

National Shelter Project

Recommendations for
Public and Social Housing
Laws in Queensland

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Executive Summary

This report, prepared for National Shelter, presents an analysis of Queensland's housing crisis and proposes legal and policy reforms to enhance access to affordable and social housing. Drawing on national and state-level data, legislative analysis, and best-practice models, it identifies the structural drivers of housing insecurity and outlines actionable recommendations for reform.

The Housing Crisis in Queensland

Queensland, like the rest of Australia, faces an escalating housing affordability crisis. Key contributors include declining home ownership rates, a growing reliance on the private rental market, and a shrinking social housing sector. Rental stress — defined as spending more than 30% of income on housing — disproportionately affects young people, the unemployed, renters, and low-income households. Homelessness is on the rise, particularly among youth, older Australians, and Aboriginal and Torres Strait Islander peoples.

Legislative Fragmentation and Inconsistent Definitions

A core challenge is the fragmented and inconsistent approach to defining and regulating affordable housing across Queensland's legislative instruments. The *Housing Act 2003* (Qld), *Housing Regulation 2015* (Qld), *Planning Act 2016* (Qld), and *Economic Development Act 2012* (Qld) each approach affordable housing differently, creating ambiguity and inefficiencies. This complexity hampers effective policy implementation and hinders coordinated responses to housing need.

Evaluation of Current Housing Initiatives

While programs such as Build to Rent and Helping Hand Headlease offer targeted relief, their limited scale and reliance on market dynamics reduce long-term impact. Similarly, strict eligibility criteria for social housing exclude many in need, and initiatives like the Sales to Tenants program are insufficient to address structural undersupply.

Recommendations for Reform

The report makes two key recommendations:

1. Mandatory Inclusionary Zoning

The Queensland Government should mandate that a percentage of all new developments be allocated to affordable and social housing. This approach—successfully implemented in South Australia, New South Wales, and international jurisdictions—offers clarity for developers and delivers long-term affordable housing supply without reliance on government funding alone.

2. Housing First Approach to Homelessness

Instead of reactive emergency responses, a 'housing first' model should be adopted. This model prioritises permanent housing as a foundation for addressing the complex needs of homeless individuals and has demonstrated cost-effectiveness and improved social outcomes in various jurisdictions.



Extent of Current Housing Crisis

Who Is Impacted?

Socio-Demographic Characteristics

The Household Income and Labour Dynamics in Australia (HILDA) survey reveals that the following socio-demographic groups are most vulnerable to entering housing stress:¹

1. **Age:** Young to early middle-aged adults (18-44 years) are at the highest risk, with those aged 18-24 being 214% more likely to enter housing stress compared to older adults (65+ years). This risk decreases slightly to 154% for those aged 25-34 and 156% for those aged 35-44.
2. **Employment Status:** Those who are unemployed are 144% more likely to experience housing stress compared to those in full-time employment. Retired individuals are 78% more likely to enter housing stress.
3. **Education Level:** Individuals without a college or university education are 78% more likely to enter housing stress than those with higher education.
4. **Housing Tenure:** Renters, both in private and social housing, are 125% more likely to enter housing stress compared to homeowners.
5. **Geographical Location:** The Northern Territory, particularly areas outside of Darwin, has the highest proportion of the population at risk, with 5.8% of people exhibiting the three main risk characteristics: being young to early middle-aged, unemployed, and living in rental housing. In all other areas, this proportion is below 4%.

Critical Life Events

The HILDA survey also identified several critical life events that increase the risk of housing stress:²

1. **Birth/Adoption of a Child:** Individuals experiencing the birth or adoption of a child are 34% more likely to enter housing stress.
2. **Family Care:** Providing care to a family member increases the risk by 15%.
3. **Marital Changes:** Separation from a partner increases the risk by 30%, while divorce increases it by 15%.
4. **Employment Changes:** Entering unemployment (through either being fired or made redundant) increases the likelihood of housing stress by 14%.

Where Is The Crisis Worst?

Housing Costs by Geographic Location and Tenure Type

The Australian Bureau of Statistics (ABS) Survey of Income and Housing (SIH) reported housing occupancy and costs for the 2019-2020 financial year.³ This report indicated that housing costs as a proportion of income varied significantly across Australian states and territories. For the purposes of

¹ Milad Ghasri, Wendy Stone, Hazel Easthope and Piret Veeroja, *Predicting risk to inform housing policy and practice* (AHURI Final Report No. 393, 2022) 2-3.

² Ibid 3.

³ ABS, *Survey of Income and Housing* (2022).



the SIH report, lower income households were those containing 38% of persons between the 3rd and 40th percentiles of equivalised disposable household income. For lower income households, the data revealed the following:⁴

- **All renting households:** The average Queensland home spent 11.6% of its income on housing. In New South Wales (NSW), households spent 14.6%, the highest in Australia. Tasmania had the lowest housing cost burden among renters, at 9.7%.
- **Homeowners with or without a mortgage:** For this group, housing costs in Queensland accounted for 48.5% of income. NSW had the highest proportion at 50.5%, while the Australian Capital Territory (ACT) had the lowest, at 34.4%.⁵

Rental Stress Among Low-Income Households

Rental stress is defined as spending more than 30% of household income on rent. This has been an increasingly pressing issue, particularly in the private rental market. The data from 2019-20 indicates an alarming rise in rental stress over the years, with significant geographic disparities:⁶

- **Greater Capital City Areas:** The proportion of low-income households experiencing rental stress rose from 38.5% in 2007-08 to 45.1% in 2019-20. This trend reflects the increasing unaffordability of housing in urban areas, driven by high demand and limited supply.
- **Rest of State Areas:** Outside of capital cities, rental stress also increased, but to a lesser extent. The percentage of low-income households in rental stress grew from 29.5% in 2007-08 to 36.0% in 2019-20.

How Australians are Being Impacted

1. Home Ownership Decline

Historically, home ownership has been the dominant form of tenure in Australia, with rates exceeding 70% in the 1960s. However, this figure has been steadily declining, dropping to 66% in 2021.⁶ This decline is particularly pronounced among younger and middle-aged households, who are finding it increasingly difficult to enter the property market.⁷ This trend suggests a growing divide between older Australians, who are more likely to own their homes, and younger generations, who face barriers due to high property prices and other economic factors.

2. The Rising Private Rental Sector

The private rental sector now accommodates 26% of Australian households, marking a significant shift from home ownership and social housing over the past few decades.⁸ The rental

⁴ Australian Bureau of Statistics, *Estimating Homelessness* (Catalogue No. 4130.0 2019-20).

⁵ Ibid.

