

The image features the silhouettes of three people—two adults and a child—standing in a field of tall grass. They are holding hands in a circle, with their arms raised towards a bright, glowing sunset sky. The sun is positioned directly behind the child in the center, creating a strong backlighting effect. The overall mood is one of hope and community.

Submission to the National Housing and Homelessness Plan

October 2023

School of Global Urban and Social Studies / Centre for Urban Research

Developing the National Housing and Homelessness Plan

Submission to the Department of Social Services, Australian Government

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[REDACTED] This submission represents the views of the authors only and does not necessarily represent the position of the Centre for Urban Research or RMIT University generally.

We provide a summary and a list of key recommendations, followed by background information about the Centre, and present detailed recommendations in response to the Issues Paper (DSS, 2023).

1. Summary

- The National Housing and Homelessness Plan should be grounded in a firm commitment by the Australian Government to realise the human right to adequate housing and its associated freedoms and entitlements. A commitment to ensure universal access to safe, appropriate, secure, affordable and well-located housing must be paired with the Australian Government's commitments across other policy arenas, including but not limited to the Sustainable Development Goals, Closing the Gap, the National Plan to End Violence Against Women and Children, and Australia's Disability Strategy 2021–2031.
- The establishment of a National Plan guiding the Australian Government's approach to housing and homelessness is a welcome and ambitious announcement. Prioritising the right to adequate housing requires that this Plan seriously considers the nature of housing and homelessness as cross-portfolio issues and this requires an integrated, whole of government response.
- The Issues Paper as currently framed does not articulate a sufficiently broad or comprehensive vision to fully address Australia's obligation to deliver on the right to adequate housing for all. As such, we strongly encourage the Minister for Housing to attend to the concerns outlined in this submission as well as to significantly amend the narrow approach to developing this Plan. This will require deeper and broader consultation, inter-departmental collaboration and suitable proposed timeframes for strategy development.
- It is clear from over three decades of Australian Housing and Urban Research Institute (AHURI) research tracking worsening housing outcomes in Australia, that households and communities need a champion within the architecture of government. Such a champion must be directly informed by these decades of research, able to forge necessary reform, and committed to delivering on the right to adequate housing. Clarity of leadership by a responsible Minister and authorised Housing agency, with a mandate to co-ordinate such reform is also required. This agency will provide the forum for a responsible, capable and accountable hub for driving housing policy reforms informed by evidence, advocacy and public consultation.
- Establishing a core hub for housing policy development and oversight will allow targeted cross-portfolio collaboration where departmental responsibilities overlap, such as between social services and housing in relation to public housing, rental subsidies, and housing and homelessness-related social services. It will also allow for the allocation of consistent and dedicated policy capacity to core issues of housing and homelessness. A mission-focused agency can have the authority and capacity to inform, co-ordinate and influence other relevant policies such as macro-economic policy and mortgage market regulation, taxation, infrastructure, labour markets, immigration, as well as social welfare and environmental policies.
- While the concerns of households and communities should be at the centre of housing policy development, the ability of Australians to fully realise the right to adequate housing has been and continues to be limited by a strongly commodified and financialised housing system. Turning this around is beyond the remit and capability of the Department of Social Services alone. Arresting and reversing this trend will require political will, commitment, and active government investment across short-, medium- and long-term strategies captured within an overarching vision for housing equity in Australia. This will include implementing housing-related taxation, mortgage market regulation, land policy and urban planning and development regimes aligned with Australia's goal of adequate housing for all and the prevention of homelessness.

- Australia has an immense and growing need for secure and affordable housing suited to the needs of a diverse range of households. Public investment in all types of housing providers should be used equitably, efficiently and effectively. Currently, however, the majority of public subsidies for housing are targeted towards private homeowners and investor landlords. Taxation settings attract short term speculative landlords to the private rental sector, which is harmful to secure affordable tenancies and need reform.
- Homelessness prevention is of paramount importance and cannot be considered in isolation from broader housing policy. In addition to policy efforts towards securing access to adequate, affordable housing and fairer distributional outcomes of the housing system, models such as Housing First should be assessed for their potential as a federal policy initiative. Again, this would require adequate capital investment and recurrent subsidies for support in the social housing system.
- The Australian Urban Observatory, a research platform developed by RMIT University, has developed a list of liveability indicators that collectively demonstrate the role of housing as a key social determinant of health and household stability. The evidence base for these indicators demonstrates that quality, safe and affordable housing not only has a direct effect on physical and mental health but is also a decisive factor in facilitating social connection and access to support, education and employment.
- Research has shown that upfront capital investment in the provision of affordable rental housing offers a more efficient approach and can reliably steer desired public policy outcomes, such as energy efficiency and social inclusion. However, an overreliance on private finance in current co-delivered social housing models has both increased costs for both governments and tenants and diminished affordability and security outcomes. Reinvigorating public housing delivery in Australia requires land policy and capital investment strategies that address its need for growth, and Australia can learn from Europe's best performing multi-provider systems including Finland, Germany, France and Austria.
- RMIT researchers have also established that the relationship between climate change and housing is reciprocal and multi-faceted. Significant efforts are required to progress the energy efficiency and circular economy agenda as they pertain to housing policy reforms. How the Australian Government engages with existing housing stock in the Plan will be important for climate change mitigation and adaptation processes more broadly. A rights-based approach to housing provision must be delivered in a way that is complementary to both domestic climate action goals and Australia's international obligations on climate change.
- Much of the data on housing in Australia is fragmented, incomplete or not publicly available. Government agency data on housing is also regularly hidden behind paywalls. This is an issue that needs urgent attention. Housing and homelessness performance data should be reported and made available publicly to support monitoring and measuring progress against agreed targets by responsible agencies and enable independent evaluation, such as via academic and community-based researchers. It should also be regularly reported to the cabinet level and within Parliament – for example via the State of the Nation's Housing report.
- A robust and appropriately resourced process of public review and consultation, involving experts from academia, the community sector, industry, grassroots organisations and individuals with lived expertise, should be established to enable regular independent evaluation of the Plan. This must be matched with a legislated commitment to timely Government action on evaluation outcomes.

2. Key recommendations

The development of a National Housing and Homelessness Plan (NHHP) presents a vital opportunity to entrench socially, environmentally and economically sustainable housing for all as a core priority for Australian housing policy. We offer the following recommendations to guide Government in its development of this important and timely initiative.

1. The National Housing and Homelessness Plan (NHHP) should be grounded in a legislated commitment by the Australian Government to realise the human right to adequate housing. A National Housing and Homelessness Bill must be developed with attention to Australian Government's ongoing commitments across other policy arenas, including but not limited to the Sustainable Development Goals, Closing the Gap, the National Plan to End Violence Against Women and Children, and Australia's Disability Strategy 2021–2031, as well as Australia's international obligations.
2. Following further research and consultation, the adopted Plan should be driven by a national agency, responsible for developing and implementing a plan involving regular public reporting, including both progress reports and adaptations as required.
3. The Plan should be subject to independent monitoring and evaluation of targets which is adequately resourced and informed by an open access evidence base with rigorously reported data. The legislative basis for the Plan (Recommendation 1) must include requirements for a timely and public Government response to issues identified through monitoring and evaluation.
4. The Plan should include commitments to adequate and sustained capital investment in public housing as well as responsible well-regulated affordable and social housing providers.
5. The Plan should include robust protections for secure rental tenancy and rent setting, developed in close consultation with academic, community sector and grassroots expertise.
6. The Plan should proceed from an understanding that current economic conditions, rather than urban planning permission, inhibit new housing supply. Rectifying this requires a stated Government commitment to the reform of macro-prudential, financial and taxation settings, which have undermined access to decent and affordable housing opportunities.
7. The Plan should identify the importance of active urban policy development to employ tools of land value taxation, strategic land lease and economic, employment and infrastructure planning. All of these mechanisms are essential for the timely delivery of energy-efficient and socially inclusive homes and neighbourhoods.
8. Development of the Plan should include a robust, evidence-based assessment of the applicability of a Housing First approach to addressing homelessness in Australia.
9. The Plan should acknowledge the rapidly declining and unequal access to home ownership including the implications of excessive household debt. Given the importance of ownership for stability and security, there is an urgent need to address the causes of this decline and improve access amongst first homeowners through mortgage regulation and targeted supply-based measures, while also improving adequacy of alternative pathways such as shared equity and affordable rental.
10. The Plan should include a staged approach to rolling back capital gains tax concessions to existing (multiple property) owners and negative gearing discounts to speculative private landlords.
11. The Plan should have a strong decarbonisation focus addressing the role of consumer behaviour, construction and maintenance standards, building materials, orientation and design

as well as location in the energy efficiency, GHGs, and finite resource use. This focus must be articulated to evidence-based policy reforms supporting the delivery of healthy, liveable, low-carbon home environments. RMIT has leading capacities in circular economy and energy efficiency in housing and is well-placed to advise Government on the implementation of this recommendation.

3. The Centre for Urban Research, RMIT

The Centre for Urban Research is a dynamic hub for interdisciplinary urban research. Through its research, the Centre is directly responding to the globally important need to shape cities that are environmentally, socially and economically sustainable.

The Centre for Urban Research leads numerous research projects primarily delivered under eight programs, being:

- Climate Change Transformations
- Critical Urban Governance
- Healthy Liveable Cities
- Health Place and Society
- Housing and Urban Economics
- Interdisciplinary Conservation Science
- People, Nature, Place
- Planning and Transport in City Regions
- Urban Cultures and Technologies

The Centre's membership draws on deep and diverse academic expertise, active and meaningful collaborations, and lessons from the past and present to contribute thoughtfully to major urban and global agendas. Our cross-disciplinary research and new-directions programs are gaining global recognition for addressing complex questions that are current and central to the fields of urban and regional planning, and social and environmental science.



4. The purpose of the Plan

4.1. The problem with the framing of the National Housing and Homelessness Plan

The National Housing and Homelessness Plan (NHHP) is currently framed and carried by the Federal Department of Social Services (DSS). RMIT research has earlier found that the marginal and residual treatment of housing as a policy portfolio within the Federal Government is primarily due to it being submerged within a large welfare-focused portfolio. Consequently, housing is not conceived within the machinery of government as a prominent policy area, despite its economic, social and environmental significance. Additionally, even though housing is located within the Social Services portfolio, successive governments have failed to recognise the direct relationship between housing and broader social wellbeing, environmental sustainability, and economic stability, siloing off housing from interconnected policy areas. The Issues Paper continues this narrow approach. There seems to be some confusion between the notion of the national housing strategy and a traditionally defined NHHP. Due to DSS's narrow welfare focus, the current proposed Issues Paper does not adequately address the social, economic and environmental causal relationships and consequences of housing policy.

To be effective, the NHHP needs to go far beyond the current remit of DSS and address issues such as mortgage market regulation, pension and superannuation settings, as well as related circuits of savings and investment, land policies and capital gains taxation. Given the important role of Treasury, Infrastructure, Immigration, and Housing Australia (NHFI), in this discussion we also hope for their strong inter-department engagement in the design of the NHHP.

We argue that the NHHP needs a broader remit than DSS suggests, and to cover aspects of the housing system and be able to guide policy efforts to promote adequate access to housing for all. This would encompass a concern for supply, demand, quality, location, as well as distributional and environmental impacts, including asset maintenance, retrofitting for energy efficiency and climate change resilience as well as decarbonisation of the built environment and circular economy ambitions.

This would take into consideration of the impact of all relevant policy levers affecting the distributional and quality performance of the housing system in Australia, both now and into the future. The NHHP should be framed as a **national vision** that actively provides 'an opportunity to better unite governments, unions, not-for-profits, industry bodies, superannuation funds and other experts in housing, finance and urban development in achieving better housing and homelessness outcomes across the country' (Issues Paper: 9). In essence, an Accord on housing policy for Australia. Yet as it is proposed, it is not clear how the Plan will unite these sometimes-conflicting groups, and how it will recognise their power differential effectively.

At the time of preparing this submission, an agreement was reached by the government and opposition Australian Greens, that could provide the proposed National Housing Supply and Affordability Council¹ (NHSAC) to play a critical role in planning for the delivery of new affordable

¹ [National Housing Supply and Affordability Council Bill 2023 \[No. 2\] – Parliament of Australia \(aph.gov.au\)](#) is to consider the performance of the housing system and the need to build a strong evidence base to support advice on housing supply and affordability matters, including for the purposes of assessing the value for taxpayers of Commonwealth, State, Territory and local government investment in the housing system; and impacts of the following on housing supply and affordability and on the demand for affordable housing: (i) credit conditions; (ii) taxation; (iii) macro-prudential regulation; (iv) rental market regulation; (v) other regulation of the housing system, such as in 35 relation to land use, planning, zoning and building 36 codes; (vi) climate change; (vii) demographic change; (viii) socio-economic factors; (ix) geographical location; (d) the availability, quality and consistency of data on housing supply and affordability and on demand for affordable housing and how the data could be improved by: (i) consulting widely with, and drawing on expertise from,

and social housing with a broad focus on the housing system.²

While it is not yet clear what the composition of the NHSAC membership will be or its expertise capacity, it is hoped that with this broad housing system mandate will enable it to consider and address all relevant matters affecting access to affordable housing more effectively. As proposed, it is to address the impact of credit conditions; taxation; macro-prudential regulation; rental market regulation; and all other regulation of the housing system, including land use, planning, zoning and building codes; as well as the influence of climate change; demographic change; socio-economic factors; geographical location; and relevant housing evidence concerning distributional equity, affordability and access to adequate and sustainable – especially energy efficient and climate neutral housing. It should be noted that the membership conditions for the NHSAC have already drawn critique from the National Aboriginal and Torres Strait Islander Housing Association for their failure to include Aboriginal and Torres Strait Islander peoples' housing needs as a core competency associated with identified positions.³

The NHHP needs to include a mechanism for public consultation and participation in its design – that goes beyond focus groups and 'town hall meetings'. It must give due weight to contributions from people with lived experience of housing stress, homelessness and poverty. It has to bring lived expertise to the forefront; include people with lived experience at all levels of the decision making process; value time and provide support for people with lived experience to participate; challenge stigma, confront oppression and promote dignity; recognise people's expertise and engage them in decision making; work with people towards an equitable representation, and build authentic relationships between people with and without lived experience (Lived Experience Advisory Council, 2016).

The **national vision** set by the NHHP should retain a broad and structural focus, so that the structural conditions of wealth extraction logics, tax and other financial settings, and the evisceration of public housing can come firmly into view to this understanding of what creates, sustains, and deepens housing insecurity. We advocate for a strong rejection of the framing of 'support' as it normalises housing insecurity and homelessness rather than addressing the root causes. Indeed, existing services are woefully inadequate and need urgent intervention and scaling. But the focus of a national visionary Plan should be addressing the root causes of housing insecurity (see Porteous and Smith, 2001; Goetz, 2013; Rolnik, 2019).

4.2. A national strategy encompassing housing and homelessness policy

Housing and homelessness problems are complex. International experience shows the value of a broadly scoped approach to housing policy, clear lines of co-ordination and responsibility and dedicated housing agencies, which are accountable for actions and outcomes (Martin et al., 2023;

other Commonwealth bodies, State, Territory and local governments and other stakeholders in the housing system or homelessness sector; and (ii) building on the research of those bodies, governments and stakeholders and other bodies that undertake research into housing supply and affordability; (e) the important role intergovernmental forums play in 15 promoting cooperation between the Commonwealth and the States and Territories to improve housing supply and affordability, including cooperation to improve the availability, quality and consistency of data on housing 19 supply and affordability and on demand for affordable housing; (f) the need to improve housing outcomes for groups of people in need of housing (including groups experiencing or at particular risk of homelessness); (g) the need to improve gender equality in housing outcomes; (h) the need to ensure climate resilience in housing supply."

