

Department of Social Security

20 October 2023

sent via: HousingandHomelessnessPlan@dss.gov.au

To whom it may concern,

re: Housing and Homelessness Plan Issues Paper

My name is [REDACTED] and I am a [REDACTED]
[REDACTED] I am also a [REDACTED]
[REDACTED]. This submission is based on my personal
opinions and does not reflect the views of any organisation.

I have found it very interesting reading through the Issues Paper and the definitions of homelessness contained. It made me realise that within [REDACTED] are those who meet the definition and at risk of homelessness. This includes:

- Young professional employed full time (across 3 jobs) struggling with rental unaffordability and insecure employment payment arrangements.
- A 5-person family living in a 3 bedroom home with two older teenagers sharing a bedroom and unable to afford an extension to their house.
- A [REDACTED] man suffering from [REDACTED] who has spent 32 years on the public housing waiting list. [REDACTED] his [REDACTED] parents supported him which has led to a complete falling out with [REDACTED]. Now in private rental accommodation he has been using superannuation withdrawn during COVID to cover the gap between his Government payments and the rent he has had to pay.

This response aims to provide constructive suggestions for improving the 'National Housing and Homelessness Plan Issue Paper'. The homelessness and housing affordability challenges in Australia are complex and multifaceted. The Issues Paper is, I believe, too general and too silo-ed in its approach to be effective. I offer some recommendations to enhance its effectiveness in addressing these complex problems. Addressing these issues necessitates a comprehensive approach that looks broadly at the causes of housing unaffordability and homelessness, acknowledges the diverse needs of the population, reevaluates existing policies and regulations, addresses the coming climate crisis and seeks sustainable solutions to ensure housing security for all.

The points below are a summary of my responses to specific questions as asked in the Issues Paper. The end of this submission will list the questions and answers. Because many things are linked the question responses can be quite repetitive so I felt it best to consolidate the points here.

Firstly, the Issues Paper spends a lot of time talking about homelessness. It hardly mentions affordable housing yet, as shown in section 2.2 of the Issues Paper, housing is a scale running from homelessness to home ownership. To prevent homelessness you must, among other things, address the issues above it on the scale. If you tackle housing affordability more people will be able to purchase a home, which will reduce the demand on rental accommodation and rental prices will drop. If rental accommodation law is strengthened, and employment law amended to provide greater security of employment then there will be more people able to afford private rental accommodation, better health outcomes, increased employment and productivity in the broader economy. (Pawson H, Randolph B, Aminpour F and Maclennan D, *Housing and the Economy: Interrogating Australian Experts' Views*, City Futures Research Centre, Sydney, 2021.) These then lead to a reduced demand on social housing and less people ending up homeless.

The issues paper starts at the end, with Homelessness. It should be the other way around. It is worth acknowledging that almost anyone can be at risk of becoming homeless as all it takes is one or more unfortunate events - losing your job, marriage breakdown, prolonged ill-health, to name a few. Even the 30% of the population who own their own home can become homeless through divorce as evidenced by the number of older women in sleeping rough statistics.

Let's start by looking at the harder end of the problem. What are the triggers causing the current housing unaffordability crisis? I will concentrate on the aspects Government has an ability to impact.

All levels of governments need to be involved as the solution needs change across many areas. The neoliberal "small government" model has under-funded the public housing sector for many years, selling off publicly owned property, failing to maintain existing building stock, and not increasing to keep pace with our growing population and need. A large investment in building new public housing has been announced, both Federally and, especially, in Victoria. Despite the large sums of money involved this will only scratch the surface of the need and take many years to construct. During which time the waiting lists will continue to grow unless other radical changes are made now.

Economic issues

The problem is way bigger than just a lack of houses. Government should be listening to economists as we need new economic models to solve the Housing Affordability crisis.

1. House purchase prices

In the 1970s, when it was the norm for only one person in a house to work full time (and women more often stayed home to raise kids) the average house purchase price was naturally limited to what could be paid on one income. Now, where often both parents work full time the average house purchase price expands to what those two (decent) incomes can possibly afford. Going beyond that, to those who are lucky enough to have Baby Boomer

parents who have benefited from Government economic policies for their entire lives, they may be able to draw on a third income – the bank of mum & dad – to outcompete others who only can access two salaries. Currently this is what is driving housing prices. It will be limited at the maximum that can be (re)paid.

But where does this leave single people, service workers, anyone without access to paid maternity leave who becomes pregnant - the everyday Australians? The answer to that rhetorical question is, they are usually locked out of the ability to purchase a house. This then creates a huge group of people who are all competing in the housing rental market thus driving rental prices up. These people pay the wealthy to increase their wealth while they are stuck in the rental market. So really the solution needs to be economic, and political.

2. Economic drivers

The Australian residential construction sector is responsible for approximately 5% of the Australian GDP. (source <https://www.nhfc.gov.au/research/building-jobs-how-residential-constructions-drives-economy#:~:text=Overview,role%20in%20the%20Australian%20economy.>) How do we address housing affordability whilst risking the economy? Currently one of the things that is driving our economy is migration, and their demand for a home to live in.

3. Economic models

Continual growth is unsustainable for the planet so we need to look at different economic models.

- Keynesian economic theory of regulated market economy underpinned Australian Government policies from the end of WWII until the mid 1970s which was a period of unprecedented wealth and stability. John Maynard Keynes' idea of "full employment" was particularly important. This is the opposite of Neo-Liberal economic theory that has led to the severe shortage of public housing (and the increasing need for it).
- Much past fiscal economic theory used by the Reserve Bank has been based on using an unemployment rate of 5% to limit inflation and manage the economy. Recently they have explored allowing unemployment rates to be lower. Whatever the unemployment rate is, that percentage of the population are having their economic stability and well-being sacrificed for the good of the remaining 95% of the populace. The least we should do is provide public housing for them in return.
- We also need to plan for the climate crisis. Of course the cheapest way to deal with climate change is to immediately cease emitting greenhouse gases but it could be argued we have already missed this opportunity and runaway climate change events are in action such as changing ocean currents and extreme weather events. There will be mass disruptions to our economy, and mass migration of climate refugees both inside and into Australia.