⁶ Australian Bureau of Statistics, *Housing: Census* (online, 25 May 2022).

⁷ Hal Pawson, Chris Martin, Julie Lawson, Stephen Whelan, Fatemeh Aminpour, *Assisting first homebuyers: an international policy review* (AHURI Final Report No. 381, 2022) 18.

⁸ Kath Hulse, Margaret Reynolds, Christian Nygaard, Sharon Parkinson, Judith Yates, *The supply of affordable private rental housing in Australian cities: short-term and longer-term changes* (AHURI Final Report No. 323, 2019) 1.



market has seen a dramatic rise in prices, pushing the cost of renting beyond the reach of many. The volatility of this sector is evident in the rapid turnover of properties and landlords, particularly in major cities, where more than half of rental properties exit the sector within five years of initial observation.⁹ This instability is contributing to structural insecurity for renters, who increasingly face the prospect of long-term or perpetual renting.¹⁰

3. Social Housing: A Sector in Decline

Australia's social housing sector, including public, community, and Indigenous-controlled housing, has also seen a significant decline. Currently, it houses just 4% of all households, down from over 6% in the mid-1990s.¹¹ The sector's decline can be attributed to a persistent deficit in funding and resources, which has led to a reduction in new social housing projects and an increase in the strain on existing housing.

Homelessness

Key Statistics

The 2021 Census estimated that 122,494 people were experiencing homelessness in Australia on Census night, marking a 5.2% increase from 2016. The overall homelessness rate decreased slightly to 48 people per 10,000, down from 50 in 2016. Notably, males comprised 55.9% of the homeless population. The data also revealed that young people aged 12-24 years accounted for 23% of all homeless individuals.¹²

Demographic Analysis

- **Youth Homelessness:** Young people aged 12-24 years constitute nearly a quarter of the homeless population. Despite a slight decrease in the rate from 73 per 10,000 in 2016 to 71 in 2021, youth homelessness remains a critical concern. Young females are more likely than males to be in supported accommodation or temporarily staying with other households, while young males are more likely to be in improvised dwellings or severely crowded conditions.¹³
- **Older Australians:** Australians aged 55 years and over represent 15.8% of the homeless population. The rate of homelessness in this group decreased from 29 per 10,000 in 2016 to 26 per 10,000 in 2021. Older males are more likely to live in improvised dwellings or boarding houses, while older females are more commonly in supported accommodation or temporarily staying with others.¹⁴

⁹ Chris Martin, Kath Hulse, Milad Ghasri, Liss Ralston, Laura Crommelin, Zöe Goodall, Sharon Parkinson, Eileen Webb, *Regulation of residential tenancies and impacts on investments* (AHURI Final Report No. 391, 2022) 2.

¹⁰ Pawson et al (n 7).

¹¹ *Making the Best Use of Public Housing* (New South Wales Auditor General's Report, 30 July 2013) 2; Peter J Boxall, Ed Willett, Deborah Cope, *Review of Rent Models for Social and Affordable Housing* (IPART, July 2017) 1-2.

¹² Australian Bureau of Statistics (n 6).

¹³ Ibid.

¹⁴ Ibid.



- **Aboriginal and Torres Strait Islander Peoples:** Indigenous Australians are disproportionately represented in the homeless population, accounting for 20.4% of all homeless individuals. The 2021 Census estimated that 24,930 Aboriginal and Torres Strait Islander people were experiencing homelessness, a 6.4% increase from 2016. 60% were living in severely crowded dwellings, reflecting systemic issues in housing availability and quality.¹⁵

Homelessness by Operational Groups

The ABS classifies the homeless population into six operational groups, which provide insight into the living conditions of those experiencing homelessness. The 2021 Census found:

- **Severely Crowded Dwellings:** 39.1% of the homeless population lived in severely crowded dwellings in 2021, representing the largest group.¹⁶
- **Supported Accommodation:** 19.8% were in supported accommodation for the homeless.¹⁷
- **Boarding Houses:** 18.1% lived in boarding houses, a group that saw a 26.5% increase since 2016.¹⁸
- **Improvised Dwellings:** Between 2016 and 2021, there was a 6.9% decrease in people living in improvised dwellings, tents, or sleeping out, partly due to COVID-19 response measures.¹⁹

Definitions of Affordable Housing

The term 'affordable housing', although a centrepiece of the discussion on the Australian housing crisis, does not have a uniform definition in Queensland legislation. The *Housing Act 2003* (Qld) and *Housing Regulation 2015* (Qld) do not address this issue head-on. Instead, what amounts to 'affordable housing' in the *Housing Act 2003* (Qld) is complicated by a number of other related terms: 'social housing', 'community housing', 'public housing', and 'crisis accommodation'. This is symbolic of the Queensland government's piece-meal approach to defining 'affordable housing' and responding to the growing housing crisis.

Nevertheless, an analysis of the *Housing Act 2003* (Qld) and *Housing Regulation 2015* (Qld), along with the *Planning Act 2016* (Qld), *Planning Regulation 2017* (Qld) and *Economic Development Regulation 2023* (Qld), reveals definitions that have become increasingly detailed over time – potentially reflecting the rising prominence of Australia's housing crisis.

The *Housing Act 2003* (Qld) does not have a definition of 'affordable housing'. The *Housing Regulation 2015* (Qld) indirectly defines 'affordable housing' as housing that is affordable to low to moderate income earners. The *Planning Act 2016* (Qld) defines an 'affordable housing component' as a development that complies with the criteria prescribed by regulation. The *Planning Regulation 2017* (Qld) defines an 'affordable housing component' as, among other things, housing that is appropriate to the needs of households with low to moderate incomes (i.e., if it costs less than 30% of the household's pre-tax income). The *Economic Regulation 2023* (Qld) defines 'affordable housing' differently for key stakeholders, including very low income households and low to moderate income households.

Drawing all of the above definitions together, the Queensland government's attempts to define 'affordable housing' has resulted in a workable framework for addressing the housing crisis in

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.



Queensland. However, by defining ‘affordable housing’ across a number of different legislative enactments and supplementary instruments, the result is nevertheless confusing and suboptimal.

The Queensland Government’s Definition of ‘Affordable Housing’

Housing Act 2003 (Qld)

Generally, housing in Queensland is governed by the *Housing Act 2003* (Qld).²⁰ One of the two ‘main objects’ of the *Housing Act 2003* (Qld) is ‘to improve the access of Queenslanders to safe, secure, appropriate and affordable housing’.²¹ However, the term ‘affordable housing’ is not defined in the *Housing Act 2003* (Qld).²² Further, the explanatory notes to the *Housing Act 2003* (Qld) do not provide any guidance on what ‘affordable housing’ means.²³ Rather, the *Housing Act 2003* (Qld) approaches the issue through related but distinct terms, including: ‘social housing’, ‘community housing’, ‘public housing’, and ‘crisis accommodation’.