² [Greens agree to support Labor's \\$10bn housing fund, breaking months-long impasse | Australian politics | The Guardian](#)

³ National Aboriginal and Torres Strait Islander Association (2023) *Submission to the Senate Economic Legislation Committee Inquiry into: Housing Australia Future Fund Bill 2023 [Provisions] National Housing Supply and Affordability Council Bill 2023 [Provisions] and Treasury Laws Amendment (Housing Measures No. 1) Bill 2023 [Provisions]*.

UNECE, Housing Europe and UN Habitat, 2021).

Australia's system of concurrent federalism requires much intergovernmental cooperation. A mission-oriented Housing and Homelessness Strategy could revitalise stalled discussions about institutions and principles for cooperation. Those effort can be mobilised via agreement on an ambitious, mission-oriented reform agenda by the Australian Government. A focus on missions such as affordable and sustainable housing, and prevention of housing problems, rather than 'market fixing' or symptomatic support is desirable.

As outlined in Martin, Lawson et al, (2023), Australia should have a Housing and Homelessness Strategy with a clear mission: for example, that everyone in Australia has adequate housing. This necessarily encompasses the core areas of social housing and homelessness, but also addresses new core areas of housing assistance, tenancy law, and residential building quality. A more coherent housing strategy would also be closely articulated with other relevant policy areas. Alignment from housing-related policies such as taxation, finance, welfare and pensions, immigration as well as planning and development would ensure housing policy goals are effectively acknowledged and strategically embedded in the role and actions across government.

To ensure Australian governments follow any housing strategy, it should also have a statutory basis, as in Canada (2019), which enshrines the right to adequate housing, nominates responsible Ministers, establishes a clear lead agency, such as Housing Australia, and establishes regulatory and accountability that ensure agencies across government keep their efforts on track. An Australian Housing and Homelessness Strategy would commit to the principle of adherence to the UN Declaration of Human Rights on the Right to Adequate Housing and would include the effective and regular monitoring of adherence and upholding of that right.

First, the *Australian Housing and Homelessness Strategy* would commit to the principle of adherence to the UN Declaration of Human Rights on the Right to Adequate Housing. This would include the effective and regular monitoring of adherence and upholding of that right.

Second, the *Australian Housing and Homelessness Strategy* would be achieved by recognising that housing system outcomes were shaped by policy domains that are often placed off-limits in the development of housing policy development processes. The *Australian Housing and Homelessness Strategy* would authorise greater engagement with national and state/territory government processes that deliver on accepted and new core housing policy and program areas; and aligning and articulating with other policy domains with considerable bearing on housing system outcomes.

Third, the significance of the *Australian Housing and Homelessness Strategy* should be supported by legislation *Australian Housing and Homelessness Strategy Act* that

- Authorises the periodic development, evaluation and revision of the Australian Housing and Homelessness Strategy
- Auspices Housing Australia as the lead national housing agency that extends the capacities of the National Housing Finance and Investment Corporation (NHFIC)
- Establishes an Australian National Housing Consumer Council
- Establishes the office of the Australian National Housing Advocate

As proposed, the Strategy is to address the impact of credit conditions; taxation; macro-prudential regulation; rental market regulation; and all other regulation of the housing system, including land use, planning, zoning and building codes; as well as the influence of climate change; demographic change; socio-economic factors; geographical location; and relevant housing evidence concerning distributional equity, affordability and access to adequate and sustainable – especially energy

efficient and climate neutral housing.

The Issues Paper does not adequately consider the importance of aging population, labour market changes towards more casualised forms of labour, rising levels of indebtedness or the poor energy efficiency for Australia's housing.

4.2.1. Australian Government's broader housing and homelessness agenda

The National Housing Accord

The National Housing Accord 'brings together all levels of government, investors, and the residential development, building and construction sector, setting an initial, aspirational target of delivering 1 million new well-located homes'. This is a step in the right direction but there are some issues that are already occurring:

First, delays are already occurring after these have been announced so there is an urgency to actually deliver. Second, there is also a missed opportunity to require these new dwellings to go beyond minimum construction code requirements which will not only future proof them but also show the rest of the industry what can be done. Third, there is also a need to deliver deep retrofit to existing social/public/affordable housing as well. Fourth, it is not clear what is meant by 'well-located homes'.

The National Housing Accord fails to articulate that speed of construction is critical to meet the demand and targets – innovative methods such as prefabrication/modular construction and digitalisation of construction processes and planning approvals may help. The National Housing Accord as well as the Issues Paper fail to acknowledge the role of existing housing in meeting the demand for housing. Both documents seem to assume that existing housing is of a decent standard, inclusive and at the right place, which is not true. In fact, there is growing evidence about housing that is inadequate in keeping people safe, warm, cool and healthy. However, there is no mechanism to assess such housing deficits, for example, by a decent home standard in Australia, and to monitor remediation.

The National Housing Accord acknowledges that energy efficiency is important by mandating "an energy efficiency rating of seven stars or greater" for new homes. However, this is not an ambitious target, as the NCC2022 calls for 7 stars minimum ratings. This rating is only for the building shell and does not consider the efficiencies of the space conditioning or hot water systems or solar PV. The shell rating has been expanded in the NCC2022 to Whole of Home standards. Yet not all states and territories have adopted the 7-star standard.

National Agreement on Closing the Gap

Specific actions under the National Agreement on Closing the Gap to improve housing and homelessness outcomes for Aboriginal and Torres Strait Islander people are welcome. However, these should be linked explicitly to Treaty, and should avoid being simply a 'welfare response' in relation to Aboriginal and Torres Strait Islander housing experiences.

In their work, Porter and Kelly share the words of Goenpul scholar Aileen Moreton-Robinson: 'the sense of belonging, home, and place enjoyed by the non-Indigenous subject—coloniser/migrant—is based on the dispossession of the original owners of the land and the denial of our rights under international customary law' (Moreton-Robinson, 2015: 3, in Porter and Kelly, 2022). Further, they argue that

[t]here is a general consensus now in Australia that we are in the grip of a severe housing crisis. The characteristics of spiralling housing costs and deepening precarity are unfolding in a context of the systematic managed decline of public housing as a critical social infrastructure, such that the

capacity to make and find 'home' is thinning every day. Yet in a settler-colony, such as Australia, the struggle against housing injustice is set inside an already violent relationship of un-homing that creates the very conditions for others to make home (Porter and Kelly, 2022).

As such, the self-determination of Aboriginal and Torres Strait Islander peoples and a robust engagement with the social, economic and spatial harms of ongoing colonisation must be core considerations for the reform of housing delivery in Australia.

The Housing and Homelessness Ministerial Council

The Council has been 'established under the National Cabinet framework to provide a forum for Commonwealth and state ministers with responsibility for housing and homelessness to progress critical housing and homelessness reforms, including improving housing supply, affordability and accessibility, and pathways out of homelessness' (Issues Paper: 12). However, there is a need to challenge the logic of 'supply'. Instead, reforms should consider distribution, pay attention to high vacancy, housing units acting as bank accounts, progressive taxation systems that incentivise ensuring homes are available as such and that also control rents. When engaging with the supply question, the type of housing delivered must also be clearly justified. While private market supply has often been touted as a silver bullet to mitigate the housing crisis, reinvestment in public housing provides a clearer path towards increasing overall housing affordability by sequestering the rental rates of these dwellings from the vagaries of the property market.

The National Housing Infrastructure Facility

The Issues Paper notes the 'expansion of the [National Housing Infrastructure Facility](#) to provide concessional loans and grants for new social and affordable housing' (p. 14). We advocate, however, for direct provision of public housing through direct capital investment by Federal and State governments. Research shows that this is most cost-effective and efficient public housing provision, as well as being transparent and more accountable.

Furthermore, the Issues Paper states the 'increase of maximum rates of Commonwealth Rent Assistance (CRA) by 15% to help address rental affordability challenges'. It is not clear how this increase has been calculated and where the evidence that supports it. Such an increase should be linked to conditions of the housing market to be fair and equitable. Affordability of housing should be defined as a metric that includes rent/mortgage and energy costs. The CRA should be supplemented with an energy assistance package. This would also mean that renters should be supported in making the home more energy efficient (e.g. help with new more energy efficient appliances) and there would be more pressure on landlords to improve the thermal performance of their homes, together with renter protection.

The National Cabinet reform package

The National Cabinet reform package 'recognises encouraging new build-to-rent projects is an opportunity to rapidly increase rental stock that is of high quality, has stable, professional management, and offers good security of tenure to renters'. However, research has shown that this is not always the case in regulatory contexts which often favour landlords, with a bias towards short-term contracts (Horton, 2020; Nethercote, 2019). Build-to-rent may be considered a new frontier of financialization in Australia, and as such should be subject to the same scrutiny associated with previous waves of housing commodification.

Social Housing Accelerator

The Issues Paper states that 'the Australian Government has delivered a \$2 billion Social Housing Accelerator to deliver thousands of new social homes across Australia'. However, it is not clear how this one-off short-term expenditure compared to previous more sustained efforts and periods

of active provision until the mid-1980s. Current flexibilities allow states to demolish more than repair new build. It is not clear, however, what the role of state land commissions who were traditionally the main promoter of public housing developments, is in this process. This underutilised tool of urban policy needs to be refocused to operate on a market shaping basis, and also supported to play a more purposeful public policy role.

4.3. International obligations and UN's Sustainable Development Goals

As a signatory to Human Rights law, the Australian Government must “take steps ... to the maximum of its available resources to progressively realise the right to adequate housing.” (UN Declaration of Human Rights 1948 and at Article 11(1) of the International Covenant on Economic, Social and Cultural Rights 1966. Per Article 2(1) of the Convention).

Globally, there is a major commitment from cities and countries to prioritize health and wellbeing, reduce poverty, and support environmental resilience. This is reflected in the UN's 17 [Sustainable Development Goals](#) (SDGs) that were adopted by all member states in 2015, with a vision for achievement by 2030. The focus of the SDG agenda is on collective action, and environmental and social justice, which align closely with environmental infrastructure objectives. Moreover, the SDGs provide an umbrella for bringing together diverse stakeholders, by encouraging both vertical (i.e. multiple levels of government) and horizontal (i.e. intersectoral) collaboration and integration to create more sustainable and livable cities. Each of the 17 goals is underpinned by numerous targets, which have been designed for relevance and application across low to high income country contexts. Bench-marking neighbourhood, city, and country progress against these goals and targets can provide important information on progress across a range of health, social, and sustainability outcomes. The global momentum and importance of the SDGs presents an opportunity for local and federal governments and stakeholders to align these with the delivery of a housing and homelessness plan, and embed varied dimensions of the goals and related targets into relevant measuring and monitoring frameworks.

Housing and homelessness issues are of direct relevance to the SDGs and the overarching 2030 Agenda for Sustainable Development. In particular, these issues are relevant to SDGs 3, 7, 10, 11, and 15, in Figure 1.



Figure 1: Sustainable Development Goals 3, 7, 10, 11, 15. (Source: <https://sdgs.un.org/goals>).

A specific Target within Goal 11 (11.1) is: ‘By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums’. This is directly relevant to any future policy of housing and homelessness in Australia.

5. The housing system

Australian has a tenure divided housing system, with substantial highly mortgaged, tax-benefitted owner-occupied sector. This segment once accommodated almost 69% of all households but is now failing (63%), as new buyers are declining and consequently a growing minority of households remain in the poorly regulated and insecure private rental market. This is also precarious living and fuelling social inequality. According to Wood and Ong (2017: 197),

The Australian housing system has been strongly oriented toward owner occupation, but is now undergoing a profound transformation. The young are finding it increasingly difficult to fulfil homeownership aspirations because many cannot afford to buy. Meanwhile, growing numbers of indebted middle-aged Australians fall out of home ownership when adverse economic and family disruptions exacerbate the financial strain of meeting mortgage payments. As a result, home ownership is in decline. But, private rental housing seems unable to supply secure and affordable housing opportunities in the quantities that would meet housing needs, especially those of low income households. Public housing is unable to bridge the gap between supply and the need for affordable rental housing, as there has been modest new investment. It remains a residual sector with lengthy waiting lists. We are therefore witnessing the emergence of a new housing precariat that is perilously positioned on the margins of our housing system.

The promised egalitarianism of the Australian settler dream is long gone, as inequality has increased in the 2020s in Australia, with the top 1 per cent accruing 19 per cent of all income (World Inequality Database, accessed 20/08/2021), and holding around 41 per cent of all wealth in Australia (OECD, 2021 in Smith et al, 2021:165).

Financially stressed households have been increasingly unable to juggle saving, spending and mortgage repayment commitments. The research demonstrates that over indebted Australian households are now in a precarious position and are moving out of home ownership by significant numbers. (Wood and Ong, 2017: 202). This level of need and precarity demands a coherent and urgent response.

5.1. The many benefits of secure housing

In recently years there have been a number of studies which have attempted to inform a reassessment of current policies promoting asset-based welfare. These studies have emphasised the range of economic, social and ecological benefits, including avoided costs, of social and affordable housing, which can be measured and accounted for both quantitatively and qualitatively. These benefits have also been researched by RMIT colleagues and summarised in a recent global review by AHURI encompassing hundreds of research papers (Oberklaid, et al, 2022) in different contexts. The monetised, quantified and qualitative measured benefits of social and affordable housing are summarised in the full report [a framework](#) and concisely below:

Domain	Evidence base	Impacts
Economic		
Government expenditure	Well-established	• Reduced use of government health, mental health, justice, and welfare services
Productivity	Established	Increased access to labour markets Increased earning potential Reduced travel-to-work time
Discretionary spending	Established	• Increased household disposable income

Employment	Emerging	Reduced risk of job loss Reduced absenteeism Increased earning potential Increased ability to seek or participate in employment
Social		
Health	Well-established	Reduced use of health services Improved health Reduced health costs for households
Mental health	Established	Reduced use of mental health services Improved mental health and wellbeing. Improved life satisfaction
Safety	Established	Reduced domestic and family violence. Reduced risk of homelessness Reduced arrests, criminal convictions, recidivism, prison stays and incarceration. Reduced use of justice services
Welfare	Emerging	Reduced use for welfare services Reduced risk of homelessness
Education	Emerging	Reduced absenteeism Improved relationships with teachers / peers Improved educational engagement, performance, and attainment
Intergenerational equity	Emerging	Improved family stability Improved equity Transfer of assets, contribution to deposits or provision of accommodation
Social inclusion	Emerging	Improved social participation, community functioning and engagement. Improved social connections and relationships
Environmental		
Energy efficiency	Well-established	Reduced energy consumption and costs Reduced carbon emissions Improved indoor environmental quality. Improved thermal comfort
Urban form	Established	Reduced reliance on private transport Reduced habitat and biodiversity loss Improved air and water quality
Materials use	Established	• Reduced resource consumption and waste

Table 1: Evidence base for impact of social and affordable housing (Oberklaid, et al, 2022).

The economic and productivity costs and benefits of affordable housing have also been given particular attention by RMIT CUR. This research has emphasized:

- The mismatch between the location of jobs and affordable homes has implications for Australia's labour market mobility, participation and employment rates.
- High housing costs undermine international competitiveness, placing pressure on wages and making Australia a more expensive place to 'do business'.
- Labour market mobility, which is constrained when there is a shortage of affordable homes accessible to employment opportunities.
- Labour market participation and employment rates, which is constrained by a shortage of affordable housing opportunities in locations near employment. Previous studies have

shown that participation rates among women is further affected by long distances between home and work.