4. Inflation

House purchase prices are increasing at a higher rate than bank savings interest rates. This makes it impossible to save a deposit to buy a home so anyone saving for a deposit is actually going backwards financially. Another aspect is that rental rates are so high that it is difficult for renters to have surplus funds to put aside to save for a deposit.

Political issues

Neoliberalism has wrought huge damage on the most vulnerable amongst our society and has seen the concentration of wealth taken away from Governments and concentrated in the hands of the few. To address the increasing problem of homelessness and housing affordability one must look at the systems that have allowed this to happen.

1. Taxation law

Taxation is intended as a way of redistributing income to ensure the equitable provision of services. Yet the constant tax cuts as sweeteners before elections, and high levels of tax avoidance by corporations and the wealthy now sees the top 1% of earners with more money than entire nations! To rectify this as a minimum:

- Negative gearing must be stopped. It is a way for the wealthy to accumulate more income rather than paying taxes to help those less well off.
- The Australian Taxation Office should be given "more teeth" to be able to aggressively prosecute and penalise those caught illegally avoiding tax.
- The tax-deductible items that are allowing the wealthy to avoid paying their taxes should be reviewed and reduced.
- The Australian Tax Office should stop encouraging investment in cars! Novation for the purchase for the purchase of new electric vehicles is the latest one. Addressing climate change means we need to shift to healthier and more sustainable forms of transport and away from cars. At the very least, bicycle purchase and maintenance should be treated equally in taxation law to cars, the same with purchase of public transport tickets.
- Older people are actively discouraged from downsizing to more appropriate housing by a variety of tax and other measures such as Age Pension asset tests, stamp duty payments for new homes, and tax settings in which cash released from the sale of the family home is taxed but capital gains are not.

2. Employment Law

Casualisation of the workforce creates many problems – lack of financial security means people cannot make long term plans, they cannot get a home loan, and contributes massively to anxiety and mental health issues. Those with casual employment are locked out of home ownership and thus locked out of wealth creation. These are the permanently poor. Short-term contracts are similar (The Government seems perpetually bewildered by the lack of

student interest in STEM careers - yet every scientist they have ever met has probably told them of the difficulties of living from grant to grant without any security). There is a direct connection between a lack of permanent employment status and housing unaffordability.

3. Failure of previous Government Housing programs

Many previous government programs to assist people to enter the housing ownership market have further inflated building costs by a corresponding amount eg HomeBuilder, First Home Buyer scheme. I believe the Victorian Government Homebuyer Fund will do the same thing. We need to listen to the economists and the advice of the economic think tanks on this - and not the neoliberal ones who created this problem in the first place.

5. Housing is a human right

Government financial policies such as negative gearing have led to housing being considered as an asset, rather than a human right. This has led to a stockpiling of housing by the wealthy. Negative gearing is a scheme whereby the less well-off pay the wealthy to accumulate even further wealth.

6. Problems with rental

In the past people lived in rental housing while they were young and saving for a deposit to buy a home. As described in Economic Issues above saving a deposit has become impossible and many people will never be able to afford to buy. There will be more people permanently living in rental accommodation. To improve housing for those people we need to:

- Strengthen rental agreements especially to give security of tenure;
- Ensure rental accommodation meets minimum standards. There should be a government program requiring mandatory independent inspections of rental properties to provide a condition and energy efficiency report prior to rental advertisements and new lease agreements. The report should be made readily accessible to prospective tenants. The ACT Minimum Energy Efficiency Standards program is a start but as well as insulation it should also cover ventilation, building sealing, heating and cooling and getting off gas.
<https://www.justice.act.gov.au/renting-and-occupancy-laws/energy-efficiency-standards-for-rental-homes>.
- Protect tenants from collusion and illegal behaviour by real estate agents. Tenants are currently too scared to complain about poor quality or request repairs as real estate agents are acting as a mafia and blacklisting people who demand their rights. As an example, online rental reference forms (which are shared between real estate agents) have a question that says "Did the tenant ask for unreasonable repairs?" There is no definition of what is "reasonable" there.
- To help protect rental tenants from the risk of becoming homeless government should provide increased funding to Tenant Unions in all Australian states and territories. These can help protect the tenants and advocate on their behalf in disputes.

7. Data collection

Some differently worded or extra questions in the Census could be useful to collect better data.

For example, on homelessness:

- Is this your regular place of residence?
- Where is your regular place of residence (with "Don't have one" as a response option)

On housing affordability:

- How much of your income do you spend on weekly housing (rent/mortgage) repayments? (with $<1/3$, $1/3 - 1/2$, & $>1/2$ your income as possible response options).

8. Affordable Housing

As a newer area, I feel that there needs to be a large government investment in the concept of Affordable Housing with national standardisation and policy, as well as the targets mentioned in the Issues Paper:

- What is the definition of Affordable Housing? This should be national and provide ongoing subsidised accommodation (not just a cheaper purchase price).
- Who operates (and polices) affordable housing properties?
- Who is this for? What are the eligibility criteria?
- We need regulation and governance to design for fair allocation and operation – particularly if the private sector are to be involved in the delivery.
- In other countries institutional investment provides most rental accommodation, in Australia, it is regular mums & dads with negative gearing. Why have Australian policies determined this and how can we attract institutional investment?
- There should be government regulation that a development over say, 20 dwellings, be required to provide at least 10% of dwellings to an affordable housing operator.
- There should be government support for alternative mortgage options, such as small, short-term mortgages, land rent schemes and low-cost government-backed reverse mortgages for those at risk of falling out of home ownership.

