032, and fast-tracked infrastructure development are a risk before the planned housing pipeline is achieved and threaten to cause displacement that disproportionately impacts people who are disadvantaged.

The need for scale and speed to deliver additional housing now.

The plan is focused on future housing delivery based on forward population projections while there is significant unmet need for housing now. It is not currently clear how this need will be met although there are many concurrent initiatives which take us in the right direction.

If we carry forward current unmet need, then the plan's housing targets may be insufficient. Q Shelter is aware there is work underway to measure current unmet housing need to drive targets for social housing. Current measures extending from the housing summit report and the emerging Queensland Housing Action Plan need acceleration and scale so that the Plan's intent and focus is not undermined by current needs that are not factored into the Update because of its future focus.

It is proposed that the Queensland Housing Round Table becomes focussed on the speed and scale of housing delivery now to meet immediate needs while longer term planning mechanisms such as the SEQ Regional Plan address medium to long term needs.

Place-making and gentrification

Place-making programs also tend to contribute to gentrification and reduced housing affordability without adequate mechanisms to achieve greater housing diversity and density with guaranteed inclusion of social and affordable housing. This requires a structured approach to identifying sites and locations where the inclusion of social and affordable housing is guaranteed as part of early planning.

Strengthening the community housing industry as delivery partners

While the plan sets targets for social and affordable housing, Queensland also needs a road map for how this can be delivered. This requires an agreed implementation plan for how community housing providers can be scaled up to both develop and deliver this housing. A combination of government and community sector-provided housing will see this investment deliver positive impacts in perpetuity in favour of private sector delivery of discounted market rent or purchase products that are poorly targeted and that do not deliver housing affordability in perpetuity, nor leverage government investment sufficiently far into the future.

The Update indicates both non-market and market affordable housing however this needs further definition and discussion to ensure that affordable housing targets represent housing that can be delivered in perpetuity to households in the lowest 40% income bracket.

Defining affordable housing

The delivery of affordable housing without adequate definitions and intent to meet the needs of the lowest 40% of the income spectrum may result in an over-reliance on products that contribute little to long-term affordability and the capacity to ensure SEQ remains socially, culturally and economically diverse over time. Q Shelter proposes that affordable housing is defined within the plan as housing that meets the needs of people on the lowest 40% of the income spectrum where they pay no more than 30% of their gross incomes in rent.

The plan identifies non-market and market affordable housing. This needs further exploration and clarification to ensure that the needs of more disadvantaged households are met, and that government investment delivers benefit in perpetuity.

Housing responses that address the needs of First Nations peoples

The Update includes specific mechanisms that include and involve First Nations peoples in engagement intended to ensure impact and influence over the protection and management of natural and cultural resources.

First Nations peoples represent 20% of Queensland's homeless population and are more likely to rent their homes than other Queensland households. Access to safe, affordable homes is an ongoing struggle because of serious structural impediments, enduring disadvantage and intergenerational barriers to home ownership resulting in less wealth ownership relative to others. First Nations people experience significant exclusion due to discrimination, from the private rental market¹. The locations of many homes lived in by First Nations Queenslanders will also be at greater risk of climate impacts.

For this reason, it is important to extend the involvement and engagement of First Nations peoples and their representative bodies into planning future housing growth for SEQ. This includes involvement in governance on decisions relating to housing.

The voices of people with lived experience of homelessness and unmet housing needs

The Update mentions needing positive interventions to facilitate change and a better understanding across the community of the need for growth planning, housing density and diversity.

Q Shelter is engaged with people who have current experiences of homelessness and unmet housing needs. It is vital that the Plan unites leaders across the tiers of government and from across the housing system in agreed approaches to community change and housing growth.

While longer term education and community development methods are important and fully endorsed by Q Shelter, there is a vital need to support current urgent needs for scale and speed in the delivery of housing. We consider it vital that governance mechanisms and other instruments such as Housing Delivery Statements, strategies and action plans are proactive about the role that courageous and united leadership can play in supporting the community to embrace housing growth and diversity in the interests of people who have no home at all or whose housing is precarious.

It is not reasonable that people with a home have louder and more impactful voices against growth and diversity when people with lived experience are struggling with such a fundamental human need and right.

The delivery of housing requires commitment from all levels of government, all elected leaders and all housing system leaders across sectors. Housing is essential infrastructure, and its delivery needs to be less subject to opportunism and divisiveness.