The *Housing Act 2003* (Qld) states that its objects are to be achieved by making provision for ‘housing-related activities carried on by the State’, including by ‘providing public housing and other housing services’.²⁴ ‘Public housing’ is defined in the *Housing Act 2003* (Qld) as ‘a social housing service provided directly by the State’.²⁵ A ‘social housing service’ is defined as ‘the provision of housing to an individual for residential use, other than crisis accommodation’.²⁶ There is one other related term – that being ‘community housing service’ – which is defined as ‘a social housing service that is not public housing’.²⁷

It is important to clarify what the difference between ‘public housing’, ‘social housing’ and ‘community housing’ is. The *Housing Act 2003* (Qld) itself does not provide the answer. ‘Public housing’ and ‘community housing’ are both forms of ‘social housing’. The Queensland government has defined ‘public housing’ as ‘social housing managed by the Queensland Government’.²⁸ ‘Community housing’ has been defined as ‘social housing assistance delivered by non-governmental organisations, local governments and community organisations’.²⁹ Both are intended to be for people who are in need of housing assistance who cannot access other forms of housing.³⁰ The key distinction is that ‘public housing’ is a

²⁰ For the full list of legislation relating to housing in Queensland, see <https://www.housing.qld.gov.au/news-publications/legislation/current>.

²¹ *Housing Act 2003* (Qld), s 4(a).

²² *Housing Act 2003* (Qld), s 7 and Schedule 4.

²³ Explanatory Notes, Housing Bill 2003 (Qld). For a full version, see: <https://www.legislation.qld.gov.au/view/pdf/bill.first.exp/bill-2003-989>.

²⁴ *Housing Act 2003* (Qld), s 5(a)(i).

²⁵ *Housing Act 2003* (Qld), s 8(4).

²⁶ *Housing Act 2003* (Qld), s 8(2).

²⁷ *Housing Act 2003* (Qld), s 8(3).

²⁸ Queensland Government, ‘How to apply’, *Homes and housing: Guide to applying for housing assistance* (Web Page) <<https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/apply-for-housing#:~:text=Public%20housing%20is%20long%2Dterm,After%20you%20apply>>.

²⁹ Queensland Government, ‘How to apply’, *Homes and housing: Guide to applying for housing assistance* (Web Page) <<https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/apply-for-housing#:~:text=Public%20housing%20is%20long%2Dterm,After%20you%20apply>>.

³⁰ Queensland Government, ‘How to apply’, *Homes and housing: Guide to applying for housing assistance* (Web Page) <<https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/apply-for-housing#:~:text=Public%20housing%20is%20long%2Dterm,After%20you%20apply>>.



form of social housing provided by the Queensland Government, while 'community housing' is a form of social housing provided by non-governmental organisations and private providers.

Although it is not clearly stated in the *Housing Act 2003* (Qld), 'public housing' and 'community housing' are intended to be 'affordable housing' for individuals that are in need of housing assistance.³¹ Therefore, the *Housing Act 2003* (Qld) establishes a framework for what affordable housing is, and helps define it by reference to 'public housing' and 'community housing'.

Housing Regulation 2015 (Qld)

The *Housing Regulation 2015* (Qld) supports the *Housing Act 2003* (Qld). The *Housing Regulations 2015* (Qld) primarily does this by legislating with regards to 'community housing'. It does this through two programs: the Housing Investment Fund program and the Build-To-Rent pilot project.³²

The Housing Investment Fund program is a program administered by the Queensland Government that 'seeks to deliver community housing and affordable housing to low to moderate income earners' by subsidising and encouraging private providers (i.e., developers, builders, etc.) to build and operate 'community housing and affordable housing' in Queensland.³³ As noted above, community housing is social housing which is provided by private providers.

The Build to Rent pilot project is a program administered by the Queensland Government that 'seeks to deliver affordable housing to low to moderate income earners by providing rent subsidies to developers to encourage the development of affordable housing in Queensland.'³⁴

The *Housing Regulation 2015* (Qld) does not define 'affordable housing'. However, by explaining what the Housing Investment Fund program is, the *Housing Regulation 2015* (Qld) indicates that 'affordable housing' is directed towards low to moderate income earners. Therefore, the *Housing Regulation 2015* (Qld) provides an indirect definition of 'affordable housing' – housing for low to moderate income earners.

Planning Act 2016 (Qld) and Planning Regulation 2017 (Qld)

The other piece of general legislation which governs housing in Queensland is the *Planning Act 2016* (Qld). The *Planning Act 2016* (Qld) has always been intended to facilitate 'housing choice, diversity and affordability',³⁵ but did not originally define affordability.³⁶

However, the *Planning Act 2016* (Qld) was recently amended.³⁷ The new amendment relevantly empowers the Queensland Government, when considering a development application, to impose a

[applying-for-housing/guide-to-applying-for-housing-assistance/apply-for-housing#:~:text=Public%20housing%20is%20long%2Dterm,After%20you%20apply](https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/apply-for-housing#:~:text=Public%20housing%20is%20long%2Dterm,After%20you%20apply)>.

³¹ Queensland Government, 'How to apply', *Homes and housing: Guide to applying for housing assistance* (Web Page) <<https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/apply-for-housing#:~:text=Public%20housing%20is%20long%2Dterm,After%20you%20apply>>.

³² *Housing Regulation 2015* (Qld), ss 19B and 19C.

³³ *Housing Regulation 2015* (Qld), ss 19C(1)(a)–(b).

³⁴ *Housing Regulation 2015* (Qld), s 19B.

³⁵ *Planning Act 2016* (Qld), s 5(2)(f).

³⁶ *Planning Act 2016* (Qld), s 6 and Schedule 2; explanatory notes do not assist: Explanatory Notes, *Planning Bill 2015* (Qld). For a full version, see: <https://www.legislation.qld.gov.au/view/pdf/bill.first.exp/bill-2015-047>.

³⁷ *Housing Availability and Affordability (Planning and Other Legislation Amendment) Act 2024* (Qld).



condition that the development include an affordable housing component,³⁸ if the development approval either proposes an affordable housing component itself, or seeks to be a 'state facilitated development'.³⁹ However, the *Planning Act 2016* (Qld) does not define an 'affordable housing component'.

