

18 June 2026

Economic Development Queensland  
GPO Box 2202,  
Brisbane Qld 4001

To Whom It May Concern

### **Land Activation Program (SEQ Tranche 1) Draft PLUP**

Q Shelter welcomes the opportunity to provide feedback on the Draft Provisional Land Use Plan (PLUP) for the Land Activation Program (LAP) South East Queensland Tranche 1 Priority Planning Development Area.

#### **About Q Shelter**

Q Shelter is Queensland's peak body working to address unmet housing needs and homelessness. We envision a future in which every Queenslanders has a home. Incorporated in 1993, Q Shelter is a membership-based organisation that works to strengthen system capacity and influence policy and investment to support effective and sustainable solutions.

We engage across all levels of government and work collaboratively with the public and private sectors, the community services sector, and the wider community to support solutions that are practical, evidence-informed, and capable of successful implementation. Our membership includes Specialist Homelessness Services (SHS), Community Housing Providers (CHPs), the broader human services sector, academic institutions, other peak organisations, people with lived experience of homelessness, and private sector stakeholders. Q Shelter maintains ongoing engagement with the sector and community to inform our policy positions. Our approach to policy development draws on both evidence and stakeholder engagement, ensuring our work reflects lived experience, service delivery insights, and system level understanding.

#### **Introduction**

Queensland continues to experience significant housing pressures driven by population growth, low vacancy rates and insufficient housing supply. Addressing these challenges requires coordinated action across planning, infrastructure, housing investment and land use policy.

Q Shelter strongly supports initiatives that increase housing supply in well-located areas and improve housing diversity. We have consistently advocated for planning reforms that enable more homes close to jobs, transport, education and services, while also supporting housing choice across different household types and income groups.

The LAP represents one of the most significant housing initiatives currently underway in Queensland and provides a major opportunity to demonstrate how government-owned land can contribute to a healthy housing system that delivers the homes Queensland needs, where they count.

## Overall Position

Q Shelter strongly supports:

- Activation of underutilised government-owned land
- Increased housing supply in well-located urban areas
- Higher-density housing close to jobs, transport and services
- Faster planning pathways that support housing delivery
- Greater housing diversity across Southeast Queensland.

Collectively, the four LAP sites have the potential to deliver more than 5,000 homes and make a meaningful contribution to housing supply. The draft PLUP aligns strongly with many of the planning and housing diversity reforms Q Shelter has supported in recent years, including increased density in well-located locations, improved utilisation of public land and a broader range of housing typologies.

## Key Opportunity for Improvement

While Q Shelter strongly supports the supply objectives of the LAP, we believe there is an opportunity for the final PLUP to more clearly articulate how affordable housing, social housing, key worker housing and diverse tenure outcomes will be pursued alongside broader housing supply outcomes.

Q Shelter has consistently advocated for a housing system that supports diversity of form, tenure, price, location, and financing and ownership models. These principles have informed our recent planning and housing policy submissions<sup>1</sup>.

The draft PLUP provides a strong framework for diversity of form and location. There is an opportunity, however, to provide greater clarity regarding how diversity of tenure, affordability and housing choice will be supported through future delivery processes.

Importantly, the draft PLUP does not currently include:

- Affordable housing targets;
- Social housing targets;
- Community Housing Provider participation requirements;
- Affordable housing delivery mechanisms; or
- A monitoring and reporting framework for housing outcomes, including tenure mix, affordable housing outcomes and social housing outcomes.

This does not mean affordable or social housing outcomes will not occur. Future procurement processes, partnership arrangements and development agreements may yet secure these outcomes. However, the pathway is currently unclear.

Given the scale, strategic importance and public ownership of these sites, Q Shelter considers there is an opportunity to provide greater clarity regarding how affordable housing, social housing and diverse tenure outcomes will be pursued alongside broader housing supply objectives.

## Public Land and Public Value

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<sup>1</sup> Q Shelter. (2025, November 4). *More Homes Sooner: Brisbane City Council review of the low-medium residential zone* [Submission]. Q Shelter. <https://qshelter.asn.au/wp-content/uploads/20251104-BCC-LMR-Review-Q-Shelter-FINAL.pdf>

Q Shelter recognises that the primary objective of the LAP is to increase housing supply and welcomes the Government's commitment to activating underutilised public land to support this objective.

