

Submission to the National Housing and Homelessness Plan Issues Paper

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Executive summary

CHIA NSW welcomes the opportunity to contribute to the development of the National Housing and Homelessness Plan. As the peak body for community housing in NSW, CHIA NSW recognises the need for social and affordable housing is significant and growing. Over 220,000 households in NSW had unmet housing needs in 2021 and this is set to grow to over 320,000 by 2041. Unmet housing need has impacts for the people directly affected, but it also creates significant costs for the wider community in lost productivity and higher demand for government expenditure on health and justice services.

The National Plan provides the opportunity to drive transformative change in the Australian housing system, and the community housing industry in NSW is ready to play a central role.

CHIA NSW's members, who own or manage over 54,000 properties in NSW, have a strong track record in providing high-quality homes and services across the housing continuum. They have delivered over 5,800 new homes across NSW over the last 10 years, with an additional 2,600 homes in the pipeline by 2026. The industry is ready to drive further growth in social and affordable housing supply by investing in local communities.

CHIA NSW endorses the joint submission prepared by our national peak body, the Community Housing Industry Association, and National Shelter. Specifically, CHIA NSW supports its proposals for:

- An overarching vision that “Everyone in Australia has a safe, affordable and appropriate home”
- Meaningful goals, including that all communities have enough social and affordable housing to meet their needs
- Leadership with Housing Australia having responsibility for delivery of the National Plans goals, and coordination with Federal agencies as well as State and Territory Governments
- Budget commitments that fully fund the National Plan
- Publicly available targets to improve performance across all jurisdictions over agreed timeframes
- Governance with the National Housing Supply and Affordability Council overseeing delivery and implementation of the National Plan
- Data improvement to improve national reporting on social and affordable housing.

CHIA NSW proposes five priority reforms for the National Plan.

1. Creating an ongoing national program of sustainably funded, permanent social and affordable homes

This is the single most important priority for the National Plan. Australia needs a significant boost in social and affordable housing to meet need, reduce homelessness, and rebalance our housing system. Importantly this will create economic, social, and environmental benefits such that for every \$1 invested in social and affordable housing \$2 of benefits are delivered.

CHIA NSW recommend the National Plan includes:

- Social and affordable housing supply targets
- Initiatives to leverage investment at scale to build new homes
- Commitments to activate government owned land for social and affordable housing
- Targets for title and/or management transfers to CHPs to enable further investment
- A commitment to create a national regulatory system for community housing.

2. Creating growth opportunities for Aboriginal community housing

Despite the significance of home for Aboriginal and Torres Strait Islander peoples, they are much less likely to own their home and much more likely to rent, experience homelessness and overcrowding than the general community. Increasing the supply of social and affordable housing, particularly through Aboriginal community housing providers, is critical to improving these outcomes and closing the gap.

CHIA NSW recommends the National Plan:

- Facilitates Aboriginal community housing growth plans at State and Territory Government level
- Dedicates growth funding to Aboriginal community housing providers
- Identifies funding for Aboriginal organisations to develop their land into new homes
- Includes targets for title and/or management transfers to Aboriginal community housing providers to enable further investment.

3. Reducing homelessness in Australia

Homelessness in NSW is increasing, particularly for Aboriginal and Torres Strait Islander peoples and young people. This is putting pressure on the service system with nearly 10,000 people turned away from Specialist Homelessness Services in NSW last year.

CHIA NSW recommends the National Plan:

- Commits to an ambitious goal to reduce homelessness in Australia
- Increases funding for Housing First programs and Specialist Homelessness Services
- Invests in evidence-based homelessness models.

4. Building sustainable and climate resilient communities

Climate change is already impacting our communities and lower income households experience these impacts disproportionately, through energy poverty, poor health, and housing insecurity due to climate events. Responding to these issues by creating a resilient built environment is costly, with current estimates putting the cost of improving the sustainability of existing social housing at \$5,000 to \$12,500 per property.

CHIA NSW recommends the National Plan:

- Commits to a National Climate Change Retrofit Strategy to decarbonise social housing at scale
- Provides funding for CHPs to develop net zero plans for their portfolios
- Facilitates a smooth transition to net zero.

5. Embedding planning reforms to support efficient delivery of social and affordable housing

The planning system is not delivering the volume of housing required in NSW, particularly at prices that are affordable for low to moderate income households. CHPs deliver new social and affordable housing where it is needed most despite several barriers within the planning system.

CHIA NSW recommends the National Plan commits to:

- Streamlining and broaden inclusionary zoning to deliver new affordable housing
- Developing streamlined approval pathways for community housing development
- Facilitating affordable housing development by establishing Affordable Housing Delivery Units at the State and Territory level and providing clarity on varying local design controls.

CHIA NSW recommendations

1. The National Plan incorporates a target that social and affordable housing makes up 10 per cent of all residential dwellings in Australia by 2041.
2. The National Plan incorporates a Social and Affordable Housing Investment Strategy with resourcing from all levels of government to leverage government contributions with those from the private sector, superannuation funds, not for profit organisations and philanthropic donations.
3. The National Plan identifies and facilitates the use of local, state, and federal government-owned land or property for social and affordable housing projects.
4. The National Plan incorporates targets for management and title transfer to CHPs to enable further investment in social and affordable housing.
5. The National Plan commits to developing a national regulatory system covering all states and territories. This reform would also include development of a single clear definition of social and affordable housing, a commitment to only direct government investment to registered CHPs, and a requirement for all CHPs in the regulatory system to be not-for-profit organisations.
6. The National Plan facilitates the development and oversees the implementation of Aboriginal community housing growth plans at the state and territory government level
7. The National Plan allocates a proportion of funding through the Housing Australia Future Fund, Social Housing Accelerator Fund and National Housing Accord for Aboriginal community housing
8. The National Plan identifies grant funding to assess and prepare existing Aboriginal land holdings for residential homes and infrastructure, including on Country.
9. The National Plan incorporates 10-year targets for management and title transfer to ACHPs and ACCOs to enable further investment in social and affordable housing.
10. The National Plan commits to an ambitious goal to reduce homelessness in Australia.
11. The National Plan increases funding for evidence-based homelessness models including Housing First models, core and cluster models, youth foyers and other supported accommodation models.
12. The National Plan increases funding for Specialist Homelessness Services and is fully indexed for inflation.
13. The National Plan commits to develop a National Climate Change Retrofit Strategy.
14. The National Plan provides funding to CHPs for net zero plans.
15. The National Plan facilitates a smooth transition to net zero by phasing in and properly resourcing any net-zero regulatory changes.
16. The National Plan includes actions to establish broad based regional and subregional inclusionary zoning schemes.
17. The National Plan supports State and Territory Governments to introduce streamlined development approval pathways for social and affordable housing, and establish a dedicated delivery unit within state planning departments.