Climate Change

In the near future many areas of Australia will become uninhabitable, or uninsurable, and climate refugees from within Australia and overseas will increase demand on public housing.

- Given the climate crisis, Australia's environmental fragility, and our rapidly increasing population we should really be ceasing expansion of our cities into arable land. Instead, we should be building smaller dwellings, more closely located together and

located near services etc but also located proximate to areas for food production, water supply and recreation to support that population.

- Federal Government must prepare a national disaster management master plan to map the risks for all regions of Australia. This should inform what regions of Australia will, in the future, become uninhabitable, and where the safest areas are, where population can be supported (and how). This should be available as a resource for all levels of Government and the public for future planning.
- The National Construction Code needs to be radically changed to suit future predicted weather and rain events so that the homes we build, and where we build, can cope with the changing climate over the next 50 years. Underground is a possibility?
- Homes should be designed to have at least one climate refuge room which can be heated/cooled when weather extremes occur. This room should be insulated (ceilings, walls, floor), and fitted with reverse cycle airconditioning, at a minimum, ideally with heat recovery ventilation as well. This should be mandatory in social housing and rental properties. One great program looking at this idea occurred in Geelong, in Victoria <https://www.abc.net.au/news/2023-04-02/project-makes-houses-safer-during-heatwaves-and-extreme-cold/102164200>

Please read on for detailed responses to questions below.

Yours sincerely,

██████████ ██████████

Required Questions

I have read and agree to the privacy notice (required)

Yes

The Government may choose to publish submissions. As such, please specify whether you would like your submission to be published on the department's website and if you would like your input to be anonymous. (required)

I consent to the publication of my feedback with my name or, if applicable, my organisation

I consent to the publication of my feedback anonymously

I do not consent to the publication of my feedback.

Are you responding as an individual or as a representative of an organisation? (required)

I'm responding as an individual

I'm representing an organisation.

Guided questions

You can choose not to answer any question by leaving the space provided blank.

Section 3.1 Homelessness

How can governments and community service providers reduce homelessness and/or support people who may be at risk of becoming homeless in Australia?

I do not think this issues paper is looking at broadly enough at the problem of homelessness and housing affordability. First you need to start by looking at the causes of homelessness and it is much broader than simply that there are not enough houses.

Please refer to my comments in the cover letter to this submission. The main issues are economic and political and so involve many other areas of government involvement rather than just the Housing sector.

1. What is most contributing to homelessness in urban, regional and rural or remote areas?

In no particular order:

- Housing unaffordability
- Casualisation of the workforce leading to insecurity of income and poor mental health.
- Mental and physical health problems
- Lack of Government support for those most at risk of homelessness - for example I was horrified to read in the Issues paper that 30% of young adults exiting formal out-of-home care experience homelessness in their first year! Any parent of adult children knows that the job of a parent does not stop when they turn 18.
- Taxation law that favours Baby Boomers and the affluent at the expense of those most in need.
- Tax avoidance by the wealthy and corporations and the relative toothlessness of the ATO in prosecution and financial recovery of money owed.
- Generational poverty which is compounded by insufficient Centrelink support.
- Family breakdown including family violence.

2. What short, medium, and long-term actions can governments take to prevent homelessness or to support people who may be at risk of becoming homeless?

As shown in section 2.2 of the Issues Paper, housing is a scale running from homelessness to home ownership. To prevent homelessness you must, among other things, address the issues above it on the scale. If you tackle housing affordability more people will be able to purchase a home, which will reduce the demand on rental accommodation. If rental accommodation law is strengthened, and employment law amended to provide greater security of employment then there will be better health outcomes, increased employment and productivity in the broader economy. (Pawson H, Randolph B, Aminpour F and Maclennan D, *Housing and the Economy: Interrogating Australian Experts' Views*, City Futures Research Centre, Sydney, 2021.) These then lead to a reduced demand on social housing and less people ending up homeless.

See response to question 3b for more detail.

3. What types of homelessness supports and services do we need more of? For example, earlier intervention, crisis support, mental health supports, etc
 - 3a. How can the homelessness system ensure those at risk of homelessness or in crisis receive appropriate support to avoid homelessness or so they are less likely to fall back into homelessness?
 - The “homelessness system” is not just those agencies who are dealing with the feeding and sleeping arrangements of those sleeping rough. It includes psychologists, counsellors, tenants unions, parole officers, foster carers, drug support services, domestic violence support services, even local Councils with front of house staff in community centres and libraries. All of these need additional (and consistent) funding to be able to better support those at risk of homelessness.
 - Likewise, the agencies who do deal with the frontline of emergency housing need more and consistent funding to be able to provide more accommodation and programs. All too often you hear of crisis housing providers having to close their doors due to lack of ongoing funding. This loses expertise and infrastructure, demoralises staff, and wastes government money.
 - Crisis accommodation should be custom built and co-located with support services such as health, drug counselling etc. The current practice of housing homeless in hotel rooms at exorbitant cost must stop as they cost way more than rental accommodation.
 - Raising the rent assistance payment for those living on Government welfare would help more people afford private rental.
 - 3b. What actions can governments take to facilitate early intervention and preventative responses?
 - Provide additional and consistent funding to psychologists, counsellors, tenants unions, parole officers, foster carers, drug support services, domestic violence support services, even local Councils with front of house staff in community centres and libraries. All of these professionals also work to prevent homelessness and need help to be able to better support those at risk of homelessness.
 - Increase the number of annual subsidised mental health professional consultations.
 - Provide financial support for Tenants' Unions (or a similar organisation) in each State to enable them to provide 1:1 support for those at risk of losing their rental accommodation.
 - Government funding for transitional housing support for those exiting institutional and foster care. For young adults this could be as simple as funding their foster carer to continue to provide support beyond age 18.
 - Financial support for mentoring and mental health support (beyond that available to the general public) for those exiting institutional and foster care.
4. How can governments capture better evidence on ‘hidden’ or ‘invisible’ homelessness (e.g. couch surfing, living in a car and overcrowding)?