- Costs associated with urban congestion, which are exacerbated by a mismatch between the location of jobs and affordable housing, and inadequate public transport.
- Costs to the wider economy arising from high housing costs and levels of borrowing and expenditure on housing.
- Dedicated resources are required to assist lower income groups access appropriate housing. Funding for capital provision, suitably leveraged, is a critical lever for increasing affordable housing supply

In June 2023, the Australian Urban Observatory (auo.org.au) located within CUR released a suite of 23 Specialist Housing Indicators to address critical housing needs and the lack of evidence and data to support decision making. The AUO was designed to transform complex urban data into easily understood and applied liveability indicators that support evidence-informed planning and policymaking. The Specialist Housing Indicators included in the AUO were co-designed with practitioners and developed to broaden the understanding and measurement of housing as an important influence and outcome of public health and urban planning (i.e. liveability) in Australian cities and create evidence that advocates for change. These small area indicators expanded the understanding of [housing](#) and identify specific areas of housing inequity across 21 Australian cities while connecting housing to an urban system's understanding of liveability. Too often housing policy is considered in a siloed approach without recognition of the connection to a range of other factors such as transport, education, employment, public open space and social infrastructure planning which are essential for enhanced health and wellbeing outcomes. Innovative Specialist Housing Indicators released in the AUO in 2023 include: the Precarity Index for Neighbourhoods and City Housing; Key Worker indicators; Distance travelled to homelessness services and Location before entering homelessness services (sourced from the AIHW at excessive cost); VAMPIRE (Vulnerability Assessment for Petrol Inflation Risks and Expenditure) linking housing to transport costs; social and community housing availability, housing ownership and rental costs, and housing demolitions and approvals.

Social and affordable housing investment can transmit strong economic stimulus.

- involves large scale expenditure with strong second round effects.
- has high employment intensity.
- produces durable assets that can contribute to wider social wellbeing and economic productivity; and
- is attractive to longer term capital investment.

Illustration of Economic Impact: Australia's Social Housing Initiative

- Direct public investment of \$5.2b in new housing accommodated 19,700 households, including 8,400 people who were homeless, 12,000 dwellings also repaired.
- Energy efficiency and adaptability introduced to more than 95 per cent of constructed new dwellings, reducing energy bills for households.
- Generated additional \$1.5 billion p.a. on average over the life of the SHI.
- Multiplier impact through the economy. For every \$1.00 of construction activity, around \$1.30 was generated in total.
- The impact on GDP was a considerable 10 basis points or \$1.1 billion on average over the life of the SHI.
- Employment in the construction industry increased by approximately 9,000 full time equivalent (FTE) positions during the period of stimulus, leading to an overall increase of approximately 14,000 FTE jobs ([KPMG, 2012](#); [Murray et al, 2013](#)).

The Plan must set agreed indicators for assessing these criteria and data collection to monitor progress. As mentioned in Martin et al (2023): Canada's strategy has been framed as a 'human rights approach' to housing, and the *National Housing Strategy Act 2019* (Can) includes the following declaration at section 4:

It is declared to be the housing policy of the Government of Canada to

(a) recognize that the right to adequate housing is a fundamental human right affirmed in international law;

(b) recognize that housing is essential to the inherent dignity and well-being of the person and to building sustainable and inclusive communities;

(c) support improved housing outcomes for the people of Canada; and

(d) further the progressive realization of the right to adequate housing as recognized in the International Covenant on Economic, Social and Cultural Rights.

Seven broad standards have been set by the United Nations Committee on Economic, Social and Cultural Rights (CESCR) for the realisation of the 'right to adequate housing':

- Tenure security
- Habitability
- Availability of services
- Affordability
- Accessibility
- Location
- Cultural adequacy

However, Australia needs nationally agreed indicators for assessing these criteria and data collection to monitor progress. Even "affordability" is not well defined, with this ambiguity allowing it to be readily deployed to characterise regressive housing policy proposals. In addition, there is increasing evidence that adequate housing, energy efficiency, energy related poverty and climate change are linked and required holistic and integrated interventions. Scale is an important factor of consideration. Access to adequate housing implies both locational proximity to aspects of the environment that sustain adequate housing (social networks, employment education, healthcare, etc via walking, cycling, affordable public transport or other forms of low fossil fuelled transport), and realisable access to shelter opportunities.

CUR research has brought to light the link between housing, neighbourhoods, health and quality of life. Research by CUR revealed that COVID-19 has exacerbated vulnerabilities such as poor housing quality and location, housing affordability, energy poverty, and a range of social, mental and physical health conditions. The physical and social make-up of apartment buildings and neighbourhood encouraged or hindered social integration, and efforts to manage apartment building common spaces seemed to have been differentiated by socio-economic conditions (Horne et al, 2020; Horne et al. 2021).

Australia's miniscule social housing system is increasingly being residualised, while the private rental market is being largely relied upon to accommodate and in part solve these issues. Therefore, the broader role of public housing in particular in shaping a better housing system for all

has been diminished through sustained government divestment. This narrow focus has led to a spiral of declining political support for direct government supply of non-market housing as well.

5.2. The housing and homelessness system: a snapshot

Housing in Australia is overwhelmingly provided through the private system, either as owner occupier (66%) or private rental (30%) (AIHW 2022). Social housing and other tenure types makes up a tiny proportion (4%) of the housing system. This proportion is also in decline or stagnant due to policies that cause the evisceration of public housing and the shift in provision to privatised actors such as Community Housing Organisations. The crisis accommodation system is geared towards merely providing respite from immediate crisis in the short term. However, solving homelessness and providing secure housing is not the primary objective of the specialist homelessness system given the lack of principled frameworks, such as Housing First, or wraparound services and the material supply of social housing. There is now considerable evidence of housing system failure, policy making failure and uncertain prospects for redressing system failure across the Australian federation.

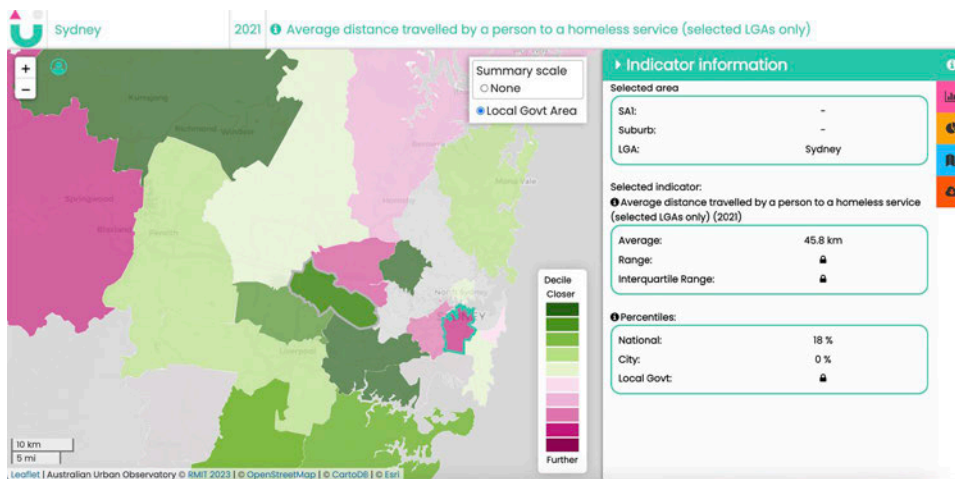


Figure 2: Average distance travelled by a person to a homeless service in Sydney, NSW (Source: auo.org.au).

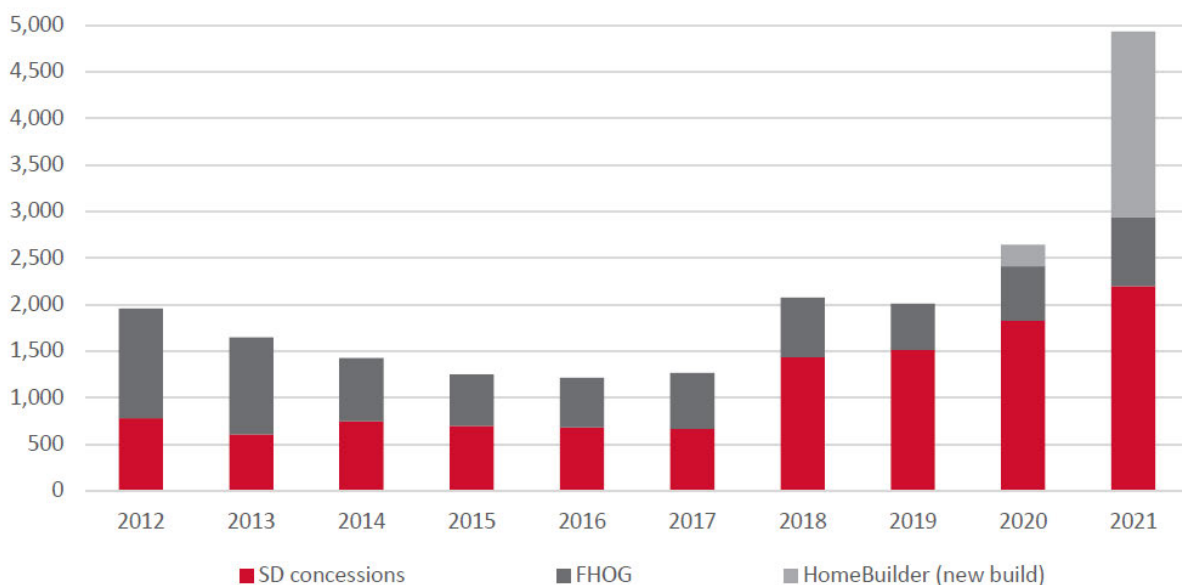
Nationally this requires better relating housing policy to: macro-economic; taxation; employment and skills; industry development; income security; immigration and settlement; urban and regional; climate change; disability; Indigenous; and women's policy making. At state/territory and local government levels similar improved institutional capacities for making housing policy are required to better link housing policy to other policy domains, in particular land use planning; residential tenancy regulation; and land taxation and management. Also housing policy making must include civil society advocacy organisations, professional and private sector producer associations.

The Issues Paper states that 'the housing system in Australia is made up of distinct, but interrelated forms of housing', a statement supported by a diagram on page 19 which describes a range of housing situations and tenures, starting with homelessness and ending with home ownership. Yet the diagram provides no sense of how this system been shaped over time, or of the policies, regulations and level of public support which greatly influences Australia's housing system and its outcomes. The present situation is likely to be the culmination of long running structural problems in Australian housing system as well as policy choices, tax settings and direct investments. While the COVID 19 pandemic aggravated market pressures the housing system crisis had been anticipated well before the onset of COVID (Wood and Ong, 2017). In 2014, we began to gain a clearer view of the allocation of subsidies within the housing system, such as analysed by Groenhart in 2014 at a post code level:

The reason consumption of housing has increased during COVID-19 was clearly not caused by migration or international students, but by unregulated financial flows into real estates and facilitated investment.

As a recent AHURI report concluded, more than \$20.5 billion (in \$2021) was expended by Australian governments in stamp-duty concessions and cash grants (including HomeBuilder) to first homebuyers in the decade to 2021 (Figure 3). Even before the economic stimulus response to COVID-19, these forms of assistance were escalating—up from \$1.2 billion to almost \$3 billion in the four years from 2016—and new demand-side measures were being added, such as the National Housing Finance and Investment Corporation’s (NHFIC) low-deposit mortgage scheme (Pawson, Martin et al, 2022: 2).

To give some sense of scale, this sum could otherwise have funded around 60,000 social housing dwellings, as a non-inflationary form of stimulus investment. Or, alternatively, it could have funded 137,000 shared-equity (SE) dwellings (Pawson, Martin et al, 2022: 5). Similarly, the Productivity commission ‘In need of repair’ report agreed: "It is well known that assistance to first home buyers can contribute to higher house prices" (Productivity Commission 2022: 32).



Sources: See Figure 17 (Section 3).

Figure 3: Stamp-duty concessions, First Home Owner Grant, and HomeBuilder, annual expenditure (\$2021m), Australian states, 2012–2021. (Source: Pawson, Martin et al, 2022: 4).

The Diagram (page 17) assumes that all houses are suitable for all households and fails to recognise that there is a need for accessible housing [over 4 million people (about 20%) are living with a disability], and that the supply may not be equally distributed, and that there are large differences in the quality of homes. This treatment of housing as fungible is an inevitable result of decades of commodification, which has normalised a general neglect of the material features of dwellings in contemporary housing policy. The current Plan adheres to this trend, prioritising quantity over quality of housing. Moreover, not all states have adopted the Silver Liveable Housing Australia standards that have become part of the NCC2022.

5.3. What is the current approach of governments?

As reported in Martin et al, (2023), the landmark UN project Housing2030 conceives of good housing policy governance as deriving from clear strategic frameworks, mission-focussed institutions, capable stakeholders, long-term leadership and commitment (UNECE 2021). It

typically requires multi-level governance, based on long-term agreements. It is also open to monitoring and critique, strengthens the voice of marginalised groups, learns from mistakes and adapts when necessary. In this way a national housing strategy can be market-shaping and transformative, addressing causes of well understood challenges, designing relevant policies and programs to ensure adequate housing for all.

Australia's housing and homelessness strategy should aim to shape and create the kind of housing markets we need, promote the right kind of innovation and channel resources to address pressing housing needs. As AHURI research has advised, this involves more than fixing market failures and filling the unprofitable gaps in the market.

5.3.1. Roles and responsibilities of governments for housing and homelessness

The recent AHURI report 'Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy' by Martin, et al, (2023), provides the most up to date advice with regards to the current national approach to housing and homelessness. This is valuable reading, that need not be repeated here. However, a summary of the main conclusions of chapter 3 on the "lie of the land" are provided below (Martin et al, : 34):

The Australian federation is a concurrent federation, and although there has been a long trend towards the expansion of the Commonwealth's powers, it must interact with the states to implement policies where it lacks a specific head of power, such as in relation to housing and homelessness. Over the years, policy makers and scholars have sought to establish institutions and principles for the cooperative practice of intergovernmental relations, but recent replacement of the COAG, the most enduring intergovernmental institution, by the streamlined National Cabinet comes at a time when the discussion of principles is also at an ebb.

Within the Australian Government, housing policy making is divided. No one agency has overall responsibility for housing outcomes and for forming a strategic view of the housing system. Most intergovernmental activity has been around housing and homelessness conceived of as residualised welfare issues, concerned chiefly with housing services for individuals, rather than the whole system and structure of housing provision (Pawson, Milligan and Yates 2020). The key instrument in this area of policy, the NHHA, is deficient, and policy development regarding other levers such as Commonwealth Rent Assistance has languished. NHFIC, on the other hand, has been developing a broader housing expertise as its functions are expanded. Meanwhile, the Australian Government's financial regulators, the RBA and APRA, are arguably conducting housing policy of their own.

There is similar fragmentation of housing responsibilities at the state and territory level. Reflecting this fragmentation, housing capabilities are dispersed through diverse agencies each having narrowly defined roles and priorities. This is at odds with the complex and interdependent nature of the housing system and is a barrier to coherently addressing the full scope of the housing policy challenges outlined in Chapter 2.