The *Planning Regulation 2017* (Qld) is the supporting regulation for the *Planning Act 2016* (Qld). It defines an affordable housing component as containing one or more of the following criteria:⁴⁰

- (a) housing that is appropriate to the needs of households with low to moderate incomes, if the members of the households will spend no more than 30% of gross income on housing costs;
- (b) housing provided by a registered provider for residential use;
- (c) housing provided as part of a program, funded by any of the following entities, to support the provision of housing that is affordable—
 - (i) a public sector entity under the Public Sector Act 2022, section 8;
 - (ii) a local government;
 - (iii) the State;
 - (iv) the Commonwealth;
- (d) housing that is sold for an amount that is less than the first home concession limit due to the type, composition, method of construction, size or level of finish of the housing;
- (e) housing that is rented at or below a value that is affordable for households with low to moderate incomes due to the type, composition, method of construction, size or level of finish of the housing.

Subsection (a) is the most relevant in attempting to define 'affordable housing'. Subsection (a) states that an 'affordable housing component' is housing that is appropriate for low to moderate income households, if the members of the households will spend no more than 30% of their gross (pre-tax) income on housing costs. The average (median) Queenslanders working full-time earns \$70,200 annually.⁴¹ Therefore, an 'affordable housing component', for the median Queensland earner, is housing which costs \$405 per week in rent or mortgage repayments. However, what constitutes 'affordable housing' will be relative to each household income.

Alternatively, subsection (d) states that housing is affordable if it is sold for less than the first home concession limit – \$800,000.⁴² To afford to purchase a house at this price without risking mortgage stress, an annual gross income of approximately \$150,000 is required.⁴³ This amount may exceed or, at the least, be on the edge of the 'moderate income' definition, which is 170% of the national median

³⁸ *Planning Act 2016* (Qld), ss 60(2)(c), 65A(1)(b); Explanatory Notes, Housing Availability and Affordability (Planning and Other Legislation Amendment) Bill 2023, 2, 3.

³⁹ Explanatory Notes, Planning and Other Legislation Amendment Regulation 2024 (Qld), 3, 6. For a full version, see: <https://www.legislation.qld.gov.au/view/pdf/published.exp/sl-2024-0123>. A state facilitated development is essentially a fast-track for developers, which is only available if at least 15% of the dwellings from that development are affordable housing (s 51A *Planning Regulation 2017*).

⁴⁰ *Planning Regulation 2017* (Qld), s 43C(1).

⁴¹ Australian Bureau of Statistics, 'Employee earnings: August 2024', *Statistics* (Web Page) <<https://www.abs.gov.au/statistics/labour/earnings-and-working-conditions/employee-earnings/aug-2024#key-statistics>>.

⁴² Queensland Revenue Office, 'First home concession' (Web Page) <<https://qro.qld.gov.au/duties/transfer-duty/concessions/homes/first-home/>>; *Duties Act 2001* (Qld), schedule 4A, column 1.

⁴³ Home Loan Experts, 'What Income is Needed to Buy a House?' (Web Page) <<https://www.homeloanexperts.com.au/home-loan-articles/what-income-buy-house/>>.



income of \$88,400 (i.e., \$150,280).⁴⁴ This suggests some potential incongruity between sub-sections (a) and (d), as such an income may be on the upper bounds of 'moderate income'. Alternatively, this suggests that the Queensland Government is focused on ensuring that low to moderate income households can rent, and that high income households can purchase a home.

Subsections (c) and (d) automatically deems housing to be affordable if provided by a registered provider or the Government.

However, subsection (e) provides a circular and evasive definition of affordable housing. Such definitions could potentially allow developments to claim to be providing affordable housing, whilst in fact not doing so.

Economic Development Act 2012 (Qld) and Economic Development Regulation 2023 (Qld)

Recently, the *Economic Development Act 2012* (Qld) was amended to insert provisions that relate to affordable housing. Relevantly, '[t]he EDOLA Act creates a head of power for the Minister for Economic Development Queensland (MEDQ) to require developers to provide ... affordable housing ... when developing land in a priority development area (PDA)'.⁴⁵ Therefore, this legislation only applies to priority development areas – otherwise the *Planning Act 2016* (Qld) applies.⁴⁶

The *Economic Development Act 2012* (Qld) defines affordable housing as housing that is affordable to particular types of households under criteria prescribed by regulation for the particular type of household.⁴⁷ Affordable housing is specifically distinguished from social housing.⁴⁸

The *Economic Development Act 2012* (Qld) is currently supported by the *Economic Development Regulation 2023* (Qld). Very recently, amendments to this regulation entered into force through the *Economic Development (Affordable Housing) Amendment Regulation 2024* (Qld). The *Economic Development Regulation 2023* (Qld) now establishes particular 'criteria for affordable housing as it will apply to the Economic Development Act 2012'.

The *Economic Development Regulation 2023* (Qld) defines 'affordable housing' as housing that is affordable for 'very low income households' and 'low to moderate income households'.⁴⁹ They are as follows:

- **Very low income households.**⁵⁰ Housing is affordable if it is provided for rental by a registered provider under the *Housing Act 2003* (Qld) (or as part of a program) at an affordable rent for very low income households. A registered provider under the *Housing Act 2003* (Qld) is a

⁴⁴ Australian Bureau of Statistics, 'Employee earnings: August 2024', *Statistics* (Web Page) <<https://www.abs.gov.au/statistics/labour/earnings-and-working-conditions/employee-earnings/aug-2024#key-statistics>>.

⁴⁵ Karen Trainor, Wendy Evans, Megan Duane and Samuel Ng, 'New Affordable Housing Criteria for Queensland: Draft Criteria Released', *Insights* (Web Page) <<https://www.claytonutz.com/insights/2024/july/new-affordable-housing-criteria-for-queensland-draft-criteria-released>>.

⁴⁶ To see which areas in Qld are currently considered priority development areas, see Economic Development Queensland, 'Priority Development Areas (PDA)' (Web Page) <<https://www.edq.qld.gov.au/our-work/priority-development-areas-pda>>.

⁴⁷ *Economic Development Regulation 2023* (Qld), s 2B(1).

⁴⁸ *Ibid* s 2B(2).

⁴⁹ *Ibid* s 2B(1)(a), (b). Also, key worker households and first home buyer households: ss 2B(1)(c)–(d).

⁵⁰ *Ibid* s 2B(2).



national provider or a state provider (i.e., the Queensland Government or Commonwealth government).⁵¹ 'Affordable rent' means not more than 30% of the gross (pre-tax) income of the household. This is a very similar definition of 'affordable housing' to that under the *Planning Regulation 2017* (Qld), s 43C(1)(a).

