Q SHELTER
Because home matters

9 October 2026

Minister for Economic Development Queensland
Economic Development Queensland
GPO Box 2202
Brisbane QLD 4001

Delivered by email: contact@edq.qld.gov.au, and via an online form

Dear Minister,

Submission on the Bowen Hills Priority Development Area Proposed Development Scheme Amendment No. 4

Q Shelter welcomes the opportunity to provide input to the proposed amendments to the Bowen Hills Priority Development Area (PDA) Development Scheme. We support increasing housing supply in well-connected locations and improving development assessment processes. We strongly recommend retaining and strengthening the provisions that ensure this growth delivers social and affordable housing, diverse housing choices and homes accessible to people across all income levels.

Additional development capacity should contribute to a healthy housing system and an inclusive community. Removing specific affordability and diversity requirements would weaken the planning framework for achieving these outcomes. Our submission also identifies complementary changes to the current Development Charges and Offset Plan (DCOP) and implementation arrangements.

Key recommendations

1. Retain the existing requirement for at least 5 per cent of total residential GFA as public, social or affordable housing as a minimum, and establish a PDA-wide target of at least 20 per cent of new dwellings as social and affordable housing
2. Secure social and affordable rental housing in perpetuity through public housing delivery, community housing providers (CHPs) and Indigenous Community Housing Organisations (ICHOs), with rents linked to household income
3. Retain the requirement for family-sized homes, strengthen requirements for accessible and adaptable housing, and provide a range of housing tenures
4. Work with Traditional Custodians, First Nations communities and ICHOs through shared decision-making to determine and deliver First Nations housing outcomes that respond to local needs
5. Establish an explicit and predictable development charge exemption for CHPs and ICHOs delivering social and affordable housing
6. Reinstate and strengthen the dedicated Housing Diversity section of the Implementation Strategy, with public reporting on housing delivery, affordability, accessibility and displacement prevention
7. Coordinate implementation of the PDA with Brisbane 2032 delivery arrangements to support an inclusive housing legacy[1].

[1] Consistent with the submission by Q Shelter and partner organisations on the Victoria Park Precinct Draft Legacy Plan, Q Shelter recommends that at least 25 per cent of the Athletes' Village's permanent homes be social and affordable housing, comprising at least 5 per cent social housing and 20 per cent affordable housing.

Background

Q Shelter is Queensland's peak body for housing and homelessness. We advocate for policy reform and investment and strengthen the housing and homelessness sector's capacity to meet community needs. Our work is informed by housing and homelessness organisations, regional networks and people with lived experience of unmet housing need.

Queensland continues to face significant housing and homelessness pressures. On 31 August 2026, 24,454 active households were on Queensland's social housing register[2]. At the end of June 2026, Brisbane Zero's By-Name List recorded 779 individual adults and 307 families, including 474 children, experiencing homelessness in Brisbane[3]. These figures reinforce the need for growth in Bowen Hills to deliver social and affordable homes, alongside housing and support for people experiencing homelessness.

A healthy housing system provides enough homes, with the types, tenures and levels of affordability needed by diverse households. PDAs provide an opportunity for the Queensland Government to plan and deliver housing alongside transport, employment, services and community infrastructure. Well-located social and affordable housing enables lower-income households to share in the benefits of that investment.

Our understanding of the proposed amendments

Economic Development Queensland (EDQ) proposes additional housing capacity, increased building heights in parts of the Mixed-Use Zone, greater flexibility for performance-based development outcomes and removal of value uplift charges. At the same time, the proposed changes represent a significant reduction in the Development Scheme's housing-specific requirements.

The current Development Scheme includes measurable requirements for at least 5 per cent of residential GFA as public, social or affordable housing and at least 10 per cent as dwellings with three or more bedrooms, as well as a dedicated Housing Diversity section within the Implementation Strategy. The proposed Development Scheme replaces these provisions with a general requirement for a variety of dwelling sizes, layouts and configurations. Q Shelter supports increased development capacity and more flexible assessment, but recommends retaining measurable housing outcomes alongside these reforms[4].

Q Shelter supports measures that increase housing supply and meet the needs of households across different income levels. Success should be measured by the homes delivered and their contribution to housing affordability. Increasing development capacity and approvals should be accompanied by clear commitments to deliver homes that remain affordable for people experiencing housing stress.

This submission builds on Q Shelter's 2025 Northshore Hamilton and Woolloongabba PDA submissions and our July 2024 Woolloongabba submission[5]. These submissions advocated

[2] Department of Housing and Public Works. (2026). *OpenHome—Queensland's housing dashboard*.

