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Organisation Sunshine Coast Association of Residents Inc (OSCAR)

Response to the Queensland State Government Housing Summit Outcomes Report

The Organisation Sunshine Coast Association of Residents (OSCAR) welcomes the Housing summit Outcomes Report and the range of actions proposed to start addressing the current housing crisis facing the community across the state. We congratulate the State Government on taking this issue seriously and taking these first steps.

On December 8, 2022 OSCAR made a submission to the Summit which occurred at the same time the Outcomes Report was released. We have included that original document as an attachment to this response to the detail in the Outcomes Report. We have also included in this response components of our submission that we feel are particularly relevant.

OSCAR is a non-partisan and not-for-profit umbrella/peak organisation covering resident and community organisations on the Sunshine Coast and Noosa local government areas (LGAs) in South East Queensland.

OSCAR currently has 35+ member groups from the Pumicestone Passage to Noosa and from the Coast to the hinterland and ranges.

OSCAR aims to support member organisations by:

- 1 Advocating to local and state government and the public on policy issues that are of regional significance and of concern to our members;
- 2 Acting to resolve issues of strategic or region-wide relevance that are referred by member organisations;
- 3 Representing the member organisations on region-wide matters of interest to the community;
- 4 Maintaining awareness and responsiveness through frequent and regular ordinary meetings and dialogue with member organisations; and
- 5 Practising professional, honest and ethical conduct.

Further information about OSCAR can be found on our website at: <https://www.oscar.org.au/>

By holding the Summit the State, LG business and the community are acknowledging that Queensland is experiencing a housing availability, affordability and diversity crisis and that significant strategic intervention will be required to address the various elements of the crisis. OSCAR acknowledges the work of the Summit participants and the State Government and appreciates the opportunity to respond to the Outcomes Report.

As the SEQ Council of Mayors stated in a media release in mid-December 2022:

“The 50 actions outlined in the Queensland Government report provide the first steps on a journey to tackle SEQ's housing and affordability crisis”.

As a community umbrella/peak organisation on the Sunshine Coast we have analysed the actions and offer our support for many of them, some with caveats and recommended additions and changes. We acknowledge the intent of the actions but have some serious concerns regarding how some actions are to be implemented. We also feel that there are some major omissions from the Actions proposed, some of which have been quoted in the Report but not followed up.

OSCAR acknowledges the existing activities being undertaken by the State Government and various Organisations across the State that support housing availability for many vulnerable people within our community. We also acknowledge that the Outcomes Report was prepared in a short time frame and hence a number of our issues maybe are yet to be considered. As is stated in the Introduction to the Outcomes Report:

This document provides an overview of the Summit proceedings and documents the actions that the Queensland Government has committed to leading as Summit outcomes to help address immediate pressures and secure a positive housing future for all Queenslanders (Outcomes Report P2)

We have also referenced our December 8 submission throughout our comments and have used the same numbering as our submission under heading **Strategic Issues**, in this submission.

In her Introduction to the Summit and the Outcomes Report the Premier said:

“It is absolutely imperative that we address, perhaps, the biggest issue facing not only Queensland but the entire nation. We’re not here just to talk about housing; we’re here to find sustainable, tangible, workable solutions, and we do that by working together.” — The Honourable Annastacia Palaszczuk MP, Premier and Minister for the Olympics

The General Community is part of that “working together” and it is within that context that OSCAR, representing some 35+ Active Resident and Community groups across the Sunshine Coast and Noosa makes a response to the Outcomes Report.

We acknowledge and commend the work undertaken to date by the Queensland Government in this space through the *Queensland Housing Strategy 2017-2027* and note the Report ‘*Interim Progress Analysis for the evaluation of the Queensland Housing Strategy 2017-2027 Department of Housing and Public Works in partnership with the University of Queensland (Institute for Social Science Research) working with ARTD Consultants 21 September 2020*’ demonstrating the evaluation process undertaken in 2020.

We also acknowledge work undertaken by the Department of Communities in the Queensland *Housing and Homelessness Action Plan 2021–2025* now sitting with the Department of Communities and Housing and the Digital Economy.

The following comments reflect on the Housing Summit Outcomes Report within the context of the *Queensland Housing Strategy 2017-2027* and the *Queensland Housing and Homelessness Action Plan 2021–2025* and within the context of the OSCAR recommendations made at the same time as the Outcomes Report was released and therefore not considered in the Summit deliberations but which

we feel have value and should be considered in future meetings of the Housing Summit participants. The OSCAR December 8, 2022 submission is included as an attachment.

This response to the Housing Summit Outcomes Report considers the outcomes document in terms of:

I. Strategic Issues, including timing;

II. OSCAR Analysis of Actions section (p17-18) of the Outcomes Report as listed in the Action Table (Table 1)

III. Setting targets, monitoring, evaluation, and reporting on the program delivery.

IV. A case study demonstrating the current situation on the Sunshine Coast as relates to Social housing and short term accommodation/vacant properties

I. Strategic Issues

Many of the actions within the Housing Summit Outcomes Report relate to other State Government Departments and particularly the Department of State Development, Infrastructure, Local Government and Planning (DSDILGP) as well as other agencies. OSCAR has made some recommendations relating to the whole of government that impinge on the Summit Outcomes, a Whole of Government Approach which includes the Queensland Community as a whole.

1 Effective cooperation between levels of government and the community coordinated by a high level State Housing Taskforce directed at deciding and achieving agreed housing targets over the next decade

OSCAR recommended that:

- 1 over the next year the State should work cooperatively with the Australian Government, Councils and the other sectors to develop targets, strategies and action plans aimed at fully aligning housing supply with demand over the next 10 years;*
- 2 a well-resourced Strategic High Level Cross Agency Housing Taskforce be established (reporting to the Premier, DP, Parliament and the community) to refine, develop and coordinate the implementation of various outcomes from the Summit; and*
- 3 the State Government negotiate with the Australian Government e.g. about extending the NRAS scheme beyond 2026; and co-funding the repair and refurbishment of housing on Aboriginal and Torres Strait Island community land.*

OSCAR is pleased to see that the OSCAR recommendations in this area are broadly aligned with those in the Outcomes Report.

OSCAR considers that the process for considering and deciding agreed housing targets will be one of the most important and challenging roles for the Strategic Housing Taskforce as it works with other levels of government and stakeholders. Without setting appropriately based targets there cannot be transparency and accountability for strategically focussed housing initiatives and outcomes. We

appreciate target setting will take time to undertake and decide. We consider it essential that decisions about targets should be based on best available research.

In section 3 of this response, OSCAR raises examples of research based approaches to considering and setting appropriate housing targets that address 3 key subject areas:

- i What is an appropriate level of public housing stock
- ii The contribution public housing and community housing makes to wellbeing – the Nordic countries as an indicator
- iii ABS Census indicators for a high public housing need community – Queensland’s Aboriginal and Torres Strait Island community as an example.