Q Shelter considers the consideration of the voices of people with lived experience a vital element in successfully managing and moderating the risk of community opposition to housing supply influencing the targets set out in this plan.

Implementation assurance

Q Shelter strongly endorses the Update's identification of implementation assurance as a key outcome. Implementation assurance is critical to accountability for delivery and in identifying implementation barriers in ways they can be addressed through distributed leadership among key stakeholders and delivery agencies.

The intention to monitor the performance of the plan including transparent sharing of evidence and information through reporting will be vital to implementation success.

Downward pressure on targets due to delivery constraints

Q Shelter is concerned that targets in the Plan remain at levels that address identified community needs. Current housing delivery challenges are acknowledged however we strongly endorse the current targets as a basis for engaging all key stakeholders and decision makers in addressing implementation barriers rather than reducing supply targets at the outset.

4. Overview of endorsements and recommendations

4.1 Support for housing targets and consolidation

1. Q Shelter has focussed mostly on Goal 1 in the plan and broadly support the mechanisms to achieve greater housing density, diversity and overall supply. The targets inclusive of sub-regional targets are also endorsed.
2. Specifically, Q Shelter endorses a target of 20% social and affordable housing with further recommendations about how affordable housing needs to be defined. Q Shelter acknowledges additional work by AHURI to define a target for social housing. Q Shelter proposes the target for social housing needs to be at least 10% to address declining investment since the 1990s as identified in the draft Update.
3. We urge adoption of 70/30 consolidation expansion ratio so that as many people as possible are located near to infrastructure in high amenity areas. Push factors for lower income households are considerable and places of concentrated poverty and disadvantage are difficult and costly to remediate.
4. We additionally highlight the importance of consolidating in high amenity areas and reducing sprawl because of the broader impacts on housing affordability, affordability of living, and the potential for reduction in cost-of-living pressures.
5. Q Shelter strongly supports the introduction of Housing Supply Statements and future housing strategies to inform how the rate of housing supply can be achieved over a short-medium and longer term by each local government area. It is recommended that continued support is provided to Local Governments to develop these instruments. The role of local governments in planning for social and affordable housing is recognised as is their role in improving housing affordability including through:
 - a. The prevention of peripheral low-density development
 - b. Improving consolidation of residential development close to public transport
 - c. Reducing car dependency
 - d. Increasing housing diversity and density
 - e. Adequate land releases for residential development and partnerships with community housing providers to access land for social and affordable housing.
 - f. Flexibility and innovation in construction methods and materials.
6. Q Shelter acknowledges the value of establishing an urban renewal framework for PDAs if mechanisms are introduced to prevent displacement of existing populations, to monitor rising property values and costs due to spatial renewal, and the role of community housing providers is defined and embedded early to ensure the inclusion and retention of social and affordable housing in perpetuity.
7. Overall, Q Shelter supports greater certainty for Build to Rent products. Community Housing Providers deliver build to rent products that are a mix of social and affordable homes. It is important that the framework for build to rent products includes affordable housing that is

affordable to people on the lowest 40% of income where no more than 30% of gross income is spent on rent. The role of Community Housing Providers in the delivery of affordable housing needs to be guaranteed where government investment is included.