1. Introduction

The Community Housing Industry Association NSW (CHIA NSW) is the peak body representing nearly 100 not-for-profit community housing providers in NSW. Our members collectively own or manage more than 54,000 homes for individuals and families who cannot afford to own or rent a home on the private rental market. CHIA NSW represents the largest community housing industry in Australia.

CHIA NSW welcomes the opportunity to contribute to the development of a National Housing and Homelessness Plan (the 'National Plan'). CHIA NSW endorses the joint submission prepared by our national peak body, the Community Housing Industry Association and National Shelter.

The National Plan presents a significant opportunity for governments at all levels to adjust their policy settings and incentives in the context of a multi-tenure housing system which has experienced a significant decline in home ownership amongst younger generations, the emergence of private rental as the fastest growing sector across Australia, rising unmet need for social and affordable housing, and increasing homelessness.

The purpose of this submission is to outline five priority reform areas for the Federal Government's action as part of the National Plan, which is informed by evidence, case studies, and lessons learned in the context of the NSW housing system.

This includes:

- 1. Creating an ongoing program of sustainably funded, permanent social and affordable housing**
- 2. Creating growth opportunities for Aboriginal community housing**
- 3. Reducing homelessness in Australia**
- 4. Building sustainable and resilient climate ready communities**
- 5. Embedding planning reforms to support the efficient delivery of social and affordable housing**

2. The role and value of community housing in NSW

Community housing providers (CHPs) are regulated, not-for-profit organisations that own or manage social and affordable rental housing for the long-term. CHPs own or manage more than 54,000 homes in NSW, including one-third of NSW's social housing portfolio. The not-for-profit community housing industry provides homes in 116 out of 128 Local Government Areas (LGAs) in NSW to a diverse range of individuals and families. This includes older people, women and children escaping domestic and family violence, people living with a disability, key worker households on low to moderate incomes, Aboriginal and Torres Strait Islander people, and people experiencing or at risk of homelessness.¹

CHPs have made a significant contribution to new social and affordable housing supply in NSW, creating homes that the private market cannot or will not deliver. Between 2012 and 2022, CHPs built more than 5,800 new homes in 49 LGAs, creating \$1.8 billion in new housing supply, generating more than \$172 million in cost savings to government, and adding over 15,300 jobs to the construction and related industries across Greater Sydney and regional NSW.² The not-for-profit community housing industry in NSW has over 2,600 additional homes in the pipeline for delivery by 2026.

Registered, not-for-profit CHPs in NSW are regulated by the National Regulatory System for Community Housing and the Australian Charities and Not-for-profits Commission. CHPs are essential for delivering the long-term housing outcomes that NSW needs:

- **Proven delivery partners:** CHPs work with diverse partners within the government, private and not for profit sectors to deliver homes and social outcomes. The industry can deliver more homes over time, dollar for dollar than either the public or private sector due to its charitable status and ability to combine and leverage government funding, debt finance, equity, tax exemptions, philanthropic contributions, and access to Commonwealth Rent Assistance. In NSW, CHPs have successfully delivered new homes through a diverse range of programs, including the Social and Affordable Housing Fund, the Community Housing Innovation Fund, the Social Housing Initiative, and the National Rental Affordability Scheme.
- **Focused on public benefit:** CHPs build and manage homes for the long term, with all profits invested in creating and sustaining more homes and improving the lives of tenants. The quality of CHP services is secured by third party regulation and the value created by CHPs is protected by the requirement that it is held for the community in perpetuity, even if an individual CHP ceases operation.
- **Established in local communities:** CHPs engage closely with communities throughout NSW and have first-hand knowledge of local needs. With more than 40 years of experience in NSW, CHPs are experienced collaborators working with communities and service providers to create housing models suited to local needs. Responsive service delivery provides an immediate return on government investment by reducing the need for expenditure in homelessness, health, and justice services.
- **High quality services:** CHPs have maintained a reputation for responsive and high-quality service delivery, achieving an overall tenant satisfaction rating of 81 per cent across the NSW industry. CHPs deliver or coordinate access to a diverse range of services to improve the social, economic and health outcomes of their tenants, including employment support programs, educational assistance and training, community development initiatives, and tenant participation programs.

¹ CHIA NSW (2022) Community Housing Snapshot 2022, <https://communityhousing.org.au/wp-content/uploads/2023/07/Community-Housing-Snapshot-2022.pdf>

² *ibid*

3. Developing and implementing the National Plan

CHIA NSW welcomes the Federal Government's commitment to develop a long-term National Housing and Homelessness Plan to guide future policy across the different levels of government, which is delivered in partnership with key stakeholders, including the not-for-profit community housing industry.

The National Plan presents a significant opportunity to drive transformative change addressing the significant shortfall of social and affordable housing in Australia. It is recognised there are numerous approaches to deliver a permanent supply of social and affordable housing for people on very, low, and moderate incomes whose housing needs cannot be resolved in the private market. Accordingly, it is critical that the National Plan provides clear direction on the role of social and affordable housing in reducing the gap between market supply and unmet housing need across Australia.

