

NATIONAL HOUSING AND HOMELESSNESS PLAN

Submission by



September 2023

CONTENTS

PAGE

1.	BACKGROUND	1
2.	A WHOLE OF GOVERNMENT APPROACH	1
3.	HOMELESSNESS AND CRISIS ACCOMMODATION	2
4.	SOCIAL HOUSING	4
5.	A BIGGER ROLE FOR THE PRIVATE SECTOR	6
6.	OTHER OPPORTUNITIES TO INCREASE SOCIAL AND AFFORDABLE HOUSING	7
7.	GOVERNMENT, PRIVATE AND CHP SECTORS WORKING TOGETHER	9
8.	CONCLUSION	10

1. BACKGROUND

I am an urban planner [REDACTED]

I have a long standing interest and involvement in the social housing sector and have undertaken research [REDACTED]

Having read the Issues Paper on developing a National Housing and Homelessness Plan many of the issues raised in the paper have already been extensively researched and investigated by well informed and highly reputable entities. Unfortunately action to address many of these issues related to housing people in greatest need of secure, safe and appropriate accommodation has been slow, ad hoc, fragmented and inadequate. I hope that the National Housing and Homelessness Plan is primarily about implementing committed actions which are adequately resourced and achieving targeted outcomes to be delivered by all tiers of government, as well as the public/not for profit and private sectors involved in the housing sector. I also hope the Plan is a bipartisan long term plan rather than a short term fix.

2. A WHOLE OF GOVERNMENT APPROACH TO HOUSING

Currently there is no comprehensive and effective national policy for housing in Australia. Housing policy is fragmented across different government agencies as well as across states and territory governments. A cohesive and integrated approach to housing is needed at the national, city, regional and local levels. The policy and strategy guiding the implementation of a national housing plan needs to be linked to social and physical infrastructure expenditure. It needs targets and timelines for the delivery of social and affordable housing. It needs a spatial context to prevent pockets of socio economic disadvantage and homelessness.

A National Housing and Homelessness Plan needs to align with a broad economic development strategy and infrastructure delivery agenda so that:

- Supports housing opportunities and choices for all ages, cultures and income levels
- Increases the supply of well-located and appropriately designed social and affordable housing
- Coordinates the provision of infrastructure, particularly support services for those most in need, with housing development
- Creates a better geographic/spatial balance between location of housing, jobs and services
- Eliminates social and economic segregation within the housing sector
- Promotes innovative cost effective and sustainable development practices in the housing sector
- Overcomes barriers to housing opportunity
- Prevents and eliminates homelessness
- Delivers housing that can be readily adapted to changing needs

- Optimizes the redevelopment of surplus government land for social and affordable housing
- Implements programs and initiatives which foster strong partnerships with the various housing providers including the private sector

As is the case in the European Union an Australia National Housing and Homelessness Plan should focus on the following key areas:

- (1) Policies and programs dealing with the acquisition of affordable housing especially for low and lower middle income households;
- (2) Policies and programs dealing with increasing the supply of social and affordable rental housing;
- (3) Policies and programs that encourage more investment in the construction of social and affordable housing by public and private sectors as well as the community housing providers;
- (4) Adequate subsidies and other housing allowance schemes targeting specific groups within the community such as homeless people, low income households and the elderly.

It is now recognized that social housing is essential infrastructure. It therefore requires a joined up public and private sector approach to provide more social housing to meet a growing need within Australian communities.

3. HOMELESSNESS AND CRISIS ACCOMMODATION

It is acknowledged that homelessness comes in different forms from rough sleeping to overcrowding, couch surfing or living in the back of a car. As a society our primary aim should be to prevent homelessness in the first instance and this places the focus not only on the provision of early intervention support services but ready access to suitable housing. Initially it may be temporary accommodation but in the longer term it should offer a pathway to permanent, safe and secure housing.