I think it is worth adding a census question on this such as:

- Is this your regular place of residence?
- Where is your regular place of residence (with "Don't have one" as a response option)

5. Is the Canadian National Occupancy Standard measure of overcrowding, and the way it is applied in Australia to define homelessness, suitable for the Australian context?

Generally I think the Canadian National Occupancy Standard measure is appropriate. I am not sure about the definition of overcrowding as being a child over 5 years of age without their own bedroom. I think two children sharing a room is fine and in a sustainability and climate crisis we need to learn to live with smaller environmental footprints. Probably above age 10 it is better if children of separate sexes are separated.

Section 3.2 Homelessness services

1. What are the main challenges in addressing chronic and repeat homelessness?

Beyond my expertise or knowledge.

2. What housing or dwelling models may need to be considered to provide appropriate options for people experiencing chronic and repeat homelessness?

Beyond my expertise or knowledge.

3. What are the medium and longer-term steps that can be taken to ensure we have a more consistent and coordinated service system to support people who are experiencing or at risk of homelessness?

Beyond my expertise or knowledge.

4. What are the best specific early intervention approaches to prevent someone becoming homeless?

- Ongoing support (financial and emotional) for those being de-institutionalised
- Children existing foster care should have the ability to access care and support until 25 years of age.
- Greater financial support of the Tenants Unions so they can employ staff to help renters resolve disputes with their landlord.

5. In what areas of the homelessness service response are people who are experiencing or at risk of homelessness not getting the support they need?

Beyond my expertise or knowledge.

6. How can the availability of accessible (particularly in relation to the physical environment) crisis and/or transitional accommodation be increased in the short to medium-term?

See my response to question 2 above.

7. What strategies can be used to build awareness of available services and supports for people who are at risk of homelessness or experiencing homelessness?

Local Councils can be a good conduit for this information - through their phone line, community centres, libraries, child care centres.

Section 3.3 ATSI Housing

Outside my area of expertise or knowledge.

Section 3.4 Social Housing

1. What is the role of social housing for low-income Australians?

This role is changing as house purchase and rental prices keep increasing. In the past social housing was for those who were unemployed or unable to work. Now many people working in lowly paid jobs are also unable to afford private housing. The role of social housing needs to increase to be able to provide for at least 15% of the population. This may include many workers in lower paid jobs.

2. What factors should state governments and housing organisations consider when allocating social housing?

I know women and children get priority placement. As I mentioned in my introduction to this submission, [REDACTED] a [REDACTED] man with a [REDACTED] who has been on the public housing waiting list for 32 years. During this time he has been unable to work more than 1-2 days per week at most. I am told the average wait time is 6 years so obviously the allocation priorities are not working. Surely the length of time on the waiting list should be one of the criteria?

3. How can governments ensure social housing is built in the right location (including close to amenities, environmental, socio-economic, current and future hazard risk and cultural factors) and will meet current and future needs of social housing tenants and the broader community?

- In my experience local Councils have a lot of this information. They also have local contacts to listen to the needs of their populace. It may be necessary to support regional Councils financially to have the resources to collect this data.
- The right locations should take into account climate change considerations as many areas of Australia will become uninhabitable, or uninsurable. An overarching Federal Government body should look at master planning the safest areas for increasing and moving our population to. New public housing should be concentrated in these areas.
- Climate refugees from within Australia, and overseas, will increase demand on public housing.

4. What are the key short-term and/or long-term social and economic issues in social housing?

- We need better funding and policy for dealing with maintenance and/or replacement of existing, ageing public housing.
- There is a lack of publicly owned land for public housing. Purchasing new land comes with a hefty pricetag. We would be better to keep publicly owned land for public housing. Public-private partnerships on public land are a way of giving away assets from the public realm to the private and limit any future ability to provide more public housing on that site in the future

5. What changes can be made to the current social housing system to improve outcomes for tenants and/or improve the efficiency and effectiveness of the social housing sector?

One thing the issues paper suggests but doesn't really delve into is an exit pathway from social housing ie is there some way underutilised public housing can be reallocated, or those whose

income increases so they could afford private rental move out of social housing? This is a tricky question that needs a lot of unpacking. Some issues:

- Public housing has traditionally been provided for the duration of their life. In some ways this is great as it provides security of tenure, the emotional value of which cannot be underestimated. The knowledge that (in public housing at least) their housing will only cost 1/3 of their income also provides the security of knowing that they can afford their accommodation. Bearing this in mind, if there is any change to eligibility criteria over time any assessment should not be too frequent - say once every 5 years.
 - Many larger social housing dwellings that formerly housed families are now occupied by only one or two people. If these people could be relocated into smaller dwellings in the same area the existing public housing stock could be allocated more effectively.
6. What are the most-effective wrap-around supports required to support Australians in social housing to maintain their tenancies? Are there existing effective models that could be scaled up?

Outside my area of expertise or knowledge.

Community Housing

7. What future role should the community housing sector play in Australia and what initiatives and funding mechanisms would support this?
- Co-housing should provide a supporting (not leading) role to Government-provided public housing.
 - Personally I think the co-housing sector would be better providing affordable rental accommodation for those on waiting lists to get permanent Government-provided housing, or on low incomes, or those in short-term need while they are unemployed or ill.
- 7a. Are there any capacity and capability constraints impacting on future growth of the community housing sector?
- Current Planning & Zoning schemes don't support alternative models of community living such as owner-occupied co-housing schemes. Here is an example from NZ <https://www.abc.net.au/news/2023-08-24/nz-opens-density-limits-friends-developing-new-housing/102714716>
8. What changes to community housing regulation could improve outcomes for tenants, the community housing sector, governments and investors?

Outside my area of expertise or knowledge.

