

20 October 2022

Hon Leeanne Enoch MP
Minister for Communities and Housing
Member for Algester
GPO Box 806
BRISBANE QLD 4001

via email: Housingsummit@premiers.qld.gov.au
and communitiesandhousing@ministerial.qld.gov.au

Dear Minister,

RE: QUEENSLAND HOUSING SUMMIT

The Royal Automobile Club of Queensland (RACQ) is Queensland's largest member-owned mutual, and we exist solely for the benefit of our nearly 1.8 million members. Throughout our 117-year history, we have actively engaged with the Queensland Government in the interests of our members, sharing our expertise and recommendations on a wide range of policy areas including road safety, transport and infrastructure, natural hazard resilience, and disaster response.

Our membership makes up a significant portion of the state's population, and we have a presence in more than 60 per cent of Queensland homes. Therefore, RACQ's contribution to the upcoming Housing Summit should be considered in developing solutions that achieve the best outcomes for Queenslanders.

RACQ believes the critical housing shortage rightly deserves urgent action from Government, industry and community organisations. Having access to safe, stable and affordable housing is a fundamental right, yet an unacceptable number of Queenslanders do not. While it is important to act quickly solutions must be well considered and avoid unintended negative outcomes in the future.

DENSITY AND TRANSPORT PLANNING

The State Government may consider facilitating additional housing in outer suburban areas or greenfield developments to take advantage of relatively lower land costs. But the lack of existing infrastructure in these areas and the broader transport challenges typically leads to significantly higher costs if the Government is to meet the needs of the community. State and local government road networks, as well as increased public transport infrastructure and services, will require investment from the State direct, or through Catalyst funding to bring forward developer and local government contributions.

Additional demand for housing density in the inner to middle ring areas may also be considered as part of Government's plan which has the benefit of prioritising mobility efficiency. Dispersed increased density generally leads to higher congestion due to reduced access to high-capacity public transport. Increased population in the inner and middle ring needs to be serviced by additional affordable housing options, ideally in clusters of higher density, well serviced by existing or new public transport services. Where increased middle ring density is planned, it should be delivered as part of an overall strategy inclusive of improved urban public transport infrastructure, and other services such as education, green spaces, roads, pathways, childcare, retail and local jobs.

Density that often creates unnecessary congestion is linear corridor development, e.g. major road corridor residential density. This type of development has a negative effect on road congestion and population amenity (noise, pollution and safety) and should be avoided. Alternative locations of clusters for density should ideally be adjacent to rail or rapid bus/metro services.



NATURAL HAZARD RISK AND BUILDING CODES

Queensland suffered nine significant disasters in 2021-2022 with economic losses of \$7.7 billion. There were 13 lives lost and over 9,000 homes were damaged. The SES took 21,500 calls for help. More than \$2.1 billion in joint federal and state funding went to recovery effort, not including the \$741 million allocated to the Resilient Homes Fund.

Careful consideration must be given to the impact of natural hazards on any new housing supply. Increased density within high risk areas should only be considered in tandem with risk mitigation strategies at the property and community level. Land at risk of flooding, cyclone, bushfire or actions of the sea is usually seen as more affordable at face value, but new developments within these areas can put more Queenslanders in harm's way. Higher insurance premiums and other costs borne by homeowners in these areas cannot continue as an afterthought. These issues must be embedded into pre-development thinking. Queensland must embrace and live by a greater natural hazard risk culture.

We cannot undo the legacy of poor decisions that have been made over generations, but we can prevent the same mistakes happening again. Planning approvals should be updated to reflect the risk of flood and it should be legislated or coded that homes must be built to more resilient standards.

In recent years, a growing volume of useful resources have been developed to help inform our view of floodsmart design – notably the Queensland Resilience Authority Homeowner Guide – and there is an emerging and growing industry of smart, contemporary design and building products. Queensland should have moved past the point of using cost as an excuse to keep the status quo of outdated construction – not incorporating these principles means we pay much more later.

The ability to financially protect one's asset as well as the mortgage must be a front-of-mind-consideration for state and local authorities before releasing land or pursuing higher density opportunities in riskier locations.