In particular there is an acute lack of crisis and transitional accommodation for those at risk of becoming homeless for whatever reasons. The shortage is just as profound in capital cities and regional centres as it is in the small coastal tourism town [REDACTED]. Some would say the challenges for people experiencing homelessness are more significant in regional centres and small towns. For example, there are fewer dwellings in which to accommodate women and children escaping domestic violence with the short term rental accommodation sector making it even harder to find secure rental housing. There are fewer specialist homelessness services available to those most in need in these regional cities, rural areas and small towns.

In terms of dwelling models for people experiencing chronic and repeat homelessness the type of accommodation provided needs to be tailor made for the circumstances of the individual/family that is homeless. Traditionally boarding houses and rooming houses were the places where people needing a bed would go but many of these establishments have either closed down or are well located properties that have been redeveloped for private market housing. Due consideration should be given to the re-emergence of the boarding house model but as a contemporary designed, new generation boarding house that provides a studio style environment with a kitchenette and private bathroom as well as communal indoor and outdoor areas.

Another option that is suited, particularly for young people avoiding homelessness, is the group house model where each resident enjoys the privacy of their own space (bedroom with ensuite) but also shares a larger communal kitchen, laundry and chill out spaces. Young people sharing a group

house and supported by services showing them how to budget the household expenses, continue education or find a job can set them on a journey of independence and access to private rental accommodation. This group housing model is also suited to older women (over the age of 50) sharing a large house but having the privacy of their own combined bedroom/ensuite and small sitting area.

Any housing model accommodating people facing chronic and repeated homelessness needs to be backed up with the required support services otherwise there is the risk of them returning to live on the street. At present governments rely heavily on community based organisations such as the Salvation Army to provide these support services. Whilst this approach occurs at the coal face of the homelessness issue there needs to be more funding and other resources given to these organisations to effectively help do the work of the government but without red tape or administrative hurdles. Easy and reliable access to information about the services available to homeless people is just as important as the provision of such services.

As to the question of accessible crisis and/or transitional accommodation, the remedy has relied too much on finding a caravan or cabin in a caravan park or perhaps a vacant motel unit. These short term solutions may be suitable for some but in places that attract a high number of tourists the motel or caravan park is not a reliable option. Also an over reliance on caravan parks for crisis accommodation can stigmatize the occupant.

There are other 'affordable' options for crisis and transitional accommodation as well as social housing. Granny flats, tiny homes, prefabricated and modular style small dwellings are some of the options. These products vary in cost but are less expensive compared to a conventional on-site stick construction. For example, a Same Day Granny Flat two bedroom one bathroom moveable dwelling plus fit out is below \$50k. An Anchor Homes 2 bedroom 1 bathroom modular home can cost less than \$300k and an architect designed 2 bedroom one bathroom modular home by Archiblox for less than \$350k. Disused shipping containers converted to a small fully out fitted two bedroom dwelling by Embark can be as little as \$50k plus transport and installation costs.

The modular and prefabricated housing sector not only reduces the cost of a dwelling when compared to conventional construction but can be erected within 8-12 weeks. In Scotland more than 80 per cent of all new housing uses off site systems of production because of the short period when weather is conducive to the construction of new housing.

We need to become more innovative and creative in the types of housing products that can provide crisis and transitional housing, social housing and affordable housing. Economies of scale are important in reducing the cost of these forms of housing as evidenced in Scotland. Federal, State and Territory governments need to support and incentivize the advanced manufacturing sector in the production of different housing products that meet all the necessary Australian Standards, are affordable and do not get delayed in their installation by local government building and planning red tape.

Currently efforts are being made to provide more crisis accommodation within the Bega Valley Shire Council by not-for-profit groups such as the Social Justice Advocates of the Sapphire Coast Inc. The accommodation provided is usually a one bedroom/one bathroom and open plan kitchen living area within a moveable dwelling sitting on a registered caravan trailer. Sites provided for the installation of these moveable dwellings have come from both private individuals and religious groups who are prepared to purchase or donate the moveable dwelling and have it located on their property. Unfortunately there have been delays in allowing more of these moveable dwellings/caravans from

being installed due to NSW local council delays including failure to recognize them as moveable dwellings/caravans and hence requiring a development approval (DA). In the Bega Valley Shire the current delay in processing DAs is 144 days.