[3] Brisbane Zero. (2026). *Brisbane Zero Steering Committee Pre-read, 20 August 2026, p. 5.; Brisbane Zero. (2026). Families with children.*

[4] Economic Development Queensland (2022). Bowen Hills PDA Development Scheme. Sections 2.2.3, 2.5.3 and 4.4.; Economic Development Queensland (2026). Bowen Hills PDA Proposed Development Scheme Amendment No. 4, for public notification. Sections 2.5.1, 2.5.5, 2.5.6 and 4.

[5] Q Shelter (2025). Northshore Hamilton Priority Development Area Development Scheme submission; Q Shelter (2025). Woolloongabba Priority Development Area Development Scheme submission; Q Shelter (2024). Proposed Development Scheme The Woolloongabba Plan and Draft Public Realm Guideline submission.

for retaining affordability and diversity targets, working with CHPs to deliver housing in perpetuity, and widening development charge exemptions. This submission also draws on our September 2026 joint submission on the Victoria Park Precinct Draft Legacy Plan, particularly its recommendations on housing affordability, First Nations housing outcomes and displacement prevention[6].

The South East Queensland displacement monitoring report, prepared by the Australian Housing and Urban Research Institute (AHURI) for Q Shelter, provides relevant regional evidence. The 2025 update found that rents for a one-bedroom unit in Brisbane LGA increased by 8 per cent between June 2024 and June 2025. At June 2025, the weekly rent of $550 represented approximately 48 per cent of the modelled weekly income of $1,150 for a low-income single-person household. Greater Brisbane's rental vacancy rate was 1 per cent in June 2025.[7] These regional indicators demonstrate increasing pressures on lower-income renters.

Social and affordable housing

We strongly recommend that EDQ retain the existing requirement for at least 5 per cent of total residential GFA to be provided as public, social or affordable housing. This requirement guides development assessment, but the Development Scheme allows some flexibility. Under section 2.2.3 of the current Development Scheme, a development that does not meet the requirement may still be approved if it is consistent with the PDA vision and is either an interim use or supported by sufficient public interest grounds[8]. EDQ should also report on the social and affordable homes committed through development approvals and subsequently delivered.

ShapingSEQ 2023 establishes a region-wide combined target for 20 per cent of new homes to be social and affordable housing, including market-affordable housing[9]. Q Shelter considers Bowen Hills well placed to make a meaningful contribution to this regional objective, particularly given the additional development capacity and greater planning flexibility proposed through the amendments. This increased development capacity should be paired with clear and predictable social and affordable housing outcomes. For these reasons, Q Shelter recommends a PDA-wide target of at least 20 per cent of new dwellings as social and affordable housing, prioritising social and income-based affordable housing rather than relying on market-affordable products that may not be affordable to lower-income households. Implementation should be informed by feasibility assessment that considers development capacity, public investment and partnerships with community housing providers.

Bowen Hills' proximity to the Royal Brisbane and Women's Hospital and its access to major public transport connections further strengthen the case for social and affordable housing in this location. Affordable homes within easy reach of major employment and healthcare services can enable lower-income workers, including those in essential services, to live closer to their workplaces, while also improving access to healthcare for residents who rely on nearby services. Ensuring that a meaningful proportion of new housing is genuinely affordable would help make the benefits of Bowen Hills' growth accessible to households across a broader range of incomes.

[6] Q Shelter and partner organisations (2026). Submission on the Victoria Park Precinct Draft Legacy Plan.

[7] Martin, D., Ralston, L., Alves, T., and Brackertz, N. (2025). South East Queensland displacement monitoring 2025 update. AHURI Professional Services for Q Shelter (pp. 17 and 20).

[8] Economic Development Queensland (2022). Bowen Hills PDA Development Scheme. Sections 2.2.3 and 2.5.3

[9] Queensland Government (2023). ShapingSEQ 2023 South East Queensland Regional Plan.

The Development Scheme should clearly state how the target will be calculated, which types of housing will count, how much social housing will be provided, and when the homes must be delivered. It should also clarify how the dwelling-based target interacts with the existing 5 per cent GFA requirement so that it does not reduce the overall floor area, bedroom mix or quality of social and affordable housing delivered. EDQ should also report both dwelling numbers and residential GFA to strengthen transparency and accountability.

Where an alternative delivery approach is proposed, it should achieve at least the same level of social and affordable housing, with clear commitments about where and when homes will be delivered and how affordability will be secured.

AHURI research identifies planning requirements, incentives and negotiated agreements as mechanisms for supporting affordable housing delivery[10]. This evidence supports the use of clear and predictable planning requirements, which allow proponents to incorporate social and affordable housing outcomes into project planning and costs.