Developing and implementing a long-term National Plan requires numerous elements to drive action and measure effectiveness. Accordingly, CHIA NSW supports the elements of the National Plan's architecture, monitoring and reporting approaches, and governance mechanisms outlined in the CHIA National and National Shelter submission. This includes (but is not limited to):

- **Proposed Vision:** *"Everyone in Australia has a safe, affordable and appropriate home."*
- **Goals:** The National Plan articulates meaningful goals and outcomes which are aligned to the achievement of its long-term vision. For example, the National Plan should include a goal that all communities have enough social and affordable housing to meet their needs.
- **Leadership:** Assigning the National Plan's development and delivery to a single agency, Housing Australia. Within this context, Housing Australia would be responsible for the delivery of the National Plan's goals, leadership of agency level coordination with State and Territory Governments, coordination with relevant Federal agencies, and ongoing engagement with key partners involved in delivering housing and services.
- **Budget commitments:** The National Plan is fully funded to deliver on identified actions, recognising these may be embedded in other external frameworks or strategies.
- **Commitment to publicly available indicators and targets:** National targets are aligned with State and Territory Government targets to improve performance across all jurisdictions over an agreed timeframe. For example, a priority target would report on and monitor a significant increase in the proportion of all homes that are social and affordable homes.
- **Governance:** The National Housing Supply and Affordability Council is well positioned to oversight the delivery and implementation of the National Plan, monitor its delivery, and provide expert advice on improving data collection to report progress. Consideration should also be given to the establishment of a governance mechanism for housing consumers, including people with lived experience of social housing or homelessness.
- **Data improvement:** To facilitate the planning and delivery of additional social and affordable homes, CHIA NSW supports cross-sector efforts to improve nationally consistent social and affordable housing data collections. For example, CHIA NSW's Data Dashboard reports on social and affordable housing which is managed and owned by the community housing industry in NSW, dwelling location, and current investment in social and affordable housing.³ However, this data is not publicly available for other jurisdictions.

³ CHIA NSW (2023), NSW Community Housing Data Dashboard, <https://communityhousing.org.au/our-impact/data-dashboard>

4. Priority 1: Creating an ongoing national program of sustainably funded, permanent social and affordable homes

CHIA NSW considers that the single most important priority for the National Plan is significantly increasing the supply of social and affordable housing in Australia over the next 10 years and beyond. This is central to addressing significant and growing unmet housing need, reducing homelessness, and rebalancing our housing system.

The problem

According to a recent analysis of unmet social and affordable housing need commissioned by CHIA National, more than 640,000 households in Australia are experiencing unmet housing need. Without significant intervention, this will increase to 942,000 households by 2041.⁴

At a state-based level, the CHIA National analysis demonstrates that NSW is experiencing the highest level of unmet social and affordable housing need in Australia. In 2021, an estimated 221,500 households in NSW (7.3% of all households) had unmet housing needs in that they were either living in housing stress in the private rental market or were homeless. This grew from 210,300 households in 2016 and, at current trends, is set to increase to 320,600 households by 2041.

Unmet housing need has implications for the households it directly impacts, but it also creates significant costs for the wider community by generating needs for support services, undermining productivity and educational outcomes, and increasing anti-social behaviour and criminal activity. It is estimated that failure to address social and affordable housing need will cost Australia \$25 billion per annum by 2051.⁵

The solutions

CHIA NSW welcomes the Federal Government's recent commitments to invest in more social and affordable housing through the Housing Australia Future Fund (HAFF), National Housing Accord (the Accord), Social Housing Accelerator Fund (SHAF), and the expanded National Housing Infrastructure Facility.

The delivery of social and affordable housing at scale creates significant economic, social, and environmental benefits for individuals, governments, and the broader community. A recent analysis commissioned by Housing All Australians demonstrates that, for every \$1 invested in social and affordable housing, an additional \$2 in benefits is achieved. This includes enhanced productivity and education benefits, cost savings to the health system, increased social capital, and a reduction in domestic violence and crime.⁶

The National Plan presents a critical opportunity to create transformational change within our housing system by developing a sustainable, long-term program for social and affordable housing. To facilitate the delivery of a long-term social and affordable housing pipeline, CHIA NSW recommends the National Plan includes:

- Social and affordable housing supply targets
- Initiatives that leverage investment at scale to build new homes
- Commitments to activate government-owned land for social and affordable housing
- Targets for title and/or management transfers to CHPs to enable further investment; and
- A commitment to create a national regulatory system for community housing.

⁴ van den Nouwelant, R., Troy, L. & Soundararaj, B. (2022) Quantifying Australia's unmet housing need - Regional snapshots, prepared for the Community Housing Industry Association

⁵ SGS Economics and Planning (2022), Give me Shelter – The long-term costs of underproviding public, social and affordable housing, report commissioned by Housing All Australians

⁶ *ibid*

Social and affordable housing supply targets

Research demonstrates that social and affordable housing outcomes are most effectively delivered when policies are embedded at the strategic level.⁷ CHIA NSW supports the commitment under the National Planning Reform Blueprint to update state, regional and local strategic plans to reflect their share of housing supply targets.

To ensure that sufficient housing supply is provided across the housing continuum, clear, measurable, and time-specific targets for net growth in social and affordable housing at the state, regional and local government level are needed. This will provide clarity around which policymakers, industry, and investors can work together to deliver outcomes, and against which progress can be measured.

CHIA NSW recommends that the National Plan commits to increasing the supply of social and affordable housing to **10 per cent of all residential dwellings** in Australia by the end of 2041.

These targets should also be underpinned by joint delivery plans which outlines how all levels of government will work collaboratively with the community housing and private sectors to successfully deliver each jurisdiction's social and affordable housing supply targets.

CHIANSW recognises the process of developing the targets will necessarily involve identifying and agreeing to a set of data indicators that will underpin monitoring of the National Plan and be updated as the process of working towards defined goals and targets develops. It is also acknowledged that the process of developing indicators and targets will require extensive consultation with State and Territory governments.

Leveraging investment at scale to build new homes

Recent research into the supply of social and affordable housing has emphasised the critical importance of ongoing funding and consistent policy settings, in order to build confidence in the industry, maintain momentum for reform and attracting at-scale private investment.⁸

As a starting point, CHIA NSW recommends that the National Plan commits to developing and implementing a Social and Affordable Housing Investment Strategy to leverage funding and finance from all levels of government, the private sector, institutional investments, not-for-profit organisations, and philanthropy.