- **Low to moderate income households.** Housing is affordable if (for example) it is provided for rental by a registered provider under the *Housing Act 2003* (Qld) at an affordable rent for low to moderate income households; or if it is provided for rental at a rent of not more than 74.9% of the market rent of the housing; or if the housing has a market rent that is not more than the affordable rent for low to moderate income households in the local government area in which the housing is located.⁵²

In both definitions, housing is considered affordable if it is 'at an affordable rent for very low income households' or 'at an affordable rent for very low income households', respectively. The *Economic Development Regulation 2023* (Qld) defines 'affordable rent' as 'rent for not more than 30% of the gross income of the household'.⁵³ Therefore, two questions remain: what is a 'very low income household', and what is a 'low to moderate income household'? The *Economic Development Regulation 2023* (Qld) defines 'very low income households' as those that earn less than 50% of the median household income in their local government area.⁵⁴ It defines 'low to moderate income households' as households that earn between 50% and 120% of the median household income in their local government area.⁵⁵

For very low income households, the legislation acknowledges that affordable housing is only achieved through government initiatives.⁵⁶

It is worth summarising the definition of 'affordable housing' as it appears in *Economic Development Regulation 2023* (Qld), as there are a number of different components. It will be broken down into two groups which are the focus of the *Economic Development Regulation 2023* (Qld): 'very low income households', and 'low to moderate income households'.

Housing is 'affordable housing' for 'very low income households' if:

- it is provided for rental by the Queensland Government or Commonwealth government (or as part of a program funded by a local government, State government, or the Commonwealth),⁵⁷
- rent is not more than 30% of the gross (pre-tax) income of the household, and
- the household income is less than 50% of the median household income in the household's local government area.

Housing is 'affordable housing' for 'low to moderate income households' if:

⁵¹ Ibid ss 2B(2)(iii)–(iv).

⁵² Ibid s 2B(3).

⁵³ Ibid s 2A.

⁵⁴ Ibid.

⁵⁵ Ibid.

⁵⁶ Ibid s 2B(3)(c).

⁵⁷ Note: this would include funding provided by the government to non-governmental organisations and private providers that provide community/social housing.



- it is provided for rental by the Queensland Government or Commonwealth government (or as part of a program funded by a local government, State government, or the Commonwealth),⁵⁸
- rent is 'affordable rent' (i.e., not more than 30% of the gross (pre-tax) income of the household), and
- the household income is between 50% and 120% of the median household income in the household's local government area.

Housing may be 'affordable housing' for 'low to moderate income households' by different definitions, however, including if:

- the housing is provided for rental at a rent of not more than 74.9% of the market rent of the housing,
- the housing has a market value that is not more than the affordable purchase price for low to moderate income households in the local government area in which the housing is located,
- the housing has a market value that is not more than 20 times the affordable rent, calculated on a yearly basis, for low to moderate income households in the local government area in which the housing is located, or
- the housing has a market rent that is not more than the affordable rent for low to moderate income households in the local government area in which the housing is located.

Therefore, whether or not housing is 'affordable housing' under the *Economic Development Regulation 2023* (Qld) for each individual households depends on the household's yearly income, and the median household income in the household's local government area. It also requires the housing to be 'social housing' – either 'public housing' provided by the government, or 'community housing' provided by a non-governmental organisation which is part of a program subsidised by the government.

Commentary on Existing Affordable Housing Initiatives

This section outlines the various initiatives being undertaken to address the housing crisis.

Rental Support

Build to Rent Programs

Build to Rent (**BTR**) is a housing initiative supported by both State and Federal governments to increase the supply of rental properties.⁵⁹ The model incentivises developers and private investors to construct residential buildings intended exclusively for long-term rental, rather than for sale to individual owner-occupiers. Each development is typically owned and managed by a single entity, allowing for consistent tenancy management.

⁵⁸ Note: this would include funding provided by the government to non-governmental organisations and private providers that provide community/social housing.

⁵⁹ Queensland Government, *What is build-to-rent and how will it shape housing in Queensland?* (Web Page, 4 October 2023) <<https://www.statedevelopment.qld.gov.au/news-and-events/what-is-build-to-rent-and-how-will-it-shape-housing-in-queensland>>.



While BTR projects in Australia have traditionally focused on high-end developments, more recent projects have begun to include a broader mix of housing options, including those aimed at meeting community housing needs.

As part of a pilot initiative, three BTR developments in inner Brisbane are currently under construction. The program's practical impact remains to be seen. Nevertheless, BTR is already a more established model in countries such as the United Kingdom and the United States, where it plays a more significant role in the rental housing market.⁶⁰

Helping Hand Headlease

The Helping Hand Headlease program supports people facing barriers to accessing private rental housing. Introduced in 2018, it involves the Queensland Government leasing a private rental property and subletting it to an eligible tenant.⁶¹ If the tenant successfully maintains the tenancy for two years, the lease can be transferred directly into their name, allowing them to continue independently.

To access the program, individuals contact their local Housing Service Centre (HSC). RentConnect officers assist in identifying and applying for a suitable rental property. If the application is successful, the government enters into the lease with the landlord and then subleases the property to the tenant.

The program is designed for individuals whose rental applications are often unsuccessful due to their personal circumstances. These may include victims of domestic and family violence, young people leaving care, people with limited rental history, those experiencing racial discrimination, individuals exiting social housing or supported accommodation, and people with mental health conditions. By providing a government-backed lease, the scheme allows tenants to build a positive rental record, improving their chances of securing housing independently in the future.

However, it is important to note that the scheme only assists those who can afford current private rental rates, and does not help those completely priced out of the market.

From July 2018 to January 2022, the program supported 422 new households. Almost all HSCs took part, with the highest participation seen in Ipswich, followed by Townsville, Maryborough, Maroochydore, Logan, and Bayside.⁶²

⁶⁰ Queensland Treasury, 'Build to Rent: A proposal to deliver more affordable housing for Queenslanders' *Build to Rent* (Discussion Paper, 28 March 2023) 1 <<https://www.treasury.qld.gov.au/resource/build-to-rent-a-proposal-to-deliver-more-affordable-housing-for-queenslanders/>>.

⁶¹ Queensland Department of Housing and Public Housing, *Life seems a lot easier now* (Web Page, 5 December 2024) <<https://www.housing.qld.gov.au/news-publications/news/life-seems-a-lot-easier-now>>.

⁶² Question on Notice No. 52, Minister for Communities and Housing, Minister for Digital Economy and Minister for the Arts (23 February 2022) <<https://documents.parliament.qld.gov.au/tableoffice/questionsanswers/2022/52-2022.pdf>>.