9. Do current regulatory approaches support future growth in the community housing sector?

Outside my area of expertise or knowledge.

10. How can governments and their partners best grow social housing stock?

Amend taxation law and aggressively prosecute high income earners and companies who practice tax avoidance to increase government revenue to be able to spend on social housing (take from the rich to give to the poor).

11. How can social housing providers better support people with complex needs (such as people with disability, people from culturally diverse backgrounds and people with mental health, alcohol and other drug issues)?

Outside my area of expertise or knowledge.

12. In a multi-provider system which includes public and community housing, how can governments and housing organisations ensure that people in most housing need or with complex needs can access housing?

Outside my area of expertise or knowledge.

13. What significant issues within the social housing sector lack sufficient quality data to inform decision-making?

Outside my area of expertise or knowledge.

14. What actions are needed now to ensure there is social housing available for people in need?

It is all urgent as decades of neglect have let national housing get into a state of crisis.

To reduce the issues that cause people to end up needing social housing:

- Increase the security and quality of rental tenure.
- Improvements to employment law to reduce the casualised workforce.
- Changes to taxation law to stop negative gearing. Why should the government be supporting the affluent to further increase their personal wealth rather than them paying taxes to help support the less well off? Once you remove the desire for people to own multiple houses the cost of house purchase prices will drop.
- Encourage institutional investment in rental accommodation (particularly superannuation funds)
- Tax income from short-term accommodation in private residential dwellings (Airbnb tax) at a higher rate.
- Encourage people struggling with cost-of-living to take in a boarder by making this income tax exempt. In 2019-2020 over 77% of Australian houses had at least one bedroom spare <https://www.abs.gov.au/statistics/people/housing/housing-occupancy-and-costs/latest-release> Set up a program to advertise and educate the public of this possibility. This could be an alternative social housing offering.
- Government action to prevent real estate agents colluding to create blacklists to exclude certain people from rental accommodation. For example, I know from personal experience in Victoria that online rental reference forms are shared between real estate agencies and have a question that states "Did the tenant ask for unreasonable repairs?" With no definition of what "reasonable" is.
- Government action to strengthen rental tenancy laws to create greater security of tenure and protection of minimum standards of accommodation.

15. Are there longer term policies that need to be considered to support social housing over the next 10 years?

See response to question 14 above. In addition, we need to:

- Continue the Big Housing Build (or a similar program) to keep building new public housing stock. Given the under-supply over previous decades, and the poor past maintenance which has meant that much public housing is now unable to be repaired at a reasonable price, this need is going to continue for much longer than five years.
- Much past fiscal economic theory used by the Reserve Bank has been based on using an unemployment rate of 5% to limit inflation and manage the economy. Recently they have explored allowing unemployment rates to be lower. Whatever the unemployment rate is, that percentage of the population are having their economic stability and well-being sacrificed for the good of the remaining 95% of the populace. The least we can do is provide public housing for them in return. So public housing numbers should be at least equal to the numbers of those unemployed.
- Universal basic income (UBI) should be explored. It may be that with a UBI a lot less social housing is required.
- Government encouragement for large employers to provide accommodation for their workers, particularly in regional areas. For example, in the past many hospitals provided apartments for their nurses. This is particularly important for poorly paid service industry workers

Affordable Housing (this one didn't even get a section number)

Please refer to my comments at the beginning of this submission as I have made a number of comments about political and economic drivers affecting affordable housing.

1. How can governments encourage delivery and availability of affordable housing in the short, medium and long-term?

As stated in my covering comments there is a lot of behind-the-scenes work on Affordable Housing before the question above can even be contemplated. We need definitions.

- What is the definition of Affordable Housing? This should be national and provide ongoing subsidised accommodation (not just a cheaper purchase price).
- Who operates (and polices) affordable housing properties?
- Who is this for? What are the eligibility criteria?
- We need regulation and governance to design for fair allocation and operation – particularly if the private sector are to be involved in the delivery.
- There should be government regulation that a development over say, 20 dwellings, be required to provide at least 10% of dwellings to an affordable housing operator.

2. How can governments work with institutional investors to support more housing development (particularly affordable housing)?

- In other countries institutional investment provides most rental accommodation, in Australia, it is regular mums & dads with negative gearing. Why have Australian policies determined this and how can we attract institutional investment? Economic models in other countries with higher institutional investment must be a key.

3. How can all levels of government incentivise affordable resilient housing options in new builds, and affordable retrofitting for existing housing?

- It is good to see resilience getting a mention here. This needs a definition - resilience to climate change? Or durable construction? Or providing a sense of resilience to the occupants (psychological factors)?
- Design needs to take into consideration our drastically heating climate as well as the increased likelihood of catastrophic events such as storms, fire and floods. New builds should be at least 8 Star energy efficiency and designed with oversized gutters and located away from flood and fire risks.
- Existing homes should start to think about climate refuge - which room can be heated/cooled when weather extremes occur? This room should be insulated (ceilings, walls, floor), and fitted with reverse cycle airconditioning, at a minimum, ideally with heat recovery ventilation as well. One great program looking at this idea occurred in Geelong, In Victoria <https://www.abc.net.au/news/2023-04-02/project-makes-houses-safer-during-heatwaves-and-extreme-cold/102164200>
- There should be Government programs to ensure all rental accommodation has at least one reverse cycle airconditioner to a living area and ceiling insulation (as a minimum). This could be a mandatory requirement, or there could be rebate programs to encourage the uptake.
- The National Construction Code needs to make changes not just based on carbon abatement measures, but also based on future predicted weather and rain events. I am an architect based in Melbourne but have just done training on design for tropical conditions as I have observed our rainfall is becoming more tropical in character and northern cyclonic weather patterns are now reaching Victoria.

3.5 Housing Costs, Home Ownership & the Private Rental Market in Australia

1. What should the most important (long-term) and/or immediate (short-term) housing market policy focus be, across all levels of government, over the next 10 years?