Not-for-profit CHPs are critical partners in the delivery of social and affordable housing supply. In addition to the HAFF and Social Housing Accelerator, a long-term social and affordable housing delivery program could potentially involve the establishment of a co-investment approach with State and Territory Housing Authorities, with CHPs contributing debt finance and taking the development risk on government land, with the gains shared between the parties in proportion to their contributions.

⁷ Pill, M., Gilbert, G., Gurran, N. and Phibbs, P. (2020) *Strategic planning, 'city-deals' and affordable housing*, AHURI Final Report No. 331, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/331>, doi: 10.18408/ahuri-7320301.

⁸ Milligan et al., 'Developing the Scale and Capacity of Australia's Affordable Housing Industry', 1; Richard Benedict et al., 'Private Sector Involvement in Social and Affordable Housing', *AHURI Final Report*, no. 388 (October 2022): 1, <https://doi.org/10.18408/ahuri7326901>.

CASE STUDY: Community Housing Innovation Fund⁹

The NSW Government's Community Housing Innovation Fund (CHIF) is a \$225 million group of programs delivering 1,000 social and affordable homes in Greater Sydney and regional NSW, in partnership with CHPs.

The CHIF uses a co-contribution model where government funding is leveraged against the additional financial and non-financial resources that CHPs can contribute to new supply projects. These resources include debt financing, equity, land, tax concessions and philanthropy, as well as the organisational and community partnerships and local networks that will support the tenants residing in these homes. The CHIF grant must be used for the social housing component of the project.

To date, CHPs have contributed more than \$134 million of their own resources to new housing supply, representing a co-contribution of up to 60 per cent for individual CHIF program rounds.



Photo: Mullumbimby CHIF project, Northern Rivers Housing

Activating government-owned land for social and affordable housing

The cost of land acquisition, particularly in high value markets where housing pressures are most acute, is a barrier to the delivery of social and affordable housing where it is most needed. The most direct way the government can deliver much needed social and affordable housing within a short period of time is to deliver dwellings on its own land. Prioritising the use of government-owned land for social and affordable housing will support development feasibilities and opportunities for new supply.

To achieve this, it is recommended that strategic plans include mandatory benchmarks for the delivery of social and affordable housing on government-owned land. Federal and state agencies disposing of or developing surplus land should be required to include a range of initiatives to address housing diversity and the need for affordable rental housing. A similar requirement exists in the Greater Sydney Region Plan.

To enable delivery of social and affordable housing to occur in a timely and efficient manner, planning and procurement processes for these sites need to be streamlined. This needs to be supported by removing policy barriers to the transfer or divestment of government land at less than full market value where there is a positive social outcome.

⁹ NSW Department of Communities and Justice (2022) Community Housing Innovation Fund, <https://dcj.nsw.gov.au/service-providers/grants/community-housing-innovation-fund-chif.html>

Accordingly, CHIA NSW recommends that the National Plan identifies and facilitates the use of Federal, State and Local Government-owned land or existing property for social and affordable housing projects.

CASE STUDY: Shoalhaven City Council and Southern Cross Community Housing¹⁰

The Coomea Street Bomaderry project is an affordable housing partnership between Shoalhaven City Council, the NSW Department of Communities and Justice, and a local CHP, Southern Cross Community Housing (SCCH) which will deliver 39 affordable units on local government-owned land in regional NSW.

The project demonstrates that for affordable housing projects to be financially viable, a level of subsidy is needed. Contributions or concessions may come from a range of sources. The project has been made possible through three funding sources:

- Shoalhaven City Council contributed the Coomea Street site for the value of \$2.2 million
- The NSW Government's CHIF program contributed 35 per cent of the construction cost (\$4.8 million)
- SCCH contributed to the remaining investment through its own equity (\$2.7 million) and debt financing

Once complete, SCCH will manage the 39 affordable housing dwellings, providing tenancy management and property maintenance services, as well as delivering community development programs and facilitating access to support services. Management through a not-for-profit CHP ensures the dwellings will remain as affordable housing indefinitely, and any profits will be used to develop further affordable housing in the Shoalhaven.

Increasing scale and growth opportunities for not-for-profit community housing providers

CHIA NSW recommends that the National Plan establishes 10-year targets for the continuation of title and/or management transfers to CHPs to enable further investment in social and affordable housing. This could be accompanied by state-based leveraging targets to track the delivery of new homes.

Recent transfer programs in NSW, such as the Social Housing Initiative and Social Housing Management Transfer, have been fundamental to the growth in scale and expertise of the community housing industry, who now manage more than 27 per cent of all social housing in Australia. For example, the Social Housing Initiative resulted in the delivery of more than 19,000 social housing dwellings across Australia over three years. However, in NSW, the transfer of title for these dwellings to CHPs resulted in the delivery of more than 1,000 additional social housing dwellings over and above those funded by the NSW Government as a result of leveraging targets.¹¹

Both title transfers and management transfers increase CHPs' operational scope and revenue. However, title transfers have immediate benefits to organisations, tenants, and governments, through improved services, increased housing supply, and greater diversity in the social and affordable housing system. Additionally, the increased scale and capacity of transfer organisations then provide a second stage of benefits, as CHPs use the increased capacity and financial strength that results from transfers to expand their services and impact.

¹⁰ CHIA NSW (2022) Regional Housing Case Studies, <https://communityhousing.org.au/local-councils-and-community-housing>

¹¹ KPMG (2012), Housing Ministers Advisory Committee – Social Housing Initiative Review, <https://www.yumpu.com/en/document/view/49840468/social-housing-initiative-review-department-of-families-housing->

CASE STUDY: Social Housing Initiative – Bridge Housing

In 2010 Bridge Housing was successful in receiving title to 242 properties in two tranches under the Nation Building and Economic Stimulus Program Social Housing Initiative (SHI). As part of its contractual obligations, Bridge Housing’s leverage target was to deliver an additional 75 homes over 10 years.

At the time of the transfer, Bridge Housing was a well-established CHP, but had never raised debt for development. Through the SHI leverage commitment, Bridge Housing secured debt of \$35 million and delivered 78 homes—more than its target—four years ahead of schedule.