Following the 2022 floods, initial assessments found that more than half of the approximately 7,000 homes directly impacted were uninhabitable. Such disastrous flooding not only significantly reduces available housing supply, but causes considerable human, social, and economic costs to communities, industries and governments alike. Townsville experienced similar housing shortages following the 2019 floods as well as Whitsunday and Mackay following Cyclone Debbie in 2017. It is not only a challenge to house the local residents who are forced to relocate, but also the influx of tradies and clean-up crew who travel to the region to repair and rebuild.

The recent decision to relax rules regarding renting of secondary dwellings ("granny-flats") to unrelated parties has merit. However, RACQ recommends that further consideration be given to restricting such approvals where the dwelling falls within a flood zone, unless mitigation solutions have been implemented. Furthermore, building codes should not be relaxed to facilitate rapid construction of new dwellings to meet demand. These codes were implemented and enhanced over time to ensure that Queensland homes are safe and robust enough to stand up to expected perils.

Natural disasters are increasing in frequency and intensity due to the impact of climate change. The forecast is for another wet and wild disaster season ahead, including widespread flooding and severe storms, with the first cyclone expected earlier than usual. This is another strong reminder of the importance of appropriate land use planning and strong building codes to keep Queenslanders safe and in their homes.

CASE STUDY

A very recent example of a community that achieved responsible planning and construction is [Babcock Ranch](#) in Florida, USA. The town of approximately 4,600 people was designed specifically to be storm resilient and self-sufficient. The devastating Hurricane Ian that caused widespread destruction across western Cuba and the southeast United States in September 2022, travelled directly over the town of Babcock Ranch but caused only minor damage. Some trees and fences were toppled, but houses and commercial buildings remained intact. Internet, wastewater and drinking water services were completely unaffected. The power stayed on.



This is a result of the deliberate and commendable design and planning decisions made along the way.

The town was purposefully built well away from the coast and 10 metres above sea level and was spared from any storm surge.

Wetlands and rain gardens helped to drain away the rainwater, so there were no flooded homes following the hurricane.

Figure 1: Building damage in Babcock Ranch after Hurrican Ian. (Image credit: Nancy Chorpenning)

Buildings were certified to a Category 4 hurricane to withstand average wind speeds of 200 kilometres per hour, and the large state-owned solar farm means the town is 100 per cent powered by renewable energy.

It is a true success story in natural hazard risk mitigation. The community and individual responsibility taken for improving the resilience of their built environment has considerably reduced their disaster risk. The lessons learned from this case study should be applied when considering new developments to address the housing shortage, so that Queensland communities are built to be more safe, resilient and sustainable into the future.



Figure 2: The large solar facility and battery storage system powers the Babcock Ranch community and surrounding region (Image credit Kaan Pala/WPTV)



WHAT OUR MEMBERS ARE SAYING

Following the 2022 floods, RACQ surveyed 474 of our members who reside in Southeast Queensland, to seek insights about their experiences before, during and after the disaster. We asked an overarching question on a scale (0 poor-10 excellent) *How would you rate the planning and preparation by the Queensland Government and relevant Local Government Agencies for this event specifically?*

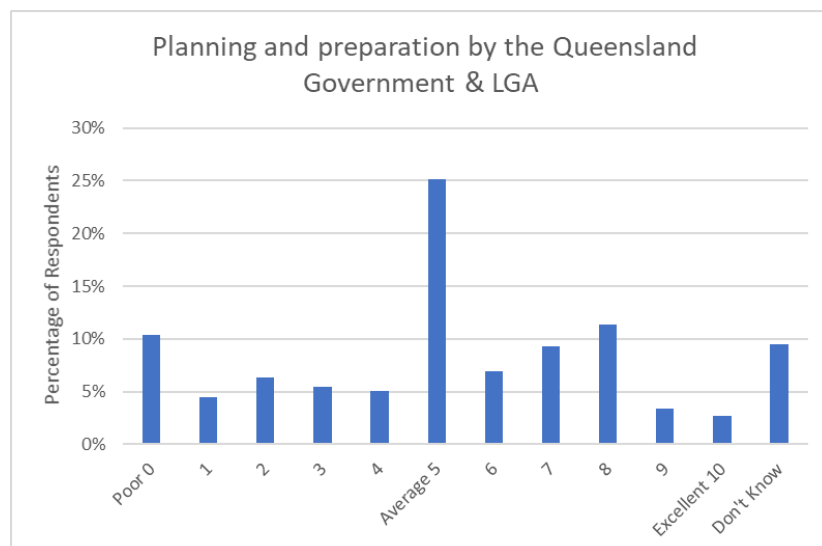


Figure 3: Rating of the overall planning and preparation for this event by state and local Governments (percentage of respondents)

In short, 58 per cent of respondents said the planning and preparation was average (5) to excellent (10) and 33 per cent reported less-than-average to poor, while the remaining 9% did not know.

