

Commencement of HAAPOLA Feedback
Planning Group
Department of Housing, Local Government, Planning and Public Works
GPO Box 690
BRISBANE QLD 4001

21 May 2024

Housing Availability & Affordability (Planning & Other Legislation) Amendment Bill 2023

Dear Minister Scanlon,

Thank you for the opportunity to provide feedback on the Housing Availability and Affordability (Planning and Other Legislation) Amendment Bill 2024 (HAAPOLA).

Queensland's housing crisis is far-reaching and has incurred particularly negative impacts upon the most vulnerable in our society. Resolutions to the crisis will require innovative and bold solutions across multiple sectors. As such, we applaud the intent of the Bill to amend the *Planning Act 2016* and other legislation, with its view to deliver more homes faster in accordance with targets set in Homes for Queenslanders and ShapingSEQ 2023.

However, we write to provide our full support to the proposed YIFBY (Yes in Faith's Backyard) amendment that it be included in Schedule 6, Development local categorising instrument is prohibited from stating is assessable development, Part 5.

We understand that the YIFBY amendment is proposing to ensure that on land owned by a religious organisation, a development for affordable housing (Class 1a or Class 2) is exempt development if meeting the below criteria:

- Comprises of 100% social and/or affordable housing product and managed by a registered provider for a period of 20 years;
- Is located in a residential zone or a community facilities zone;
- Is no more than 1,200m² in developable area;
- Results in no more 12 dwellings;
- Has a building height no greater than the adjoining zone plus 1 storey;
- Complies with the built form provisions of the planning scheme;
- Is not impacted by bushfire hazard, coastal hazard, flood hazards or landslide hazards;
- Is appropriately (or capable of being) serviced by infrastructure.

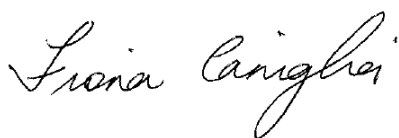
The YIFBY amendment would provide a clear pathway, removing planning barriers to contribute to the delivery of social and affordable housing. By allowing small-scale developments as exempt development, it has the potential to deliver broad scale benefits to communities across Queensland.

The YIFBY amendment presents an incremental approach for integrating social and affordable housing, of a gentle density scale, into established communities. I support the proposed reforms and urge the Queensland Government to consider its inclusion in the HAAPOLA Bill for the following reasons:

- **Mission alignment** – The reforms present an opportunity for faith-based organisations to broaden their community offering on surplus land and alignment with their mission to provide for those less fortunate.
- **Availability of land** – Faith-based organisations have extensive landholdings, including a significant amount of surplus land, that is prevented from delivering affordable and social housing due to applicable planning restrictions.
- **Increased Supply** – Unlocking the extensive availability of surplus land owned by faith-based organisations can facilitate a pipeline of social and affordable housing YIFBY would create certainty for organisations to deliver housing at appropriate scale. Exemptions for suitable, low-scale developments can ensure a continual delivery, whilst freeing resources to unlock larger sites.
- **Well-located homes** – Landholdings of faith-based organisations are in well-located urban areas throughout Queensland communities. This enables the delivery of well-located affordable homes, and an aggregated delivery that provides benefits for residents across urban and regional communities.
- **Gentle Density outcomes** – The YIFBY amendment proposes social and affordable housing that is reflective of its adjoining residential neighbours. Allowing for up to 12 dwellings and 2-3 storeys, to be accepted development. Including a maximum developable area for this exemption ensures that this land is developed at an appropriate scale. This will enable an incremental approach to delivery that blends into existing communities and a diverse mix of dwelling types in neighbourhoods.
- **Alignment with Existing Exemptions** – The *Planning Regulation 2017* currently provides for exempt development, including rural workers accommodation, temporary domestic violence accommodation, community residence and rooming accommodation. The YIFBY amendment provides for outcomes of a similar scale, that can facilitate significant yield of needed housing typologies of State interest.
- **Faster, de-risked delivery** – Reducing the risk associated with assessment for social and affordable housing projects can increase the likelihood of projects accessing available funding, and resulting in housing on the ground, faster.
- **Activating source of land for CHPs** – The YIFBY amendment will unlock a reliable source of land for community housing providers to deliver social and affordable housing on an ongoing basis with limited risk to access funding.

We urge the Queensland State Government to implement the YIFBY amendment to expedite the delivery of social and affordable housing as a bold and innovative approach to achieving the significant, and necessary social and affordable housing targets.

Yours sincerely,



Fiona Caniglia
Executive Director