

19 September 2025

Minister for Economic Development Queensland (MEDQ)
Economic Development Queensland
GPO Box 2202
Brisbane, 4001
Delivered by email: contact@edq.qld.gov.au

Dear Minister

NORTHSHORE HAMILTON PRIORITY DEVELOPMENT AREA (PDA) DEVELOPMENT SCHEME

This submission outlines Q Shelter's input to the proposed amendments to the development scheme – the Northshore Hamilton PDA, and the Development Charges and Offset Plan (DCOP).

Key Recommendations

Amendments to the development scheme

1. We strongly recommend that EDQ maintain the targets in the current development scheme, providing for a minimum of 5% social, public or affordable housing, or alternatively, adopt the SEQ Regional Plan target of 20% of all new homes being designated as social and affordable housing.
2. We strongly recommend that EDQ maintain the targets for diverse housing options in the current development scheme, to suit a range of households that provide either:
 - diversity in tenure (e.g., build-to-rent, key worker housing, over 50's retirement living, community housing provider-led development), retaining the requirement for universal design and adaptable design, or
 - a mix of dwelling types.
3. We strongly recommend that EDQ maintain robust requirements for housing diversity by retaining the requirement for universal design and adaptable design.

Development Charges and Offset Plan (DCOP)

4. We recommend that Item 2.9, which concerns development charges that do not apply to development undertaken by the State, or another entity representing the State, be widened to include:
 - Registered Community Housing Providers (CHP), delivering social and affordable housing.

Our understanding of the proposed amendments

Q Shelter understands that the proposed amendments to the development scheme seek to:

- Improve clarity, streamline development assessment, and provide greater certainty for industry, investors and the community.
- Key proposed changes include:
 - addressing requirements that add unreasonable costs to housing
 - removing red tape and duplication
 - increasing flexibility, and
 - simplifying and rationalising the document.
- We also understand the Development Charges and Offset Plan (DCOP) is seeking to balance social outcomes like liveability, connectivity and accessibility with economic feasibility.

Background

The current housing context poses significant challenges due to an insufficient supply of housing to meet existing and emerging community needs. Furthermore, Queensland's population is projected to grow significantly by 2046, resulting in even greater demand for housing. It is expected that an additional 2,160,700 people will reside in South-East Queensland alone, requiring 863,800 more dwellings. In Brisbane, the population is expected to grow by 463,000 people, requiring 210,800 additional dwellings¹.

The Queensland Government has set a target to construct 53,500 social and community homes by 2044. The Government has also committed to wider housing targets in response to significant unmet housing needs, including diverse housing types and tenures. There is a growing partnership between the Government and community housing providers, enabling them to engage in growth activities to meet the needs of diverse households, including those of people with significant vulnerabilities.

It is well established that access to affordable housing choices is increasingly difficult for individuals with low to moderate incomes, and this is also the case for many other demographic groups, such as women over 55 years old. There is a documented increase in demand for homelessness services, reflecting the overall lack of affordability and supply.

Within this context, the current Northshore Hamilton PDA seeks to ensure that 5% of its residential units are designated as social, public, or affordable housing.

Q Shelter has been and continues to contribute to various engagement processes led by the Queensland Government outlining comprehensive housing policies, investment, and reform recommendations. We welcome the Queensland Government's broader housing reforms, particularly those relating to the community housing sector, and firmly believe that a primary objective of all housing reforms should be to achieve a 'healthy housing system'— one in which supply meets demand, housing diversity and choice are key features, and homes are accessible to people across all income levels. Without specific interventions, housing markets have not delivered housing diversity and affordability for all people. We consider a healthy

¹ SEQ Regional Plan (2023 update)

https://www.planning.qld.gov.au/__data/assets/pdf_file/0024/86145/shapingseq-2023-Low.pdf

housing system to include housing diversity responsive to the needs of diverse people. Without adequate supply, inclusive of diverse housing types and tenures, the broader community and economy face significant costs, including rising visible homelessness, increased pressure on emergency services, and greater demands on local authorities as the management of public spaces becomes more complex.

1. Proposed amendments to the development scheme

In general, we believe PDAs, such as the Northshore Hamilton PDA, provide a crucial opportunity for the Queensland Government and EDQ to deliver much-needed social, public 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 Queensland's broader housing supply, diversity and affordability challenges.

In short, the proposed amendments to the development scheme remove key and essential housing diversity and affordability objectives. Namely –

- Changes to the **PDA Vision** – including changes to the stated sustainability and environmental aims
- Changes to **PDA-wide Criteria** – Removing the requirement for universal design, adaptable design, and tenure variety and deleting the provision requiring a minimum of five percent of the total residential Gross Floor Area (GFA) to be dedicated to public, social, and affordable housing.