SJA Inc. have spent the last 16 months wanting to install Same Day Granny Flats (See: https://samedaygrannyflats.com.au/?gclid=CjwKCAjw38SoBhB6EiwA8EQVLsXWD58TU77AgOrry_x0SiZ_mMxy-Ci-Jm1YTNT73lLCI3Zim2rzqxoC1EYQAvD_BwE) as crisis accommodation in Bega Valley Shire but has experienced inordinate delays due to Council not accepting these units as moveable dwellings/caravans. Under the NSW Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulations 2021 these moveable dwellings/caravans are not subject to a DA from the local council if they meet the criteria under s.77 of the regulations. SJA Inc. has submitted all relevant information to demonstrate that s.77 of the regulations can be met but continues to experience delays in council acknowledgement of this compliance. In the meantime we have more homeless people needing such accommodation within the Shire.

Recently the Victorian Government's Housing Statement has stated that a small second home on the same lot such as a granny flat will no longer need planning approval if it is less than 60 square metres in floor area. So why can't this be a nationwide approach to ease the housing crisis and provide housing for those most in need such as the homeless and women escaping domestic violence?

What is needed is an appropriate crisis and transitional housing accommodation policy which states which types of accommodation fit this category and the specific criteria to be met to avoid having to lodge a DA with the local council. Lodging the necessary paperwork for a DA is not only expensive but time consuming. This adds cost to the crisis accommodation unit making it less affordable. Both government policy and regulation need to fast track the provision of these forms of housing. Criteria could include which land use zones they are permitted; limitations on extension of stay (say 6 months with the option to extend if warranted); ability to be connected to reticulated water, power and sewerage; prohibition on being used as short term rental or market priced rental accommodation; facilities and minimum floor areas to be provided within the moveable dwelling etc. Failure to meet the criteria would then trigger the need for a DA. Government needs to work with the manufactured moveable dwellings sector to fine tune the most appropriate criteria when preparing such a policy.

4. SOCIAL HOUSING

The Issues Paper is seeking ways to improve access to social housing which includes public housing and community housing. There are several existing and potential providers of social housing – community housing providers, institutional investors, not-for-profit organisations and private industry.

Currently the Community Housing Provider (CHP) sector is a key contributor to the provision of social housing. As the Issues Paper states – there are over 500 community housing providers across Australia some of whom are very small and others are quite large in terms of their property portfolios. A total of 25% of all social housing in Australia is provided by the community housing sector with 50% of this growth due to stock transfers from public housing.

In my experience with the CHP sector it is evident there are some fundamental issues that need to be addressed if this sector is to grow and diversify its social housing portfolios. The current rental income earned from the CHPs managing social housing once the cost of maintenance, administrative and operational/social support services expenses etc. are met is very low. Government payments such as Commonwealth Rental Assistance, JobSeeker payments, Youth Allowance etc. to residents

eligible for social housing remain inadequate despite some recent increases. Because of these low rates of assistance the CHP is limited in how much rent it can require from its clients. The lack of adequate revenue to scale up and grow the CHP sector's social housing supply is hindered by the very tight margins they operate under. Some state governments are off-loading the management and maintenance of its ageing public housing stock to CHPs whilst still retaining the ownership of the stock. Because the CHP is the lessee of the public housing this lack of ownership results in a lack of equity in the asset which, in turn, impacts on the CHP ability to secure bank finance to expand and grow its social housing portfolio. Most CHPs want to scale up and benefit from economies of scale in the provision of social housing but this drip feeding of public housing to the sector without a clear title to the asset impacts on their ability to grow.

Unless the CHP sector can develop as a mature asset class within the property development market and secure private finance, rather than being largely dependent on government income support programs, the more constrained it will be in delivering more housing for those most in need.

