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To Whom It May Concern,

**PROPOSED DEVELOPMENT SCHEME – THE WOOLLOONGABBA PLAN AND DRAFT PUBLIC REALM GUIDELINE**

This submission sets out Q Shelter's input to the proposed development scheme – the Woolloongabba Plan and draft public realm guidelines for the Woolloongabba Priority Development Area (PDA).

**General principles**

The current housing context presents significant challenges with a dire lack of supply to meet current needs. Queensland's population is growing at an exponential rate, further exacerbating the pressure on demand. This escalating crisis makes access to affordable housing options increasingly difficult for people on low-moderate incomes and other vulnerable population groups, leading to a rise in homelessness rates.

With a renewed focus on housing from all levels of government and the private sector, the groundwork is being laid for a future 'healthy housing system'. Priority Development Areas (or PDAs), such as the one proposed for Woolloongabba, provide a crucial opportunity for EDQ to deliver much-needed social and affordable housing. The PDAs allow for a coordinated approach, where diverse housing options can be strategically planned alongside public and active transport infrastructure and essential health, education, retail and community amenities. By leveraging this opportunity, PDAs offer a promising solution to our state's broader housing affordability challenges.

The Woolloongabba Plan's vision for urban centres across the PDA to provide diverse housing choices that cater for a diverse community, people of all abilities, and changing life-cycle needs is a crucial aspect. Housing in the PDA is [to be] supported by retail and community uses that address the needs of local communities and create complete neighbourhoods. Q Shelter firmly believes that every Queenslanders deserves the right to a home and that complete neighbourhoods must be inclusive and cater to all income brackets. This is not just a vision statement but a necessity for a thriving community.

Community Housing Providers (CHPs) are not-for-profit organisations uniquely placed to deliver social and affordable housing in perpetuity.

Recent policy examples, such as the National Rental Affordability Scheme (NRAS), have shown the limitations of offering time-limited subsidies for housing at a discount to market rent. The need for this housing persists even after the subsidies end, leading to homelessness and housing stress for vulnerable households. Therefore, we strongly recommend a development scheme that unequivocally commits to working with CHPs to achieve the growth of social and affordable housing, which exists in perpetuity.

You can locate more information about Q Shelter and the community housing system (CHPs) in **Appendix A** of this submission.

## **1. The Woolloongabba Plan**

### **1.1. Q Shelter supports the following:**

- For residential development on private land comprising ten dwellings or more, a minimum of 20% of the total residential GFA will be delivered as high-quality social or affordable housing.
  - Q Shelter would like to see this mandated as a condition of planning approval rather than incentivised.
  - We also recommend that, where possible, transactions to deliver social and affordable housing are done directly or in partnership with community housing providers (CHPs), who are well-placed to deliver and manage both social and affordable housing 'in perpetuity'.

### **1.2 Q Shelter also supports the following amendments or future considerations:**

- Where residential dwellings are developed on public land, consideration of up to 100% of GFA to be delivered as high-quality social or affordable housing.
- Further detail must be provided on the mechanisms that ensure that affordable and social housing remains affordable in perpetuity. See 1.1 above.
- Consider increasing the 20% target to 30% for one-bedroom dwellings. This would address the lack of one-bedroom dwellings (7% of dwellings in Brisbane, ABS Census 2021) compared to the number of single (or lone) person households (23.6% of Greater Brisbane, ABS Census 2021).
- Further detail is required on build-to-rent, key worker housing, over 50's retirement living and community housing provider-led development and how this will be delivered in perpetuity.

## **2. Draft Public Realm Guideline**

### **2.1 Q Shelter supports the following:**

- Elevated visibility of the area's rich and distinctive First Nations heritage.
  - Q Shelter supports First Nations Traditional Owners and community members' meaningful involvement in all public realm design and delivery aspects.
- Promote and prioritise active travel, uplifting amenity, accessibility and pedestrian comfort.
  - Q Shelter supports human-scale architecture and recommends that public furniture be designed to attract diverse users rather than deter any demographics including homeless people.
  - Q Shelter supports planning and design measures to support active travel and pedestrian comfort.

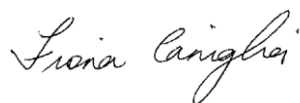
## **3. Other considerations**

Q Shelter understands that, from July 1, the EDQ corporate structure has changed, and the provision of diverse housing, including social and affordable housing, will be included. This will enable EDQ to enter into agreements with third parties, like CHPs, to deliver social and affordable housing projects. Q Shelter welcomes this as an alternative pathway as CHPs work to scale up their operations and achieve multiple growth projects across the state.

### **Further contact**

We appreciate the opportunity to provide input into the development scheme and related plans. Q Shelter can be contacted through the Policy & Strategic Engagement Manager, Jackson Hills, at [jackson.hills@qshelter.asn.au](mailto:jackson.hills@qshelter.asn.au) or 0411 395 842.

Yours sincerely



Fiona Caniglia  
**Executive Director**

## **APPENDIX A**

### **About Q Shelter**

Q Shelter is a peak body working to ensure every Queenslanders has a home. We advocate for policy and investment solutions while also working to build system capacity to deliver those solutions. Our members consist of Specialist Homelessness Services, Community Housing Providers, private sector entities, other peak organisations, local government representatives, academic institutions, broader human services, and interested individuals, including people with lived experience of unmet housing needs and homelessness. We have an extensive network of 6000 subscribers throughout Queensland, and we work with 17 regions through a network of regional representatives.

We draw our mandate from members and stakeholders working to end homelessness and achieve enough housing supply and diversity to meet the community's needs. At present, the level of demand for housing and support is unprecedented. Building system capacity to deliver housing targets that include social and affordable housing is critically important, which is why PDAs play a role in this.

### **About Community Housing Providers (CHPs)**

CHPs are distributed across Queensland and deliver place-based and integrated housing and support solutions as part of local service systems.

CHPs are also:

- Regulated under the National Regulatory System for Community Housing (NRSCH)
- Decentralised with a significant regional footprint
- Connected with local support services to achieve sustainable tenancies
- Delivering 11,000+ homes to vulnerable Queenslanders
- Contribute to place-making, sound design, and significant local community engagement
- Deliver substantial housing outcomes to households led by people who identify as First Nations Australians
- Primed for growth, as evidenced by recent submissions from Queensland CHPs to develop, build, and deliver at least 4000 homes through HAFF funding.