Deterioration in policy making capacity across the public service has been widely observed for some time, particularly in the housing space (Milligan and Tiernan 2011). The most recent independent review of the Australian Public Service (APS) attributed the decline to many factors, among them: increased outsourcing of policy advisory functions; undervaluing of domain expertise in public service recruitment; difficulty maintaining strategic policy roles amidst ongoing efficiency savings; and prioritisation of short-term, politically driven policy agendas (DPMC 2019). Added to these general trends, the refusal of a strategic housing role by the Australian Government (Pawson and Milligan 2023) and the downgrading of most dedicated housing agencies at the state level, has decreased the capacity and influence of housing policy makers.

6. Focus areas

Following on from this constructive critique above, we view the Issues Paper as continuing down a pathway of Australian housing policy that is narrowly defined and withered amidst fragmented governance arrangements at the Federal level, where responsibility for housing policy is split across government departments. We would recommend a stronger focus on the wider importance of housing in driving societal economic and social change and also its environmental implications for energy efficiency, carbon emissions, and finite resource use.

The role of owner-occupation should also be more thoroughly questioned in relation to its capacity to deliver a housing service accessible for all Australians and also for its role in economic development, the distribution of wealth, and social inequality. We share our research to strengthen the focus on these policy concerns.

6.1. Relationship between housing, aging and welfare

Australia is one of the first countries where the design of its welfare system is largely reliant on outright home ownership, in other words post-retirement relies on one's asset-based welfare. It is surprising, not least in view of the recently released intergenerational report, that population ageing and its implications for the Australian Housing System are not listed in the Issues Paper as a key theme. Population ageing will need tailored housing supply responses as demands for supported residential accommodation, home care packages and age care homes rise. Australia's financial arrangements with respect to home care packages and age care homes have inequitable impacts, and especially so for tenants in need of support or age care accommodation (Wood, Ong, Haffner, 2022).

Following on from this there are also likely implications of population ageing and growing housing indebtedness for increasingly casualised labour supply. According to recent RMIT research, owner-occupiers are growing indebtedness as they approach pensionable age. Some mature-age Australians are carrying mortgage debt later in life and this is delaying their retirement.

Furthermore, aging indebtedness also implies that increasing numbers will be working when the risks of adverse life shocks are higher. According to Ong, Wood and Cigdem (2022) serious ill health, for example, is a career-threatening hazard with an elevated risk in later life. Furthermore, marital breakdown and redundancy are shocks that also involve higher risks because it is more difficult to recover from such shocks in later life (Wood, Ong and Cigdem, 2020).

6.2. Homelessness

Effective policies to reduce homelessness require an understanding of what causes people to enter homelessness, as well as what prevents them exiting homelessness (Johnston et al, 2019) which include recognition of structural factors shaped by government policies, as well as individual risk factors.

Researchers at RMIT in collaboration with many other experts have been actively researching the scale and distribution of homelessness in Australia (see for example Batterham et al, 2022). While per capita rates of homelessness have been steady in recent years, the changes in the composition of the homeless population are having important consequences for the geography of homelessness. These changes in spatial distribution have potentially important implications for the location of homelessness services.

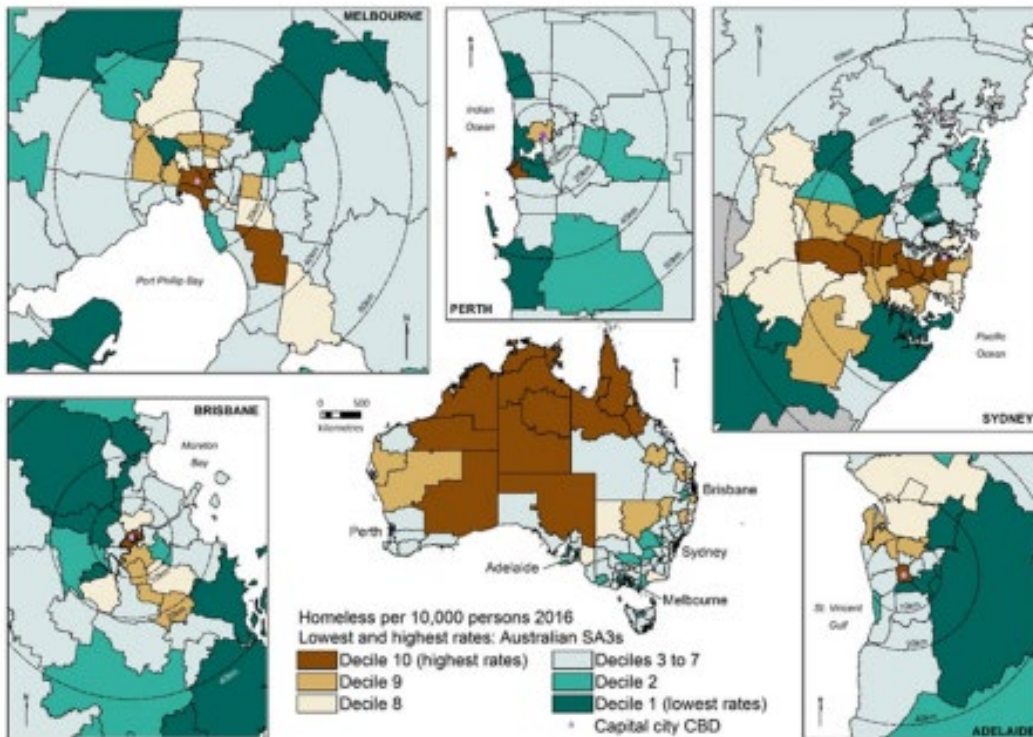


Figure 4: Homeless per 10,000 persons, 2016. (Source: Batterham, et al, 2022).

6.2.1. Contributing factors

Beyond this research, we are now beginning to appreciate is the importance of local housing and labour market conditions, and how these interact with personal characteristics to influence homeless dynamics. Johnson, Scutella, Tseng and Wood (2019) use data from the Australian panel survey, Journeys Home, to find clear evidence that for certain subgroups it is being the ‘wrong person in the wrong place’ that matters most when considering risks of entering homelessness.

Importantly, Johnson, Scutella, Tseng and Wood (2019) also found public housing to be a very strong protective factor reducing risks of homelessness. *“Public housing is particularly effective because it is affordable. It has also traditionally offered a long-term, secure housing option for those at the bottom of the housing market. This is because public housing leases provide the benefits of security of tenure commonly associated with home ownership.”*

Their research also suggested that community housing did not appear to offer the same level of protection. *“despite community housing being affordable, however security of tenure is weaker possibly because providers are more dependent on rent revenue and therefore less tolerant of rental arrears.”* They raise the relevant concern that the stock of public housing continues to decline in Australia with State government-initiated transfers of stock to the community housing sector accelerating this trend (Johnson, Scutella, Tseng and Wood, 2019).

6.2.2. Homelessness and access to health

One key dimension of homelessness is its complex relationship with health, and how access to appropriate health services is a key challenge for the homeless people in different ways, placing different demands on the health system. Again, using panel data from Journeys Home (Scutella, Wood and Johnston, 2021), the research examined how resource constraints impede access to health care, as well as the chaotic nature of living as a homeless person. It argues that *“people experiencing homelessness do face difficulties accessing primary health services, but for those in*

the sleeping rough/squatting subgroup, homelessness also results in an elevated rate of hospital admissions. There are higher costs associated with hospital in-patient services and these findings contribute to a large body of evidence supporting calls for a stronger policy emphasis on homelessness prevention, and especially sleeping rough and squatting” (ibid, 2019: 279).

The research contends that focusing more on prevention of homelessness, in particular street homelessness, would both reduce the damaging physical, psychological, and social impacts of homelessness, as well as contribute to a more optimal access to and utilization of health services.” (p. 279).

6.3. Social housing

Multi provider systems (MPS) exist in many different areas of service provision, such as education, health, childcare, transport and vocational education – increasingly Australia’s social housing sector, with its public, co-operative and non profit housing sector, as well as emerging private sector models. Social housing is an umbrella term that covers public housing, a form of long-term, secure rental tenure owned and operated by state and territory government agencies, community housing, which is owned and/or operated by non-government organisations, and state-owned and managed Indigenous housing (SOMIH).

Australia’s public housing sector largely sits outside discussions on necessary infrastructure investment and despite evidence of need, its assets are declining, deteriorating are rationed. The business operating model and maintenance strategy is opaque, and some argue not well regulated (Lawson, Milligan and Davies, 2022, Lawson, Pawson et al, 2018; Muir, Powell et al, 2020; Productivity Commission 2017).

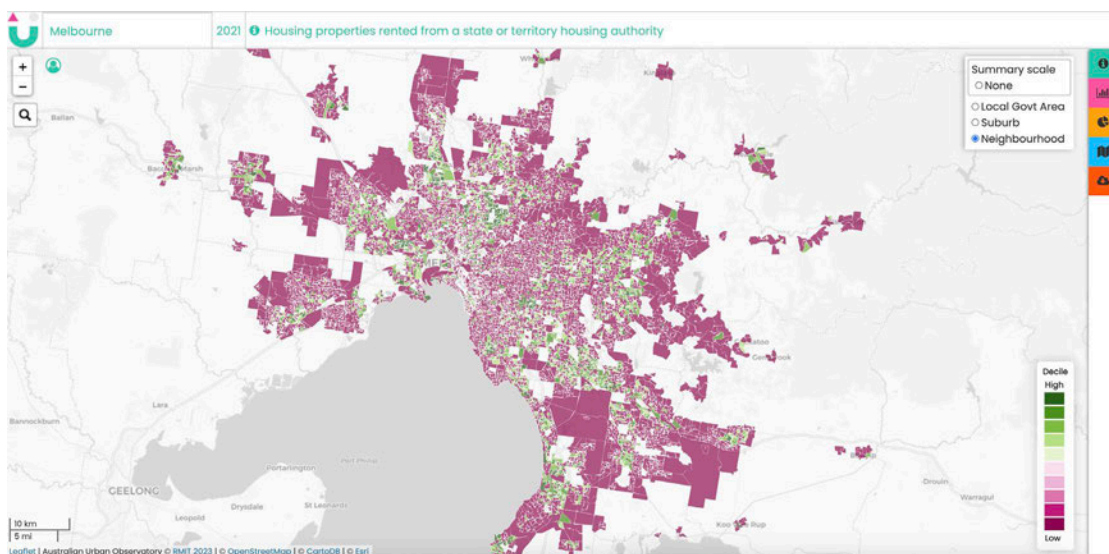


Figure 5: Housing properties rented from a state or territory housing authority in Melbourne (Source: auo.org.au).

Alongside public housing, which is the largest provider, numerous community housing organisations also play a role in housing promotion and management. While much attention has been given to growing CHPs, this has primarily occurred due to transfers of public housing and the densification and renewal of public housing estates.



Figure 6: Housing properties rented from a community, cooperative or church in Melbourne (Source: auo.org.au).

Already in 2014, research identified that insufficient stock and increasingly targeted households, represented a social and financial problem for housing agencies. It argued then that the stock was ill-adapted to tenants' needs. One of the major changes the research identified has been targeting, which has greatly altered the household composition from the 1980s (Groenhart & Burke 2014).

Demand for social housing properties remains high, waiting lists are long, and the sector is expected to meet the needs of an increasingly diverse current and prospective tenant population. The scale of the challenge facing social housing providers is captured in the projections of Lawson, Denham et al, (2019), who estimated that over the next 20 years from 2016, 727,300 *additional* social housing (both public and community) dwellings will be required in Australia; a 64 per cent increase on the current combined public, community and Aboriginal housing stocks, which totalled 442,700 dwellings on 30 June 2022 (AIHW, 2023).

Australia's community housing providers have variously benefited over time from public investment, involving land allocations and leases, stock transfers, grants, loans and guarantees, as well as tax deductions and exemptions. These settings have shaped the decline and growth of their housing portfolios.

The private rental sector has absorbed and increased pressures on many tenants who, while eligible for social housing, are unable to access secure affordable housing due to public housing residualisation. Private landlords are also a beneficiaries of various investment incentives and tax benefits as well as government expenditure on Commonwealth Rent Assistance, yet do not deliver a defined community service obligation.

Evidence of the allocation of subsidies across providers is fragmented and partial. Industry perceptions of different growth pathways are also very informative and important, but this evidence has not yet been systematically gathered for all states and territories.

Key providers certainly have views on the optimal design of these growth pathways, as found by research report Options for Regulating the Good Growth Options for regulating the good growth of Victoria's social and affordable housing and also the pathbreaking Inquiry Social Housing as Infrastructure (Lawson, Milligan and Davies, 2022; Lawson, Pawson, et al, 2018).

6.3.1. The importance of social housing

"Social housing provides safe, secure, long-term accommodation for some of the most disadvantaged in the community. Social housing provides housing for people who are very unlikely

to afford private rental market rents in most areas or who will find it difficult to be accepted into private rental due to a need for medical, age-related or other forms of support. It provides people with homes where they can live with dignity and as comfortably as possible, and, as an added benefit for the wider society, helps reduce people's use of expensive health and judicial services. For some people, social housing provides a place where they can rebuild their lives, acquire education skills and access employment opportunities" (AHURI, 2023).

Social housing shares similarities with many other forms of social infrastructure serving societal (as well as economic) needs (PC 2009: 3). For example, schools and hospitals are also long-term asset-based services enhancing social and economic wellbeing which are allocated on a needs basis, rather than for commercial return. Investment in social infrastructure enables essential services to be delivered, schools enable education, hospitals enable health care and social housing enables secure affordable shelter, ideally to a decent standard, in the right location and when needed (Lawson, Pawson et al, 2018: 2).

While users of infrastructure are increasingly called on to pay for associated services through various charges, full payment can undermine the social and economic benefits they are intended to deliver. For this reason, services such as health and education are not delivered on a full fee-paying basis or driven to generate surpluses or recover costs. These services are intentionally subsidised and involve conditional public investment to ensure their provision and also maximise the social and economic benefits they are designed to deliver.

6.3.2. Growth of social housing

There are a variety of pathways which have emerged for the growth of social housing, which are not equally effective or indeed beneficial. Indeed, the share of social housing in the Australian housing system is actually declining.

Like other forms of public infrastructure, social housing has experienced an extended period where governments have moved away from direct capital grants and long-term public loans or interest subsidies towards housing allowances as recurrent operating subsidies. This looks set to continue with the proposed use of HAFF funds – but further elaboration of the models to be pursued should heed important evaluative research on the cost effectiveness of different approaches (Lawson, et al, 2018).

At the same time, social landlords are increasingly expected to do more with less cost-effective private debt: accommodating more low-income and high needs tenants, while improving the quality of dwellings and surrounding neighbourhoods. A review of the now diverse pathways is provided in Lawson et al, (2018) (see Figure 7). There is clearly a need for consolidation of a preferred pathway, based on an evaluation and drawing on best international practices (UNECE et al, 2021).

The Commonwealth-State Housing Agreement (CSHA) and later funding agreements were a means for the joint long-term investment in public and community housing to support social and affordable rental housing provision. In recent years, direct public investment has been partly replaced by indirect private investment and has been demonstrably less effective.

An evaluative report on the cost to government of alternative pathways (Lawson, Pawson et al, 2018) built on earlier work (Randolph, Troy et al, 2016) *Paying for Affordable Housing* and also international research comparing 6 mechanisms for channelling investment towards affordable rental housing (Lawson, Milligan and Gilmour, 2010).

The criteria developed for evaluating Australia's investment pathway, which were provided in Table 13 of Lawson et al 2018, drew attention to much higher cost (24% more) of privately financed operating subsidy models. In later work principles for good growth of social housing were distilled from concrete research of actual investment pathways in Victoria (Lawson, Milligan, Davies, 2022).