OSCAR notes that the 2021/22 Report by the Productivity Commission on Government Services contains a wealth of information on housing, including many data sets on public housing, homelessness etc. according to State and Territory to help guide decision-making. For example, it is notable that over the last 5 years Queensland’s per capita expenditure on social housing is the lowest or second lowest (behind NSW) in the country, and markedly so compared with some other jurisdictions. This is at odds with other considerations such as the state’s rapid population growth rate, the costs of building in remote, rural and regional Queensland and many other factors such as the high demand for public housing associated with its Aboriginal and Torres Strait Island population as indicated in (iii) above.

Additional funding for public housing included in the Outcomes Report is of course supported, but the State clearly needs to go well beyond these increases to consistently reach and exceed the level of national per capita expenditure on public housing. Related key questions are of course finding room in the State Budget and determining the best possible value for money for available public housing funds.

2 Maintaining a consistent sustainability focus in all planning decisions

OSCAR recommended that:

- 1 the Economic Development Act be amended to include an ESD purpose statement comparable to the Planning Act so that there is a consistent approach to sustainability outcomes in decision-making under both Acts.*

It has been suggested that Economic Development Queensland (EDQ) can play a major role in influencing housing affordability and diversity outcomes, via Priority Development Area declarations and brownfield and greenfield urban development projects and as such there should be “*strengthening the remit of Economic Development Queensland to drive new housing supply by establishing the delivery of social, affordable, and diverse housing, in the context of urban renewal and precincts as a clear purpose in legislation, together with exploring opportunities to further boost capacity strengthened to drive new housing supply.*”(Outcomes Report page 17)

We agree as suggested that it is potentially possible, for example, by incorporating more diverse housing types, more social and community housing and more medium density in both existing and future Priority Development Areas.

However, we emphasise that EDQ is not currently required to address broader sustainability issues in planning and developing its projects and this could explain why there is criticism coming from many quarters about the quality and livability of its urban development projects and level of community satisfaction. The Economic Development Act 2012 lacks an ESD purpose statement of the kind found

in the Planning Act. We recommend that be rectified by amending the ED Act to include an ESD purpose statement comparable to the Planning Act so that there is a consistent approach to sustainability outcomes in decision-making under both Acts.

While the focus is on housing availability, affordability and diversity issues, the State should not lose sight of the broader sustainability issues such as : Universal Housing design; efficient and effective sustainable housing design as illustrated for example in the Sunshine Coast Regional Council Design Book; creating accessible, liveable, well serviced urban developments; avoiding and minimising environmental impacts; and suitable responses to mitigation, adaptation and resilience aspects of Climate Change. In making any housing recommendations relating to the planning and development system the State must therefore follow the ecological sustainability principles of the Planning Act 2016.

OSCAR is very concerned that the issue of an ESD statement and Principles in the EDA 2012 was not addressed in the Summit or the Outcomes Report. To our mind the current provisions of the EDA 2012 are a poor reflection on the State of Queensland. OSCAR stands by its recommendation to the Government.

3 Queensland population growth management and settlement strategy

OSCAR recommends (strongly) that:

- 1 *the State seriously consider pursuing a Population Growth Management and State Settlement Pattern Strategy; and*
- 2 *full community consultation be undertaken at both the State Strategic and Regional Plan level.*

The Outcomes Report appears to be just as it states – an Outcomes Report. As important as that is in the current environment, OSCAR feels that all of the actions, activities and areas for further work should sit within a Strategic Policy framework. We see basically one or two references to such in the Outcomes document. It would be useful to the community to have a greater reference to the Strategic Documents *Queensland Housing Strategy 2017-2027* and the *Queensland Housing and Homelessness Action Plan 2021–2025* in the introduction to the Summit Outcomes report. OSCAR understands that the *Outcomes Report* sits under the *Queensland Housing Strategy 2017-2027* and the 2021-2025 Action Plan.

We note that only one participant, Matt Collins from the Planning Association Australia (Qld) raised *the elephant in the room* issue – that being the need for a Population Growth Management Strategy and a State Settlement Strategy

The P I A QLD suggested developing a Queensland Population Growth Management Strategy and a State Settlement Strategy focusing on the capacity of regional coastal and inland centres to accommodate a greater share of forecast rapid population growth and using the levers available to governments and the private sector to determine how, when and where urban development will occur in QLD. Adopting such a strategy has been debated for decades without any resolution. The housing crisis and other related considerations suggests it's time to revisit such a strategy as the Strategic Overarching Policy which will drive sustainable housing development; delivered in a timely manner; supporting and promoting economic, infrastructure and services growth across the State;

ensuring amenity and livability for all Queenslanders and treading as lightly as possible on our environment.

Arguably it is not sustainable to continue trying to accommodate 80 percent of State population growth in SEQ when Queensland is fortunate enough to be a big state with a long coastline and numerous inland and coastal towns and regional cities with potential to sustainably take a larger share of population and urban growth. SEQ is heading towards a 200km long congested conurbation with a population of around 4 million. Brownfield and greenfield urban development in SEQ is creating progressively more complex sustainability, livability and infrastructure and services funding challenges.

We strongly recommend that the State seriously consider pursuing a Population Growth Management and State Settlement Pattern Strategy as the Overarching document and Policy for the next decade at least. It can be an extension of the existing regional planning processes occurring under the Planning Act to include an overarching statewide strategic direction that informs and influences regional planning.

Full and appropriate community consultation must be undertaken at both the State Strategic and Regional Plan level to ensure that communities across the state understand the reasons for adopting the new approach to population and urban growth management and understand what the advantages will be for each regional area.

4 Meeting SEQ targets for medium density housing

OSCAR recommended that:

- 1 the causes of the failure to deliver SEQ targets for medium density housing be identified and determine how that can be rectified.*

Matt Collins also pointed to the failure to deliver SEQ targets for medium density housing and proposed several ways to increase housing diversity including an opt-in code (details not elaborated), tiny houses, micro-lots, and various medium density housing types up to 3 storeys (the “missing middle” - duplexes, triplexes, townhouses, cluster houses, terrace row houses etc).

The UDIA and others questioned whether the SEQ Urban Footprint (UF) is fit for purpose, suggesting a review of the Plan be carried out, and very likely seeking an expansion of the UF. While we do not oppose reviewing how the Plan is performing, we suggest there is a need to thoroughly consider what factors are in play and how they can be addressed before any premature and ill-advised actions are made.

The failure to achieve SEQ medium density targets partly explains why the potential population and housing capacity of the SEQ Urban Footprint is not being fulfilled. Probable explanations include:

- a insufficient development constraints analysis has occurred in preparing the SEQ Regional Plan and that this results in lower yields of lots and dwellings than expected in greenfield and brownfield sites.
- b failure by governments and developers to deliver infrastructure and services required to support development in a timely and coordinated way.
- c development of lots and dwellings and their release onto the market is deliberately slowed to maximise developer returns.

- d community resistance to increased density caused by poor historical development experiences

Each of these three explanations need to be unpacked to identify the causes of the problems and how they can be rectified. For example, would additional revenue raising by the State improve its ability to fund and deliver the infrastructure and services required to support development in a timely way, including big ticket items such as transport, health, education and social housing; should development approvals mandate the timing of development stages and release of lots and dwellings to the market; how can development constraint methodology and development yield analysis be improved. This is definitely a priority job for the Strategic High Level Cross Agency Taskforce recommended above.