Social Housing

Eligibility for Social Housing in Queensland

Due to high demand and limited availability, social housing in Queensland is allocated based on strict eligibility requirements so it reaches those most in need. To be eligible, an applicant must: (a) be a resident of Queensland; (b) be an Australian citizen or have permanent residency in Australia; (c) not own or part-own any type of property in Australia or overseas; (d) have an independent income so that they can pay rent and financially manage a tenancy; (e) meet prescribed asset and income limits associated with their particular household; and, (g) experience certain wellbeing factors (eg. have a reason to move, financial need or non-financial need).⁶³

The financial and wellbeing requirements are outlined below.

Financial Requirements

The asset eligibility requirement stipulates that the total liquid assets owned by an applicant and, if relevant, anybody listed on their application must not exceed certain limits. At time of writing, for a single-person household, this limit is \$116,375, while for households with two or more people, the limit is \$148,625.⁶⁴ Liquid assets include, but are not limited to, money, shares, fixed investments, managed funds, property trusts, superannuation payouts (if the person has reached preservation age), and the value of caravans, mobile homes, and live-aboard boats.⁶⁵ However, some assets are excluded from this calculation, including vehicles, home contents, and collectibles.⁶⁶

The income eligibility requirements are outlined in the below table.⁶⁷

Household Types	Household Weekly Gross Income Limit
• 5 single people • Couple with 3 or more children • Couple with 1 single person and 2+ children • Couple with 2 children and 1 single person • 2 couples with 1+ children • Other households with 5+ people including 2+ adults	\$1121
• Single person with 3+ children • 2 single people with 2 children • 3 single people and 1 child	\$999

⁶³ Queensland Government, 'Guide to applying for housing assistance', *Queensland Government* (Website, 18 June 2024) <<https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/check-your-eligibility>>.

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Ibid.

⁶⁷ Ibid.



• 4 single people • Couple with 2 children	
• Single person with 2 children • 2 single people and 1 child • 3 single people • Couple with 1 child • Couple and 1 single person	\$877
• Single person with 1 child • 2 single people • Couple with no children	\$755
• Single person, no children	\$609

[Note: this is current at time of writing, June 2025]

Wellbeing Requirement

An assessment of how an applicant's current housing situation affects their well-being is undertaken to ensure that those with more urgent and complex needs are prioritized for social housing assistance.⁶⁸ This assessment is based on three key well-being factors: (a) the applicant's reason to move houses; (b) complex non-financial needs; and (c) financial needs. An applicant is eligible if they can demonstrate one reason to move, two complex non-financial needs and one financial need.⁶⁹

Examples of recognised reasons to move include:

- homelessness or likely homelessness;
- domestic and family violence;
- sexual violence;
- unsuitable location;
- household needs to being met by current living situation; and
- unaffordability.⁷⁰

Examples of recognised complex non-financial needs include:

- serious, long-term medical issues;

⁶⁸ Ibid.

⁶⁹ Ibid.

⁷⁰ Ibid.



- homelessness or homelessness at least one time in the last three years;
- two evictions in the last three years;
- multiple unsuccessful private rental applications;
- lack of appropriate housing in private rental market;
- leaving the child protection system or youth custody or detention;
- domestic and family violence;
- sexual violence; and
- other safety concerns.⁷¹

Examples of recognised complex non-financial needs include:

- unemployment for a continuous period of 12 months or more;
- current unemployment and frequent unemployment over the last 12 months;
- high living costs, an inability to work due to serious, long-term medical issues and financial hardship due to continuing medical expenses; and
- earning, through any employment, an amount less than the above income eligibility limits.⁷²

Sales to Tenants Program

The Queensland Sales to Tenants program offers public housing tenants the opportunity to purchase the department-owned home they currently rent, provided that property is actually available for sale.⁷³ Outgoing tenants who no longer meet the eligibility criteria to remain in public housing and are within the four-month 'exit period' are also eligible to participate in this program.⁷⁴

There are also two types of loans available to support tenants in utilising the Sales to Tenants program, the Queensland State Housing Loan and Pathways Shared Equity Loan.⁷⁵ These are compared below.

⁷¹ Ibid.

⁷² Ibid.

⁷³ Queensland Government, 'How to buy your public housing home', *Queensland Government* (Website, 22 May 2025) <<https://www.qld.gov.au/housing/public-community-housing/public-housing-tenants/buying-your-home/how-to-buy-your-home>>.

⁷⁴ Ibid.

⁷⁵ Ibid.



Queensland State Housing Loan	Pathways Shared Equity Loan
Targeted at public housing tenants wanting to buy the property they rent.	Targeted at public housing tenants wanting to buy the property they rent, who cannot afford 100% of the home through a 'standard loan'.
<u>Key Features:</u> - Tenants entitled to a lower interest rate, which is capped in early years of loan - Minimum deposit of \$2000 - Tenants are responsible for rates, utilities, maintenance costs and home insurance - Tenants must have sufficient savings to cover deposit and loan fees (for example, legal fees, stamp duty, insurance, etc.) - Tenants must intend to continue living in the home for the duration of the loan	<u>Key Features:</u> - Tenants enter into a partnership agreement with government to buy a share of the home - Repayments less than 35% of tenant's income - No rent paid on department's share of home - Tenants are responsible for rates, utilities, maintenance costs and home insurance - Can purchase more shares in the partnership over time (and eventually fully purchase the home), in minimum 5% increments - Can sell the home, but the government is entitled to the income on their share

Reforming Housing Policy in Australia: Planning, Inclusionary Zoning and Homelessness Solutions

Australia's housing crisis is no longer confined to major capital cities or those on the lowest incomes – it now affects a broad cross-section of the population, from low to middle income earners to young families and regional residents. Rising costs, inadequate supply, and policy inertia have contributed to worsening affordability and growing homelessness. Central to this issue are restrictive planning laws, the underutilisation of inclusionary zoning, and fragmented homelessness policy responses.

The Current Landscape of Australian Housing Policy

The Impact of Restrictive Planning Laws

Current restrictive planning rules constrain supply. For example, planning rules have added to apartment costs, where building height limits in major cities prevent more construction. While such rules are often justified on the grounds of preserving views or managing congestion, research shows that their economic costs outweigh the benefits.⁷⁶ These restrictions reduce housing availability and contribute to rising prices.

⁷⁶ Brendan Coates and Tom Crowley, *How to Make Housing More Affordable* (Submission to the Parliamentary Inquiry into Housing Affordability and Supply in Australia, Grattan Institute, 2021) <<https://grattan.edu.au/wp-content/uploads/2021/09/HoR-Tax-Inquiry-into-Housing-Supply-September-2021.pdf>>.