8. The role of community housing providers needs to be defined within the delivery framework. Further work is needed to develop a road map and targets for delivery of social and affordable housing by community housing providers so that Government investment is applied in perpetuity and reinvested in perpetuity for the purpose of further growth in social and affordable housing.
9. Q Shelter urges reconsideration of setting minimum lot sizes in favour of an approach that encourages innovative design to achieve optimal yield and lower housing costs wherever possible.
10. Q Shelter supports the implementation of Density Done Well Model Codes and the introduction of capped levels of assessment for gentle density products.
11. Q Shelter supports community education and awareness campaigns in support of housing density and diversity however we urge investment in more fine-grain developmental approaches to building community support for housing density and diversity. This goes beyond broad-scale public information campaigns to working in a place-based way with local leaders to proactively address concerns and proactively build support. This should be inclusive of community housing growth providers who have extensive local relationships and could play a proactive role in increasing support to achieve growth projects.
12. We propose a review of the Planning Regulation 2017 to remove exclusionary zoning practices, such as zones that prevent or suppress multiple dwelling construction, minimum lot sizes and car parking requirements.
13. Model codes developed by the Queensland Government should incorporate aspects of home design that promote innovative approaches to dwelling construction, co-housing models and passive heating and cooling.
14. Q Shelter endorses the prevention of new homes being in locations where they are at risk of impacts from disaster events such as fires and flood. An examination of existing homes at risk of impacts should be undertaken to understand and plan for the potential loss of homes due to disaster events.
15. Queensland Government could consider developing an objective matrix to identify high amenity areas suitable for higher density housing using the criteria outlined in the Draft Shaping SEQ Update. This could be used to create a spatial layer that can be accessed for the purposes of growth and site planning.
16. Q Shelter urges accelerating the consideration of inclusionary zoning as a means of capturing value uplift when properties are rezoned for higher density development. Further consideration of infrastructure charging or a new regime to ensure the most efficient means of capturing value uplift caused by beneficial rezoning is also suggested.
17. Consider the expansion of priority development areas with targets for social and affordable housing.
18. We do highlight concerns that in addition to the SEQ Regional Plan, we need mechanisms and investment to accelerate the delivery of housing at scale responsive to the current crisis in the immediate term. We urge the focus of the ongoing Housing Round Table to focus on immediate supply as well as solving housing growth implementation challenges.

4.2 Sustainability, connectivity and liveability

19. Measures to address climate change and improve the sustainability of homes and communities are also supported. Disadvantaged households struggle with additional costs of living due to higher car dependency, distance from transport nodes, outdated appliances and no financial capacity to afford the cost of energy adaptations that improve the environment and reduce cost of living.
20. Q Shelter understands the importance of place-making and improving people's connections to the places in which they live. Liveability is important and place-making can enhance the sense of belonging and connection between and among people living in a place. Our concern is that without housing supply that offers security of tenure and affordability, these opportunities will not be sufficiently distributed across all demographic groups in the community.
21. We understand the plan identifies the opportunities of place making, mega events and accelerated infrastructure programs however all these things alone and in combination will have significant gentrifying impacts. The potential for significant displacement of existing populations needs urgent consideration and a plan to monitor implementation and housing needs should include methodologies that monitor displacement as a basis for mitigation.
22. Similarly, the scale and acceleration of infrastructure projects should require planned housing supply initiatives to prevent impacts on local housing markets consistent with support for rural workers accommodation. Contractors and suppliers should be engaged in planning a housing response for their workforce.

4.3 Strengthening the role of community housing providers

23. Ensure affordable housing is defined as housing that is affordable to lowest 40% of the income spectrum where they are not paying more than 30% of their gross incomes on rent. This definition needs to be applied consistently across funding initiatives and across the levels of government.
24. Government investment in affordable housing should ensure the investment delivers affordable housing in perpetuity through community housing providers.
25. Q Shelter urges a strategic approach to identifying and releasing Government land to ensure that well-located Government land prioritises the delivery of social and affordable housing including a role for community housing providers in delivery.
26. Improve tracking of approvals and completion of social and affordable housing to identify growth across locations against targets. Q Shelter suggests using existing platforms such as Measures that Matter dashboard.
27. Develop an industry road map for community housing provision in Queensland led by peak and industry bodies to clearly identify a pathway to delivery of targets for social and affordable housing. A road map will set out a range of mechanisms to scale up community housing providers in a targeted way to achieve a stronger sector with capacity for significant growth complementary to the provision of housing by Government and offering genuine choice to people.

4.4 Governance and implementation assurance

28. Q Shelter supports improved governance to ensure effective implementation and implementation monitoring.

29. Q Shelter notes the intention to engage and involve First Nations peoples in governance arrangements relating to the management of natural areas. Given the scale of housing challenges impacting First Nations peoples, it is proposed that the scope of involvement in governance arrangements extends to housing supply.
30. Q Shelter suggests that mechanisms are developed to involve the participation of people with lived experience of homelessness and housing need in implementation and monitoring. The needs and experiences of people need to be engaged to ensure diversity of views and interests help to shape plan implementation.
31. Q Shelter also suggests that expertise in the delivery of social and affordable housing is included in governance arrangements.