Any proposed increase in the SEQ UF should only be permitted where it aligns with environmental best practice principles. We are experiencing significant climate change and development should not be permitted in flood plain, coastal erosion or high impact bush fire zones. Engineering solutions to 1:100 areas may now be outdated and ineffective, as indeed may be the 1:100 planning concept generally. Climate change exacerbation of natural hazards suggests the need to move to more risk-averse planning principles and methodology e.g. adopting a Probable Maximum Flood level benchmark instead of the current 1:100 year event.

OSCAR questions why delivering more social and affordable housing should only be done in the context of urban renewal? Why not in the context of any new land and housing development projects.

OSCAR notes that the Housing summit outcomes document (page17) makes reference to increasing housing diversity awareness and “*Progressing planning reforms to facilitate and expedite housing supply and support housing diversity*”. Presumably this will be undertaken as part of any SEQ RP review and development of new Planning schemes?

5 Addressing community resistance to increased density caused by poor historical development experiences

OSCAR recommends that:

- 1 *Governments, the development industry and urban and regional communities need to embark on a journey about sustainable population and urban growth, including reasons to accept increased urban densities, compact urban form, greater housing diversity and mixed use developments, increased use of public and active transport, and embracing the opportunities of a low carbon urban future - rather than business as usual continuing low density urban sprawl, car dependency, loss of agricultural land, and loss of environmental values and rural landscapes;*
- 2 *Governments and the urban development industry address the resistance, cynicism and opposition by the community to medium and higher densities in urban infill and brownfield development based on many examples of bad medium and higher density development; and*
- 3 *the urban development industry should be required to deliver far better building and urban design outcomes to help overcome community resistance to increased density.*

As the President of LGAQ and Mayor of the Sunshine Coast Regional Council, Cr Mark Jamieson stated at the summit:

“We’ve got to find a way of not just being “more growth and more profits” but a balance that enables people to understand the community needs and also the economic opportunities.” – Cr Mark Jamieson, Mayor of Sunshine Coast Regional Council and President of the Local Government Association of Queensland

Based on the strength of several recent Sunshine Coast community campaigns against medium and higher density development projects, we also agree with the PIA QLD on another aspect of why medium density housing targets in the SEQ Regional Plan are not being met.

There is significant market resistance and community opposition to increased urban densities, brownfield urban infill, which arises because the community sees so many bad examples of medium and higher density development and so few examples of well designed, attractive, livable, increased density developments. The community is also rightly sceptical that the necessary open space and supporting infrastructure and services will be delivered by governments and developers. The need for profitable developments is understood and appreciated but any development should not be undertaken to the detriment of the community who live in or propose to live in a particular area.

Governments and the urban development industry clearly need to turn this situation around by requiring and delivering far better building and urban design outcomes. This will necessitate amendments to the Planning Act, more prescriptive development codes that can’t be sidestepped by development applicants, and producing a number of demonstration projects across the region incorporating good built and urban design principles.

However, in addition to the above actions, we strongly support the PIA position that is clearly necessary for governments and the development industry to take urban and regional communities on a journey about sustainable population and urban growth of the kind described in our recommendations above.

We note in the Outcomes report, this issue of addressing community resistance to increased density caused by poor historical development experiences is to be addressed by actions such as:

“Partnering with local governments and industry to create a community engagement and awareness campaign covering growth and housing diversity”

“Facilitate industry adoption of housing diversity and best practice through Demonstration projects and Capacity building.”

The community does not need to be made aware, they need to be engaged! State and Local Governments can spend millions of dollars on “awareness” programs, but until governments have a conversation and hear of the lived experiences of good and bad examples of medium density and housing diversity, nothing will change. Communities have seen the glossy pictures and then see what actually appears in the landscape.

IAP2’s Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public’s role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

The IPA2 Public Participation spectrum identifies five approaches to Public Participation – from least to greatest degree of participation as follows:

Inform, Consult, Involve, Collaborate and Empower

In order to respond to the PIA suggestion of “having a conversation” in IPA2 terms would include at least the Goals of the third element “Involve” which states:

Public Participation goal - *To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.*

Promise to the Public - *We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.*

Even better would be to take on Board the Goals of the fourth stage, that of Collaborate:

Public Participation goal - *to partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.*

Promise to the Public - *We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.*

Text taken from © IAP2 International Federation 2018. Public Participation Spectrum

OSCAR recommends that instead of having an expensive media campaign, that the State and Local Governments have a conversation with the community re this issue as suggested by the PIA. Developers also need to be part of that conversation to hear why the community so dislikes the current approach to increasing density. Perhaps the State Government might engage with community groups in the development of such a campaign, for example as did the Sunshine Coast Regional Council (SCRC) with its 2024 Planning Scheme development Preliminary non-statutory community consultation, by establishing a Community Reference Group (CRG), with wide representation from different sectors, age etc across the LGA, to work on developing the approach to the consultation. It was a very effective engagement process with some 9000 residents participating.

We are pleased to see the action to have demonstration projects illustrating best practice. It would be great to see some projects involving LG, developers and the community. OSCAR has suggested this to the Sunshine Coast Regional Council as a means of overcoming some of the concerns and attitudes of residents.

6 SEQ Regional Plan issues

The SEQ Regional Plan has a major influence on future outcomes for SEQ, including the split between greenfield development and urban consolidation, major infrastructure proposals, and it sets many of the housing numbers and parameters to be met by local Councils. The proposed review of the Plan is of great interest to the community, including the role it will play in addressing the housing crisis.

It was interesting during the summit to hear Cr Mark Jamieson in his role as President of LGAQ quote the statistics that there were 100,000 approved developable blocks across the state with 60,000 of those in SEQ. An analysis of how this has occurred and whether this is “land banking” or slow release of developed lots should be undertaken as part of the SEQR review.

OSCAR *recommends that:*

- 1 *the community and LG are informed of the Urban Footprint and SEQ RP review timelines, the outcomes of the reviews, and ensure that the process for the next Regional Plan for SEQ is available months before it*
- 2 *ecologically sustainable development outcomes guide the development of the SEQRP; responsiveness to Climate Change impacts are ensured, and that unrealistic expectations of SEQ UF development yields are avoided. Any extensions to the UF should **exclude** land subject to significant development constraints – notably development on floodplains or on other high risk natural hazard locations, locations likely to be significantly impacted by Climate Change, valuable farmland, and valuable biodiversity and scenic landscape areas. All existing inter-urban breaks should be retained; and*
- 3 *to improve public consultation processes and community engagement the State should undertake a program of preliminary consultation and analysis prior to preparing and releasing a Draft RP. This could include discussion papers on key issues such as land banking, the proposed strategic directions of the RP, submission opportunities, public displays, websites, surveys, focus groups, roundtables with key stakeholder groups etc. The outcomes of the consultation process should be publicly available.*

The Outcomes report continues the line of need for more land for urban housing and the opening of new land under the heading of:

Increase land supply and enable infrastructure growth, including through: (Page 17 Outcomes Report)
a range of activities with three Strategic initiatives

- commencing the South East Queensland Infrastructure Plan
- reviewing the South East Queensland Regional Plan ShapingSEQ, including to ensure land and housing supply settings are fit for purpose and responsive to current growth, and to provide for an enhanced framework to engage with councils to accelerate delivery of more housing.
- progressing planning reforms to facilitate and expedite housing supply and support housing diversity.