Similarly, the amount of disposable income left for a social housing resident once rent and utilities are paid is again very small with stories of residents skipping meals because they cannot afford to buy food. The subsidies to households in social housing need to be increased and as recommended by the Productivity Commission, a more direct financial assistance model for low-income households needs to replace the current assistance models. In addition, the gap between revenue and expenses for social housing organisations, that is the 'subsidy-gap', needs to be addressed by government if it wants the CHP sector to continue to provide and manage social housing and at the same time, increase social housing supply.

Whilst some state governments such as the Victorian State Government are redeveloping established public housing estates with new public housing and mixed tenure (private sector) housing, there is ample scope for these governments to also pursue the redevelopment of allotments currently accommodating a single three or four bedroom public housing unit being a typical older style public housing product in many regional cities and towns. In these regional areas and small towns there are clusters of social housing, most of which are single detached houses on suburban sized lots.

For example, in the town of Eden on the Far South Coast of NSW there are well over 100 social housing units which comprise one dwelling on a suburban sized lot. The housing is approaching the end of its life and is designed for the traditional family unit and not single and couple accommodation where there is the greatest need. The potential exists to either erect a smaller second dwelling in the back yard of these lots or redevelop the entire site for at least three dwellings which are designed and sized to meet the needs of those seeking social housing in that locality. In many instances the demand in small towns is for one-to-two bedroom accommodation including accommodation for seniors and the elderly. This densification of social/public housing properties can again be readily and affordably achieved by the use of tiny homes, granny flats and the like. A sequenced and staged approach to redevelopment of these low density allotments can ensure current social housing tenants remain in the area whilst providing more housing including social and affordable housing.

Associated with the provision of more social housing is the need to offer a degree of flexibility in the design of such housing. This includes scope for extending another room or bathroom onto the social housing unit or dividing the house into two smaller units at some stage in the future. Due consideration needs to be given to the adaptability of the social housing unit to meet changing needs as well as making the housing sustainable, energy efficient and comfortable.

5. A BIGGER ROLE FOR THE PRIVATE SECTOR

The majority of new housing in Australia is built by the private sector. If we are serious about providing more social housing and affordable housing then government needs to introduce policies and programs that boost the supply, particularly in locations close to jobs and services including public transport. The hard evidence tells us that even with additional government funding and support by national, state and territory governments not enough dwellings will be built to meet the growing need for social and affordable housing. The issues paper is correct in stating that *'there will always be a demand for social housing.'* (Issues Report, p.47) Equally, there will always be a demand for affordable housing to buy or rent and population projections for the states and territories are testament to ongoing and accelerated housing demand.

It is time the private sector did more of the heavy lifting and contributed significantly to the supply of social and affordable housing. The land use planning and zoning systems operating in Australia regulate the use of land and guide future development. The current planning system does not proactively create more social and affordable housing. It merely responds to development proposals being lodged with a local council. Nevertheless, local government does have levers available to it to encourage and even mandate for more social and affordable housing. They include mandatory inclusionary zoning and fast track planning decision making for development applications that include social and/or affordable housing.

Inclusionary zoning, which has operated in other countries for several years, is usually a mandatory provision that establishes a percentage of dwellings in a development be set aside as social and/or affordable housing. The percentages adopted overseas are as high as 30 per cent of all dwellings but can be even higher depending on the scale and nature of the development. In the UK the mandatory requirement is, in some areas, 50% to be social/affordable housing. This planning tool can be embedded in the zoning regime where specific zones or geographic areas are selected for an increase in social and affordable housing such as within and close to public transport services, activity centre hubs and high job density areas. The tool can also apply to the rezoning process as part of a value sharing uplift outcome. It is a tool that the property development sector in Australia is fully aware of in terms of its implications for the feasibility of a development proposal.

A big issue for the private sector, including superannuation fund managers, is what percentage is required to be social and/or affordable housing and what, if any density bonuses may they realise if they include social and/or affordable housing in their developments to cross subsidize the cost of the social and/or affordable housing component. Due consideration should be given to a sliding scale on the percentage of housing within a development to be social and/or affordable housing with this scale increasing in future years. This enables the developer who is often land banking for future development projects to factor in the potential cost of a mandatory provision in the purchase price of the land well in advance of the sliding scale being increased thus maintaining a reasonable profit margin.