Government-owned land, however, provides a unique opportunity to deliver broader public value alongside increased supply. Public land is one of the strongest tools available to government to influence housing outcomes beyond market supply alone.

Well-located housing delivers benefits beyond shelter alone. Locating homes close to employment, education, health services and public transport can reduce household transport costs, support workforce participation and improve access to opportunities for lower and moderate-income households. Research by the Australian Housing and Urban Research Institute has found that lower-income households increasingly face trade-offs between housing affordability and access to employment, often resulting in longer commutes and higher transport costs<sup>2</sup>. These benefits are particularly important at a time when many Queensland households, including essential and key workers, are experiencing housing affordability and broader cost-of-living pressures.

Across Australia, governments have increasingly utilised publicly owned land to support a mix of housing outcomes while also advancing broader social and economic objectives. For example, Victoria's Ground Lease Model uses publicly owned land to deliver mixed-tenure communities comprising social, affordable and market housing while retaining public ownership of the land. Across seven sites, the program will deliver more than 2,500 homes, including more than 1,000 social and affordable rental homes<sup>3</sup>. Importantly, the model brings together government, Community Housing Providers and private sector partners to deliver a broader range of housing outcomes than would typically be achieved through market housing alone. Under the model, public land is leased for 40 years before the land and homes return to government ownership, ensuring the long-term retention of public assets while increasing housing supply and housing diversity.

Australian research similarly highlights the role that publicly owned land and mixed-tenure development models can play in supporting housing affordability, social inclusion and neighbourhood renewal. Research by the Australian Housing and Urban Research Institute identified the potential for the renewal of approximately 12,000 social housing properties across Brisbane, Sydney and Melbourne to generate more than 40,000 additional medium-density dwellings through mixed-tenure approaches, while increasing housing diversity and supporting stronger community outcomes<sup>4</sup>. The research highlights the capacity of publicly owned land to contribute simultaneously to housing supply, affordability and broader social outcomes.

The LAP also presents an opportunity to consider the longer-term housing legacy associated with significant public investment and growth across South East Queensland in the lead up to Brisbane 2032. The LAP sites are strategically located within a region that will experience substantial transport, infrastructure and economic investment over the coming decade, creating an opportunity to ensure housing benefits are shared broadly across the community and contribute to lasting housing outcomes beyond the Games.

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<sup>2</sup> Gurrán, N., Hulse, K., Dodson, J., Pill, M., Dowling, R., Reynolds, M., & Maalsen, S. (2021). *Urban productivity and affordable rental housing supply in Australian cities and regions* (AHURI Final Report No. 353). Australian Housing and Urban Research Institute Limited. <https://www.ahuri.edu.au/research/final-reports/353>

<sup>3</sup> Homes Victoria, *Ground Lease Model*, Victorian Government, accessed June 2026, <https://www.vic.gov.au/ground-lease-model>

<sup>4</sup> Australian Housing and Urban Research Institute. (2023, November 20). *Mixed tenure neighbourhoods are a recipe for success when redeveloping social housing*. <https://www.ahuri.edu.au/analysis/news/mixed-tenure-neighbourhoods-are-recipe-success-when-redeveloping-social-housing>

Given the scale, strategic importance and public ownership of the LAP sites, there is an opportunity to consider how affordable housing, social housing, key worker housing and mixed-tenure communities can contribute alongside broader housing supply objectives, helping to maximise the long-term public value generated through these developments.

## Site-Specific Comments

Q Shelter's site-specific comments reflect the unique characteristics and opportunities presented by each location. While housing supply is the primary objective, each site also presents distinct opportunities to contribute to broader housing system outcomes.

### *Banyo*

Q Shelter supports the activation of the former Energex site and the proposed medium-density residential outcomes. The site's proximity to public transport, employment and services creates an opportunity to deliver a diverse mix of housing types and tenures that support a broad range of households, including first home buyers, renters and key workers. Future delivery arrangements should consider opportunities for affordable rental housing and partnerships with Community Housing Providers.

### *Meadowbrook*

Q Shelter strongly supports housing delivery adjacent to Logan Hospital, Griffith University and major employment precincts. The site's proximity to major health and education infrastructure creates a significant opportunity to support workforce participation through affordable and key worker housing outcomes. Given its location within a major health and education precinct, the site is particularly well positioned to support health, education and other essential workers who may otherwise face barriers to securing housing close to employment. As future development models are considered, Q Shelter encourages a mix of housing tenures and price points that support both local workers and the broader community.