One would assume that there is a State-wide Infrastructure Plan in place. If not we agree that there should be. Project timelines within the Infrastructure Plan must be consistent with the development of new areas and renewal of older areas.

Any Planning reforms must be consistent with the Principles and ESD statements in the current Planning Act 2016.

II. Analysis of Actions Section (p17-18) of the Outcomes Report

Existing activities	Issues/comments	OSCAR recommendation/s
Planning changes to increase housing supply, increase rental stock and allow renting of secondary dwellings.	Need to ensure that LG PS are respected	OSCAR supports the renting of secondary dwellings within the parameters of parking arrangements as per the relevant Planning Scheme and on the condition that they are used for long-term rent.
Review of economic impacts of short-term rental accommodation, including the impact on housing availability.	Release publicly	OSCAR welcomes the Review of STA and recommends early, effective action by the State.
Investigate and consult extensively on introducing inclusionary requirements into the planning framework to increase the supply of social and affordable housing.	Make sure consultation is full and open, not in holiday time or before Christmas or Easter and includes community	OSCAR recommends that any consultation must include the community and should not be undertaken during the Christmas, Easter or school holiday times.
Progress Modern Methods of Construction project and establish the QBuild Rapid Accommodation and Apprenticeship Centre at Eagle Farm, with QBuild having the capacity to produce one home per week.	Starting date?	OSCAR recommends that, dates and numbers of houses completed be included on a "Housing Summit Dashboard"
Implementing streamlined planning approvals for housing projects, particularly social and affordable housing projects.	As long as consistent with a LGA's current PS	OSCAR recommends that "streamlined planning approvals" only apply to housing projects that are consistent with the relevant PS. In this way, conforming applications are rewarded. Such projects should not be Code Assessable.
Introduce Priority Growth Areas to unlock land and deliver housing supply.	This should not be left to EDQ without ESD oversight	Any Priority Growth area declarations should not compromise ecological sustainability as defined in the Planning Act, and should include effective consultation with the affected Council and local community.
\$150 million Catalyst Infrastructure Fund to unlock development and \$50 million Growth Acceleration Fund to deliver infrastructure in growth areas.	More detail required, targets and timelines	OSCAR requests more detail re this project but supports in principle

Existing activities	Issues/comments	OSCAR recommendation/s
\$15 million in loan funding to Cairns Regional Council for water infrastructure to unlock residential supply in North Queensland.	Is that reticulation from existing sources	OSCAR supports this proposal as long as the areas of land to be “unlocked” are developed in line with the principles of Sustainability as expressed in the Planning Act 2016.
\$70 million Build-to-Rent pilot project to provide affordable and secure housing and investment in the construction sector.	More detail as to how these processes work	OSCAR is generally supportive of the Build to Rent concept and would like to have more details as to how such a program operates to ensure that properties under such a scheme remain available for long-term rentals only
Ensure the Brisbane 2032 Olympic and Paralympic Games delivers a positive legacy and increases supply of social and affordable housing.	A no brainer, but ensure that construction and amenity standards are not compromised	
Work with local governments to deliver local housing strategies and housing action plans.	This must include the community	Ensure that communities are engaged in the process of developing housing strategies and action plans.
In line with recommendations of the Queensland Audit Office, the Queensland Government will develop a model to predict future demand for social housing.	Good	OSCAR supports this action. Note: See submission recommendations and attachment about this action.
The Queensland Government will continue to deliver the Community Housing Providers (CHP) Development Program, in partnership with relevant CHP peak bodies, to build capability and capacity in the CHP sector to participate in market processes, such as the Housing Investment Fund, and deliver additional social and affordable housing supply.	Reminder that Government does not build capacity they can only facilitate such. Gov can support Capability building but facilitates, capacity building. If Gov needs further details talk to the myriad of Landcare and Catchment groups. They will tell you how patronising gov can be by suggesting that Gov builds their capacity!	OSCAR recommends that government officers speak to Landcare, Catchment and NRM community groups to identify what and how governments can contribute to a group/community building its own capacity. They will tell you how patronising government can be by suggesting that Government “builds their capacity”!
\$16 million Immediate Housing Response package released in June 2022 with \$5 million boost in September.	On what is this being spent?	OSCAR recommends that details of such programs, including targets, milestones and reporting be included on the Housing Summit Dashboard
Implementing the Towards ending homelessness for young	What does this program do?	OSCAR recommends that details of such programs,

Existing activities	Issues/comments	OSCAR recommendation/s
Queenslanders 2022–2027 housing and homelessness response for young people backed by almost \$30 million investment.		including targets, milestones and reporting be included on the Housing Summit Dashboard
Ongoing delivery of rental reforms, to balance the rights and interests of renters and property owners and sustain private investment.	Consultation with all players	OSCAR recommend consultation with all participants in this market.
Housing with support for families – prevention and early intervention project to provide housing and on-site support to at-risk families in Brisbane including construction of 38 units.	Is 38 units a drop in the Ocean, how much money allocated, time frames etc	OSCAR supports this proposal but questions how far 38 units will go? This action is only considered a first step.
Key actions		
<p>Deliver more housing, including social and affordable housing, including through:</p> <p>* strengthening the remit of Economic Development Queensland to drive new housing supply by establishing the delivery of social, affordable, and diverse housing, in the context of urban renewal and precincts as a clear purpose in legislation, together with exploring opportunities to further boost capacity</p> <p>* boosting the Housing Investment Fund to \$2 billion – with returns of \$130 million a year now available to support an increased target of 5600 new social and affordable home commencements by 30 June 2027</p> <p>* enabling the Homes for Homes donation deed model to operate in</p>	<p>Must be done with ecological sustainability in mind – social/cultural, environmental and economic</p> <p>Support but need targets, timelines and reporting of such. Is this the best value for money? Articles by Economist Cameron Murray suggest spending to building public housing is more productive than investing money from a fund to build.</p>	<p>OSCAR has major concerns with any extra remit being afforded to and undertaken by EDQ. The EDA 2012 has NO Ecological Sustainability Principles, in fact, focuses on economic development. Housing provision and development MUST consider all components of Ecological Sustainability – social/cultural, economic and environmental. OSCAR questions why delivering more social and affordable housing should only be done in the context of urban renewal? Why not in the context of any land and housing development projects.</p> <p>OSCAR supports this proposal, but the program should have targets and timelines for reporting progress</p> <p>OSCAR supports this program but with details being made public to encourage participation</p>