The provision of social and affordable housing should apply across an entire urban area and not just in the established central, inner and middle suburbs of capital and regional cities. Greenfield development, large urban renewal projects and large greyfield developments should be required to incorporate a percentage of new housing which is social and affordable housing. The provision of social and affordable housing has no boundaries in terms of need. Even in small towns due consideration needs to be given to a mandatory provision for social and affordable housing based on the size of the housing project or mixed use development.

For example, the Bega Valley Shire includes several popular coastal towns that require more social and affordable housing (especially for key workers) and yet private sector developments are not delivering on this need whatsoever. The housing that is being built is expensive to purchase with a growing number of houses and apartments owned by investors exploiting the short term rental accommodation market. In this situation supply alone will not deliver more social and affordable housing stock. The planning system, as well as government policy, needs to intervene.

Fast track planning decision making and cutting red tape have been mantras of the planning system for decades. In some cases it is working, in others it is not. For example, in seeking planning approvals for social housing in Victoria the State government intent is that they be fast tracked. However they currently rely upon local government approval and that is where delays can and are occurring. Strict timelines on decision making by local councils need to be enforced as time is money and money impacts on how many social and affordable housing dwellings can be provided. In some instances direct state government intervention is warranted, particularly in locations close to jobs and services. The recent Victorian Housing Statement proposes actions to enhance the delivery of social and affordable housing. These actions have considerable merit and should be considered as part of the development of the National Housing and Homelessness Plan.

Whilst the SA Housing Authority model offers incentives for affordable home purchase or rental accommodation in the development assessment process, there is merit in applying mandatory requirements to address the growing problems within the housing sector generally. Cost savings such as energy efficient features and close proximity to public transport should be mandatory rather than discretionary when providing social and affordable housing.

Other incentives e.g. density bonuses to private sector development such as being considered in the WA planning reforms should also be mandatory and not negotiable in specific locations where the need for social and affordable housing is the highest priority. The private sector will inevitably factor into its feasibility and residual land value assessments the cost impacts of mandatory requirements as part of the process of determining the extent of a density bonus needed to still make a reasonable return on the investment.

6. OTHER OPPORTUNITIES TO INCREASE SOCIAL AND AFFORDABLE HOUSING

State, Territories and Local governments own considerable tracts of land as does the Commonwealth government. Substantial scope exists to redevelop these land assets for housing and mixed use development not just in capital cities but in all urban and regional areas. A more proactive approach is needed to unlock the development potential of these public assets to assist in addressing our nation's housing crisis.

Some local councils have been proactive in supporting and providing social and affordable housing. The former St Kilda City Council in 1986 established the St Kilda Housing Association. It began by developing the air rights above an off street public car park owned by the council for social housing for homeless men. This initiative has grown to become Housing First Ltd which currently owns and manages +1400 properties across 13 councils with a value of \$485m.

<https://www.housingfirst.org.au/> This is a classic example of local government not only being a regulator but an initiator of establishing a not-for-profit company providing social and affordable housing and value adding on its property assets.

Most local councils own at-grade off street car parks, many of which are strategically located adjacent to commercial areas, public transport hubs and community facilities. Some charge a fee for parking whilst others do not. For many councils with off street car parks where no parking fee is

charged these assets become expensive to maintain. Opportunities exist to value add on what are public assets by exploiting the air rights above the car parking to accommodate social and affordable housing. Adopting a long term lease with a developer can be attractive in these circumstances, particularly given the excellent access and amenity that such land offers close to shops, jobs and services. Such developments should provide a reasonable percentage of housing for social and affordable rental housing. This approach needs local government to be innovative and proactive in seeking expressions of interest to develop these air rights whilst maintaining adequate car parking for the public.