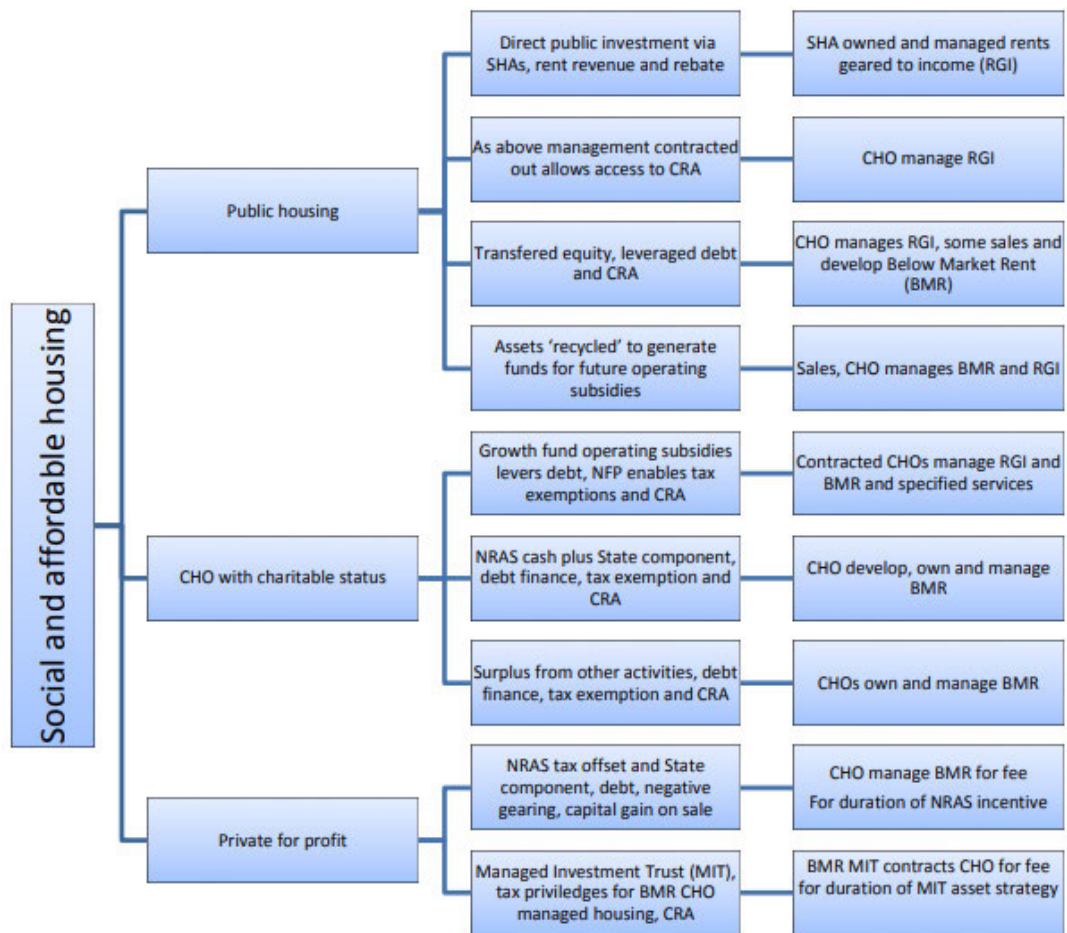


Figure 7: Established and emerging pathways in Australian social housing provision (Source: Lawson et al, 2018: 40). Legend: SHA: State Housing Authorities, RGI: Rent Geared to Income, CHO: Community Housing Organisation, CRA: Commonwealth Rent Assistance, BMR: Below Market Rent, MIT: Managed Investment Trust.

This shift to attract private debt as equity investment, requires adequate returns to private investors and thus an either an assured recurrent subsidy or higher revenue from rents and sales.

Private investment models are designed to minimise up front public budget outlays, such as capital grants and importantly, also capture long term subsidies (notably Commonwealth Rent Assistance, GST concessions and other benefits available to NP developers).

Finite growth models rely on the renewal and densification of existing public sites and only suited to areas with rising land values and higher density development opportunities, which are scarce.

Management/ownership transfers of public housing to community housing providers have also been finite in number and often had high costs associated with asset repair and upkeep.

Some approaches are seen as limited, such as debt capacity: NHFIC's current approach to securing its loans across a provider's whole portfolio was limiting borrowing capacity and driving providers to look for alternative higher cost retail finance.

Some recent initiatives have drawn heavily on the public private partnership (PPP) model used for hard infrastructure provision, which are complex and customised, are costly to establish and also involve payments from government over multiple decades to private operators. PPPs require a

high level finance and legal skills to package a deal. Bids also incur high management and transaction costs – this limits the bidding to a few larger players and exhausts limited resources in the NP sector. The ability of the NP partner to drive the best outcomes for tenants (for example, in dwelling design) is at risk of being compromised in these commercially driven deals. From a regulatory perspective, PPP- like models were seen as being more complex to monitor (e.g., involving a proliferation of Special Purpose Vehicles (SPVs) with powerful private equity partners in addition to the registered lead NP) with the risk that transparency and accountability could be weaker (Lawson, Milligan, and Davies, 2022).

Another lesson from the past has been that sporadic and ad hoc approaches to growth can weaken the capacity of policy makers (e.g., in Homes Victoria), and undermine the retention of development and financing skills, and project management experience in the community housing sector. Capital grant programs are ad hoc and are often associated with measures to stimulate the economy. This feast or famine approach to capital funding results in organisations needing to rapidly acquire capacity which later they need to let go. Capital funding to quickly bring on supply results opportunistic land purchase rather than strategy land purchase. The outcome is often poorly located housing delivering the type of housing easiest to obtain rather than what should be built.

Overall, providers and investors alike questioned the suitability of current approaches in social housing growth, noting that there was little evidence from robust analysis or independent evaluation of the efficacy and comparative effectiveness of the new models to draw on. Instead, they expressed a strong desire to return to a simpler, needs based, long term capital funding model, which is needs-driven (not opportunistic), cost efficient (not least cost), based on not-for-profit principles (reinvestment of surpluses and asset realisation – i.e., sales and redevelopment), and which can abate the risk to social and financial outcomes over the long term (Lawson, Milligan, and Davies, 2022).

These examples underscore the case for a sustainable and more widely applicable growth and investment mode – and a reinforcing regulatory framework.

Successful social housing ecosystems define the operating principles of housing providers, their social task, and needs-based allocation. This provides a fit for purpose framework for rent and allocation policies, setting decent housing standards, and reinvesting operating surpluses and realisation of assets. Adherence to a well-defined framework enables providers to be eligible for and revolve various forms of public support, from direct public investment to tax concessions. Conditionality also focuses and drives NP public purpose, value for money and good innovation, and distinguishes them from for profit and shareholder driven (FP) approaches. A well-defined framework also ensures that providers do not take excessive risks, cut corners or undertake extractive practices. Australia's regulatory framework is partial and underdeveloped, and should take note of successful regulatory regimes in other countries, such as Scotland, Austria, Denmark and Finland (Housing Europe, 2021).

A more predictable and strategic growth path is desirable to boost and sustain organisational, policy and regulatory capacities. A long term (30 year) investment strategy, linked to funded needs-based targets and realistic performance indicators and outcomes reported to parliament, would greatly strengthen social housing development, direction and innovation.

It is important to ensure that public investment is directed to entities operating according to the public purpose with a dedicated mission to supply and manage social and affordable housing primarily to assist people in housing need – regulated public and non-profit providers. In addition to public investment in regulated mission focused entities, public land banking, disposal and leasing processes as well as planning regulations play a vital role in growing or hindering affordable housing development.

Overall, Lawson, Milligan and Davies (2022) find that clearly defined non profit operating principles,

supported by strategic long term capital investment and co-ordinated land policy instruments, can ensure more effective and sustained forms of social housing provision. Concrete options are put forward in this report to consolidate and strengthen the capacity of NP providers to grow well. These options are accompanied by relevant international illustrations and resources to support their implementation (ibid, 2022).

6.3.3. The demand and supply of social housing

The abovementioned research ‘Social housing as infrastructure: An investment pathway’ (Lawson, Pawson et al, 2018) and ‘Options for regulating the good growth of Victoria’s social and affordable housing’ (Lawson, Milligan, and Davies, 2022) provides a clear pathway for investment in social housing. “First, in order to maximise social and economic outcomes, social housing requires a capital investment strategy informed by current and future needs. Secondly, productive social housing systems know what it takes to procure housing, and uses the most efficient and purposeful methods.

Productive social housing systems use a range of instruments to ensure supply outcomes, necessarily including the investment of public equity and not-for-profit delivery. Demand side subsidies alone cannot increase supply and are particularly ineffective where provision is for profit, rents are deregulated, and vacancies are low. Thirdly, productive social housing systems use efficient financing, as this reduces pressure service charges and related assistance and ultimately reduces the cost burden on all taxpayers. Greater transparency in comparing the cost of capital is vital to help policy makers and program designers determine the ideal mix of funding and financing that should be used to address Australia’s social housing deficit.

6.3.4. Features of social housing

Recent research from RMIT CUR and colleagues (Sharam, McNelis et al, 2021: 7-8) found that the social housing stock has the following characteristics:

- approximately, 438,000 dwellings were managed by eight large State Housing Authorities (SHAs), 518 Community Housing Providers (CHPs) and 226 Indigenous Housing Organisations (IHOs). Of them, 53 per cent of CHPs and 40 per cent of IHOs manage fewer than 20 dwellings.
- a significant proportion of social housing stock has issues of age, condition, quality and amenity, and does not adequately meet tenants’ needs.
- over the past five years, upwards of 10,000 dwellings valued at over \$5.4 billion have been transferred from state or territory housing authority ownership to CHPs.
- the value of social housing stock is not aggregated and reported and reporting of replacement cost is needed to further understand of renewal liabilities.

Currently, social housing in Australia has an estimated value of \$105 billion. However, as most of the stock is at least 40 years old and highly depreciated most of the value of social housing reflects land ownership not buildings. An unacceptable number of tenants live in sub-standard housing, with Indigenous tenants more likely to live in housing with multiple structural problems. SHAs and many CHPs rely on Rental Tenancies Acts as the basis for habitation standards and as a consequence there is no minimum standard in some states/territories (Sharam, McNelis et al, 2021).

The social housing sector is characterised by the residualisation of tenants. Due to the lack of available housing stock, only a handful of those most in need are offered housing. Waiting lists are very long and the housing stock does not meet demand. SHAs manage this by creating priority and general lists. In June 2022, the number of households on a waiting list (excluding transfers) were (AIWH 2023):

- 174,600 households waiting to be allocated public housing (up from 154,600 at June 2014)
- 13,700 households on a waiting list for a SOMIH dwelling (up from 8,000 at June 2014).

Between June 2014 and June 2022, the number of greatest need households waiting for public housing increased from 43,200 to 68,000, while greatest need households waiting for SOMIH dwellings increased from 3,800 to 7,100 over the same period.

These numbers do not reflect real need. Many of those in need do not register their need due to because they know their need will not be met anytime soon or if at all. A review of needs-based estimates is provided in Lawson et al (2018).

Seventy-five percent of social housing is public housing. Public housing authorities are prevented from borrowing by global borrowing restrictions imposed by governments. We advocate for SHAs to become independent of governments and permitted to borrow. State entities can obtain the cheapest funds in the market and borrowing to invest in long lived capital assets is a basic business strategy. Policy that actively encourages CHPs to borrow whilst preventing SHAs from doing so is counterproductive.

There are many ways in which the tenancy and asset management by SHAs could be improved and good practices institutionalised. For example, developing better systems to encourage tenant mobility within their portfolios.

Voluntary tenant mobility is associated with improved health, employment, education outcomes (Sharam, Byford et al, 2018). Schemes such as House Exchange in the UK promote mobility which improves utilisation.

Maintenance standards and processes for ensuring housing assets are kept in good repair are an effective, responsible and long-term approach. This may be institutionalised via the specification of decent home standards, tenant rights to repair and reduced rent, dedicated maintenance fund, revolving contributions, a tribunal to enforce good standards, and the right to withdraw rent payment where decent standards of housing are not met (Lawson and Davies, 2021: 19).

To illustrate, in Austrian subsidised housing, maintenance requirements are clearly stipulated in the Tenancy Act, standards are outlined in the Building Code (especially regarding energy efficiency), and owners have an obligation to properly maintain their buildings, and there is a monthly maintenance and improvement charge. Landlords can also raise rents with new contracts and increase security of rent revenues, to fund investment in housing quality. Tenants have also established rights to demand urgent repair, but also have an obligation to contribute towards maintenance and renewal costs as part of their cost rent (p. 21).

Community housing is typically younger, and CHPs have capacity through access to project finance to actively recycle assets to ensure housing meets decent housing standards, sustainability and functionality requirements. State housing authorities are grossly underfunded. The result is a very significant maintenance backlog. Recycling of SHA assets is constrained by lack of capital. Policy prevents SHAs from borrowing to renew stock and hence houses are depreciating faster than they would have otherwise. SHAs should be provided with independent borrowing powers and permitted to access NHFIC funding.

Research from CUR found that the asset management challenges stem from the funding model. There is no long-term prospect of capital funding and ad hoc capital funding is typically aimed at sporadic 'growth' rather than improving assets and addressing existing liabilities. Income based rents only cover operating costs – little more. Maintenance is an operating cost, but this cost is increasing as the stock ages. Active asset recycling programs (which require capital investment) ensure stock does not become hard (expensive) to maintain. That is, the age profile of stock should be 15–20 years rather than 40–60 years. Further, restriction of allocations to highest needs tenants (residualisation) reduces rental revenue while increasing property damage costs. The impact of residualisation and the requirement on CHPs to take a high percentage of highest needs tenants undermines their capacity to borrow and thus recycle assets (Sharam, McNelis et al., 2021).

RMIT has contributed to numerous research projects which advocated for good regulation of all landlords providing social and affordable housing, both public and private, and a more prescribed non-profit business operating model, including responsible tenancy and asset management, for those receiving public subsidies (Lawson and Davies, 2021; Lawson, Milligan and Davies, 2022).

As mentioned above, it is very useful for Australian housing policy makers to look towards other countries with growing stable well-maintained supply and these have been outlined in useful AHURI reviews and international reports (Housing Europe, 2021, OECD, 2020, Koessl, 2022).

Addressing Australia's stalled regulatory system for social housing and the fragmentation of operating models, Martin, Lawson et al, (2023: 52) put forward the Austrian model of limited profit housing legislation, which supports Europe's most successful and growing affordable housing sector:

The Limited Profit Housing Act defines key aspects of rent setting, revolving funds and auditing requirements (Koessl 2022:11–12). This clarity helps to consolidate good business practices among affordable housing providers, and fosters contestability and transparency in the allocation and use of subsidies. Furthermore, it promotes cost effectiveness and value for money for tenants. GBVs are monitored by an Auditing Association (Revisionsverband) which they must belong to, as well as the Regulatory Authority operating in each regional government, whose auditing rules are codified in the national law. Compliant GBVs are exempt from corporation tax in their main and ancillary areas of business.