Existing activities	Issues/comments	OSCAR recommendation/s
<p>Queensland to contribute to increasing the supply of social and affordable housing and providing \$500,000 seed funding from the Queensland Government</p> <p>* working with local governments to support accommodation for rural workers and relieving pressure on the existing housing stock</p> <p>* establishing an opportunities portal as a single front door to government for proposals that have the potential to deliver new housing stock</p> <p>* reform body corporate legislation to allow for terminating uneconomical community titles schemes to facilitate renewal and redevelopment having regard to the New South Wales approach.</p>	<p>Details be made public to encourage participation</p> <p>Agree, but consider range of models – including Wellcamp</p> <p>As long as any proposals are consistent with LGA PS.</p> <p>Need more information re this</p>	<p>OSCAR supports this process but suggests that Wellcamp should be included in the mix.</p> <p>OSCAR recommends that any such proposal must undergo the full DA process, preferably Impact assessment, and not be a means to take short cuts. OSCAR is concerned that in the rights of individual owners in Body Corporate matters are not disadvantaged just because a developer wants the land. Housing is just NOT an economic issue-it is more a social/cultural matter.</p>
<p>Increase land supply and enable infrastructure growth, including through:</p> <p>* expanding Catalyst Infrastructure Fund to further unlock development</p> <p>* commencing the South East Queensland Infrastructure Plan</p> <p>* conducting an audit of state government-owned land and buildings for opportunities for residential</p> <p>* use; and partner with local governments and Non-Government Organisations (NGOs) to identify similar opportunities for land and buildings owned by local governments and NGOs</p> <p>* working to declare new Priority Development Areas or Provisional Priority Development Areas to bring more land to the market</p>	<p>More details</p> <p>Thought we already had one!</p> <p>Good – include Wellcamp</p> <p>Agree include Wellcamp</p> <p>Must be within the constraints of and Principles of the 2016 Planning Act</p>	<p>OSCAR supports these initiatives. However, we thought that there was an existing Q'land Infrastructure Plan and recommends that Wellcamp should be included in the audit.</p> <p>OSCAR supports this action</p> <p>OSCAR is extremely concerned with the declarations of PDAs or Provisional PDAs. The lack of any ecological sustainability principles in the ED ACT 2012</p>

Existing activities	Issues/comments	OSCAR recommendation/s
<p>* reviewing the South East Queensland regional plan ShapingSEQ, including to ensure land and housing supply settings are fit for purpose and responsive to current growth, and to provide for an enhanced framework to engage with councils to accelerate delivery of more housing.</p>	<p>Ensure no knee-jerk reactions. Thought there was a time-frame for that. Need to engage with the community as well. Remember we/they pay your wages!!</p>	<p>and the virtual exclusion of the community and the Local Government in the ongoing development process is not a constructive way to undertake planning. It may suit the developers who do not want third party comments and community participation but it is an insult to the community.</p> <p>OSCAR understands that such a review is imminent. At least 2 LGA's MBRC and SCRC have sufficient dwelling numbers until MBRC 2051 and SCRC 2041. OSCAR recommends that as part of the SEQ RP review that the Government look at the amount of land banking occurring across the State. At the summit Mayor Mark Jamieson, as president of LGAQ and speaking for LGs across the State made the comment that across the state there are 100,000 approved lots, of which 60,000 are in SEQ. Why this is occurring must be independently investigated and developers asked to "please explain"!</p>
<p>Support housing diversity, including through:</p> <p>* partnering with local governments and industry to create a community engagement and awareness campaign covering growth and housing diversity</p> <p>* progressing planning reforms to facilitate and expedite housing supply and support housing diversity.</p>	<p>Process development MUST involve the community and developers. Developers need awareness programs of good/bad development.</p> <p>Ensure community extensively engaged and Planning Principles applied</p>	<p>OSCAR recommends that instead of having an expensive media campaign that the State and Local Governments have a conversation with the community re this issue as suggested by the PIA. Developers also need to be included in that conversation to hear why the community so dislikes the current approach to increasing density.</p> <p>Details of proposed reforms should be released for public consultation asap.</p>
<p>Provide for housing stability, including through: supporting people experiencing severe housing stress to sustain</p>	<p>Agree</p>	<p>OSCAR supports these measures</p>

Existing activities	Issues/comments	OSCAR recommendation/s
<p>tenancies by:</p> <ul style="list-style-type: none"> * expanding private rental assistance products and services for people experiencing severe rental stress to prevent them losing their tenancies, including through expanded provision of bond loans, rental grants, rental security subsidies and boosting the regional discretionary fund * expanding tenancy sustainment responses to support vulnerable people to sustain current tenancies. 	Agree	
<p>Help people transition from homelessness to housed, including through:</p> <p>providing emergency accommodation faster through:</p> <ul style="list-style-type: none"> * expediting approvals for emergency housing in disaster affected communities * delivering more temporary emergency accommodation with on-site support faster by using underutilised accommodation * providing a further boost of \$5 million to the Immediate Housing Response package, to enable people at risk of homelessness to remain housed * providing additional support for after-hours outreach in five locations (Brisbane, Gold Coast, Sunshine Coast, Townsville and Cairns) to link people who are experiencing homelessness, including sleeping rough, with temporary emergency accommodation and supports. 	Agree with all	OSCAR supports these measures
<p>Provide cost of living relief, including through:</p> <p>providing additional emergency financial and material responses, through:</p> <ul style="list-style-type: none"> * doubling the amount of emergency relief (both financial and material) available for people most in need 	Agree with both suggestions	OSCAR supports these measures

Existing activities	Issues/comments	OSCAR recommendation/s
*doubling the support the Queensland Government provides for food relief services to Queenslanders experiencing severe financial hardship.		
Areas for further work		
Explore potential changes to regulatory settings to facilitate and incentivise housing supply and consider the merit of land tax concession in the context of build to rent developments that deliver affordable housing.	Monitor the take-up of NSW proposal re short-term stamp duty (v) long-term land tax for first home buyers. Consider adding affordable housing options as well.	
Consider innovative investment models for the delivery of social and affordable housing.	Agree – consider the partnership model with buyer and gov as WA.	OSCAR supports this measure
Investigate a mechanism to preserve ongoing affordability of housing stock.	In principle agree but need more detail	OSCAR supports this measure and looks forward to more detail.
Explore options, including through the Housing Investment Fund, to further promote Build to Rent developments that also provide substantial affordable housing.	Make public details of how this project works as on the surface it has potential	OSCAR supports this process in principle and recommends that the outcomes of any pilot are publicised. It is critical that the build to rent concept ensures long-term permanent rental availability and can't be high- jacked for Short term Accommodation.
Explore expanding prefabricated home manufacturing in regional locations.	Agreed and why not suburban areas (see our submission)	OSCAR supports this measure and questions why this should only occur in regional areas? The industry should be encouraged to grow throughout the State given its great potential for rapid, low cost, efficient production of dwellings.
Examine opportunities to better support housing diversity and affordability through a Queensland Housing Code.	More detail required	OSCAR is interested in what this might contain.
Facilitate industry adoption of housing diversity and best practice through Demonstration projects and capacity building.	Agree with demonstration projects. N.B. Gov only facilitate capacity building	OSCAR is in strong support of this measure as it is a mechanism applicable to both developers and the community.

