

12 November 2023

Growth Areas Team  
Planning Group  
Department of State Development, Local Government, Infrastructure and Planning  
Via email: [redlandshs@dsdilgp.qld.gov.au](mailto:redlandshs@dsdilgp.qld.gov.au)

To Whom It May Concern,

## **SUBMISSION TO THE REDLAND HOUSING STRATEGY**

### **Opening statements**

Q Shelter welcomes the opportunity to provide feedback on the draft Redland Housing Strategy (the Strategy). We commend the efforts of the Queensland Government, Redlands City Council, and many local governments, to improve housing affordability and availability across Queensland.

A range of local governments have recently introduced housing strategies and statements regarding housing supply. Many of the strategies vary considerably in their objectives and approach. It is important that regional diversity is reflected in the plans while they also address certain matters consistently.

We acknowledge the work of LGAQ and the Queensland Department of Housing, to support Local Housing Action Plans that address the measures included in the SEQ Regional Plan update. Housing Action Plans, housing statements and planning schemes need to clearly articulate how they intend to interact with and meet the goals of the SEQ (Southeast Queensland) regional plan, in particular the targets for social and affordable housing supply.

### **Support for strategic objectives**

The Consultation Report highlights:

- Concerns about housing affordability and availability
- Diverse housing needs including people who need to downsize
- Community support for housing located close to services, transport, and other infrastructure
- Diverse age groups require diverse housing types including flats, apartments, terrace houses, town houses and semi-detached homes. There were also some households who identified their preference and need for detached dwellings however many other housing types were also identified which highlights diversity of need.

As such, Q Shelter supports the strategic objectives in the plan because:

- Increased housing density in high amenity areas will prevent disadvantage due to remoteness or distances from services, transport, and other infrastructure
- Greater housing diversity will address the future needs of diverse households which have been identified in the draft Strategy
- All communities, particularly high-amenity communities need more social and affordable housing because well-located social and affordable housing meets housing needs while also reducing cost of living expenses due to distance and lack of services
- Monitoring and reporting of housing supply and diversity is a way to ensure implementation and solve implementation barriers in shorter time spans.

Housing affordability and proximity to services and facilities were in the top five factors important to survey respondents which is a hopeful basis for discussion in the community about achieving housing diversity and density to meet local needs.

### **Diverse needs driving the future**

Overall, the process of developing the Strategy demonstrates community concerns about housing affordability, diversity and availability while also citing concerns about ongoing community engagement and involvement. It is important that Housing Strategies such as this, are proactive about meeting future needs and current unmet needs and that wider community dialogue is facilitated inclusive of people in home ownership *and* people who are renting. Future engagement processes need to ensure the voices of people who are uncertain about meeting their future housing needs are heard.

### **Summary recommendations**

In summary, Q Shelter supports the Strategy and recommends the following:

- 1. Using objective demographic data to ensure ‘right-sized’ dwelling targets.**
- 2. Inclusion of social and affordable housing targets in the Strategy, including an implementation plan for their delivery and monitoring.**
- 3. Model codes for accepted development that allow high quality (and high density) housing typologies, which may require elimination of benchmarks such as minimum lot sizes and car parking requirements.**
- 4. Change readiness programs rolled out in the community in conjunction with the policy revisions.**

### **1. Meeting housing need**

#### ***Objective data to inform housing targets.***

Q Shelter supports the use of objective demographic data to inform housing typology targets. Only 18% of consultation respondents indicated they were looking to upsize while 20% wanted to downsize. There is a need for diverse housing types and sizes which needs to be based on current and projected population needs. Specially for Redland City Council, the data demonstrates “right-sized” dwellings required are predominately one-to-two-bedroom dwellings in proximity to transport connections to Brisbane city, and other activity centres.

We acknowledge that this is identified in the Strategy and Q Shelter supports this position.

#### ***Inclusion of affordable housing targets in Strategy***

Cost of living was a factor for respondents when finding somewhere to live. Q Shelter understands that the Queensland Government has commissioned AHURI (Australian Housing and Urban Research Institute) to advise on current and future social and affordable housing need, and that this information will be used to inform dwelling targets. While we acknowledge and support the projected dwellings (including a breakdown of typologies) in the Strategy<sup>1</sup>, and the identification of the existing shortfall of 5000 affordable dwellings within the Background Report<sup>2</sup>, we recommend that social and affordable housing targets are included in the Strategy as a basis for monitoring and reporting.

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<sup>1</sup> Redlands Housing Strategy 2023, p. 37

<sup>2</sup> Redlands Housing Strategy 2023 – Background Report | October 2023, p. 28

## ***Inclusion of mechanisms for affordable housing in the implementation plan***

Specific mechanisms are required to meet the goal of 20% of new dwellings being social and/or affordable housing in the draft *ShapingSEQ 2023 Update*, and these mechanisms should be included in the proposed implementation plan. We reiterate our recommendation to consider inclusionary planning tools, especially in development on publicly owned land, and in any future revision of Queensland's infrastructure charging regime.