5. Responses to priority goals

Q Shelter has focussed on the following goals within the draft Update:

Goal area	Q Shelter's interest
Goal 1 Grow	There is adequate housing supply in SEQ to ensure a healthy housing system inclusive of adequate supply of social and affordable housing to meet population demand.
Goal 3 Connect	That people have access to transport near to homes they can afford so that ongoing living costs and car dependency are reduced.
Goal 4 Sustain	That the impacts of climate change are prevented and that relatively disadvantaged households are ensured their homes are well-located, safe from climate impacts and more affordable due to energy efficiency.
Goal 5 Live	That access to employment, transport and services in places of belonging is fairly distributed to households experiencing vulnerability due to lower incomes.

5.1 Housing growth provisions

Q Shelter broadly supports the elements and strategies outlined in relation to efficient land use, housing supply, affordability and diversity. If Queensland is to accommodate over 2 million additional residents by 2046 then ambitious housing growth targets are urgently needed.

This section describes factors impacting housing affordability and supply. Importantly, it has identified a downward trend in the delivery of social housing since the early 1990s.

Q Shelter acknowledges the other relevant strategies and action plans including the Housing Summit Report outcomes cited in the analysis. The SEQ Regional Plan Update focusses on housing growth responding to future population needs however acceleration of growth at scale is also needed immediately to address current demand. If current demand is not addressed at scale, then the success of the SEQ Regional Plan Update housing targets is likely to be eroded.

Specifically, Q Shelter support the following measures and provides a rationale along with additional considerations and input.

Table 1: General comments on provisions in the plan

General comments	
Theme	Response
Housing market conditions	It is important to retain the overall housing target of 900,000 because the plan identifies that housing supply is not keeping pace with demand. The lack of supply in the private rental market combined with falling investment in social housing since the 1990s requires an ambitious target and implementation success.
Support for housing diversity	Community opposition to increased housing supply and density needs to be addressed through unity, leadership and commitment. While community change processes are commended and important, there is also a need to leverage the SEQ Regional Plan Framework to bring together State Government and Local Governments to

General comments	
Theme	Response
	<p>demonstrate support for housing diversity and density. The voices of people who are not housed or whose housing is not appropriate or affordable need to be heard and add urgency to the delivery of the Plan's new proposed targets.</p> <p>The dominance of detached dwellings is not meeting the need for smaller dwellings to accommodate smaller households. Q Shelter supports higher density and greater diversity of housing types to meet current and emerging needs including the trend towards smaller households.</p> <p>Q Shelter also notes the downward trend in lot sizes and supports continued inclusion of smaller lot sizes as part of the overall delivery of housing diversity and affordability.</p> <p>Q Shelter supports optimising opportunities for gentle density and for higher density developments located close to services, transport, employment and other infrastructure.</p>
Accessible housing	Q Shelter supports ensuring that housing targets and the location of housing meets the needs of people with disability.
Underutilised urban footprint	Q Shelter urges better use of undeveloped or underutilised areas in the urban footprint. We note the barriers cited in the plan and support resourcing appropriate interventions that may be required to unlock these areas for development. Q Shelter urges collaboration with community housing providers to consider options for the inclusion of social and affordable housing in site or precinct plans.
Infrastructure to support growth	<p>Growth in expansion areas can exacerbate poverty and disadvantage due to lack of access to services, poor transport, car dependency and long commuting times. These areas can quickly become areas of concentrated disadvantage due to push factors driven by housing affordability among lower income households.</p> <p>The Plan Update highlights that the cost of infrastructure provision in greenfield areas can be up to four times more than in established suburbs. There are gains for households seeking a home as well as reduced costs to government and the community.</p> <p>As such Q Shelter strongly supports growth closer to existing infrastructure and specifically urges the need to achieve a 70/30 consolidation/expansion ration.</p>
High amenity areas	Q Shelter supports the amenity-based policy framework focussing housing density and diversity to higher amenity locations where communities are supported by high frequency public transport, open space and activity centres.