Bridge Housing’s achievement of a large leverage target—31%— was due to the organisation taking advantage of the opportunity of title transfer to kick start a new phase in its development. The growth of Bridge Housing’s balance sheet enabled the organisation to raise debt. Bridge Housing continued to build on this capacity and its debt finance facility has more than doubled since that initial loan. Bridge Housing’s project delivery and management capacity is now well established, and the organisation is a key partner to state and local governments.



Photo: Bridge Housing

Case Study Highlights

31% leverage in 3 developments:

- New development: 31 homes in Bungarribee
- Redevelopment: 9 units in Ashfield
- New development: 38 units in North Parramatta

Establishing a national social and affordable housing regulatory system

A strong and fair national regulatory regime is critical to expanding and maintaining the delivery of social and affordable housing in Australia.¹² CHIA NSW recommends that the National Plan includes a commitment to work towards a national regulatory system as a reform area.

Over time, it is important that both Victoria and Western Australia join the National Regulatory System. The disadvantages to CHPs, tenants, and investors (including the Federal Government) outweigh the benefits to these jurisdictions and serve as a barrier to institutional investment in social and affordable housing.

As part of the transition to a national system, CHIA NSW recommends that State and Territory Governments commit to a single clear definition of social and affordable housing within the context of the National Regulatory System for Community Housing (NRSCH). Consistent with existing NSW legislation, any receipt of

¹² Affordable Housing Working Group, ‘Supporting the Implementation of an Affordable Housing Bond Aggregator’, Report to Heads of Treasuries (Canberra: Council on Federal Financial Arrangements, September 2017), 26–27, <https://treasury.gov.au/sites/default/files/2019-03/170921-AHWG-final-for-publication.pdf>; Australian Government, ‘Statutory Review: Operation of the National Housing Finance and Investment Corporation Act 2018’, Final Report, August 2021, 25, <https://treasury.gov.au/sites/default/files/2021-10/p2021-217760.pdf>.

government investment or concessions for the provision of social and affordable housing should be conditional on registration in the NRSCH.

Consistent with this approach, CHIA NSW recommends the national regulatory system incorporates provisions to safeguard the social and affordable housing sector with explicit requirements for CHPs to be not-for-profit organisations, preferably registered charities under the ACNC.

Recommendations

1. The National Plan incorporates a target that social and affordable housing makes up 10 per cent of all residential dwellings in Australia by 2041.
2. The National Plan incorporates a Social and Affordable Housing Investment Strategy with resourcing from all levels of government to leverage government contributions with those from the private sector, superannuation funds, not for profit organisations and philanthropic donations.
3. The National Plan identifies and facilitates the use of local, state, and federal government-owned land or property for social and affordable housing projects.
4. The National Plan incorporates 10-year targets for management and title transfer to CHPs to enable further investment in social and affordable housing.
5. The National Plan commits to developing a national regulatory system covering all states and territories. This reform would also include development of a single clear definition of social and affordable housing, a commitment to only direct government investment to registered CHPs, and a requirement for all CHPs in the regulatory system to be not-for-profit organisations.

5. Priority 2 – Creating growth opportunities for Aboriginal community housing

The problem

The Issues Paper acknowledges the cultural significance of housing to Aboriginal and Torres Strait Islander peoples and the connection that it provides to traditional lands and Country. Despite the significance of home for Aboriginal and Torres Strait Islander peoples, there is overwhelming evidence regarding their high levels of housing need.

CHIA NSW considers that the National Plan has a critical role in addressing the poorer housing outcomes experienced by Aboriginal and Torres Strait Islander peoples across the housing continuum. Aboriginal and Torres Strait Islander households are half as likely to own their homes when compared to the general community, and twice as likely to be renting. One in five Aboriginal and Torres Strait Islander households live in social housing, compared with 3.8 per cent of the general population. Aboriginal and Torres Strait Islander peoples are also more likely to experience homelessness and reside in overcrowded housing.¹³

The National Agreement on Closing the Gap recognises that Aboriginal Community Controlled Organisations (ACCOs) deliver the best services and outcomes for Aboriginal and Torres Strait Islander people in local Aboriginal communities. The Closing the Gap targets commit governments to increasing the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized housing to 88 per cent but further interventions are required to improve housing outcomes for Aboriginal and Torres Strait Islander peoples and communities.¹⁴ Increasing the supply of social and affordable housing is critical to the achievement of the Closing the Gap targets.

Accordingly, CHIA NSW supports the growth of the Aboriginal community housing industry to address the high levels of housing need for Aboriginal and Torres Strait Islander peoples and communities, and in accordance with the objectives of the National Agreement on Closing the Gap.

The Aboriginal community housing industry in NSW has recently experienced a significant increase in capability, as evidenced through the successful registration of 40 Aboriginal community-controlled organisations under the National Regulatory System for Community Housing. The continued growth of the Aboriginal community housing industry ensures that more Aboriginal and Torres Strait Islander people can live in homes that are owned and managed by ACCOs.

The solutions

Create a plan for growth

CHIA NSW recommends the National Plan facilitates the development of clear plans at the state and territory level, including NSW, for the growth of ACHPs including capacity building, developing the scale of the industry through transfers of existing public housing, and specific funding for growth. Building the capacity of ACHPs will support growth and unlock the provision of more homes and culturally appropriate services for Aboriginal and Torres Strait Islander people and communities.

Prioritise new housing supply for Aboriginal and Torres Strait Islander communities

The Housing Australia Future Fund (HAFF), the Social Housing Accelerator (SHAF), and the National Housing Accord (the Accord) presents a significant opportunity to support the sustainable growth of ACHPs and ACCOs in Australia, including in NSW.

¹³ Australian Bureau of Statistics (2022), Housing statistics for Aboriginal and Torres Strait Islander Peoples – 2021, <https://www.abs.gov.au/statistics/people/aboriginal-and-torres-strait-islander-peoples/housing-statistics-aboriginal-and-torres-strait-islander-peoples/latest-release#landlord-type>; Australian Bureau of Statistics (2022), Housing: Census – 2021, <https://www.abs.gov.au/statistics/people/housing/housing-census/2021>

¹⁴ Closing the Gap, Closing the Gap Targets and Outcomes - Outcome 9, <https://www.closingthegap.gov.au/national-agreement/targets>

CHIA NSW recommends that a dedicated Aboriginal housing stream is established through each program to support the delivery of small to medium scale developments by ACHPs and ACCOs. This will require governments to commit 100% grant funding towards development costs so that ACHPs and ACCOs have an opportunity to leverage existing land holdings and debt funding for future developments.