Existing activities	Issues/comments	OSCAR recommendation/s
Work in partnership with the Australian Government in relation to: * National Housing Accord * Housing and Homelessness Ministers Council * Housing Australia Future Fund * Aboriginal and Torres Strait Islander housing	Agree	OSCAR supports this measure
Work with stakeholders, including the Australian Government through the National Housing Accord, to attract capital for social and affordable housing (institutional, social impact and philanthropic investors).	Agree	OSCAR supports this measure
Work with the Australian Government to identify measures to support Community Housing Providers access finance and attract institutional and philanthropic investment to deliver social and affordable housing.	Agree	OSCAR supports this measure
Co-designing and piloting a new crisis accommodation model that will integrate support for the complex and diverse needs of women experiencing homelessness as a result of domestic, family and sexual violence – as an initiative under the Family, Domestic and Sexual Violence Responses 2021–23 National Partnership Agreement.	Agree	OSCAR supports this measure
Work with Indigenous Community Housing Organisations and peak body Aboriginal and Torres Strait Islander Housing Queensland to better support housing outcomes for Aboriginal and Torres Strait Islander peoples.	Agree	OSCAR supports this measure
Investigate further housing with support projects in Queensland, including models with onsite support and specialised tenancy management services.	Agree	OSCAR supports this measure

III. Setting targets, monitoring, evaluation and reporting on the program delivery

Setting targets

Research based approaches to adopting housing supply and diversity targets – public housing, Aboriginal and Torres Strait Islander housing, and wellbeing considerations as examples

The Outcomes Report proposes establishment of a Housing Delivery Board comprised of relevant heads of state agencies and increasing the remit of EDQ in achieving supply, affordability and diversity outcomes.

This is broadly in line with our recommendations about establishing a high level strategic taskforce to *“develop targets, strategies and action plans aimed at fully aligning housing supply with demand over the next 10 years”*.

In developing housing targets there is considerable academic and NGO research and ABS data to help the Commonwealth, the State and other sectors decide suitable targets and diversity, as well as strategies, plans and timeframes to achieve them.

OSCAR wants to focus on just a few research based approaches to target setting that address some major issues such as the Outcomes Report proposal to *“developing a model to predict future demand for social housing at the state and regional levels to inform planning, investment, and service delivery”*.

Determining what is an appropriate level of public housing stock

In July 2022 the Australian Housing and Urban Research Institute Final Report 231 addressed the question “What is the appropriate level of social housing in Australia?”

A participant in the Housing Summit suggested that public housing is about 3% of total Queensland housing stock (a more specific figure is hard to identify). How does this compare with the AHURI analysis of considerations? AHURI found that:

- In the 40 years 1981 to the 2021 census, the number of dwellings in Australia doubled, but the % of public and community housing stock declined from 4.9% to 3.8%.
- 6.1% of 2021 Australian households either lived in social housing or had applied to live in social housing.
- There were 348018 social housing dwellings in 2021, but there were 216846 applicants for public, community and state owned and managed indigenous housing (163508, 41240, and 12098 applicants respectively). i.e. applicant numbers were equal to about two thirds of currently existing total social housing dwellings. Clearly there is a very substantial unmet national demand for public housing.
- Compared with Australia’s 3.8% of households in public housing, the figures were 1% for the US, 4% for NZ, 4.2% for Canada and 17% for England.
- Ranking the GDP per capita of other countries against % of population in social housing showed that many countries with wealth comparable to or greater than Australia had significantly higher percentages in social housing. The four highest social housing figures were in EU countries – 29% or 7.6 times higher than Australia in the case of the Netherlands.

The contribution public and community housing makes to wellbeing – the Nordic countries as an indicator

Interestingly, the AHURI research found that the four Nordic countries with comparable wealth to Australia were consistently well above Australia's % social housing (ranging from 11% in Finland to 21% in Denmark). These countries are often cited as having high levels of personal and social and economic wellbeing.

There is considerable public and academic debate at present about embedding wellbeing outcomes as a core function of Australian governments, including specific reporting in Treasury budgets. A major element of a broad-based approach to measuring and reporting wellbeing outcomes could be rethinking attitudes to supplying public housing and the role a higher level and greater range of public housing might play in contributing to raising personal and overall social and economic wellbeing in Australia and Queensland. Researching the Nordic situation would be a useful starting point, as well as investigating alternative housing models such as community-based cooperative and co-housing, which were pioneered by these countries and are now widely adopted there and around the world.

Census data and a specific high need public housing community – Queensland's Aboriginal and Torres Strait Island population as an example

The 2021 Census contains a great deal of useful information to help determine an appropriate target % of public housing in Queensland and what might be priority areas e.g. the following selection of ABS data provides pointers to Aboriginal and Torres Strait Islander need for public housing and its priority :

- QLD Aboriginal and Torres Strait Island population is easily the second largest in Australia and not far below NSW
- 4.6% of QLD population identifies as Aboriginal and Torres Strait island compared with 3.2% nationally
- the Aboriginal and Torres Strait Island QLD population grew by 50,821 or 27.25% in the 5 years to 2021 – growing at about twice the rate of state population growth – and rising from 3.6% of the QLD population in the decade since 2011
- household size is 3.2 persons compared with 2.5 statewide
- 18.8% of households were overcrowded (needing more bedrooms)
- 12.9% of Aboriginal and Torres Strait Island households rented state housing compared with the overall state public housing figure of around 3% of total dwelling stock
- a further 31.7% of households were in private rentals meaning a total of 44.6% of Aboriginal and Torres Strait Island households were renters compared with 31.1% statewide
- levels of owning or buying their dwellings were correspondingly low – 37.9% for Aboriginal and Torres Strait Island households compared with 63.5% state-wide
- there is much additional useful ABS data such as family and household characteristics, age structure, education, income, rental affordability, dwelling type and the location of Aboriginal and Torres Strait Island people in QLD.

The Census indicates Queensland has a large and rapidly growing Aboriginal and Torres Strait Island population with significantly larger than average household size. Unlike the situation for the state as a whole, there is a very high level of households in public and private rental housing and correspondingly very low levels owning or buying their own homes. Overcrowding is an issue for many households. Overall, the ABS data paints a picture of an ongoing, long term, high level of

Aboriginal and Torres Strait Island demand for rental housing, especially appropriately sized public housing. The high proportion of the Aboriginal and Torres Strait Island population residing in rural and regional areas outside the Greater Brisbane Region creates ongoing challenges in meeting this demand – e.g. construction costs and the supply of materials and skilled labour.

Access to secure, appropriate and affordable housing is often cited as a key determinant of health, education, employment, income, wealth, equality and various other social and cultural wellbeing outcomes. It is especially important for marginalised and disadvantaged individuals and households, and notably so for Aboriginal and Torres Strait Islander people because achieving so many of the Closing the Gap targets relate to housing circumstances. Success in Closing the Gap in QLD is heavily dependent on meeting the housing needs of Aboriginal and Torres Strait Island communities, especially delivering the high levels of suitable public housing implied by the 2021 ABS data.