The changes need to be greater than just to housing market policy as so many other factors feed into it.

- Increasing affordable and public housing stock. We have one of the lowest percentages of public housing per capita.
- To do this we need to increase taxes. Negative gearing and tax avoidance should be stopped. See my comments at the beginning of this submission.
- Encouraging institutional investment in rental accommodation properties.
- Disaster management strategies. If we don't plan now for climate refugees from areas under threat from extreme heat, flood and fire then our housing shortage will increase astronomically. Government should, at a national scale, work out which areas of Australia pose less risks and concentrate services and new construction in those locations - taking into account issues like people needing to live remotely for food production.
- Improvements to rental lease terms and conditions.
- Regulation of the minimum quality of rental properties. Draft sealing and insulation are the two most important issues for energy efficiency. I have a young family member currently renting a house [REDACTED] where there are 30mm gaps at windows that they can't get the real estate agent to fix. As mentioned above under my comments on climate

refuge rooms I believe each dwelling should be required to have at least one reverse cycle airconditioner.

- Government regulation to reduce the amount of casualisation of the work force would increase job security which then leads to greater housing security, a healthier population and reduced healthcare costs.
- It should be mandatory for private developments of over 20 dwellings to provide a minimum of 10% social housing units

2. How can the utilisation of existing properties be improved? How can governments incentivise improved utilisation of existing properties?

I like this question. There is not a shortage of bedrooms. In 2019-2020 over 77% of Australian houses had at least one bedroom spare

<https://www.abs.gov.au/statistics/people/housing/housing-occupancy-and-costs/latest-release>.

One of the causes of the current housing shortage is a trend towards less people per dwelling. Anything to encourage people to share more - with extended family, share houses - would decrease the demand. Here are some ideas I had:

- There could be Government programs to help encourage people with spare bedrooms to share them with those in need. Other countries have different models for eg in Norway income from long-term rental in a house you occupy is exempt from tax (but income from short-term accommodation such as Airbnb is taxed).
- In Italy they have programs pairing a young person looking for accommodation with an old person living on their own. <https://www.weforum.org/agenda/2018/11/why-some-students-in-milan-are-moving-in-with-elderly-people/>
- Those escaping domestic violence, or older women at risk of homelessness due to the economics of relationship breakdown, may be able to be able to share successfully with others, in subsidised private rental.
- Long term social housing tenants whose family have left home and are only occupying a portion of their dwelling could be encouraged to share - or move to a smaller dwelling. The short SBS series Molly & Cara is a good example <https://www.sbs.com.au/ondemand/tv-series/molly-and-cara>

3. How do supply, demand and affordability challenges differ in urban and regional/remote areas? How could these differences be taken into account when designing policy?

Outside my area of expertise or knowledge.

Home ownership

There should be government support for alternative mortgage options, such as small, short-term mortgages, land rent schemes and low-cost government-backed reverse mortgages for those at risk of falling out of home ownership.

4. How can the use and release of land encourage residential growth in well located areas (i.e. close to infrastructure, jobs and services, and resilient to natural hazards) in the short, medium and long-term?

In Australia we need to stop expanding our cities outward. Instead we need to densify the existing land area and reduce individual dwelling sizes. This is the only way we can protect our remaining landscape around our cities for food production and biodiversity.

5. Are there ways to improve supply chain issues to support more efficient housing supply and reduce building costs?

In terms of affordability, part of the reason building costs have skyrocketed so much is that all the fabrication industries have relocated offshore. This became incredibly apparent in COVID lockdowns where even just the lack of one small component could stop a whole building project. Government should support industries to produce locally.

6. What role can housing by design play in improving housing supply and affordability?

I'm not sure I understand this question. I think prefabrication of construction will be increasingly important. Currently there are cost penalties largely due prefabricated components still being in their infancy, and many prefabricated wall panels (for example) are imported from overseas. Government investment and support for local industries working in prefabricated construction will help bring construction costs back down

Rental Properties

7. How can flexibility, accessibility (particularly in the physical environment), affordability and security be improved in the rental private market, particularly for low-income earners?

- Government action to strengthen rental tenancy laws to create greater security of tenure and protection of minimum standards of accommodation.
- Regulation of the minimum quality of rental properties. Draft sealing and insulation are the two most important issues for energy efficiency. I have a young family member currently renting a house [REDACTED] where there are 30mm gaps at windows that they can't get the real estate agent to fix.
- As mentioned above under my comments on climate refuge rooms I believe each dwelling should be required to have at least one reverse cycle airconditioner.
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- Improvements to employment law to reduce the casualised workforce (would increase the security of rental accommodation a lot).
- Government action to prevent real estate agents colluding to create blacklists to exclude certain people from rental accommodation. For example, I know from personal experience in Victoria that online rental reference forms are shared between real estate agencies and have a question that states "Did the tenant ask for unreasonable repairs?" With no definition of what "reasonable" is.

8. Are further wrap-around supports required to support vulnerable Australians in the private rental market to maintain their tenancies? Are there any examples of effective models that could be scaled up?

Provide financial support for Tenants' Unions (or a similar organisation) in each State to enable them to provide 1:1 support for those at risk of losing their rental accommodation.

9. What should governments, private industries, the not-for-profit and community sectors focus on to help improve access to housing and housing affordability in the private market?

The issues paper badly needs a definition of what constitutes affordable housing. For example a private development when some apartments are sold at below market rate is a missed

opportunity as the dwelling is only "affordable" the first time it is sold and does not contribute to the overall increase of affordable housing stock.

3.6 The Importance of Planning, Zoning & Development

1. To what extent is the supply, affordability and diversity of houses affected by planning and zoning regulations and administrative processes?

Town Planning regulations are important for protecting quality of design and notification of neighbours. In the projects I work on there is more conflict between neighbours where there hasn't been a Town Planning Process.