By establishing a dedicated funding stream for Aboriginal housing, ACHPs and ACCOs will have sufficient time and opportunity to co-design appropriate models which meet the diverse needs of their local communities.

To ensure that ACHPs and ACCOs are well positioned to leverage their existing land holdings for new Aboriginal housing, additional grant funding should be identified by governments for ACHPs and ACCOs to assess and prepare potential sites for development in the short to medium term. This will provide governments and the Aboriginal community housing industry with more options to develop residential homes and infrastructure that will enable more Aboriginal and Torres Strait Islander people to live on Country in regional, rural, remote, and very remote areas.

Build scale through title transfers

Title transfers have been instrumental in supporting the growth and capacity of the community housing industry in NSW. To ensure that equitable outcomes can be achieved in the Aboriginal community housing industry, it is critical that the property titles for Aboriginal housing delivered through the Australian Government's programs are transferred to ACHPs and ACCOs.

Over the medium to long term, the Aboriginal community housing industry's growth will increase the financing options available to the industry, including through the National Housing Finance and Investment Corporation and other lenders, to facilitate the delivery of more homes for Aboriginal and Torres Strait Islander communities.

To achieve this outcome, it is recommended that the National Plan incorporates 10-year targets for title transfer to ACHPs and ACCOs to enable further investment in social and affordable housing for Aboriginal and Torres Strait Islander peoples and communities.

Recommendations

6. The National Plan facilitates the development and oversees the implementation of Aboriginal community housing growth plans at the state and territory government level.
7. The National Plan allocates a proportion of funding through the Housing Australia Future Fund, Social Housing Accelerator Fund and National Housing Accord for Aboriginal community housing.
8. The National Plan identifies grant funding to assess and prepare existing Aboriginal land holdings for residential homes and infrastructure, including on Country.
9. The National Plan incorporates 10-year targets for management and title transfer to ACHPs and ACCOs to enable further investment in social and affordable housing.

6. Priority 3 – Reducing homelessness in Australia

The problem

Homelessness in NSW is increasing. At the 2021 Census there were 35,011 people who were experiencing homelessness, which is 43:10,000 people. This is an increase of 7,532 people since the 2011 Census and an increase of 3:10,000 people in the rate of homelessness.

The proportion of people in NSW experiencing homelessness compared to Australia has also increased from 26.8 per cent to 28.6 per cent over the same period.¹⁵ Homelessness in NSW particularly impacts Aboriginal and Torres Strait Islander peoples and young people.

Aboriginal and Torres Strait Islander peoples in NSW experience homelessness at a rate of 128:10,000 people, while for young people it is 57:10,000 people. Both are significantly higher than the average in NSW of 43:10,000 people¹⁶.

The growing number of people experiencing homelessness in NSW is increasing the pressure on the service system, particularly Specialist Homelessness Services. During 2021/22, Specialist Homelessness Services in NSW assisted a total of 68,473 clients, but were not able to assist 9,842 clients, representing an average of 37 clients per day¹⁷. This has devastating consequences for people turned away from services, but also creates significant costs in the health, child protection and justice systems¹⁸.

The solutions

Commit to national, state and territory targets to reduce homelessness

CHIA NSW recommends that the National Plan commits to an ambitious goal to reduce homelessness in Australia. This would involve each State and Territory Government setting interim and final targets to reduce homelessness in their respective jurisdictions.

To achieve this goal, it is critical that the National Plan is underpinned by a target to significantly increase the supply of social and affordable housing, as outlined at Priority 1. This recognises that the lack of social and affordable housing is a key structural driver of homelessness.

Increase funding for Housing First programs to break the cycle of homelessness

There is significant evidence from Australia and internationally demonstrating that Housing First is the most successful model to break the cycle of homelessness for people with complex needs¹⁹. By providing people with access to long-term housing and wrap-around support services through Housing First models, repeat and entrenched cycles of homelessness can be avoided.

CHIA NSW recommends that, in addition to significantly increasing social and affordable housing supply, the National Plan supports ongoing investment in Housing First models, such as NSW's successful Together Home program. To achieve this, the National Plan should also embed Housing First principles into funding agreements with State and Territory Governments.

¹⁵ Australian Bureau of Statistics (2023), Estimating homelessness – Census, 2021 (Table 1.3)

¹⁶ Australian Bureau of Statistics (2023), Estimating homelessness – Census, 2021 (Table 1.5)

¹⁷ Australian Institute of Health and Welfare (2022), Specialist homelessness services 2021-22 – Data tables (Tables Clients.1, Unassisted.1 and Unassisted.2)

¹⁸ SGS Economics and Planning (2022), Give me Shelter – The long-term costs of underproviding public, social and affordable housing, report commissioned by Housing All Australians

¹⁹ Roggenbuck, C. (2022) Housing First: An evidence review of implementation, effectiveness and outcomes, report prepared by AHURI, <https://www.ahuri.edu.au/sites/default/files/documents/2022-08/AHURI-Prof-Services-Housing-First-An-evidence-review-of-implementation-effectiveness-and-outcomes.pdf>

Invest in evidence-based homelessness models

CHIA NSW recommends that, in addition to increasing social and affordable housing supply, the National Plan also invests in evidence-based homelessness models, including:

- Core and cluster models providing housing and support for domestic and family violence survivors. Funding for additional core and cluster models should complement existing funding for Specialist Homelessness Services.
- Youth Foyers and other supported accommodation models that provide young people with access to housing and support services to facilitate their participation in education and training, and transition to independent living. Funding for additional youth housing models should complement, and not replace, existing funding for Specialist Homelessness Services.