Drawing from Koessl (2022), the key features of the limited-profit housing model are:

- *Cost-rent. GBVs calculate rents on a cost-basis, which means that rents can neither be set above nor below the costs incurred in the production, financing and management of residential buildings. Rented homes for which financing loans have been paid off are subject to rent control on a permanent basis, also referred to as the Basic Rent.*
- *Limitation of profits. Surplus generating components are a constituent part of cost-covering prices. In the case of GBVs, however, these components are clearly defined by the Limited Profit Housing (LPH) Law and supplementary regulations that set upper limits.*
- *Revolving funds. Equity is permanently tied up for limited-profit purposes and surpluses are continuously reinvested. This is guaranteed by a limitation to profit distribution and by an obligation to reinvest any surpluses in housing construction. Furthermore, shares in a limited-profit housing association may only be sold off at the nominal value of the initial investment (the 'nominal value principle').*
- *Personnel restrictions. GBVs must be independent from the construction industry to prevent tie-in deals to the detriment of customers. This applies in particular to directors, managers or other representatives (officials) of limited-profit companies. The Law also sets a limit to the salaries of directors and managers of limited-profit housing associations and caps the administration cost per unit.*
- *Limited business activities. Limited-profit housing associations must primarily pursue business activities that are within the main scope as stipulated in the Law, i.e. the construction, maintenance, and renovation of homes, and must do so in their own name. Other areas of business activity such as the construction of business premises, garages or community facilities are allowed but must be secondary in volume. Some other undertakings require the permission of the respective regional government.*
- *Audit requirements. All limited-profit housing associations must be a member of an auditing association and are audited annually by independent auditors. The audit monitors compliance with the LPH Law, including the efficient and economic use of resources and*

capital as well as the sound management of the organisation.

Recent research at RMIT and colleagues concluded that governments should view the social housing sector as part of the larger housing market rather than as a separate, standalone system. The current situation of perceiving the social housing sector as a separate system means siloing responses rather than an integrating a response with many available alternatives (Levin, Tually et al, 2023). Figure 8 demonstrates how the different levels of housing needs and products can be conceived as one large, interconnected housing system, instead of a fragmented set of systems.

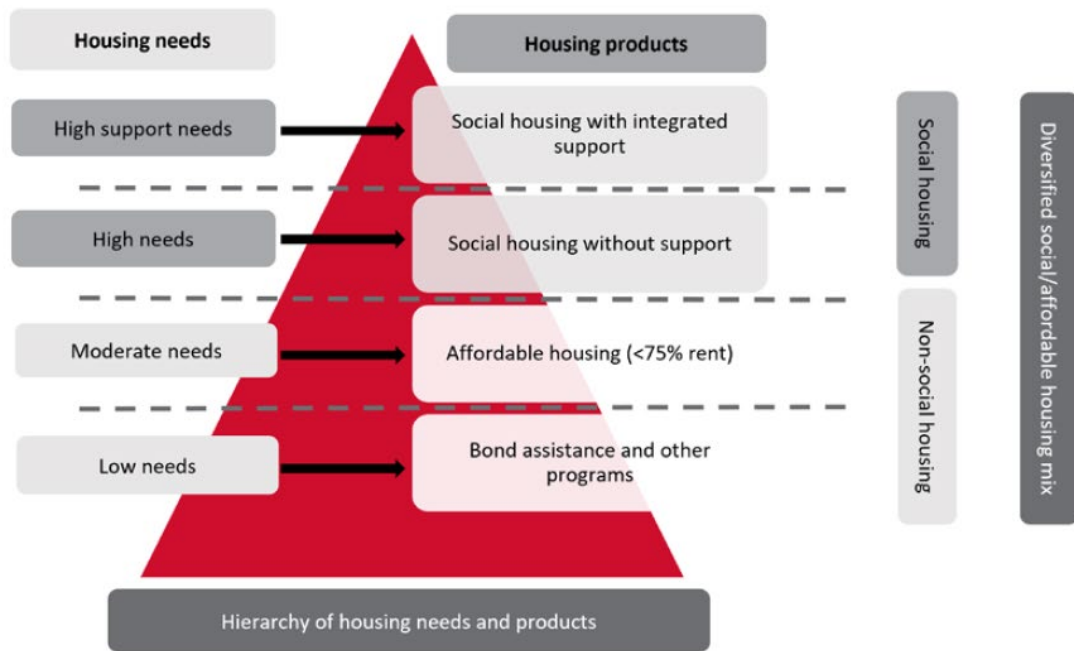


Figure 8: Hierarchy of housing needs and products. (Source: Levin, Tually et al, 2023: 4).

6.3.5. The role of community housing

Community housing organisations are not-for-profit organisations that own, develop and maintain rental housing for people on low incomes. Community housing is an integral part of the housing system and aims to provide a housing option that is affordable, secure, responds to local community needs and supports tenant participation (CHIA Victoria, 2023). Community housing providers (CHPs) sometimes specialise in assisting specific groups, such as people with a disability, older people or women. Community housing tenants receive CRA while public housing tenants do not.

The Issues Paper states that providers can leverage funding to achieve additional scale for their social housing supply. But CHPs are constrained by the subsidy gap which reduces capacity to borrow and thus actively recycles assets/growth. The subsidy gap is larger where there is a requirement to take a high percentage of highest needs tenants from the common waiting list. This reduces revenue and increases costs). SHAs impose requirements on CHPs to take a high percentage of highest needs applicants from common waiting list.

The Issues Paper further states that providers can leverage funding to achieve additional scale for their social housing supply (p. 56). However, there is no operational subsidy. Operational expenditures rely on rental revenue and there is no reliable capital funding. Capital funding is ad hoc and mostly there is little available most of the time. CHPs, as non-profit entities, are required to be solvent and thus must balance competing social and financial objectives.

Stock transfers should not be used by SHAs to transfer liabilities. Any transfer of poor-quality stock

should be accompanied by capital grants. Stock transfers should involve full transparency of stock condition. There is also a need to distinguish between ownership transfer and management. Far greater public benefit is gained through title transfer than management only. However, there is little acknowledgement of existing liabilities. There is a huge need to renew existing stock. The advantage of needing to renew stock is the opportunity to intensify sites.

Oversight of asset management by housing registrars varies around the country and registrars require greater asset management expertise. Registrars are under-resourced. Therefore, there would be great value in a single national scheme (see Sharam, McNelis et al., 2021).

The Ground Lease Model is an example of where the prohibition of SHA borrowing drives sub-optimal solutions. The Victorian Government makes recurrent payments to the consortia for 40 years. These payments need to fund the development, operations and profit. If this were a traditional public redevelopment the financing costs would be lower, profit would be internalised (to provide more social housing) and many transaction costs would not exist.

6.3.6. Lived experience of social housing applicants and tenants

Recent research exploring the experiences of people living in social housing (both public and community housing) (Flanagan, Levin et al, 2020) found that underinvestment in the social housing system has led to extreme rationing and limited the support that can reasonably be provided to tenants. Applicants and tenants therefore largely experience the social housing system as onerous, challenging and unsupportive. If social housing providers are to continue to target so exclusively to need, greater efforts must be made to implement processes that provide adequate support to applicants and residents.

This research revealed that social housing tenants value their homes and communities. They regard themselves as deeply fortunate to live in social housing and in contrast to the past experiences many have had of acute housing instability, social housing provides them with profound ontological security. Tenants value caring relationships with individual workers, yet many have experienced disrespectful and demeaning practices and interactions. Housing officers, especially in public housing, must be resourced and supported to prioritise care and respect in their everyday interactions with clients.

Better coordination is needed between the social housing system and other areas of human service delivery. This includes with aged care services and the National Disability Insurance Scheme (NDIS), to ensure that for older tenants and people with disability, support to live independently aligns well with the provision of appropriate housing. Measures to better integrate support for tenants also need to include better engagement with employment services to assist tenants into paid work so they can increase their incomes and move out of poverty.

Tenants, and many providers, regard the role of social housing as one of providing permanent, affordable housing to low-income households and of sustaining tenancies rather than disrupting them. At present they do not consider the system to function as a transitional pathway and, largely, they do not think it should in future. This is an important point that goes against some recent conceptions by state governments that see social housing as a pathway to non-social housing.

6.4. Housing costs, home ownership and the private rental market in Australia

6.4.1. Housing costs

Static comparisons of housing affordability at a point in time offer a partial picture. An additional and important dimension is the persistence of housing affordability – those trapped in unaffordable housing are of especial concern. This is known as Housing Affordability Stress (HAS), which is

defined using the 30/40 indicator: stress occurs where a household's housing costs exceed 30 per cent of their equivalised income and their income is in the bottom 40 per cent of the household income distribution.

With regards to HAS, Wood, Ong and Cigdem (2015) found that one in five experienced housing affordability stress (HAS) and half of those did so as a one-off, short-term event. However, for the other half this experience is on a recurring or enduring basis. Low-income households are prone to recurring or enduring periods of HAS, and these include migrants from non-English speaking backgrounds, households with dependent children, the jobless, self-employed and those on casual contracts. There are labour market factors (e.g. reduced income or unemployment) and housing factors (increased housing costs) are equally important in causing HAS. Policies to boost employment participation and supplements to income might be effective in helping low-income groups permanently exit HAS. Both Commonwealth Rent Assistance (CRA) and public housing still play important roles in preventing HAS, although the effectiveness of CRA has declined. The affordability of public housing might be eroded if policy proposals to introduce market rents are enacted.

Cost to mental health are important considerations. Rising costs of ownership and loss of ownership is associated with deteriorating mental health. These adverse mental health consequences are cushioned where the move alleviates affordability stress and removes exposure to housing investment risk/ Moves within the rental sector that occasion payment difficulties and less secure housing circumstances, are associated with a dip in mental health (Wood et al 2023).

Rising house prices have seen the typical mortgage taken out for first home purchase increasing substantially. However, while mortgage repayment affordability has been largely cushioned by falling interest rates, mortgage deposit affordability has become more constrained. As a result, it could be said that over the past 20 years it is increasingly wealth that has become the key constraint on access to home ownership, rather than income. The deposit hurdle has been recognised as one of the key barriers faced by FHBs seeking to finance home ownership. Consistent with this analysis, the Grattan Institute argued in 2018 that, by comparison with the historic norms, 'it is harder to save a deposit for a first home, a first home loan now entails more risk, borrowers live with that risk for longer, and inflation is unlikely to erode the cost of repayments as quickly as in the past' (Daley, Coates et al, 2018: 14). That study noted that where it would have taken the average household six years to save for a deposit in the early 1990s, this would have risen to 9–10 years by the late 2010s. Thus '[t]he challenge of saving an initial deposit is now typically a bigger barrier to home ownership than the initial burden of mortgage repayments' (Daley, Coates et al, 2018: 21).

Outright owners (most of whom are retired) are immune to enduring or repeated bouts of HAS. As outright ownership plays a very important role in protecting older Australians from housing stress and poverty, the long-term decline in rates of ownership and rising indebtedness of younger Australians are a signal that this safeguard may be threatened for a growing number of Australians. Policies to sustain ownership rates among younger cohorts may prove decisive in ensuring that HAS continues to be an uncommon event in old age Wood, Ong and Cigdem (2015).

The generous fiscal concessions offered to owner occupier, for example capital gains tax exemptions, mean that residential housing is an advantaged vehicle for storing and accumulating wealth. They are therefore central to the financialization of housing systems that has attracted so much attention and concern in recent years, at least in academic circles.

At least some of the tax-exempt owner occupier capital gains and net imputed rents are surely capitalised into house prices, especially in view of the evidence that housing supply is price inelastic.

Less well known as preferential fiscal settings, but nevertheless potentially important, is the omission of owners' primary homes from age pension asset tests as well as the preferential

treatment of owner-occupied housing under means tests determining age care charges for nursing home accommodation and home care packages. These concessions leave older tenants at a substantial disadvantage compared to homeowners.

Of a different taxation basis, most State Governments and Territories persist in applying stamp duties that are a bigger burden on low-income home buyers, deter mobility and add to deposit requirements and hence raise barriers to first home ownership. They are widely recognised as one of the most inefficient and inequitable taxes in Australia. Yet State Governments and Territories resist replacing stamp duties by a recurrent comprehensive land tax. If applied at a uniform rate there is good reason to believe that its effective incidence will be on existing landowners, and therefore land values will fall and inflationary pressures in housing markets will ease as a result. Most if not all tax experts recommend this reform, and various ingenious methods of transitioning away from duties and to a uniform land tax have been devised with a view to making this reform package politically feasible (Wood et al, 2012, 2012a; Wood, 1994).

Using Victorian Valuer-General property data, Wood et al, (2016) estimated the land tax liabilities that property owners would be asked to pay if a revenue neutral broad-based land tax replaced stamp duty on conveyance. The strong efficiency case in favour of such a tax substitution is complemented by empirical findings which suggest that higher income communities' shoulder higher land tax burden.

Planning issues and the role of public and private land bankers are taken up later and are relevant to the issues here. But in addition, Commonwealth fiscal settings are probably very important as a cause of high real house prices and hence high housing costs.

6.4.2. Home ownership

Historically in Australia, demand-side assistance for first homebuyers (e.g. grants and government-backed loans) was complemented by supply side policies (e.g. state-commissioned housing development for low-cost sale), government mortgage issuance, and regulatory preference for first homebuyer private lending. This balance is longer true, and Australia lacks an effective purposeful supply side response for first home buyers (Pawson Martin, et al, 2022). More than \$20.5 billion (in \$2021) was expended by Australian governments in stamp-duty concessions and cash grants (including HomeBuilder) to assist demand from first homebuyers in the decade to 2021. Even before the economic stimulus response to COVID-19, these forms of assistance were escalating—up from \$1.2 billion to almost \$3 billion in the four years from 2016—and new demand-side measures were being added, such as the National Housing Finance and Investment Corporation's (NHFIC) low-deposit mortgage scheme. There is a serious absence of targeted supply which is directly accessible for FHBs.

There are many benefits of home ownership, but they are unevenly experienced and for those in mortgage stress, in danger of falling out of home ownership or losing home ownership there are financial and health deficits that can have damaging effects on wellbeing, as mentioned above (Wood et al, 2023; Truong, Smith et al 2023)).

The numbers experiencing precarious housing circumstances on the edges of home ownership appear to be increasing, so it is important to offer a more balanced view of owner occupation that can better inform housing policy (Wood et al, 2023) The mortgage stress and precarious home ownerships affects young and holder households (Ong, Wood et al, 2019).

The policy implications are significant since the presence of repayment risk appears to prompt older mortgagors to draw down on their superannuation wealth. The rising trend towards mortgage indebtedness in later stages of the life course is therefore worrying from a retirement incomes adequacy perspective. If superannuation balances are being run down to pay off mortgage debt rather than meet spending needs in retirement, there will be growing pressure on the age pension system, as increasing numbers of baby boomers retire or are forced (by say ill health or

redundancy) to withdraw from the labour force while mortgage balances are unpaid and secured against the family home.

The research (Ong et al, 2019) is also clear that some will find it difficult to cope with mortgage debts in later life, and material deprivation is then a hazard. There is already significant concern in policy circles about older people's vulnerability to poverty, particularly single elderly women, who have longer life expectancies than men, but lower superannuation balances.

High levels of mortgage debt are likely to act as a drag on consumption spending, particularly when house prices fall, and especially the spending of older mortgagors, as they have fewer years of earnings ahead of them. These concerns are accentuated by the absence of insurance instruments that could enable mortgagors to hedge house price declines, policy makers should consider whether product innovation along these lines is worth encouraging.

Other policy options include encouraging older mortgagors to downsize into smaller, less expensive dwellings through reductions in stamp duty and pension asset tests; improving tenants' rights and ability to modify dwellings for mobility aids; and introducing innovative programs such as shared ownership. accumulating wealth for low-income renters unable to access home ownership (Ong et al, 2019).