Another mechanism available is rewarding local councils that set and achieve housing targets for the provision of more dwellings, including social and affordable housing. Most local councils have a housing strategy. However often such strategies do not include aspirational targets for new dwellings, especially for more social housing. State and Federal governments are significant sources of funding for hard and soft infrastructure including community facilities, public realm upgrades and improved public transport services. There is scope to incentivize local councils that deliver on their housing targets as part of densifying, for example, the middle suburbs ('the missing middle') and encouraging more housing diversity, especially for low and middle income households.

The London Plan 2021 administered by the Greater London Authority pursues this targeted approach. Ten year targets for net housing completions apply to each of the boroughs. Each borough is required to prepare and implement delivery focused development plans to achieve its housing target which includes unlocking the potential redevelopment of council owned land and identifying sites suitable for medium and higher density housing and mixed use developments. Most urban areas in Australia have existing developments that are approaching the end of their useful life. They are called brownfield and greyfield sites. Local councils should be required to firstly, identify these sites (be they in public or private ownership) and, with the relevant parties, prepare master plans for their redevelopment for housing and mixed use which includes social and affordable housing as part of the mix. These plans will inevitably require both public and private sector investment with local, state and federal governments offering to help fund the necessary social and physical infrastructure to support the resident population provided there is appropriate social and affordable housing within the development itself.

In London, as with other cities, the challenge is how to keep private rental housing costs capped at levels affordable to low-income households. The use of covenants, the right to part buy a dwelling (e.g. shared equity) and financial packages that assist low income households an opportunity to move from renting to owning a dwelling are used to ensure rental accommodation remains affordable for low income people. Stable rental contracts providing a five year fixed term contract and ensuring rents do not rise more than inflation are other measures used to secure affordable housing.

A concept that is embryonic in Australia is co-housing. Cohousing is a sustainable and affordable approach to living in a community. Each household has a small self-contained, private dwelling as well as shared community space. Residents come together to manage the development, share activities and may often regularly eat together. There are shared laundries, communal open spaces, community gardens, reduced car parking but increased bicycle parking etc. within such developments. It is a form of affordable housing becoming popular in the European Union and the USA with the aim of living socially and sustainably and at a reduced cost of living. It is attractive to younger and older adults, singles as well as couples and families. Older single women with limited access to assets are showing interest in the cohousing option. Both the public and private sectors can play a greater role in facilitating and providing cohousing developments as another way of keeping

housing and living costs down. At present some local planning regulations dealing with multi dwelling development do not include a separate definition for cohousing but rather create barriers for cohousing e.g. stringent rules for on-site waste collection, car parking and vehicle access, private open space areas. Cohousing should be mandated as affordable housing. It should be separately defined with specific criteria that recognize the nature and legitimacy of this form of housing.

7. GOVERNMENT, PRIVATE AND CHP SECTORS WORKING TOGETHER

Reference is made to the Planning Institute of Australia's Discussion Paper 2022 on the *Role of Planning in Housing* [Housing Discussion Paper 2022.pdf](#) This document provides sound advice as to how the planning system can help address housing supply and affordability in Australia. A National Housing and Homelessness Plan needs to take into consideration, in particular, the discussion paper's planning policy levers available to promote diverse and affordable housing.

Much has been said about the financial models that can assist in increasing the supply of social and affordable housing. They include taxation reform, tax increment financing, social impact bonds, government subsidies and grants as well as various mechanisms to enable low income households to afford the purchase of a dwelling (e.g. shared equity schemes, key start etc.). These mechanisms are well within the gamut of government – it's about the political will to implement the necessary financial models that will make housing in Australia more affordable for everyone and not just some.

The USA has been operating a Low Income Housing Tax Credit (LIHTC) system since the late 1980s. This housing credit currently finances about 90 per cent of all new affordable housing in the USA. The tax credits are claimed over a 10 year period but the property must be maintained as affordable housing for a minimum of 30 years. See: https://treasury.gov.au/sites/default/files/2019-03/C2016-050_WNC_Inc.pdf and <https://www.ahuri.edu.au/analysis/brief/lessons-usa-tax-incentives-encourage-long-term-investment-low-income-housing-market>

The Australian Taxation Office operates a Capital Gains Tax discount for affordable housing. See: <https://www.ato.gov.au/Individuals/Capital-gains-tax/Property-and-capital-gains-tax/CGT-discount-for-affordable-housing/> However there are specific and relatively complex criteria to qualify for this discount including the property rental must be managed by a registered CHP which can make this offer unattractive to an investor.