Increase funding for Specialist Homelessness Services

To ensure that Specialist Homelessness Services are better placed to respond to significant and rising demand for housing and support services, CHIA NSW recommends that Specialist Homelessness Services funding is increased and fully indexed for inflation.

CASE STUDY: Together Home Program

In the early stages of the COVID-19 pandemic, the NSW Government demonstrated commitment and innovation in addressing rough sleeping through the establishment of the Together Home Program.

Based on evidence-based Housing First principles, the Together Home Program has provided stable housing and support to over 1,000 people since July 2020. The program has predominately targeted people sleeping rough.

Funded by the NSW Department of Communities and Justice, the program is being delivered by 18 community housing providers in NSW, who are responsible for providing homes and commissioning wrap-around support services.

Since the program's initiation, around 90 per cent of participants have successfully sustained their tenancies, despite many people having complex and multiple needs.²⁰

Recommendations

10. The National Plan commits to an ambitious goal to reduce in Australia.
11. The National Plan increases funding for evidence-based homelessness models including Housing First models, core and cluster models, youth foyers and other supported accommodation models.
12. The National Plan increases funding for Specialist Homelessness Services and is fully indexed for inflation.

²⁰ CHIA NSW (2023) Addressing rough sleeping and changing lives – The case to make Together Home a permanent Housing First response in NSW, <https://communityhousing.org.au/wp-content/uploads/2023/03/Together-Home-Addressing-rough-sleeping-and-changing-lives.pdf>

7. Priority 4 – Building sustainable and climate resilient communities

The problem

Climate change is already impacting our communities. As demonstrated by the 2022 Northern NSW floods, extreme weather events exacerbate housing insecurity. Climate events will disproportionately impact vulnerable households, leading to higher prevalence of overcrowding and homelessness, with resultant impacts on health and wellbeing.

To build resilience and achieve Federal Government and NSW Government net zero targets by 2050, significant emissions reductions will be needed across the built environment, which is a major contributor to carbon emissions. This must occur at speed and scale to smooth the way for other hard-to-abate industries.

Lower-income households are more likely to live in homes, including social housing, with the lowest energy efficiency. This leaves these households at greater risk of energy poverty and poor health due to extreme heat conditions, whilst rising energy bills will continue to compound the cost-of-living crisis for these households. Most social housing was built over 20 years ago, prior to the introduction of minimum building and energy standards. Accordingly, older social housing managed by CHPs generally performs poorly, contributes to greenhouse gas emissions, and results in higher energy bills for tenants.

Decarbonising existing homes at-scale will require a high outlay of capital. As ongoing managers of social and affordable housing, CHPs are committed to environmental sustainability and the reduction of costs for tenants. However, CHPs have expressed concerns at the additional costs of meeting higher environmental standards. In inland regional areas, concerns also extend to additional costs associated with sourcing workers and materials to more remote areas. This is further complicated by the fact that most social housing managed by CHPs is owned by state housing authorities or the private sector. Consequently, it is difficult for CHPs to make significant investment in retrofits for ageing social housing dwellings, as opposed to new social and affordable housing.

Current Australian cost estimates for social housing retrofits range from an average of \$5,000 to \$12,500 per property, depending on the scope of works required.²¹ Given the age, type, volume, and current inefficiency of Australia's government-owned social housing portfolios, the cost for retrofitting tens of thousands of existing social housing properties will be beyond the reach of the highly constrained budgets of CHPs.

The solutions

Decarbonising existing social housing

Decarbonising social housing will help achieve government net zero targets by 2050 and will also improve the health and wellbeing of social housing tenants. CHIA NSW welcomes the Australian Government's recent commitment to establish a Household Energy Upgrades Fund (HEUF) with \$300 million for energy efficiency upgrades to approximately 60,000 social housing properties, with co-funding provided by State and Territory Governments.

The HEUF could be informed by the lessons learned from the NSW Government's now-concluded Home Energy Action Program, which included funding to upgrade 2,500 community housing properties. An independent evaluation of the Home Energy Action Program demonstrated that the program delivered total benefits of \$31.8 million, exceeding the total program investment of \$20.3 million.²²

²¹ Australian Council of Social Service (2021) [Proposal and implementation plan for a national low-income energy productivity program](#) (NLEPP), ACOSS, Sydney.

²² Urbis (2018) *Home Energy Action Program Evaluation: Final Report, July 2018*.

To support the decarbonisation of social housing, CHIA NSW recommends that the National Plan commits to the development of a comprehensive National Climate Change Retrofit Strategy, which is coordinated with, and aligned to, the proposed National Energy Performance Strategy.

Co-investment with State and Territory Governments is critical to decarbonising social housing at scale. This requires Federal Government funding to be matched by State and Territory Governments to support deeper retrofit activity across more social and affordable housing properties. The most efficient mechanism to support retrofit activity across the social housing portfolio managed by CHPs is through direct grants. Funding allocated to CHPs could be used to deliver a range of upgrades, including (but not limited to) insulation, draught sealing, appliance upgrades, and solar panels.

As part of a National Climate Change Retrofit Strategy, it is vital that all social housing providers, including CHPs, are prepared to manage the transition to net zero. Therefore, CHIA NSW recommends that grant funding is provided to CHPs to develop net-zero plans, in order to both enhance their understanding of climate risks and drive decarbonisation activity across the whole social housing portfolio. Within this context, adaptation and mitigation strategies for government-owned and CHP managed social housing would be developed and agreed jointly by State and Territory Government agencies and CHPs.

To facilitate a smooth transition to net zero, Federal, State and Territory Governments must clarify the timing of anticipated regulatory changes, including disclosure requirements and minimum energy efficiency standards for rental properties. This must be phased in and complemented by subsidies for CHPs to avoid the creation of additional financial and regulatory barriers to social and affordable housing delivery.

CASE STUDY: Financing energy efficiency upgrades – SGCH²³

SGCH, a NSW-based community housing provider, upgraded 1,230 dwellings across its portfolio using a range of energy efficiency measures. These measures included installing ceiling insulation, replacing electric hot water heaters with heat pumps for systems, draught proofing, installing LED Lighting, ceiling fans, and rooftop solar PV.