Australian homeowners and investors benefit from various tax concessions. Homeowner tax concessions are poorly targeted with older, higher income households the main beneficiaries. This tax favoured owner-occupied housing sector attracts investment that would otherwise have been employed more productively elsewhere. Investors can also use negative gearing to convert ordinary income into capital gains that are taxed leniently. These tax benefits distort the supply of rental housing to the detriment of affordable rental housing opportunities (Wood et al, 2016).

Pawson, Martin and Lawson (2022: 11) report that "declining rates of young adult home ownership in Australia have caused considerable public disquiet. In particular, the proportion of the 25–34 age cohort owning their own home declined from 60 per cent in 1988–89 to only 40 per cent in 2015–16. Within this, it has also been demonstrated that among young adults and every other pre-retirement age group, home-ownership rates have fallen most substantially for lower-income households (Daley, Coates et al, 2018), thus exacerbating wealth inequality. While falling home ownership rates among younger adults may be to some extent influenced by changing lifestyles, educational and career trajectories, there is near universal agreement that generally declining house purchase affordability is the main explanation.

House price inflation is the product of various forces including factors such as population growth that are difficult for governments to influence. There are also important drivers such as monetary policy that are determined by macro-economic considerations of which house prices is but one.

However, there are government fiscal settings that arguably drive-up house prices or give Australian housing markets an inflationary bias that are significant causes of the Australian housing crisis. It is alarming that these fiscal settings are ignored despite being widely recognised as important. Investor landlords are also an important source of competition at entry level against first home buyers. Our current mortgage market regulation does not favour FHB. By restraining investor landlord purchasing power, interventions by APRA in 2014 and 2017 were indirectly to FHBs' advantage, as competition in the market was thereby somewhat blunted. However, historically, mortgage regulation in Australia was more overtly structured to benefit FHBs. There could be alternatives for these investors – such as Housing Convertible Investment Bonds from Austria – which were proposed in 2012 (Lawson, Milligan and Yates, 2012).

6.4.3. Private rental in Australia

Institutional, corporate, and NFP, investment into housing in Australia is currently able to exploit a number of regulatory gaps associated with residents' tenure quality that are quite obvious from

even a cursory analysis of the business models prevalent in the sector and will create great social and financial cost in the longer term. But these gaps are generally considered outside of the scope of housing policy, and definitely outside of the scope of housing economics, even though they are central to the (disruptive) forms of value extraction employed. It is important to move beyond siloed policy domains and both identify the gaps in regulation, and the policy arenas that should be mobilised to address them.

Current regulatory gaps in many jurisdictions include; a) tenancy law that is ill-equipped to deal with the realities of operators and owners managing multiple tenancies, including non-existent standards or regulatory requirements for collective tenant representation (meaning most residents have nothing akin to a body corporate, alongside no rights as a property owner); b) lacking (and in many cases non-existent) standards or regulation for the sophisticated building and tenancy management systems which are increasingly central to the creation of value, through utilising data-driven approaches to analyse all aspects of management and produce income streams for investors; c) a lack of sufficient professional standards for staff involved in operations and in the use and interaction with these building management systems, such as real estate agents. Particularly in the areas of discrimination, and privacy. Much of the above being left to individual business models, market mechanisms, or in-house interpretation of various related regulatory and reporting requirements, with little in the way of accountability processes, such as to investors or industry bodies.

This may seem outside of the scope of those setting up the mechanisms to increase supply. However, in a sector where the financial models rely on often very small margins, and income streams are drawn from specific operational approaches to tenancy and building management across often very significant numbers of tenancies, changes to the regulation of those practices may well undermine their viability.

This can potentially lead to undesirable outcomes such as; a future reticence to regulate in the interests of residents due to push back from an already established industry; a loss in viability if retrospective regulation does occur leading to a potential emergence of substandard stock and services; a cost to the public purse to make up the loss or a public liability to keep the stock of services operational; or at best some kind of more drastic market solution like the failure of the model and either full or partial release onto the build to sell market (if the stock is up to that standard), or increases in rents. As such the regulatory gaps are unsustainable and should be pre-empted, as there is no doubt that as these forms of tenure become more prevalent this will give rise to either extensive social and material costs to the public (think the worst cases of mismanaged and declining public housing stock), or the need for future regulatory constraints sooner or later.

Private rental housing supplied by 'Mum and Dad' investors has been the most important source of rental housing in Australia. It is astounding that negative gearing and the capital gains discount that are such contentious aspects of policy intervention in this tenure are virtually ignored.

Their presence puts institutional investors at a disadvantage – and therefore is a barrier to the emergence of this source of funding and housing supply. They also distort the supply of rental housing by disadvantaging rental housing in affordable segments of the tenure. Finally, they are efficient tax shelters that raise the income tax burden on those not investing in private rental housing, which is inefficient and unfair.

Earlier research showed that low-tax-bracket investors are concentrated in low-value rental housing that attracts rents which are high in relation to property values. (Wood and Yong. 2004). About one in four property investments are withdrawn from the rental market within 12 months. Thus, tenants of approximately one quarter of all rental properties occupy insecure accommodation. Low income, and negatively geared property investors, are more likely to make early exits from the rental housing market: negatively geared investors appear to move in and out of property investments (Wood and Ong, 2010).

There are ways of reforming these tax subsidies in ways that are perhaps more politically palatable.

- The Henry Tax Review proposes that housing affordability can be improved through changes to negative gearing, as well as abolishing stamp duties and modifying current land tax arrangements.
- The introduction of a Savings Income Discount (SID) of 40 per cent for net rental income (including capital gains) would offer a more balanced tax treatment of rental income and capital gains, while curbing some of the tax shelter benefits from negative gearing. Despite fears of a 'flight' of investors from the market, such changes are unlikely to lead to an overall contraction in private rental housing stock.
- The abolition of stamp duty should reduce entry costs to home ownership. It is also expected there would be a boost to the supply (and affordability) of rental housing as the introduction of a broad-based land tax places landlords and homeowners on an equal footing (Wood, Ong, McMurray (2011)).

Rental homes are also more energy inefficient than owner occupied homes, which makes housing for renters even more unaffordable (Daniel et al, 2020).

The transience associated with short-term leases can lead to stress and ambivalent feelings of home, especially for recent overseas migrants and international students (Dorignon, 2023).

6.4.4. Direct and indirect impacts on the housing market

Rising costs of materials and supply chains shortages are also said to be a factor in the push from the construction and building industry to promote rise and fall clauses in building contracts, so fluctuating costs can be shared between the builders and clients. This may further add to housing pressures and costs for consumers. Reforming construction industry practices via upscaling modern methods of construction such as prefabrication and greater digitalisation in the design and delivery of projects may help increase material efficiency and project certainty, reduce construction times and ultimately deliver better outcomes for clients/residents in terms of built quality, thermal comfort etc. (Correia, Dorignon and Moore, 2023).

6.5. The importance of planning, zoning and development

According to AHURI research involving RMIT researchers (Gurran et al, 2021), increasing affordable rental housing near key employment areas, particularly in Melbourne and Sydney, is possible – and under current planning rules. However, complex market barriers (e.g. underlying land values and the complexities of site acquisition, amalgamation, and remediation), rather than zoning or development controls – are what is preventing the take up of these opportunities.

This research goes on the state that “Given that the market is not currently making full use of available planning capacity, planning system interventions that seek to stimulate new supply by further ‘upzoning’ residential areas will have limited success. Additional interventions are likely needed to catalyse new and affordable housing growth in these locations.

It recommends the following:

- Improving accessibility and connectivity to outer suburban and satellite city housing markets via strategic investment in transport and communications infrastructure.
- ‘Concentrated decentralisation’—fostering new employment clusters through strategic place-based funding interventions and digital innovation. Overall, providing more affordable rental opportunities in locations offering high access to employment would benefit Q2 households currently living in housing stress and support long term labour market sustainability. In particular, policies to increase affordable supply in middle suburbs through

new development incorporating lower cost rental housing would assist employment participation and reduce housing stress of Q2 households.

Further, policies to support ‘concentrated decentralisation’, including strategies which leverage increased work location flexibility in the context of the COVID-19 pandemic, will improve job accessibility for Q2 households. However, these strategies need to be matched by interventions to preserve and increase affordable rental housing for existing residents and those able to relocate for new employment opportunities (Gurran et al, 2021).

A recent report (Lawson and Ruonavaara 2020) has reviewed the many different land policy instruments that are available to government and outlined best practices to improve housing affordability and promote more inclusive neighbourhoods. These instruments include public land banking, public land leasing, land re-adjustment, land value recapture, regulatory planning, neighbourhood planning and regulating the platform real estate industry. This report does not recommend weakening or deregulating urban planning systems. Rather it calls for more purposeful policy innovation and effective public intervention in land markets to shape better outcomes.

GOVERNANCE TOOLS	Strategic frameworks		Institutions and capacity-building
	Multi-level governance		Setting and monitoring housing standards
	Evidence		Supervision
	Dedicated social and affordable housing providers		Tenant and owner-occupier involvement frameworks
FINANCE AND INVESTMENT TOOLS	Regulating financial institutions	Non-profit provision of social and affordable housing	Subsidizing rents
	Rent setting, Indexation and regulation	Microfinancing	Using household savings
	Public loan, grants and purposeful investment	Interest rate subsidies	Loan guarantees and insurance
	Special-purpose intermediaries	Shared equity and costs schemes	Revolving funds for investment in affordable housing
	Taxation to guide investment		
LAND POLICY TOOLS	Public land banking		Public land leasing
	Land readjustment		Land value capture
	City and neighbourhood planning		
	Land-use regulation and inclusionary zoning		
	Land value taxation		
CLIMATE-NEUTRALITY TOOLS	Energy performance-related building regulations		Regulating the urban environment for energy efficiency
	Non-regulatory climate policy initiatives		Financial incentives
	Awareness-raising and training		

Figure 9: Policy tools defined and illustrated in the #Housing2030 report.

Building on Lawson and Ruonavaara’s (2020) report is the UN’s #Housing2030 initiative (UNECE Housing Europe 2021) and its online repository of best practices and related podcasts (<https://www.housing2030.org/reports/>). These resources clarify the building blocks of affordable housing: effective governance, strategic land policy, as well as purposeful circuits of investment and active promotion of climate neutral and affordable housing and neighbourhoods (Figure 9). The study draws on the experience of over 100 researchers, policymakers, housing providers and advocates from across the United Nations Economic Commission for Europe (UNECE) region and beyond, to define useful approaches, outline their advantages and disadvantages, and illustrate their practical application.

6.5.1. Land use planning and zoning

The Issues Paper recognises that the location of dwellings that households can afford to buy or rent shapes their access to jobs and economic and social infrastructure. On page 56 it states 'Affordable housing enables people to live in desirable locations, including locations that are close to jobs and well connected to transport, infrastructure and other services'.

Two factors, 'land supply' and 'land price premiums', are identified as important in shaping the capacity of households to live in 'desirable locations'. The issues paper states 'The most critical factor is the supply of land in desirable locations, including locations that are close to jobs and well connected to infrastructure and other services' (p. 67). On page 70 the issues paper poses the question '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? However, on page 72 the paper notes that 'where areas provide superior access to jobs and service opportunities, there will be a significant difference in land price premiums regardless of planning controls'.

In effect the Issues Paper says that reforming zoning, planning and development controls can increase the supply of land, including well located land. However, because there are price premiums for this well-located land metropolitan land markets will continue to produce spatial inequality in household access to jobs and social and economic infrastructure and produce spatial inequality. The issues paper does not consider policy initiatives that might begin to address the ways in which low- and moderate-income households might improve their access to employment opportunities and economic and social infrastructure.

In the current context it is essential that the growing inequality resulting from continuing and growing land price premiums are recognised and policy responses are developed. At a metropolitan level the consequences of this pattern of development are profound. In summary they are

- Job rich central city areas along with good public transport and private car access contribute to creating increasing land price premiums that are reflected in dwelling prices and rents that can only be afforded by higher income earners
- Outer suburban and fringe areas are comparatively job poor and households experience more limited public transport and longer and more expensive car commute times which are reflected in lower land price premiums and more affordable dwelling prices and rents
- Planning strategies that seek to increase the proportion of new dwellings being built in the job rich inner cities and decrease the proportion of suburban fringe new dwellings are producing limited results which will require continued long term outer suburban growth
- Continuing fringe suburban growth is increasing metropolitan spatial inequality; socioeconomic disadvantage; biodiversity loss; poor public health outcomes; food production losses and increased food miles; and infrastructure allocative inefficiencies in infrastructure provision.

6.5.2. The effects of planning, land use and zoning on the housing system

The Issues Paper makes only passing references to residential land and housing producers. They are limited to 'private industry and investors', 'real estate industry', 'housing industry' and 'private development industry'. There is scope in the plan for recognising the complex institutional arrangements of the industry that produces serviced residential land and new dwellings.

The way in which the land and housing industries plan, design, procure and build dwellings on serviced land takes many forms and is complex. This complexity has to be taken into account in any discussion about how to increase housing supply especially housing that can be afforded by low- and moderate-income purchasers and renters. It is an industry that produces (Ong, Dalton et al, 2017).

Different types of residential land and housing with distinct variations in shape, size, configuration, amenity, finance, vendor arrangements, building materials and methods of construction. There are considerable spatial variations with some developers operating nationally while others operate very locally, perhaps within only one or two local government areas. Funding arrangements also differ with larger, national firms having access to significant loan facilities that can be secured on their balance sheets, while smaller organisations rely on project specific finance.

It is important to recognise the differentiated nature of this industry for the following reasons:

- The time that producers take to respond to new demand for dwellings varies because some building types, in particular multi-unit buildings, require longer time frames to plan, finance, design and construct than single detached dwellings.
- The limitations of aggregate models used to forecast residential starts and completions and inform policy should be recognised by considering industry structure and the production of different types of residential dwellings.
- Policy development aimed at increasing supply must recognise industry arrangements so that governments seeking to influence producers of residential land and housing are more likely to realise their objectives.
- The residential and housing industries have a distinct spatial structure must be recognised when using aggregate data by complementing its use by paying close attention to expert local or regional community and industry knowledge.
- Governments can drive innovation in housing production by meeting objectives, especially those relating to affordability, location, embodied carbon reduction in materials, construction technologies, energy efficiency, urban design and procurement.

This approach to understanding the structure of residential land and housing industries can be assisted by using typologies using the key characteristics typically used to understand industry characteristics. There are two typologies that have been presented in recent AHURI research that seek to provide a better understanding of the main contours of the residential land and housing industries.

The first typology uses actor group 'capital intensity' as the key distinguishing feature. It does this because actor groups vary considerably in their command over resources and 'capital intensity' is a way of measuring these resources. This matters because it is also an indicator of the likely capacity of actors to act strategically in the new and emerging policy contexts.

A second typology uses the standard definitions of industry set out in the ABS ANSZIC⁴ industry classification system. Its purpose is to provide a framework for grouping 'similar productive activities' referred to as industries. The two main industries, using the ANSZIC codes, producing housing are the Housing Construction Industry (3011) and multi-unit apartment and construction industry (3019). As shown in AHURI research (Dalton, Dorignon et al, 2023), each industry can be described in terms of what is produced; who purchases the dwellings; who produces the dwellings; and industry structure in terms of capital intensity, industry concentration, innovation and barriers to entry.

⁴ Australian and New Zealand Standard Industrial Classification.