Monitoring, evaluation and reporting on the program delivery

Governments at all levels, business, industry and the community understand well the need for programmes and projects to be monitored, measured and their effectiveness in terms of outcomes, cost, impacts etc to be reviewed. The community expects governments and their departments to be undertaking monitoring, analysis and reporting continuously on all major policy areas, but particularly in relation to the Housing Crisis.

OSCAR suggests that the State Government develop a dashboard feature which records and reports targets, actions, outputs, expenditure against objectives and outcomes and that such a dashboard be easily accessed by the community as a whole as well as those groups with specific interests.

A case study demonstrating the current situation on the Sunshine Coast as relates to Social housing and short term accommodation/vacant properties

Social Housing Needs on the Sunshine Coast

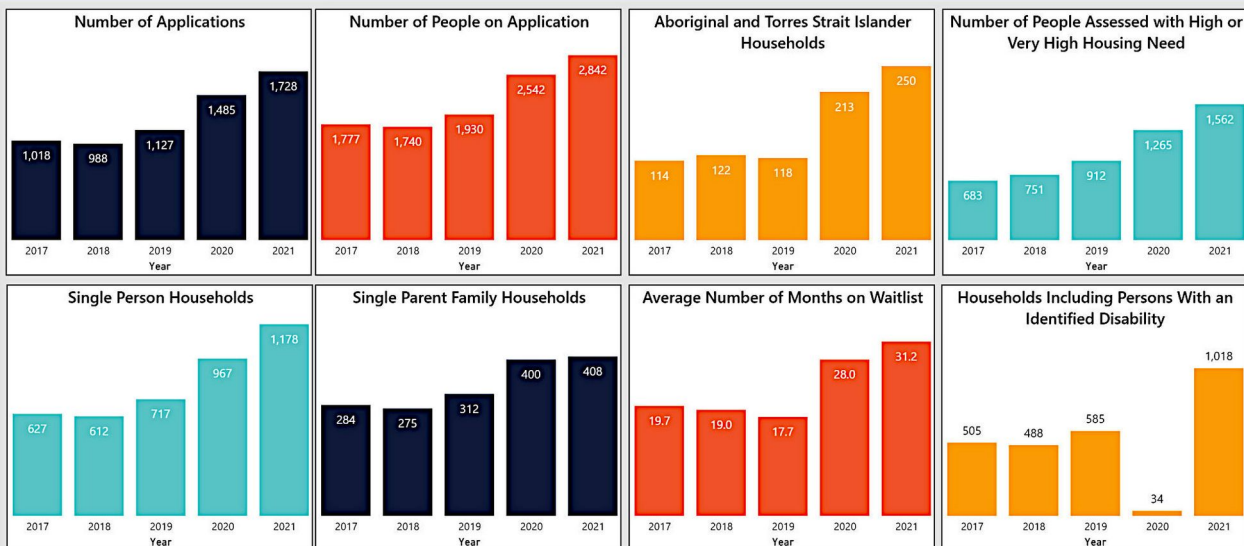
Housing tenure

Sunshine Coast - Households (Enumerated)	2021			2016			Change
Tenure type	Number	%	Greater Brisbane %	Number	%	Greater Brisbane %	2016 to 2021
a Fully owned	44,702	33.0	25.1	37,462	32.2	25.3	+7,240
a Mortgage	44,441	32.8	34.8	36,123	31.0	34.0	+8,318
Renting - Total	35,741	26.4	34.0	31,894	27.4	32.5	+3,847
a Renting - Social housing	2,701	2.0	3.1	2,633	2.3	3.6	+68
a Renting - Private	32,832	24.2	30.7	29,031	24.9	28.7	+3,801
Renting - Not stated	208	0.2	0.2	230	0.2	0.2	-22
Other tenure type	3,816	2.8	1.5	2,846	2.4	1.4	+970
Not stated	6,813	5.0	4.7	8,096	7.0	6.9	-1,283
Total households	135,513	100.0	100.0	116,421	100.0	100.0	+19,092

Source: Australian Bureau of Statistics, Census of Population and Housing 2016 and 2021. Compiled and presented by .id (informed decisions).

Social Housing Register Profile: Local Government Authority, Timeseries

Sunshine Coast Regional Council



Source: Social Housing Register, accessed at data.qld.gov.au as at 30 June.

The 2022-23 Queensland Budget supports **good jobs**, provides **better services** for all Queenslanders and protects our **great lifestyle**. In Sunshine Coast it provides:

\$819.4M

on infrastructure

for productivity enhancing infrastructure and capital works estimated to support around **2,500 JOBS** in this region.

\$1.5B

on health

for the Sunshine Coast Hospital and Health Services.

\$144.3M

on education

to maintain, improve and upgrade schools on the Sunshine Coast.

\$550.8M

for the Beerburum to Nambour Rail Upgrade (Stage One)

including \$41.3 million in 2022-23 for upgrades of sections of the North Coast rail line between Beerburum train station and Nambour train station. Delivered in partnership with the Australian Government.

\$35.2M

for social housing

to expand and improve social housing on the Sunshine Coast.

\$5.7M

for homelessness services

to deliver specialist homelessness services on the Sunshine Coast.

Commentary:

In 2021 Sunshine coast had 2701 Social Houses – up 68 in the five years since 2016. Not many social houses in the context of 135K on the Coast - little increase.

QCOS social housing register for 2021 showed more people on application – 2842 – than there are total social houses on the Coast. Current rate of 12 extra social houses a year is surely unacceptable. But even if it grew by 500 percent it would not make much impact.

The current Budget commitment of \$35.2M for social housing cannot lead to significant improvement in the seriously bad situation.

Therefore - can it be concluded that Social Housing initiatives are most unlikely to address the Coast's housing predicament?

Does this mean that there needs to be much more emphasis on facilitating households to purchase and/or rent their own privately or corporately owned homes?

If the government has come to a view that social housing is not the solution, then we need to look to the private sector for assistance and – 'Build to rent' perhaps may offer the best option?

The Outcomes Report states: *\$70 million Build-to-Rent pilot project to provide affordable and secure housing and investment in the construction sector.* (Ref. Existing Activities page 17-18 of Housing Outcomes Report)

OSCAR, on behalf of the community seeks more detail on the processes associated with Build to Rent pilots. Questions we ask about this project are:

- 1 To what is the 70 million dollars applied – construction of units and by whom?
- 2 Is this an incentive payment or is it for subsidisation of rent?
- 3 Is it an incentive payment against the land tax that would be payable by a private developer?

One aspect that does not seem to have attracted much attention is the adverse impact of State Land Tax on build to rent providers.

It is our understanding that Land valuations for significant parcels of medium density zoned land are usually substantial and the consequent tax significant.

For example for a company renting out say 20 rental units a land valuation of \$2.250M plus would not be remarkable. Land Tax on that would currently be \$33,750 per annum or \$1600 per unit. When this is added to all the other owner's outgoings the disincentives appear to be piling up?

Do these pilot projects consider the incentives and disincentives that are or can be applied? Given the potential of the Build to Rent concept in developing affordable housing to which OSCAR gives "in principle" support, we hope that there will be transparency in how the process works, including the use of incentives, any disincentives, and the expected outcomes of such projects in terms of both numbers of units constructed and numbers of people for whom they will be available.