The estimated cost of the upgrades was \$4.8 million. The program of work was made possible by combining debt financing from the Clean Energy Finance Corporation with grant funding from the NSW Office of Environment and Heritage.

SGCH estimates energy savings across the 1,230 retrofitted dwellings of 2,270,000 kWh per year. This represented a total cost saving of \$491,000 for the portfolio, and an average \$400 saving per dwelling.

Recommendations

14. The National Plan commits to develop a National Climate Change Retrofit Strategy.
15. The National Plan provides funding to CHPs for retrofits and net zero plans.
16. The National Plan facilitates a smooth transition to net zero by phasing in and properly resourcing any net-zero regulatory changes.

²³ SGCH (2022) Impact Report – Our Environmental, Social and Governance Approach, <https://sgch.com.au/wp-content/uploads/2022/06/Impact-Report-2022.pdf>

8. Priority 5 – Embedding planning reforms to support the efficient delivery of social and affordable housing as critical infrastructure

The problem

The planning system in NSW is not delivering the volume of housing required. Current five-year completion forecasts for Greater Sydney, of around 25,700 homes per year²⁴, are less than half of the NSW Government's commitments under the National Housing Accord (around 63,000 homes per year) and around a third of the target for funding under the New Homes Bonus (of 75,000 homes per year).

Additionally, the planning system is failing to deliver homes at price points that are genuinely affordable for low to moderate income households. Despite high completion levels in recent years, the proportion of homes that are genuinely affordable for lower-income households has decreased. One analysis estimated voluntary incentive mechanisms delivered affordable housing equivalent to just 0.5 to 1 per cent of Sydney's total housing supply.²⁵

CHPs deliver new social and affordable housing projects in high-cost locations where they are needed most. They have consistently identified several barriers within the planning system to new social and affordable housing supply, including:

- A lack of suitable land for new social and affordable housing development, and where land is identified for housing, planning settings do not maximise opportunities for inclusive communities.
- Out-of-date or unnecessarily restrictive planning policies, which do not support the feasibility of sub-market housing products.
- Complex and inefficient planning approval pathways, which add unnecessary cost, uncertainty, and delays to the delivery of housing.
- A lack of understanding of social and affordable housing models amongst consent authorities
- Community opposition to new development, due to concerns with development impacts or misconceptions about social and affordable housing.

The solutions

Streamline and broaden inclusionary zoning

CHIA NSW strongly supports the National Planning Reform Blueprint commitment to the phased introduction of inclusionary zoning to support permanent affordable, social and specialist housing.

Inclusionary zoning is an efficient mechanism for securing affordable housing and ensuring that development responds to the full range of housing needs. However, the process for implementing inclusionary zoning schemes is complex, inefficient, and piecemeal. This creates uncertainty and results in missed opportunities. A simpler, more streamlined, approach is needed to improve policy certainty for industry, CHPs and the community and overcome barriers to implementation.

To support market consistency and reduce the administrative burden on local councils, CHIA NSW recommends State and Territory Governments establish regional and sub-regional schemes that apply a broad-based, but modest, levy on new development. This recognises that the need for affordable rental housing exists across all communities, not just areas being upzoned.

²⁴ Medium-growth scenario estimate for the period 2022/23-2026/27, NSW Department of Planning and Environment.

²⁵ These measures primarily included density bonuses and concessions available under the Affordable Rental Housing State Environmental Planning Policy, and affordable housing negotiated through Voluntary Planning Agreements, between 2009 and 2017. Source: Gurrán, N., Gilbert, G., Gibb, K., van den Nouwelant, R., James, A. and Phibbs, P. (2018) Supporting affordable housing supply: inclusionary planning in new and renewing communities, AHURI Final Report No. 297, Australian Housing and Urban Research Institute Limited, Melbourne.

In circumstances where a major renewal precinct can feasibly support higher rates, the option should remain for a higher rate above the benchmark rate to be introduced, subject to feasibility testing. Feasibility concerns with inclusionary zoning can be addressed by phasing in requirements over time to allow the market to adjust.

Reforms to address barriers to the timely delivery of development approvals

CHIA NSW welcomes the National Planning Reform Blueprint's commitment to reforms supporting the rapid delivery of social and affordable housing and address barriers to timely development approvals. In NSW, planning processing times have blown out from 69 days on average in July 2021 to 116 days in March 2023. This represents a significant additional cost for community housing developments, risks project viability and delays delivery of much needed social and affordable housing.

Delays result from the complexity of the approvals processes, including the increasing volume of supporting documents required to be prepared and reviewed, inconsistent advice, inefficient design review processes, and duplication of information requests. The increased delays in processing times have also been exacerbated by a shortage of planners within councils and a lack of knowledge of social and affordable housing.

A significant proportion of social and affordable housing projects will continue to be delivered by CHPs through local council approval pathways. There remains a need for further reforms aimed at reducing the complexity of local approvals processes and increasing the capacity of councils.

CHIA NSW recommends that State and Territory Governments introduce a streamlined approvals pathway for low-impact community housing developments not eligible for state-assessed pathways. Although various mechanisms may be used to deliver this outcome, in NSW this could be achieved without legislative change through an expansion of exempt and complying development provisions.

CHIA NSW also welcomes the commitment under the National Planning Reform Blueprint to provide adequate resourcing for built environment professionals, including planners, in local government. In NSW, this could take the form of expanding long-term funding for staffing programs such as the 'Strong Start Cadetship' and 'Regional Flying Squad' initiatives.

It is also recommended that State and Territory Governments establish a dedicated Affordable Housing Delivery Unit within their planning departments. This unit would be tasked with working with councils and community housing providers to facilitate the timely assessment of proposals for social and affordable housing. This could include assisting councils with the preparation of assessment reports, coordination of referrals, and resolution of issues.

Establishing a dedicated centralised resource will address issues arising from a lack of resources within individual councils. It also provides the opportunity to develop an assessment resource with deep understanding of social and affordable housing.

Recommendations

17. The National Plan includes actions to establish broad based regional and subregional inclusionary zoning schemes.
18. The National Plan supports State and Territory Governments to introduce streamlined development approval pathways for social and affordable housing, and establish a dedicated delivery unit within state planning departments.

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