The emergence of the Build To Rent (BTR) sector in Australia has the potential to boost the supply of rental accommodation. Some of the national property developers are pursuing this model as it secures an ongoing revenue stream that can be used for investment in new housing and mixed use developments. To date, however, these BTR projects are focused on middle and higher income households and are not contributing a great deal to the social and affordable housing stock. The application of mandatory inclusionary zoning and/or LIHTC for medium and large scale BTR developments would not only contribute to meeting the demand for social and affordable housing as rental accommodation but also ensure these developments do not become enclaves housing only higher income households.

Good housing outcomes include building housing that is sustainable, energy efficient and resilient to the impacts of climate change. Federal, state and local governments all play an important role in the design of new housing as does the developer. Much has been published about how to make housing more sustainable and fit for purpose in terms of climate change. The higher the energy rating in a dwelling the more comfortable it is to live in and cheaper to run. Too many new homes in greenfield estates are built to minimum energy efficiency standards. Often solar panels are an extra cost as are water tanks. The orientation of the new house is dictated by the shape, size and orientation of the

allotment with most subdivision designs in these new housing estates focused on increased yield and cookie cutter housing designs rather than siting and design that can achieve higher energy star ratings. Site coverage on small lots is high leaving little space for tree planting and private open space that has good access to sunlight. Houses are too close to one another restricting natural ventilation and solar access. Many developers claim the housing they are building in these outlying urban fringe areas is 'affordable'. For many they are not affordable nor are the offering the types of housing in locations where most people would prefer to live, that is close to jobs and services including public transport. 'Affordability' in these growth areas has resulted in smaller allotments with bigger houses and even then this product is not at a price that a low income or lower income person can afford.

National planning and building regulations can ensure that all new housing be it single or multi dwelling development achieves a minimum of a 10 star rating. Solar panels, water tanks, third pipe plumbing, appropriate siting and design of dwellings to address thermal mass, window volumes, material choices and orientation etc. are all factors that assist in meeting this high star rating but if these matters are not enforced and even mandated under the National Construction Code then the bulk of new housing only achieves a 6 star rating, if that. For existing dwellings including social housing and low income housing it can be more challenging to retrofit them to become more sustainable and improve heating and cooling. Federal, State and Territory governments should explore additional incentives to retrofit existing dwellings beyond solar energy discounts. Professional advice on how these dwellings can be more sustainable is required free of charge to owners alongside government financial support.

8. CONCLUSION

It is vital that the National Housing and Homelessness Plan is underpinned by a detailed implementation plan that is properly funded over the short, medium and long term and, at the same time, significantly contributes to addressing Australia's acute housing crisis for all citizens. The implementation plan also needs to identify who is responsible for which actions and the timelines in which actions are to be undertaken. The Plan will need to alter the taxation regime as it relates to housing generally and what incentives and mandatory requirements need to be in place to have a significant and effective impact on increasing the amount of social housing and affordable housing to rent or buy as quickly and as efficiently as possible.

The private sector should be required to do more of the heavy lifting in the supply of social and affordable housing given that it is this sector that builds by far the majority of housing in Australia. The CHPs need to be properly funded, supported and incentivized to grow their social housing portfolios to house the homeless and low income people. The social and community service sector needs to be expanded and properly financed, especially in regional, rural and small towns, to meet the growing needs of those most in need of safe, secure and comfortable housing. Governments at all levels need to act rather than just talk about the housing crisis in our nation. Much can be done to address the matters raised in the Issues Paper. What is important is that the necessary actions are taken quickly, effectively and in a targeted way. Less talk and more action is needed to address what is becoming a nationwide issue affecting current and future generations.

[REDACTED]

[REDACTED]

[REDACTED]