Of the respondents that rated planning and preparation as less-than-average to poor, 17 per cent pointed to the number of houses and other infrastructure built in flood-risk areas.

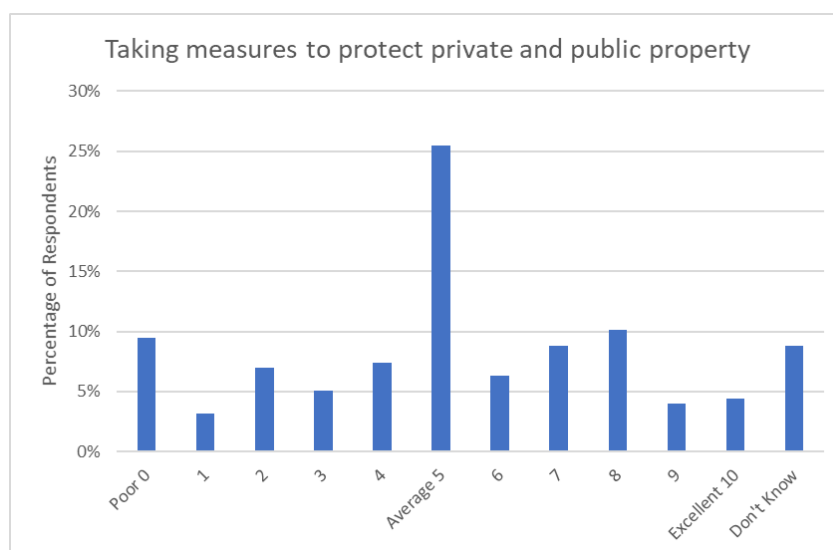
One respondent stated: *"The Queensland state government and local authorities are allowing development of flood prone land and not taking sufficient precautions to mitigate the surface drainage of the flood waters."*

Another shared: *"The suburb was landlocked by flooding and help was minimal not to mention no preventive measures (have) been undertaken after the 2011 flooding."*

A specific sub-question asked *How would you rate the response of the Queensland Government and LGA to the weather event, on taking measures to protect private and public property?* Just 32 per cent gave a rating above average and also, 32 per cent gave a below average to poor rating.

RACQ believes this finding can be attributed to a growing community sentiment that greater effort needs to be made in disaster resilience or natural hazard risk reduction.

Importantly, this shows that Queenslanders are concerned about the impact of natural hazards on their homes and communities and they expect Governments to make sensible land use planning decisions as standard practice and also when taking action against critical situations like the current housing crisis.



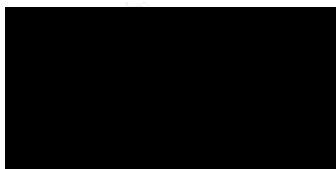


Finally, RACQ urges the Queensland Government to ensure a diversity of housing options that cater for the state's current and future population demographics, particularly our ageing population. A sustainable mix of housing types responds to the needs of people with a disability and older Queenslanders allowing for inter-generational occupancies and enabling people to live within familiar communities into their old age. This will create more inclusive and, ultimately thriving, communities.

Housing solutions that appear to be fast and inexpensive to develop and build may not necessarily remain that way, if community transport needs, disaster risk, and sustainability considerations are an afterthought. We call for careful evaluation of solutions presented to address the housing crisis, to ensure they effectively tackle the current problem, and set Queensland up for future prosperity.

RACQ reiterates our commitment to collaborate with the State on this important issue. We stand ready to contribute our expertise, policy advice and recommendations in the interests of our members and for all Queenslanders. For any enquiries, General Manager Advocacy Joshua Cooney can be contacted in the first instance on [REDACTED].

Yours sincerely,



David Carter
Group Chief Executive Officer
T [REDACTED]
[REDACTED]