- Planning and Zoning Laws should be amended to incorporate the delivery of social and affordable housing that is affordable in perpetuity through mandatory contributions by landowners and developers.
- Incorrect data interpretation. Town Planning housing regulations are based on an assumption that the basic housing user is a single nuclear family. This is incorrect data interpretation. Figures presented by the Census (and quoted in the Issues Paper) states that 70.5% of houses are occupied by families. But when you look at the data in detail this includes couples, and families whose adult children have left home. A household just occupied by a couple has very different housing needs to one with young children. In reality less than 40% of Australian homes are occupied by families with non-adult children <https://profile.id.com.au/australia/households-with-children#:~:text=There%20are%201%2C608%2C072%20couples%20with,both%20adults%20and%20children%20age.>
- Planning laws are not flexible enough to allow different models of living. Many families, especially migrant ones and indigenous Australians, want to live with different housing models such as multi-generational living, or providing capacity for adult children to continue living at home – but with their own independence and autonomy. Current town planning regulations do not support the ability for extended families or disparate groups to be able to live together with semi autonomy. In particular, only one kitchen or laundry is allowed per property without subdividing.
- Town Planning approvals are terribly slow, where I work 9-12 months is typical for a simple house extension. The process is good but way too much time is spent with a file sitting on someone's desk - generally because local Council Planning departments are understaffed. This is a funding issue. Speeding this up would reduce construction costs and alleviate the housing shortage faster.
- The Tiny House movement is really popular and many people are prepared to live in very small accommodation (which is of course more affordable). But Planning and Building Regulations are generally unsupportive. For example typical problems tiny houses would have achieving compliance are in areas like ceiling heights, stair widths and slope and sleeping platforms on mezzanines.
- Planning regulations lagging behind demand. The private sector is keen to be able to provide additional accommodation (secondary dwellings) within their properties and much of this is happening illegally already. It would be good if Planning regulations were updated to control the quality of the spaces that are being created.
- Planning regulations too inflexible to support alternatives. Other models of group living people are not supported by current Planning regulations eg people pooling their money and living semi-autonomously <https://www.abc.net.au/news/2023-08-24/nz-opens->

density-limits-friends-developing-new-housing/102714716. This is a good model for self-funded retirement living.

2. How can planning and zoning regulations effectively increase the supply of land in well-located areas taking into consideration current and future hazard risk?

- Given the climate crisis, Australia's environmental fragility, and our rapidly increasing population we should really be ceasing expansion of our cities into arable land. Instead, we should be building smaller dwellings, more closely located together and located near services etc but also located proximate to areas for food production, water supply and recreation to support that population.
- The National Construction Code needs to be radically changed to suit future predicted weather and rain events so that the homes we build, and where we build, can cope with the changing climate over the next 50 years. Underground is a possibility?
- Federal Government must prepare a national disaster management master plan to map the risks for all regions of Australia. This should inform what regions of Australia will, in the future, become uninhabitable, and where the safest areas are where population can be supported (and how). This should be available as a resource for all levels of Government and the public for future planning.

3. How can governments work together to be more responsive and flexible to housing demand pressures, both now and in the future?

Outside my area of expertise or knowledge.

4. What is the role of state and local governments in the improvement of speed and/or transparency of development assessment processes to help improve supply of housing and the affordability of homes?

As mentioned above, one of the things increasing the cost of housing are extended delays in Planning approvals. I don't think the process is broken, just that there aren't enough staff to handle it in a timely manner.

5. How can the development assessment process address community concerns, so the length of appeals processes is minimised, and developers have an efficient path to resolve issues and gain approval?

- VCAT constantly undermining Council decisions doesn't help! My experience of VCAT is that whoever has the most money wins and they have more consideration of financial matters and less concern for the environment and the community. So if the project has enough financial gain it is worth developers challenging the decision and clogging up the system.
- Town Planning, as a mechanism to control quality of construction, is a toothless tiger as its power is limited to only when major building changes are proposed. In addition, penalties for non-compliance are so weak that they do not serve as a deterrent. One suggestion to strengthen both energy efficiency (star rating requirements) and rental construction standards would be random inspections of houses to ensure compliance with minimum standards.

6. How can state and local governments improve accessibility (particular in the physical environment) through planning and zoning, for example, to ensure transport systems are accessible for the whole community?

Through changes to the National Construction Code and Australian Standards ie minimum regulatory standards.

7. What key short, medium and long-term planning and zoning reforms could be explored in the Plan?

- For many years I have bemoaned that fact that our Zoning system is based on a birdseye view or plan map. This siloes areas of activity so we end up (pre-COVID at least) with dormitory suburbs, located a long way from shops, services and places of work. The most vibrant liveable communities around the world have a mix of land use types together. A much more effective Zoning model would be to look at levels for example retail on the ground floor, offices on a first floor and residential above. That way the streets and public spaces are used all the time, commute times are reduced, shopping trips can be done one foot rather than in a car and so on. To do this we also need good allocation of public open green spaces nearby.
- Reform Planning regulations to allow permanent Tiny House construction - possibly multiple dwellings on a site with shared services and open space.
- Reform Building regulations specifically for Tiny House construction with their own laxer Building Regulation requirements.
- Reform Planning regulations to allow secondary dwellings on a residential site if certain conditions are met.

8. What other reforms, beyond planning and zoning, can governments implement to improve the speed and efficiency of the supply of housing?

I think prefabrication of construction will be increasingly important. Currently there are cost penalties largely due prefabricated components still being in their infancy, and many prefabricated wall panels (for example) are imported from overseas. Government investment and support for local industries working in prefabricated construction will help bring construction costs back down

9. How can governments and other stakeholders (e.g. property developers) ensure that planning and housing decisions do not create or embed hazard risks?