### *Montague Road*

Montague Road presents a particularly significant opportunity within the program due to its inner-city location and proximity to employment, transport and services. This creates a unique opportunity to deliver housing outcomes that extend beyond supply alone. As one of the few large publicly owned redevelopment opportunities in an inner-city location, Montague Road presents a rare opportunity to support affordable housing, social housing and mixed-tenure communities alongside market housing. Opportunities of this nature are increasingly scarce and provide an important means of ensuring lower and moderate income households can continue to access well-located urban communities, employment opportunities, public transport and essential service<sup>5</sup>. As future delivery models are developed, Q Shelter encourages active consideration of Community Housing Provider partnerships and affordable housing outcomes that maximise long-term public value.

### *Turbot Street*

Q Shelter supports the proposed high-density mixed-use approach for this CBD fringe location. Given its accessibility and strategic location, the site presents opportunities to deliver social housing and affordable rental housing, alongside diverse tenure models, including Build-to-Rent, and Community Housing Provider partnerships. Its proximity to employment, education, health services and public transport also positions the site to support housing outcomes that improve access to opportunities for lower and moderate income households while reducing the need for lengthy commuting.

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<sup>5</sup> Daley, J., & Coates, B. (2018). *Housing affordability: Re-imagining the Australian dream*. Grattan Institute. <https://grattan.edu.au/wp-content/uploads/2018/03/901-Housing-affordability.pdf>

## Recommendations

Q Shelter recommends that the final PLUP:

1. *Maintain its strong focus on housing supply and housing diversity*

Q Shelter strongly supports the overall direction of the Land Activation Program and the activation of government-owned land to accelerate housing delivery in well-located areas. The program has the potential to make a significant contribution to housing supply while supporting a broader range of housing types and communities across South East Queensland.

2. *Provide greater clarity regarding housing diversity and affordability outcomes*

Articulate how affordable housing, social housing, key worker housing and diverse tenure outcomes will be considered as future procurement, partnership and delivery arrangements are developed across LAP sites. This may include consideration of a range of delivery models, including Community Housing Provider partnerships and mixed-tenure developments where appropriate.

3. *Support partnerships that maximise housing outcomes*

Recognise Community Housing Providers as important delivery partners capable of contributing to affordable housing, social housing and mixed-tenure outcomes across LAP sites. Q Shelter also encourages consideration of delivery models that bring together government, Community Housing Providers and the private sector to maximise both housing supply and broader community outcomes. These partnerships need active facilitation at an early stage of planning.

4. *Provide transparent information about government owned land that is available, as early as possible in the planning stages*

Bring key state agencies, local governments and community housing providers together in the early planning stages where land is identified and earmarked for residential development. Community Housing Providers can then factor in these opportunities, engage in partnership development and integrate funding opportunities to achieve diverse housing outcomes in key locations.

5. *Establish a monitoring and reporting framework*

Establish a monitoring and reporting framework that enables government, industry and the community to understand not only how many homes are delivered, but also the housing outcomes achieved through the program.

This could include reporting on:

- Total dwellings delivered;
- Housing typologies delivered;
- Tenure mix;
- Affordable housing outcomes;
- Social housing outcomes;
- Community Housing Provider participation;
- Housing delivery in locations with access to public transport, employment and services;
- Key worker housing outcomes; and
- Delivery timeframes.

6. *Maximise public value from public land*

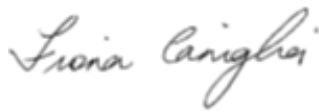
The LAP presents a significant opportunity to demonstrate how publicly owned land can contribute not only to increased housing supply, but also to housing affordability,

workforce participation, social inclusion and long-term community benefit. As the program progresses, Q Shelter encourages consideration of how well-located government-owned land can support enduring housing outcomes that maximise public value and contribute to the broader housing legacy of South East Queensland's growth and investment over the coming decade.

**Further contact**

We appreciate the opportunity to provide input to the review process. For further questions or contact, please liaise with Q Shelter Policy and Strategic Engagement Lead, Maya Glasman, at [maya.glasman@qshelter.asn.au](mailto:maya.glasman@qshelter.asn.au), in the first instance.

Yours sincerely



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