For Q Shelter's PDA-level recommendation, affordable housing should be defined by the income of the households it is intended to serve, rather than solely by a discount to market rent. Consistent with Q Shelter's policy position, affordable housing should cost no more than 30 per cent of household income for households in the lowest 60 per cent of the income distribution[11]. AHURI distinguishes income-based affordability from a discount to market rent, which can remain unaffordable to the intended household. For example, a 20 per cent discount on a weekly market rent of $600 produces a rent of $480; for a household earning $1,000 a week, the rent would still represent 48 per cent of the household's income[12].

Social and affordable rental housing should be secured in perpetuity through CHPs, ICHOs and public housing delivery. Agreements should clearly state who the homes are for, how rents will be set, who will own or manage them, and how affordability will be maintained if ownership or management changes. Public investment and planning decisions should deliver homes that remain affordable for future generations. The housing mix should include a clear social housing contribution to meet the needs of households with the lowest incomes and greatest support needs.

Housing diversity and accessibility

Q Shelter recommends retaining the requirement for at least 10 per cent of total residential GFA as dwellings with three or more bedrooms, while also providing homes for smaller households[13]. Social and affordable housing should include homes suitable for families. Housing diversity should respond to different household sizes, disability, changing needs across the life course and multigenerational living.

We welcome the universal, adaptable and inclusive design principles retained in section 2.5.1 of the proposed Development Scheme[14]. We encourage EDQ to strengthen section 2.5.6 to

[10] Gurran, N., Gilbert, C., Gibb, K., van den Nouwelant, R., James, A., and Phibbs, P. (2018). Supporting affordable housing supply: inclusionary planning in new and renewing communities.

[11] Q Shelter. (2026). 2026–2027 Q Shelter pre-budget submission; Australian Housing and Urban Research Institute (2023). What is the difference between social housing and affordable housing—and why do they matter?

[12] This example illustrates the difference between discounted rent and income-based affordability; it is not an estimate of Bowen Hills rents.

[13] Economic Development Queensland. (2022). *Bowen Hills PDA Development Scheme*. Section 2.5.3.

[14] Economic Development Queensland (2026). Bowen Hills PDA Proposed Development Scheme Amendment No. 4, for public notification.

ensure these principles translate into accessible and adaptable homes that meet diverse needs, including those of people with disability and older people. Clear guidance and reporting would help support delivery and assess progress.

We encourage a mix of public and community housing, affordable rental housing and other long-term rental options. Build-to-rent and key worker housing can contribute to this mix, provided homes counted towards the affordability target are affordable to the intended households and remain so over time. Social and affordable homes should be integrated within the community, with equivalent design quality and access to shared facilities.

We encourage EDQ to work with Traditional Custodians, First Nations communities and ICHOs through shared decision-making to determine and deliver First Nations housing outcomes that respond to local needs and support culturally appropriate housing.

Development charge exemptions

The July 2026 DCOP provides exemptions for specified State development, including social housing. It also allows exemptions for eligible not-for-profit and charitable organisations, generally capped at $150,000 per application and excluding sub-regional and value capture charge types[15]. Exemptions may also be considered in exceptional circumstances.

Building on our earlier PDA submissions[16], Q Shelter recommends establishing an explicit and predictable development charge exemption for registered CHPs and appropriately regulated ICHOs delivering social and affordable housing, rather than requiring them to rely on the general discretionary not-for-profit exemption and its $150,000 cap. The exemption should apply to the social and affordable housing component of a development and be supported by binding affordability commitments.

Preventing displacement and homelessness

Urban renewal can improve neighbourhoods and increase housing supply while also creating risks for existing lower-income renters. A systematic review of 22 empirical studies of Olympic Games-related displacement identified direct eviction and indirect displacement among the documented impacts[17]. These findings reinforce the value of early action and monitoring to help prevent displacement, although they do not mean these impacts are inevitable in Bowen Hills.

Where redevelopment affects occupied lower-cost housing, including rooming accommodation, we encourage EDQ and developers to work with residents and housing and homelessness organisations to help people remain housed. Early engagement, independent tenancy advice and relocation assistance can support this process. Access to suitable, affordable and accessible housing would help residents maintain connections to employment, education, services and community.

[15] Economic Development Queensland (2026). Bowen Hills Development Charges and Offset Plan. Sections 2.10 and 2.11.

[16] Q Shelter. (2025). *Northshore Hamilton Priority Development Area Development Scheme submission*; Q Shelter. (2025). *Woolloongabba Priority Development Area Development Scheme submission*.

[17] Rocha, C. M., and Xiao, Z. (2022). Sport Mega-Events and Displacement of Host Community Residents A Systematic Review.