Federal Government must prepare a national disaster management master plan to map the risks for all regions of Australia. This should inform what regions of Australia will, in the future, become uninhabitable, and where the safest areas are where population can be supported (and how). This should be available as a resource for all levels of Government and the public for future planning.

3.7 The Impact of Climate Change and Disasters on Housing Security, Sustainability & Health

Firstly, Government needs to take drastic action to reduce the risk of climate hazards happening:

- Government must immediately put a ban on all new fossil fuel projects;
- Government must bring forward the closure date of coal-fired power stations;
- Government must prepare a national disaster management master plan to map the risks for all regions of Australia. This should be backed by science and inform what regions of Australia will, in the future, become uninhabitable, and where the safest areas are where population can be supported (and how). This should be available as a resource for all levels of Government and the public for future planning.

1. How can governments improve housing and accommodation service coordination to better support individuals affected by hazards?
 - A National Disaster Management Strategy Plan (as referred to above) with zoning information is essential for other services to refer to.
 - There will be multiple disasters and requirements for short-term rehousing, or relocation. Government should not assist people to rebuild in areas currently deemed uninsurable and should instead encourage relocation to a safer area.
 - Government should develop relocatable multi-residential accommodation pods ready to be shifted to disaster affected areas as soon as possible after the event. Overseas aid disaster relief agencies would have prototypes. I'm thinking of something like the pop-up shipping container mall at Christchurch in NZ after the earthquake there in 2011 <https://premiershippingcontainers.com.au/2017/11/01/shipping-containers-and-the-christchurch-re-build/>.
2. How can governments support hazard resilient housing and housing modifications for new and existing housing, in particular within rural and remote locations that are more likely to be impacted by extreme weather events?
 - One of the weaknesses of building regulations is that they only apply when someone is making substantial changes to the building fabric. Rental and public housing could be improved by having mandatory minimum energy efficiency and heating/cooling requirements - as I have noted elsewhere in this submission. Random inspections to ensure compliance are essential.
 - Heatwaves result in more deaths in Australia than bushfires, severe storms, cyclones and floods combined (Hughes, L., Hanna, E. and Fenwick, J., 2016 The silent killer: Climate change and the health impacts of extreme heat, The Climate Council.) Thus the idea of climate refuge rooms (insulated and cooled) in each dwelling becomes important.
 - Once a National Disaster Management Strategy Plan (as referred to above) is prepared I think people living in houses and areas deemed to be unsafe/uninhabitable should be given a grace period, and maybe some grants, to relocate and/or make modifications to their home to improve its chances of withstanding a catastrophe. For eg in a bushfire prone area maybe the minimum requirements for them to continue living there are the installation of a fire emergency bunker and a sprinkler system to the roof and eaves of the house.
3. How can governments better encourage the uptake of energy efficient housing modifications and design?
 - In Victoria, Energy Efficiency measures would be really boosted if the State Government would approve the requested planning scheme amendment 'Environmentally Sustainable Design Targets' which was submitted by 24 local councils on 21 July 2022. Delays in approvals such as this really impact the delivery of climate-ready dwellings.
 - Building Regulations are the best place to ensure uptake of energy efficiency measures. There will always be those who want to do what is best but regulations serve to protect everyone. As mentioned earlier, future changes to the National Construction Code should be more radical to suit future predicted weather and rain events so that the homes we build, and where we build, can cope with the changing climate over the next 50 years.
 - Compliance - one of the weaknesses of the current Energy Efficiency construction requirements is that no-one (except the architect if one dedicated to sustainability is

involved) checks it. It should be mandatory for Building Surveyors to check that the energy efficiency materials, construction techniques and the like, that have been specified have actually been implemented in the build. I have had builders say to me "What energy efficiency target do we have to say we are achieving?" Spot checks by government assessors (like they do with plumbing compliance) would really make a huge difference.

4. How can housing policies and programs support people who have been displaced due to climate disasters?

- I think in the short term governments should help with relocatable temporary accommodation ready to be shifted to disaster affected areas as soon as possible after the event. Overseas aid disaster relief agencies would have prototypes. I'm thinking of something like the pop-up shipping container mall at Christchurch in NZ after the earthquake there in 2011
<https://premiershippingcontainers.com.au/2017/11/01/shipping-containers-and-the-christchurch-re-build/>.
- Often these people would lose their employment in the disaster too. For this reason many are likely to end up on public housing waiting lists. This is another reason why really strong climate change mitigation is imperative now.
- Ideally people are notified of the high risk of their place of accommodation well before a disaster happens so that they can avoid it!
- In many cases people who have been dislocated from the disaster may be best encouraged to relocate somewhere safer. Obviously for Aboriginal people living on traditional lands this is incredibly problematic. Many Torres Strait Islanders will have no choice but to relocate.

5. What options should be explored for improving the energy efficiency of rental properties?

- Ensure rental accommodation meets minimum standards. There should be a government program requiring mandatory independent inspections of rental properties to provide a condition and energy efficiency report prior to rental advertisements and new lease agreements. The report should be made readily accessible to prospective tenants. The ACT Minimum Energy Efficiency Standards program is a start but as well as insulation it should also cover ventilation, building sealing, heating and cooling and getting off gas. <https://www.justice.act.gov.au/renting-and-occupancy-laws/energy-efficiency-standards-for-rental-homes>.
- Like I said with energy efficiency at point 3 above, spot checks by government assessors (like they do with plumbing compliance) would really make a huge difference.

6. How can hazard resilience and thermal performance of housing in regional and remote locations be improved?

- A National Disaster Management Strategy Plan (as referred to above) with zoning information is essential for other services to refer to. If widely publicised and supported by local Councils this would inform owners of their risk and support information should be provided to assist them to mitigate their risk.
- Rental properties in regional risk areas should be required to upgrade their property to mitigate the risk.
- There is no point spending money improving houses in areas that will become uninhabitable due to climate change.