General comments	
Theme	Response
	<p>These locations are also important to the delivery of social and affordable housing as they improve access to essential services and infrastructure and reduce cost of living expenses.</p> <p>Q Shelter understands there is a critical role for Local Governments in identifying high amenity areas within their planning schemes.</p>
Definition of affordable housing	<p>Q Shelter proposes that a consistent definition of affordable housing is adopted to mean housing that is affordable and appropriate for people on the lowest 40% of the income spectrum where they pay no more than 30% of gross income on housing costs.</p> <p>The significant unmet need for affordable rental homes is justification for also ensuring that any government investment in affordable housing is utilised in perpetuity to invest and re-invest in social and affordable homes. Community housing providers can guarantee that all government investment in social and affordable housing is invested in perpetuity. Programs of delivering affordable housing should avoid time limited subsidies because it forces future risks of homelessness for vulnerable households similar to the impacts of NRAS ending.</p>
Dwelling supply targets and local government	<p>Local Governments play a crucial role in facilitating housing supply. Q Shelter supports the requirement that Local Governments produce housing supply statements and delivering a housing strategy and implementation plan. Q Shelter supports capacity building activities to support Local Governments to develop and deliver housing supply statements and strategies.</p> <p>Local Government also need the certainty of strategic support for growth activities bringing unity and leadership in response to change management needs and community sentiment.</p>
Gentle density	<p>While gentle density is supported by Q Shelter, there is also the need to achieve scale and yield on appropriate sites to meet the unmet housing needs of current and future populations.</p>

The following table reflects specific responses to key themes in the plan with an emphasis on Goal 1 focussed on growth.

Table 2: Responses to key goal areas

Ref	Theme/Item	Response	Considerations
1.1	Efficient land use	Q Shelter supports achieving a 70/30 consolidation/expansion ratio	This is important to reduce the risk of concentrated disadvantage and postcode poverty.
1.2	Efficient land use	Q Shelter supports prioritisation of unlocking underutilised land in the Urban Footprint	Q Shelter urges the inclusion of social and affordable housing on these sites through partnerships with community housing providers

Ref	Theme/Item	Response	Considerations
1.3	Efficient land use	Q Shelter supports optimal use of high amenity areas for the development of residential densities proposed.	High amenity areas are important locations for social and affordable housing and partnerships with community housing providers should be considered to ensure the inclusion of housing to people on low to low-moderate incomes. These locations are also important locations for accessible housing for people living with disability.
1.4	Efficient use of land	Q Shelter supports increased residential density in new communities	<p>We support diversification of housing in new communities to include higher density housing, multi-family housing, and co-housing as examples.</p> <p>Q Shelter proposes the removal of minimum lot sizes within Queensland's planning framework to improve housing affordability overall and to also drive innovation in how homes are delivered more affordably.</p>
1.6	Efficient use of land	Protect PFGAs that may be needed to accommodate long-term urban growth	Long term planning for growth is vital to success. Safeguarding sites and areas with growth potential need to be part of the planning framework and methodology for achieving the Plan's targets.
2.1	Housing supply	Q Shelter supports the dwelling supply targets and sub-targets in Figure 6.	While issues have been raised with system capacity, it is vital to have targets that address real housing need. Pushing targets lower due to system capacity constraints will reduce pressure to achieve system improvements that lead to adequate supply.
2.2	Housing supply	Q Shelter supports maintaining a minimum 4 years of approved land supply and a minimum of 15 years supply that has been appropriately zoned and is able to be serviced	Q Shelter has consistently proposed land supply strategies that support adequate growth to meet demand for housing.
2.3	Housing supply	Q Shelter strongly supports residential opportunities on publicly owned land to accommodate growth in the short-term including temporary uses that respond to acute demands.	Q Shelter urges immediate consideration of where these sites might be to commence regional multi-sectoral co-design to activate these sites to address current acute demand for housing.
3.1-3.5	Housing diversity	Q Shelter strongly supports measures to increase housing density and diversity.	Consideration across all housing types for the inclusion of social and affordable housing is important given the unmet need and scale of the targets.