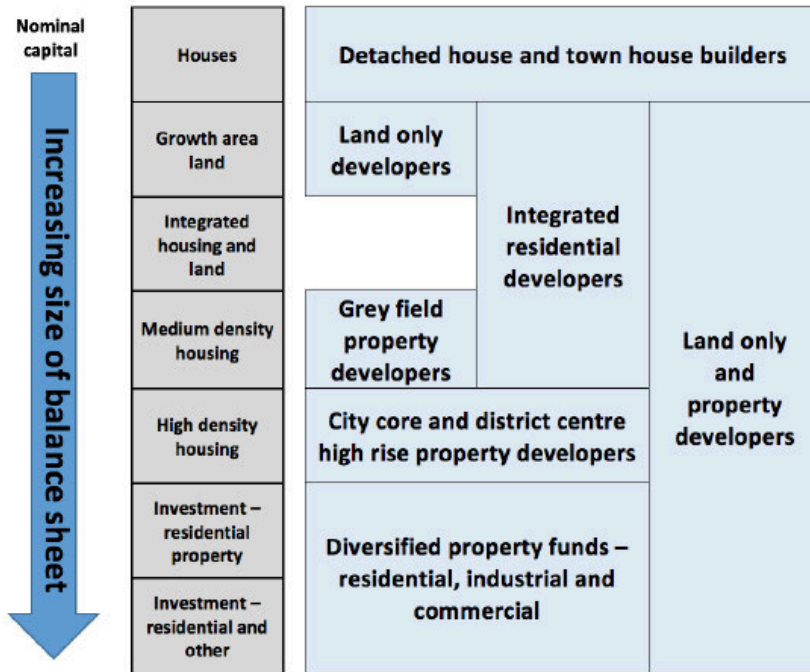


Figure 10: Land and housing development in Australia. (Source: Dalton et al, 2023).

6.5.3. Productivity Commission Review – recommendations on planning and zoning

The Productivity Commission Review focuses on the quantity of housing but fails to address critical housing features such as housing type, quality and suitability for the varied population groups and household types. A more mission focused approach is required and should be shown in policy design as well. How will nuanced need focused targets be realised? RMIT has made many suggestions in the past and can draw on international experience in Lawson and Ruonanvaara (2020) and Gilbert et al. (2021).

6.6. Climate change impacts the availability and quality of housing

Any consideration of climate change and housing needs to pay careful attention of the reciprocal and multi-faceted relationship between climate change and housing and consider the interactions between housing type, quality, energy services and carriers, construction methods and location.

There is a need for a comprehensive inter-disciplinary research programme on the reciprocal and multi-faceted relationship between climate change and housing. The framing of this section of the National Housing and Homelessness Plan Issues Paper (NHHPIP) suggests that a one-directional causal relationship between future climate change and the security, availability and quality of housing. However, this framing fails to recognise the emerging body of research that shows that the varied ways in which our current housing stock and construction methods contribute to climate change, and the influence of our current housing stock and construction methods on human health. As such, we challenge the premise the underlying conception of this section and suggest that policy makers have to take more responsibility for promoting the improvement of the existing housing stock, decarbonising the built environment construction and planning for a future climate without compromising housing availability. Such goals will require varied initiatives.

6.6.1. A net zero carbon target of operational emissions for new housing

Housing accounts for about a quarter of Australia's electricity use and more than one tenth of the nation's carbon emissions (DCCEE, 2023). A building's carbon emissions are a function of the carbon intensity of the fuel, the efficiencies of the varied appliances, the type of services, the energy use practices of householders and the thermal performance of the dwelling envelope. Heating and cooling are the most energy and carbon intensive energy services across all jurisdictions. Even though, the heating and cooling demand of new housing may be reduced by passive means in milder and temperate climates, the space conditioning demand in hot climates cannot be eliminated by improved building envelopes alone (NatHERS, 2023).

Minimum standards in Australia are improving, yet they are lagging behind decarbonisation efforts in other developed countries, and research has shown that the expectation that householders and the construction industry will voluntarily pursue better or best standards have not realised (Moore et al, 2019). Even though the *Trajectory for Low Energy Buildings* has proposed a timeline for "zero energy (and carbon) ready building" by 2028, progress is slow and adoption in varied states is delayed.

6.6.2. A future climate in building assessments

The National Construction Code should be reformed to purposefully assess and address climate change risks. Under the heading 'Sustainable housing', the Issues Paper suggests that the National Construction Code provides minimum performance requirements that will protect homes from some climate change risks. Such a statement is misleading:

- The NCC does not consider the resilience of housing to future climate risks or extreme weather. Even though stakeholders have raised concern about the misrecognition of such risks to human health and wellbeing since 2014 (ABCB 2014), the latest NCC2022 still does not contain the term "climate change" or "hail. The ABCB may consider such hazards in future editions of the building code (ABCB 2022; Acil Allen Consulting 2022).
- The current standards focus on quality at the point of dwelling completion with little consideration of maintenance or fit-for-purpose later in their life span. The current housing regulations do not require regular quality checks, involve few obligations for health and safety in not-brand-new housing and do not consider the effects of a warmer, wetter, drier or stormier climate.

Addressing housing risks to climate change may require a reform of the way building codes are currently developed, the values that underpin the assessments and building quality indicators (Viggers et al, 2021; Visscher et al, 2016).

6.6.3. Shift to a circular housing economy

The circular economy (CE) provides an opportunity to meet housing and environmental targets. The CE approach calls for a shift from a linear produce-use-waste economic development to a closed-loop system that is generative. As we move towards net carbon operational impacts of housing, the focus shifts to reducing the energy and carbon embodied in building materials and construction processes. Current construction methods rely on materials that have a high embodied carbon content, such as concrete, steel and bricks, with little employment of reused or recycled resources.

Researchers from the Centre for Urban Research in collaboration with the Universities of South Australia, New South Wales and Tasmania have recently released an AHURI report proposing a policy framework towards a circular economy housing in Australia (Horne et al, 2023). The Inquiry into circular economy housing in Australia considered aspects of neighbourhood development, apartment construction, renovation of social housing and construction materials. The inquiry concluded that policy, the housing industry, the construction sector and society at large need to

come together to achieve this fundamental shift in how housing is valued, financed and governed. The AHURI report proposes four key areas for reform:

- reappraising value and prioritising sustainability,
- shaping markets for a sustainable purpose,
- tilting investment flows, and
- building capacity.



Figure 11: Quadrant framework for a CE housing strategy. (Source: Horne et al, 2023).

The report suggests directions of reform and assigns tasks at varied levels of governance.

6.6.4. Climate change resilience

Climate change impacts extend beyond housing. Housing provides a fixed location that ties people to a community. There is convincing evidence that those who are part of a strong community survive extreme events better. Hence, access to social infrastructure is key for building resilience. This suggests that planning for new housing needs to be integrated into high quality areas with good access to services and social infrastructure.

6.6.5. Hazard resilient new housing and housing modifications

Hazard resilient new housing and modifications require a concerted effort from policy, industry and society. An often-overlooked sector is the insurance industry, which can have a role in promoting cost-effective solutions and help drive quality and performance outcomes, as revealed by research conducted by CUR in collaboration with Master Builders Victoria (Correia et al, 2023). The study explored initiatives from The Insurance Institute for Business and Home Safety (IBHS), a not-for-profit research organisation funded by the insurance industry in the US, providing science-based information to policy and lobby organisations. Currently, IBHS is working collaboratively with James Cook University in Australia, looking at wind-driven rain penetration in typical openings of building façades, causing damages and losses, impacting the durability and sustainability of buildings. They have also developed 'Fortified', an above code-building method based on years of research studying wind events, for which they also provide training. Recently IBHS developed a programme aimed at preparing homes for wildfires. The result of a decade worth of research into how embers are moving and landing, accumulating and lighting buildings on fire, and what are the recommendations for households to significantly reduce their wildfire risk. IBHS is working closely with the State of California to deliver this programme and enable homeowners to access insurance. They argue for the pairing of resilience investments with energy efficiency (Correia et al, 2023).

6.7. Sustainable housing

There is no agreed definition of “sustainable housing” in Australia and around the world. While the term is often explained by economic, environmental, and social criteria during the operational phase, sustainability in housing should encompass all stages of the housing life cycle and consider local and more distant scales of impact (Iyer-Raniga and Willand 2010). By focussing on energy efficiency, the Issues Paper neglects to acknowledge the varied other criteria that impact householders, the community and actors in the supply chain.

6.7.1. Energy efficient housing modifications and design

Energy efficient housing modifications and design include passive climatic design, improvement of the building envelope, upgrade of appliances and systems and access to renewable energy sources. Upscaling retrofits also requires the optimum interplay of governance, technology and equity to avoid any unintended consequences in environmental, social and health outcomes. At this point, it would be disingenuous to offer an answer to this Issues Paper question as there is a significant gap in knowledge on how the energy efficiency of existing housing may be upscaled in a timely, effective and equitable manner. Finding an answer to this question requires a multi-year interdisciplinary research programme.

Governments around the world are challenged by the lower than required and desired uptake of retrofit measures in existing homes. Retrofits are shaped by a complex web of social, technical and economic decisions, and upscaling retrofit requires a range of different policies, programmes and research activities. However, any initiative that aim to promote energy efficiency improvements needs to pay attention to questions of equity and the risk of an uneven distribution of the benefits and burdens.

A good starting point to promote energy efficiency in existing homes is an energy audit that assess the energy efficiency of homes. In Australia, energy efficiency assessments are currently only required for new homes. There is a need for the provision of transparent and trustworthy information about energy quality of homes and recommendations for what households can or should do to improve it. The ACT is the only jurisdiction that requires an energy efficiency assessment at a dwelling’s point of sale or lease. The Victorian Scorecard is a promising tool that may soon be available nationwide (COAG Energy Council 2019).

The retrofit of homes is shaped by factors that are (a) exogenous to the refurbishing household including technical, regulatory, economic and social factors, and (b) endogenous to the household, including social practices, goals, attitudes and behaviours (Willand and Horne 2013). Government use mandatory and voluntary tools to affect retrofits. In Australia, there are no mandatory regulations for people to retrofit their homes. Mandatory energy efficiency standards in Residential Tenancy Acts are not common in Australia but have been introduced in New Zealand and the UK. In general, governments use a mixture of tools, such as financial incentives, information tools (like home energy efficiency ratings that are only mandatory for new homes in Australian states except for the ACT), increasing professional knowledge, and voluntary labels. Rebates, low interest loans and feed-in tariffs are proven incentives for retrofit actions. The capability of building professional and technical solutions may facilitate the execution of the homeowners’ objectives. Trigger events, which may precipitate the decision toward comprehensive refurbishments, include the ‘necessary’ renovation of the home, a change in ownership, an energy audit or advice from a building professional (Willand and Horne 2013).

A recent interdisciplinary study led by RMIT (Rajagopalan et al, 2023) has investigated the policy instruments that may improve the thermal efficiency of homes in Australia. The report highlights the lack of understanding of the technologies, regulatory and other instruments that may progress a home thermal energy efficiency agenda across Australia’s diverse climate zones, markets and building typologies. The study has identified ten prioritised research areas, eight main research themes and 22 research questions that are mapped against three milestones of 2025, 2028 and

2030.

The research areas with the highest priority are:

- Benefits Of Improved Thermal Performance
- Existing Home Thermal Performance Assessment
- Building Fabric (Windows/glazing, air tightness, condensation, pre-cooling)
- Home Retrofits and Decarbonisation (Rajagopalan et al, 2023: 4).

The eight research themes are:

- Technology and envelope performance
- Assessment and quality assurance
- Capacity building and delivery
- Home occupant direct- and co-benefits
- Home occupant engagement and communication
- Research, development, and innovation
- Policy support and regulatory framework
- Market, funding (subsidies) and financing (Rajagopalan et al, 2023: 6–7).

There is also increasing concern about unfair outcomes of Australia's move to lower carbon housing. Energy vulnerability, which is the risk of harm due to limited access to essential energy, is an increasing housing-related problem across Australia (IEA 2023). Several CUR research outputs have highlighted the inequality of opportunity to improve the energy performance of the home that is often entrenched by the current retrofit initiatives. For example, an investigation into residential energy-efficiency subsidies in Victoria (Willand et al, 2020) revealed inequities in the distribution of benefits, suggesting that non-targeted financial incentives may be regressive and reproduce energy inequalities. A more restorative justice approach would entail targeting retrofit-enabling schemes households experiencing vulnerability (Willand et al, 2020). There is also concern about uneven distribution of the benefits and burdens of a push toward lower carbon gases such as hydrogen (Sandri et al, 2021). At the root of the injustice is often the misrecognition of the multiple dimensions that shape access to retrofits beyond income and the requirements to self-identify and ask for assistance (Willand et al, 2023). While trusted intermediaries can help people gain access to help, limited public understanding of energy efficiency and the siloed thinking of housing, energy and health portfolios hinders an integrated approach to help so-called hard-to-reach householders (Willand et al, 2019; Willand et al, 2021; Willand et al, 2023).

6.7.2. Improving the energy efficiency of rental properties

The Issues Paper acknowledges that rental homes are less energy efficient than owner occupied homes, which in the context of rising rents, makes their housing even more unaffordable. In 2020, CUR researchers in collaboration with colleagues at the Universities of Adelaide and South Australia conducted an Investigated Panel study (Daniel et al, 2020) that examined the prevalence and experience of energy disadvantage within Australia's rental housing market. The study found that:

- “Across the private and social rental sectors, the challenges are different with respect to resident/tenant and landlord/property manager relationships, tenants' rights, and the material condition of housing. Hence, the responses required to improve thermal efficiency and reduce energy hardship need to be tailored to the different tenant cohorts.
- No single set of policies or governmental actions will be able to meet the challenge of improving energy efficiency in the rental housing stock. Instead, a portfolio of measures is needed— including, for instance, mandatory building standards, targeted financial or material assistance for very vulnerable households, and investment in the public housing sector.
- Setting minimum standards for the energy performance of rental properties is a critical starting point in the process of reform, which some jurisdictions have already begun to undertake, independent of national leadership. Mandating acceptable levels of thermal performance

across the nation's rental housing stock is likely to deliver a population-wide benefit. However, such requirements are also likely to encounter resistance from many stakeholders within the property industry due to perceived added costs.

- Developing a consensus on what constitutes 'safe' housing —and tenants' rights to it—among key government players, non-government stakeholders and housing providers would greatly assist in enabling policy action.” (Daniel et al, 2020:1–2)

Minimum performance levels for rental properties may include criteria for climate resilience. This level should be met when a dwelling comes up for rent and become more stringent with time. There also needs to be easier ways for landlords and tenants to access financial support to help. Changing the tax system could also help so that there is an incentive when upgrading a rental unit that improved quality/performance is required to claim a tax rebate.

6.8. Other: Measuring and monitoring progress National Housing and Homelessness Plan

There is an urgent need for a longitudinal housing data set to measure and assess progress against the National Housing and Homelessness Plan. The Issues Paper acknowledges that housing is a commodity, a service and a social good. The Issues Paper also recognises that housing is a social determinant of health, and that housing stability and change are key determinants of personal, economic and social progress. Housing is also a critical influence of liveability as measured in the [Australian Urban Observatory](#) at RMIT University.

However, there is little data covering the dynamics of Australian housing, health and home life. The few housing-focused surveys, such as the Australian Housing Conditions Data, Australian Rental Housing Conditions Data and High Life Study provide valuable snapshots of housing and households, yet data are limited to a small number of states, limited by non-representative sampling and do not allow assessment of changes over time. Thus, they have limited benefit for policy and planning development.

Furthermore, there is an urgent need for a nationally coordinated open access to relevant datasets, such as bringing AIHW data out from beyond expensive paywalls, and supporting the generating of data that monitors key drivers of the phenomenon of housing tenure such as its security, cost and occupancy rights. This data needs to be both wide-ranging and standardised as well as available freely to everyone.

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