This is obviously of significant concern to Q Shelter and its members. We believe these elements are essential for providing the appropriate housing required in these locations and directing market activity and investment into housing projects that achieve this optimal mix.

It is well documented that intentional strategies to promote housing diversity and affordability consistently outperform less coordinated efforts focused solely on increasing supply. Inclusionary planning tools leverage significant quantities of affordable housing supply in many parts of the United Kingdom and the United States². They are also being explored in South Australia and New South Wales. Up until this point, Queensland has been seen as a leader in planning, with targets embedded in PDAs and the SEQ Regional Plan (2023 Update). To maintain this leadership, it is important that the proposed amendments build on these achievements rather than diminish them.

The proposed changes would not only dilute the intent to deliver more affordable housing that specifically targets low- to moderate-income households, but they will likely also decrease the likelihood of partnerships with community housing providers (CHPs). The current targets provided legitimate incentives for developers to collaborate with CHPs, allowing them to access significant funding for the development of social and affordable housing in these areas from the state and federal governments. While we acknowledge that EDQ has progressed several market-led opportunities for CHPs in the past 18 months, these have been backed by grant funding and intentional coordination.

As such, we strongly recommend that EDQ maintain the targets in the current development scheme, providing for a minimum of 5% total residential GFA as high-quality social or

² Inquiry into increasing affordable housing supply: evidence-based principles and strategies for Australian policy and practice, AHURI, April 2018

affordable housing, or alternatively, adopt the SEQ Regional Plan target of 20% of all new homes being designated as social and affordable housing.

We strongly recommend that EDQ maintain the targets for diverse housing options under Item 2.5.5 (i) – Housing diversity:

- retaining the requirement for universal design, adaptable design, and tenure variety; and
- diversity in tenure (e.g. build-to-rent, key worker housing, over 50's retirement living, community housing provider-led development), or
- a mix of dwelling types.

2. Development Charges and Offset Plan (DCOP).

Our main feedback regarding the DCOP concerns the use of exceptions from Development Charges.

We recommend that Item 2.9, which concerns development charges that do not apply to development undertaken by the State, or another entity representing the State, be widened to include:

- Registered Community Housing Providers (CHP), delivering social and affordable housing.

3. 2032 Brisbane Games-pressures and impacts on housing markets, including in the Northshore Hamilton PDA

Q Shelter is on the record urging the Queensland Government to set targets for social and affordable housing within the legacy of Athletes' Village housing stock, to be incorporated into a broader 2032 Olympic Games housing legacy plan. Additionally, we advocate for the role of CHPs in managing that stock both before and after the games to align with the government's broader housing objectives and ensure a measurable legacy in this respect. Whilst the village location is outside of the Northshore Hamilton PDA, this proposed policy approach is relevant to the PDA.

Outside of the Athletes' Villages, we also expect housing market pressures to intensify in SEQ due to hosting the games. We know that hosting mega events tends to expedite major urban renewal and infrastructure projects. Without early planning for social and affordable housing, the delivery of new infrastructure and facilities drives up real estate prices and exacerbates displacement pressures, particularly for low-income renter households. In the context of a sustained housing crisis in Queensland, a further escalation in housing costs and rents risks pushing more households toward housing insecurity and homelessness.

In October 2024, Q Shelter, with the support of the Australian Housing and Urban Research Institute (AHURI), developed the first SEQ Housing Market and Displacement Monitoring Report. This wide-ranging report examines various factors, including their impact on local housing systems, such as housing market prices, stock movements, evictions, and increasing community displacement. It will be measured annually in the lead up to the Games, and in the years following, to better understand the impact of the Games-related pressures on the housing system.


It is our strong view that without an intentional approach to housing diversity and affordability, such as embedded social and affordable housing targets in planning schemes, low-to-moderate income households will be displaced from these areas, away from essential services, into regions that are not equipped to meet the demand.

Further contact

Q Shelter appreciates the opportunity to provide input to the PDA consultation process. We have also linked below recent submissions to related bills and inquiries for background purposes.

For further questions or contact, please liaise with our General Manager, Policy & Strategic Engagement, Jackson Hills at Jackson.Hills@qshelter.asn.au.

Yours sincerely



Fiona Caniglia
Chief Executive Officer
Q Shelter

Attachments

Attached below are recent submissions to related bills and inquiries, where Q Shelter has sought to make similar proposals –

1. [Submission on Economic Development and Other Legislation Amendment Bill 2024](#)
2. [Economic Development \(Affordable Housing\) Amendment Regulation 2024](#)
3. [Q Shelter / AHURI SEQ Housing Market and Displacement Monitoring Report, 2024 edition](#)