We encourage coordination between EDQ, housing agencies, Brisbane City Council and service providers to help residents maintain their tenancies or find suitable housing where relocation is needed.

Planning can also help retain long-term housing as demand for construction workforce and visitor accommodation changes in the lead-up to Brisbane 2032. Monitoring the conversion of long-term homes to short-term accommodation would help identify emerging pressures and inform timely responses.

Brisbane 2032 housing legacy

The Queensland Government anticipates around 1,800 permanent homes from the Brisbane Showgrounds Athletes' Village after the Games[18]. In our joint Victoria Park submission, Q Shelter and partner organisations recommend that at least 25 per cent of these homes be social and affordable housing, comprising at least 5 per cent social housing and 20 per cent affordable housing, secured in perpetuity through CHPs and ICHOs[19]. We reaffirm that position.

The proposed amendment to the Bowen Hills PDA Development Scheme does not change the planning, assessment or delivery arrangements for Games infrastructure or venues[20]. We encourage EDQ to work with the agencies responsible for Brisbane 2032 to support the social and affordable housing outcomes proposed for the Athletes' Village. Alongside this longer-term legacy, social and affordable homes are needed in Bowen Hills before the Games to respond to current housing pressures and help residents remain in their community.

Implementation and accountability

The current Development Scheme includes a dedicated Housing Diversity section within the Implementation Strategy, covering housing data and monitoring, incentives for diverse and affordable housing, and mechanisms to maintain affordability over time. The proposed Development Scheme's Implementation Strategy does not include an equivalent section[21]. Q Shelter recommends reinstating and strengthening this function, with clear actions, responsibilities, timeframes and public reporting. This could include partnerships with CHPs and ICHOs and identification of land and funding opportunities. Traditional Custodians, First Nations communities, housing and homelessness organisations and people with lived experience should help shape this work.

We encourage EDQ to establish a baseline of housing in the PDA and publish annual updates on homes approved, started and completed; social and affordable homes committed and delivered; dwelling sizes and accessibility; rent levels and how long affordability will be maintained; and the loss and replacement of existing lower-cost housing. Reporting should protect residents' privacy. It should clearly distinguish future development opportunities and commitments from completed homes, so progress can be assessed accurately.

This work could draw on Q Shelter and AHURI's annual SEQ displacement monitoring report[22] and the Social Legacy Monitoring Framework proposed in Q Shelter's Victoria Park

[18] Queensland Government (2026). Vision unveiled for Brisbane Showgrounds.
[19] Q Shelter and partner organisations (2026). Submission on the Victoria Park Precinct Draft Legacy Plan, 25 September.
[20] Economic Development Queensland (2026). Bowen Hills Priority Development Area consultation page.
[21] Economic Development Queensland (2022). Bowen Hills PDA Development Scheme; Economic Development Queensland (2026). Bowen Hills PDA Proposed Development Scheme Amendment No. 4
[22] Martin, D., Ralston, L., Alves, T., and Brackertz, N. (2025). *South East Queensland displacement monitoring: 2025 update*.

submission[23]. Together, these approaches could help identify emerging housing pressures and inform action to prevent displacement and the loss of affordable homes.

Conclusion

Q Shelter supports increased housing supply in Bowen Hills and the opportunity to create a diverse and inclusive community close to major healthcare and employment precincts, public transport and essential services. To realise this opportunity, we strongly recommend retaining and strengthening the Development Scheme's social and affordable housing requirements, alongside provisions for family-sized, accessible and adaptable homes.

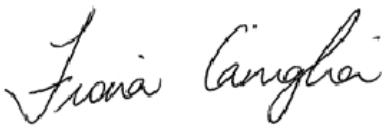
Partnerships with CHPs, ICHOs, housing and homelessness organisations and local communities can help translate growth into lasting housing outcomes. Development charge exemptions, a reinstated and strengthened Housing Diversity section and public reporting would support delivery, while early engagement with residents affected by redevelopment would help prevent displacement.

Bowen Hills has the opportunity to make a meaningful contribution to an inclusive Brisbane 2032 housing legacy while responding to housing pressures now. Success should be measured not simply by additional housing capacity, but by the delivery of diverse and accessible homes that remain affordable over time and enable people on lower incomes to live and remain connected to their community.

Further contact

Q Shelter would welcome the opportunity to discuss this submission further. Please contact Maya Glassman, Policy and Strategic Engagement Lead, in the first instance at maya.glassman@qshelter.org.au or 0492 808 560.

Yours sincerely,



Fiona Caniglia
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Q Shelter

[23] Q Shelter and partner organisations (2026). Submission on the Victoria Park Precinct Draft Legacy Plan, 25 September.