## **2. Improve housing choice**

### ***A range of dwelling typologies in established suburbs***

The Strategy highlights how the development industry will need to be encouraged to deliver alternative homes for the Redland community from single detached dwellings.<sup>3</sup> We support the ability to increase dwelling density (and housing typologies) in established suburbs. While secondary dwellings are more easily achieved in the existing planning framework (e.g., limited community opposition, no need for development approval), they often occur with limited local government oversight and do not necessarily deliver the benefits of increased density, as residents of secondary dwellings are often car dependent but with increased tenure informality (and therefore, housing insecurity).<sup>4</sup> Therefore, additional planning mechanisms must also be used to increase housing diversity, in our view.

### ***Using model developments to inform model codes.***

There are a growing number of well-designed, micro-lot housing examples across SEQ which are accepted and praised by local communities.<sup>5</sup> We recommend that these developments are used to develop model codes for accepted development, and that 'use' codes, such as single-family house zones, are eliminated in favour of form-based codes, unless there is an objective planning reason to prevent population growth in an area. For example, restricting development on the Southern Moreton Bay Islands is based on objective evidence, particularly as lack of sewerage infrastructure, natural hazard risk and environmental sensitivities limit the population capacity of these areas.<sup>6</sup> However, due to rising housing unaffordability on the mainland, many of these islands are growing in population at exponential rates.<sup>7</sup> This is an example of what happens when dwelling growth in established areas with existing infrastructure and amenities is restricted.

Some requirements, such as minimum lot sizes, maximum dwelling yields and minimum car parking requirements are a barrier to creating high-quality, high-density housing (including freehold micro-lot housing) in established suburbs. Minimum lot sizes can delay the conversion of vacant land into new housing and prevent redevelopment at higher densities<sup>8</sup>. Research also shows that minimum lot size requirements are the most significant factor in whether a property owner constructs a secondary dwelling.<sup>9</sup>

We support revisiting any requirements that present substantial barriers to housing diversity.<sup>10</sup>

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<sup>3</sup> Redland Housing Strategy 2023, p. 60

<sup>4</sup> Troy, L., & Van Den Nouwelant, R. (2023). Accessory Dwelling Units and Incremental Urbanism: Becoming 'Urban' or just 'Intensive Suburban'? *Built Environment*, 49(1), 39-57. <https://doi.org/10.2148/benv.49.1.39>

<sup>5</sup> Amy Degenhart (2023). SEQCA presentation slides. Available at: [https://seqalliance.org/wp-content/uploads/2023/10/Slides\\_Degenhart.pdf](https://seqalliance.org/wp-content/uploads/2023/10/Slides_Degenhart.pdf)

<sup>6</sup> Dennis, J (2022). Lack of infrastructure 'unsustainable' on Southern Moreton Bay Islands as population spikes. *ABC News*. Available at: <https://www.abc.net.au/news/2022-08-12/qld-southern-moreton-bay-islands-future-population/101304948>

<sup>7</sup> Moore, T (2023). Treasure islands: Why SEQ's hidden gems are growing three times as fast as mainland. *Brisbane Times*. Available at: <https://www.brisbanetimes.com.au/national/queensland/treasure-islands-why-seq-s-hidden-gems-are-growing-three-times-as-fast-as-mainland-20230608-p5df0n.html>

<sup>8</sup> Zhao W (2022). The long-run effects of minimum lot size zoning on housing redevelopment, *Journal of Housing Economics*, 55, 101806, <https://doi.org/10.1016/j.jhe.2021.101806>

<sup>9</sup> Chapple K, Wedmann J, Mashhood F and Coleman R (2017). Jumpstarting the market for accessory dwelling units. Available at: [https://turnercenter.berkeley.edu/wp-content/uploads/pdfs/Jumpstarting\\_the\\_Market\\_-\\_ULI.pdf](https://turnercenter.berkeley.edu/wp-content/uploads/pdfs/Jumpstarting_the_Market_-_ULI.pdf)

<sup>10</sup> Redlands Housing Strategy 2023, p. 53

### **3. Community readiness for change**

#### ***Change readiness education embedded in planning consultation process.***

Survey respondents cited the city's unique position on Moreton Bay and a need to protect core ecological values, such as trees for koalas and coastal wetlands. The character of an area is broader than housing typologies.

In addition, communities that are aware of population growth and the need for dwelling diversity are more accepting of change. The change readiness work being undertaken by Studio THI, on behalf of the Cairns Regional Council, is a good example of locally specific programs that can be rolled out by local governments, having important conversations with the community about growth, housing diversity, amenity options and other considerations. Q Shelter also suggests that involving community housing providers in proactively considering how to facilitate community support for growth activities is important.

We recommend that a similar approach is considered in this Strategy to ensure the community is actively engaged in future change responsive to population growth and needs.

#### **Contact**

For further details about this submission, please contact the Policy team at Q Shelter (07) 3831 5900 or [policy@qshelter.asn.au](mailto:policy@qshelter.asn.au).

Yours sincerely

A handwritten signature in black ink, reading "Fiona Caniglia". The signature is written in a cursive, flowing style.

**Fiona Caniglia**  
**Executive Director**