Ref	Theme/Item	Response	Considerations
		It is positive to see support for new models of housing delivery including build-to-rent, co-housing and micro-housing.	
3.6	Housing diversity	Q Shelter supports working with the community to build knowledge and understanding of housing diversity and benefits to local communities.	Q Shelter also urges the State Government to work closely with Mayors and other community leaders to bring proactive and united leadership to the need for housing growth to meet community needs. The SEQ Regional Plan can be a guiding framework and context for presenting a consistent set of messages responsive to the needs of people who are homeless or who can't afford their home.
4.1	Social and affordable housing	Q Shelter supports the target of 20 per cent of new homes in SEQ being social and affordable homes.	<p>We acknowledge the additional modelling underway however consider it important to set a target of at least 10 per cent social housing given the steady decline since the 1990s and in the context of such significant unmet need.</p> <p>We are concerned that community housing is not linked to references to affordable housing. CHOs will benefit from opportunities to deliver a mix of homes so that developments are more financially viable and so the populations being housed are living in more socially sustainable and resilient communities.</p> <p>Q Shelter addresses the need for a definition of affordable that meets the needs of the lowest 40% of the income spectrum where they pay no more than 30% of income on rent.</p>
4.2	Social and affordable housing	Q Shelter is supportive of active facilitation of potential partnerships between the development industry, financial institutions, housing and homelessness service providers, local, state and federal governments to progress opportunities for growth in a range of housing types responding	There are examples of these types of partnerships in Queensland and more intentional facilitation of these opportunities could help to achieve more. This type of opportunity helps to be regional capacity for place-based responses that are unique, flexible and innovative. Q Shelter proposes that the Community Housing Futures Program could assist in supporting this type of partnership.

Ref	Theme/Item	Response	Considerations
		to homelessness and housing need.	
4.3	Social and affordable housing	Q Shelter strongly supports the repurposing of under-utilised spaces and buildings for immediate term accommodation options.	Q Shelter suggests that wherever possible, these options should be considered for long-term housing as well to provide greater security to households. We also propose plans to immediately scaling up of the delivery of housing supply now using modern methods of construction to achieve housing volume to meet population demands.
4.4	Social and affordable housing	Q Shelter strongly supports increased supply of safe, secure and affordable housing choices for Aboriginal peoples and Torres Strait Islander peoples.	Q Shelter acknowledges the development of a new Aboriginal and Torres Strait Islander Housing Action Plan is underway. We strongly suggest the extension of engagement with First Nations Peoples proposed in relation to natural areas under this plan to involvement in providing advice about housing needs and housing delivery.

5.2 Other considerations

Place-making and wellbeing

Q Shelter notes provisions that focus on designing communities to provide interactive and open spaces to cultivate a sense of place and community belonging.

The integration of these opportunities with social and affordable housing is important to wellbeing. Consideration of how social and affordable housing are integrated into place-making activities and initiatives can significantly improve the overall success and social resilience of tenants and strengthen the relationship with the broader community.

There are also innovations through social enterprises to activate and maintain spaces where people living with disability and people living in social and affordable housing can experience opportunities for economic participation.

Inclusive decision making

Element 8 includes a focus on new models of inclusive decision-making and opportunities to capture the wide range of voices and interests that exist in communities. Opportunities to engage people with lived experience of housing needs and homelessness and people who are tenants are essential to the future of the region. This will help to ensure the interests of people with unmet housing needs are represented and amplified, particularly in response to potential community opposition to housing density and diversity. The interests and access to decision-makers of people who own homes require a response that actively facilitates the involvement and participation of people who face exclusion from housing options.

Affordable living

The plan appropriately considers holistic factors that influence affordable living. The Update acknowledges the reduced affordability of rental homes and associated impacts on essential workers who are increasingly unable to access or afford housing near to where they work. Q Shelter encourages and supports the concept of affordable living to guide plan implementation to ensure that push factors from high amenity areas do not cause more entrenched spatial patterns of concentrated disadvantage.

Urban footprint principles

Urban footprint principles are critical in supporting compact settlement patterns which create more affordable living options for diverse households. Q Shelter is supportive of opportunities to increase the capacity of the Urban Footprint to take priority over expanding boundaries in ways that can reduce the affordability of housing overall.

The location of social and affordable housing within the urban footprint is important to improved wellbeing, life opportunities and the overall affordability of living. The efficient provision of physical and social infrastructure improves social equity outcomes because more people are located near to infrastructure that reduces the cost of living.

Location of additional housing

Over-reliance on detached dwellings in greenfield sites on the urban fringe is unsustainable. Arguments that peripheral expansion is more affordable than infill development are unsubstantiated. Research published this year shows that infill development in Sydney is \$75,000 less per dwelling.¹

This finding is supported by research from other international jurisdictions², and the overwhelming evidence that the escalating cost to the public sector of providing infrastructure to low density, sprawling cities has prompted numerous state government enquiries.³ As such, Q Shelter strongly supports the Queensland Government's commitment to densification of high amenity locations, gentle density, and affordable housing provision.