The Politics Behind Planning Decisions

Planning outcomes are shaped not only by technical rules but also by political considerations. Local opposition to development – often driven by concerns about traffic, public transport crowding, noise and changes to neighbourhood character – has led to restrictive land-use policies. These policies benefit existing residents by increasing the scarcity value of their properties but exclude prospective residents who are not represented in local council elections, especially those from outside middle-ring suburbs. As a result, planning decisions often prioritise local preservation over broader housing needs.⁷⁷ Restrictive or unpredictable planning stances by local authorities also discourage developers, who may avoid entire Local Government Areas (LGAs) due to uncertainty or risk.⁷⁸

Use of Inclusionary Planning and Zoning

Land use planning reforms – particularly inclusionary zoning – are widely recognised as tools for improving housing affordability. These reforms typically require developers to include a set percentage of affordable housing in new projects as a condition of planning approval.⁷⁹ Other approaches that mandate developer contributions to social and affordable housing can provide a source of funding to make appreciable contributions to increasing housing supply for vulnerable communities with limited cost to the government.⁸⁰

Inclusionary planning recognises the need for land use patterns to integrate multiple land uses and amenities. In their 2023 Town of Nowhere report, the University of New South Wales recommended that Queensland ‘phase in meaningful inclusionary zoning,’ including ‘mandating developer contributions to social and affordable housing.’⁸¹ Proposals for inclusionary planning are based on research evidence which shows that schemes mandating developer contributions can deliver ‘large-scale affordable housing contributions’ without impacting commercial viability of developments or housing supply. In contrast, research in NSW shows that incentive or voluntary mechanisms have produced low affordable and social housing output, in comparison to mandatory mechanisms employed in South Australia and overseas.⁸² In the current pilot program initiated by the Queensland Government, there is exclusive reliance on incentive and voluntary mechanisms, which, in light of this research, limits its possible impact to create meaningful change.

Broad, uncalibrated incentives through ‘bonuses’ are problematic and site-by-site negotiations are disruptive to development processes as they do not offer certainty for developers, housing providers or

⁷⁷ Ibid.

⁷⁸ Steven Rowley et al, *Understanding How Policy Settings Affect Developer Decisions* (Final Report No 384, Australian Housing and Urban Research Institute, August 2022)

<https://www.ahuri.edu.au/sites/default/files/documents/2022-08/Executive-Summary-FR384-Understanding-how-policy-settings-affect-developer-decisions_0.pdf>.

⁷⁹ Queensland Government, *Inclusionary Planning Pilot* (Webpage, 22 July 2024)

<<https://www.planning.qld.gov.au/planning-issues-and-interests/inclusionary-planning-pilot#:~:text=The%20pilot%20program%20will%20assess,refine%20these%20definitions%20and%20measurements>>.

⁸⁰ Hal Pawson et al, *Breaking Ground: Progress Updated and Assessment of Queensland’s Housing Crisis* (Report to Queensland Council of Social Services, 2024) <https://www.qcoss.org.au/wp-content/uploads/2024/06/Report_Breaking-Ground_Progress-update-of-Queensland-Housing-Crisis_web.pdf>.

⁸¹ Hal Pawson et al, *A Blueprint to Tackle Queensland’s Housing Crisis* (Report, The Town of Nowhere, March 2024) <<https://www.qcoss.org.au/wp-content/uploads/2023/03/Hal-Pawson-Report-2023-Final.pdf>>.

⁸² Ibid.



communities.⁸³ Social and affordable housing becomes less accessible when landowners and developers either decline to pursue inclusionary options or fail to ensure development scale matches capacity of surrounding infrastructure.⁸⁴

Housing Policy and Homelessness Solutions

Prior to the National Housing and Homelessness Plan (**NHHP**), there was the National Housing and Homelessness Agreement (**NHHA**) which was a funding agreement for homelessness and housing services rather than coordinated policy action. It did not commit governments to implementing any specific reforms. For example, it did not require the Queensland Government to have a housing strategy, and did not achieve its policy objectives of decreasing homelessness across the country.⁸⁵

The current programs in place for homeless individuals or vulnerable families include the Immediate Housing Response for Families (**IHRF**) which secures temporary accommodation for those living in insecure and unsafe environments. However, it is intended to be a 'last resort' emergency response and has been labelled a 'band-aid solution' by many NGOs.⁸⁶

Current Recommendations and Policies

Restrictive Planning Laws and the Politics of Planning

To foster reform in this area, recommendations include:

- reforming zoning rules that allow only single detached houses;
- allowing more dense development along key transport corridors, with height limits set up front;
- relaxing regulations limiting the building and use of secondary dwellings;
- relaxing minimum carpark requirements around existing public transport; and
- relaxing minimum floor sizes.⁸⁷

Policy responses to implement these recommendations include:

- allowing regional housing providers to take advantage of the Housing Australia Future Fund (**HAFF**) to build additional dwellings;
- direct government action to address rural housing supply which, based on international experience, has been demonstrated to be both possible and effective; and
- place-based policies, a form of government intervention in the economy and society, with broad-scale application.⁸⁸

⁸³ Ibid.

⁸⁴ Ibid.

⁸⁵ Australian Government Productivity Commission, *In Need of Repair: The National Housing and Homelessness Agreement* (Study Report, August 2022) <<https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness-overview.pdf>>.

⁸⁶ Pawson et al (n 81).

⁸⁷ Coates and Crowley (n 76); Andrew Beer et al, *Disruption in Regional Housing: Policy Responses for More Resilient Markets* (Final Report No. 424, Australian Housing and Urban Research Institute, July 2024) <<https://www.ahuri.edu.au/sites/default/files/documents/2024-07/Executive-Summary-424-Disruption-in-regional-housing-Policy-responses-for-more-resilient-markets.pdf>>.

⁸⁸ Ibid.