Regarding the previous graphs and data for Sunshine Coast –the numbers speak for themselves. If the very low number of social houses on the Coast (2701) were to quadruple overnight (and how could that happen?) It still would make minimal impact? As it is – social housing has been growing by around 12 dwellings per year.

Impact of short-term accommodation and vacant properties on housing supply.

The Deputy Premier indicated in the media that the Government was undertaking an analysis of the impact of the increasing use of properties for short-term accommodation (STA). However the Deputy Premier commented that he did not think that STA use of properties would prove to be an issue.

Analysis of the 2021 Census Housing data is most revealing. The graph/tables following are taken from the 2021 Census and include a comparison with the 2016 data. This data considers "vacant" properties which will include holiday homes owned by people living in Brisbane and residents of other parts of Australia. Local governments have attempted to identify the STA properties in order to apply levies such as tourism levy and or differential rating categories. LG having to undertake this task is intensive in terms of time and money and most effective use of staff.

Dwelling type							
Sunshine Coast	2021			2016			Change
Dwelling type	Number	%	Greater Brisbane %	Number	%	Greater Brisbane %	2016 to 2021
Occupied private dwellings	135,512	90.9	93.4	116,419	89.3	92.3	+19,093
Unoccupied private dwellings	13,126	8.8	6.5	13,560	10.4	7.6	-434
Non private dwellings	372	0.2	0.1	400	0.3	0.1	-28
Total dwellings	149,010	100.0	100.0	130,379	100.0	100.0	+18,631

Source: Australian Bureau of Statistics, [Census of Population and Housing 2016 and 2021](#). Compiled and presented by .id (informed decisions).

We note the following, that: Unoccupied private dwellings on Sunshine Coast in 2021 was 13,128 (8.8%) vs 6.5% in Brisbane.

The number of unoccupied dwellings reduced by 434 from 2016 while total dwellings increased by 18,631.

In our Submission of 8 December 2022 (OSCAR Submission to Housing Summit 8 December 2022) we made a number of comments and two recommendations. We have copied that section of our submission here.

It is our understanding that the Queensland Government established an industry reference group, which provided advice to the Government on managing short-term accommodation in Queensland. Generally it was considered that short-term (transitory) accommodation matters would be best managed by councils.

This means that there is no consistency between Local Government Areas (LGAs) and that a Local Government is left to deal with and wear any consequences of any legal challenge or community backlash in relation to any decisions made. It also means that generally any regulations made by a LG is dependent on preparation of a new Planning Scheme, generally a one in 10 year process and Local Law arrangement such as that undertaken by Noosa Shire Council's, new Local Law relating to Short Stay and Home Hosted accommodation. ,

Urgent action is required to bring some consistency into the Planning Act and Regulations across the state to ensure that short-term rental properties are suitably located, fairly rated and that wherever possible short-term rental properties are returned to owner-occupier or long-term rental uses.

OSCAR recommends that:

- 1. Treasury and State Development Urgently complete the reviews of the reasons for the apparent loss of 20k rental properties (such as use by owner for working from home, holiday home use, being held for sale or use as short-term/transitory accommodation); and*
- 2. the State Government develop, within 12 months a consistent state-wide approach to the regulation of short-term letting under both the Planning Act and the Economic Development Acts.*

This could include provisions such as:

- a) in cooperation with Local Governments, review the implications for any regulation of existing use rights for short-term holiday letting/short-term accommodation and provisions to continue such use and at what point they might expire;*
- b) encouraging LG to amend Planning Schemes as required, and provide substantial penalties for non –compliance by owners. This should be supported by adequate State and Council media releases and other notifications to the community about the changes and the reasons for the changes; and*
- c) consider whether there should be limitations on the number of short-term rentals permitted in some zones given that they individually and collectively can cause noise, car parking and other local amenity issues, are not regulated as heavily as the mainstream commercial tourist accommodation industry, and may not pay industry promotion levies.*

Urgent action is required to ensure as many short-term rental properties as possible are quickly returned to owner-occupier or long-term rental uses.

OSCAR remains firm on this issue and given the fact that the Sunshine Coast Regional Council LGA has a higher percentage of vacant properties than Brisbane, warrants action. STA may be perceived as “good” for the regional economy, but the Planning Act 2016 refers to ecological sustainability as “a balance that integrates ” across all pillars of sustainability – social/cultural environmental and economic.

Conclusion

The Housing crisis as reported throughout the Summit is a very complex issue. The community expects then that ALL components of any proposed solutions are examined very carefully to ensure that not only will the housing issues be resolved in a fair and transparent process but that the implications for all Queenslanders are outlined. Will the waiting lists for social housing, and community housing be reduced sooner than later and will the number of private rentals at a fair cost be increased?

In our Submission of 8 December 2022, (Section 18 page 14) OSCAR reflected on comments from a number of economists about the effectiveness of First Home Owners Grants Scheme and recommended that the State Government review that scheme as well as: *an analysis of alternatives to a grants scheme and their comparative benefits and risks - including options that can be better targeted at higher needs groups and be more effective in meeting their needs. E.g. a well-designed shared equity scheme of the kind introduced by the Federal Labor Government could be quite effective in securely raising owner-occupier housing levels in targeted higher need groups if operated at greater scale than the Labor scheme.*

As there was little attention paid to alternative ways of assisting higher need groups at the Summit, and lack of comment on the effectiveness of the various Grants schemes, or issues associated with other forms of incentives and the potential disincentives of other opportunities OSCAR recommends that:

1. All forms of incentives, be they grants, loans, subsidies etc be reviewed for their effectiveness in solving the housing crisis and their cost to the budget
2. All forms of disincentives, including taxation both State and Commonwealth be reviewed for effectiveness in solving the housing crisis and their cost to the budget
3. That a detailed study of available (approved lots) land and the rate of development of those lots, prior to rash moves to open more greenfield sites. This issue was raised by Cr Jamieson, President LGAQ at the Summit and the community seeks a response to that.

The SEQ Council of Mayors in their December Media Release also commented that: *"This crisis is a complex issue and all levels of government and key stakeholders have a key role to play"*, and *South East Queensland is the fastest growing region in Australia. In less than 20 years the South East region will have an additional 1.6 million residents and it'll be home to around 75 per cent of all Queenslanders*

Given the above statements OSCAR suggests that the residents of SEQ are key stakeholders and agrees that the issues are extremely complex. However, that is not an excuse for excluding the community as a key stakeholder.

Therefore OSCAR expects that the community will be engaged in future activities relating to the Housing provision and any proposed Planning Reforms.

The Sunshine Coast community through groups such as OSCAR appreciates the opportunity to comment on the Housing Summit Outcomes Report. Our hope is that the State Government and other key stakeholders take the time to read our issues and respond to the content of our submission.

Yours sincerely

A handwritten signature in black ink that reads "Melva E Hobson". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Melva Hobson PSM
President
OSCAR Inc.
(Organisation Sunshine Coast Association of Residents Inc.)