More homes in high-amenity areas

Supporting more people to live in high-demand areas with good access to economic activity, public transport, education, and green space will be crucial for reaching the State's urban consolidation

¹ Productivity Commission (2023). Building more homes where infrastructure costs less. Available at: https://www.productivity.nsw.gov.au/sites/default/files/2023-08/202308_NSW-Productivity-Commission_Building-more-homes-where-infrastructure-costs-less_accessible-v2.pdf

² Trubka R, Newman P and Bilsborough D. (2010). The costs of urban sprawl - infrastructure and transportation, Environment Design Guide, vol. 83, pp. 1-6.

³ Standing Committee for Long Term Strategies of the House of Representatives (1992). *Patterns of Urban Settlement: Consolidating the Future*, Report of the Standing Committee for Long Term Strategies, Parliament of Australia, Canberra.

targets. It also ensures that new dwellings are built in places where people want to live⁴, and where the provision of infrastructure costs less.⁵

We recommend that the Queensland Government uses this framework⁶ to create a spatial layer that is publicly available and identifies parcels across SEQ that are within proximity of a centre, major bus or train station or corridor with frequent service, significant greenspace, and primary and secondary schools. This will assist local governments to objectively identify areas suitable for increased density and ensure that the framework is consistently applied across SEQ. Research shows that much of Brisbane's required dwellings could be supplied in land within walking distance of existing railway stations.⁷

We commend the Queensland Government's decision to allow rooming accommodation in low density residential areas and recommend that model codes incorporate the ability to be flexible in complying with performance outcomes, to ensure positive new co-housing models can be delivered.

⁴ NSW Productivity Commission (2023). Building more homes where people want to live. Available at: <https://www.productivity.nsw.gov.au/building-more-homes-where-people-want-to-live>

⁵ NSW Productivity Commission (2023). Building more homes where infrastructure costs less. Available at: <https://www.productivity.nsw.gov.au/building-more-homes-where-infrastructure-costs-less>

⁶ ShapingSEQ 2023 Update, p. 80

⁷ Yang K and Pojani D (2017) A Decade of Transit Oriented Development Policies in Brisbane, Australia: Development and Land-Use Impacts, *Urban Policy and Research*, 35:3, 347-362, DOI: 10.1080/08111146.2017.1294537

6. Conclusion

Q Shelter is encouraged by the scope of the draft Update and endorses the articulation of housing growth targets. We are also encouraged by the inclusion of social and affordable housing targets however we are seeking to be further engaged in an agreed definition of affordable housing focussed on households in the lowest 40% of the income spectrum. We are also seeking further engagement to define the scope and role of community housing providers in the delivery of non-market affordable housing. We consider it essential to the future provision of social and affordable housing that all government investment in these forms of housing is captured in perpetuity to be reinvest for this purpose.

We note a range of themes, principles and mechanisms that favour consolidation close to infrastructure and within high amenity areas. This is crucial to the prevention of spatial disadvantage and postcode poverty.

Further we support and acknowledge measures that seek to strengthen governance and implementation assurance. We are seeking further involvement in governance arrangements that support the involvement of First Nations peoples in planning for housing growth and diversity and mechanisms for ensuring that the voices of people with lived experience are not subjugated to the interests of people who are adequately housed.

Thank you for the opportunity to comment. We look forward to ongoing opportunities to support the Plan's evolution, finalisation and successful implementation.



Fiona Caniglia
Executive Director
On behalf of Q Shelter

7. Contact

Q Shelter can be contacted through the following members of the leadership team. Please note that all phone numbers go to mobile phones.

Fiona Caniglia
Executive Director
Fiona.caniglia@qshelter.asn.au
3831 5900 ext 100

Jackson Hills
Manager of Policy and Strategic Engagement
Jackson.hills@qshelter.asn.au
3831 5900 ext 109

Contact details:

Q Shelter
515 Wickham Terrace
Spring Hill 4000
PO Box 214
Spring Hill 4004

ⁱ Maalsen, S., Wolifson, P., Rogers, D., Nelson, J. and Buckle, C. (2021) Understanding discrimination effects in private rental housing, AHURI Final Report No. 363, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/finalreports/363>, doi: 10.18408/ahuri7324501.