Inclusionary Planning / Zoning

Current recommendations and priorities include:

- changes to planning and housing supply regulations to encourage density development, affordability and increase value;
- changes to zoning arrangements to foster commercial growth; and
- maximising benefits from underutilised State and Commonwealth land. For example, repurposing government land to be used for affordable housing or public space.⁸⁹

The Constellation Project, an advocacy collaboration involving organisations such as the Red Cross and Mission Australia, has developed a national framework for mandatory inclusionary zoning, with a minimum 10% requirement of housing floor space developed on privately owned land that should be designated as affordable or social housing. The goal is to foster ongoing supply without additional government funding.⁹⁰

South Australia and New South Wales have seen success with inclusionary zoning. For example, the Housing Plan for South Australia mandates that 15% of new dwellings in all significant developments must be affordable. From 2005 to 2015, mandatory inclusionary zoning delivered 5,485 affordable houses in South Australia. 63% of these homes were supported by government incentive or subsidy or built on government land.⁹¹

Comparatively, voluntary planning incentives in NSW have delivered a smaller proportion of affordable homes, with 'affordable' being up to 80% of market rent or 30% of gross household income. In Sydney, a mandated affordable housing component in specific zones has seen residential developers needing to 'provide social housing at the rate of 0.8% of total floorspace, while non-residential development attracts a contribution obligation of 1.1% of floorspace.' The scheme targets around 80 new units per year and delivered around 900 social housing units by 2021.⁹²

The Australian Housing and Urban Research Institute research demonstrates that developers were sympathetic to mandatory inclusionary zoning schemes. In South Australia, mandatory inclusionary zoning schemes were seen to provide a 'fair and level playing field' as well as 'certainty around requirements, making it easier to assess project feasibility.'⁹³

In the UK, there is a long-established inclusionary planning system, through 'Section 106 Agreements', which require private developers to include affordable and social housing in their projects. It is a legal agreement between developers and Local Planning Authorities (LPAs) under the *Town and Country Planning Act 1990* (UK). As developers are aware of Section 106 requirements, all inclusionary zoning

⁸⁹ National Shelter, 'The Role of the Planning System to Deliver Social and Affordable Housing' (Policy Platform Background Paper, n.d.) <<https://shelter.org.au/wp-content/uploads/7.-The-Role-of-the-Planning-System-to-Deliver-Social-and-Affordable-Housing-1.pdf>>.

⁹⁰ The Constellation Project, 'Establishing a National Framework for Mandatory Inclusionary Zoning' (Report, n.d.) <<https://shelter.org.au/wp-content/uploads/tcp-miz-document-v5.pdf>>

⁹¹ Australian Housing and Urban Research Institute, *What is Inclusionary Zoning, and How Does it Help Deliver Affordable Housing* (Webpage, 29 August 2023) <<https://www.ahuri.edu.au/analysis/brief/what-inclusionary-zoning-and-how-does-it-help-deliver-affordable-housing>>.

⁹² Ibid.

⁹³ Ibid.



costs are considered when initially buying land. Consequently, about 26,000 affordable homes were built in 2021–2022.

In New York, mandatory inclusionary housing laws require that '20-30% of residential floor area in new developments, enlargements, and conversions to residential use above 10 units and 12,5000 square feet must be permanently affordable for low- and moderate-income earners.'⁹⁴

Therefore, based on national and international experience, as the Planning Institute of Australia suggests, the Queensland Government should continue to invest in social housing, mandate inclusionary zoning to provide tangible outcomes, introduce design requirements and encourage community engagement.⁹⁵

Homelessness

A national long-term program to build affordable and social homes to address unmet needs may help facilitate long-term construction pipelines, investment planning and sustained industry development. This may be achieved through mandatory inclusionary planning and can assist community housing organisations that find it difficult to navigate government policy funding requirements through competitive tender processes and strict local government planning rules which do not accommodate affordable rental homes.⁹⁶

Subsequently, a 'housing first' approach is one solution that can potentially increase social and affordable housing. 'Housing first' models strategically prioritise stable and permanent housing for homeless or vulnerable communities. Once housing is secured, multidisciplinary support worker teams assist with the resident's needs through services such as alcohol or drug counselling, mental health treatment, and can provide safety and support.⁹⁷ There has been research in the ACT suggesting that 'housing first' is a more cost-effective solution than other state government-funded services that do not provide secure housing.⁹⁸ The model is more accessible, as it does not have policies that require homeless individuals to prove they are 'housing ready' before they can access permanent housing.⁹⁹ This also assists in identifying structural barriers in the current system, particularly where homeless individuals cannot prove themselves as 'housing ready' due to unique disadvantages and the complexity of the system.¹⁰⁰

⁹⁴ Ibid.

⁹⁵ Planning Institute of Australia, *Submission on the Planning (Inclusionary Zoning Strategy) Amendment Bill 2023* (Submission to State Development and Regional Industries Committee, 16 June 2023) <<https://www.planning.org.au/documents/item/12479>>.

⁹⁶ Catherine Stuart, *CHIA & National Shelter: Submission to the National Housing & Homelessness Plan* (Report, 18 October 2023) <<https://www.communityhousing.com.au/wp-content/uploads/2023/10/CHIA-National-Shelter-NHHP-Submission-20102023-with-appendix.pdf?x57237>>.

⁹⁷ Australian Housing and Urban Research Institute, *What is the Housing First model and how does it help those experiencing homelessness?* (Webpage, 25 May 2018) <<https://www.ahuri.edu.au/analysis/brief/what-housing-first-model-and-how-does-it-help-those-experiencing-homelessness>>.

⁹⁸ Cameron Parsell and Andrew Clarke, *Housing First: UQ Research Spurs New Pilot Program that is Getting Some of the Australian Capital's Most Vulnerable People Off the Street* (Webpage, 2020) <<https://stories.uq.edu.au/research/impact/2020/housing-first/index.html>>.

⁹⁹ Ibid.

¹⁰⁰ Ibid.



Summary and Recommendations

Currently, affordable and social housing supply is limited due to restrictive planning rules that reflect the politics of planning. Generally, planning policy settings can determine what developers do on site, and political local planning authorities can deter developers from operating.

Recommendation 1: That mandatory inclusionary planning and zoning be introduced in Queensland, including the mandating of developer contributions to social and affordable housing.

This has seen success in South Australia, New South Wales and overseas (in the UK and New York) and is preferred over incentivised contributions as it provides developers with more clarity, certainty around requirements and increased abilities to assess project feasibility.

Recommendation 2: That a 'Housing First' approach be taken to homelessness in Queensland.

Current social housing projects for homeless and vulnerable communities are 'band-aid' solutions and do not provide stability. A 'housing first' approach prioritises stable and permanent housing for homeless or vulnerable communities, whilst providing multidisciplinary support that assists in targeting structural barriers these communities may face in securing suitable housing. The 'housing first' approach can be more cost-effective than other government-funded services and can be integrated in inclusionary planning models with the mandated developer contributions to social housing.

Australia's housing challenges demand more than piecemeal or short-term fixes - they require systemic reform. Restrictive planning laws, shaped by local political resistance and outdated zoning frameworks, continue to limit the potential for higher-density and more affordable developments. Mandatory inclusionary zoning offers a clear, evidence-based pathway forward: it ensures predictable contributions to affordable housing without undermining commercial viability, as demonstrated in South Australia, New South Wales, and international jurisdictions. In parallel, homelessness policy must move beyond emergency responses. These reforms - grounded in certainty, integration and inclusion – offer a coherent path toward a more equitable and functional housing system in Australia.





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