

19 October 2023  
Ref. No: HFSCA 23-10-01

National Housing and Homelessness Plan  
Department of Social Services  
GPO Box 9820  
Canberra ACT 2601

By email: [HousingandHomelessnessPlan@dss.gov.au](mailto:HousingandHomelessnessPlan@dss.gov.au)

Dear Secretariat,

### Issues Paper on Housing and Homelessness in Australia

I write as Chair on behalf of Home Fire Sprinkler Coalition Australia ([homefiresprinklers.org.au/](http://homefiresprinklers.org.au/)), a strategic partnership between AFAC, the National Council of fire and emergency services, and Fire Protection Association Australia (FPA Australia), the national leader of the fire protection industry. Together these two peak organisations have formed the Home Fire Sprinkler Coalition Australia (HFSCA), a not-for-profit public safety collaboration to help better protect Australian communities from residential fires.

The Coalition does this by raising awareness of and advocating for the life-saving benefits of automatic home fire sprinklers, as the overwhelming majority of Australian preventable fire fatalities occur in homes. Together with Fire and Rescue NSW, the Coalition partners were the proponents of the Proposal For Change (PFC) to the 2019 National Construction Code (NCC) that led to what has been the most significant improvement in Australian fire safety regulation in decades in providing significantly greater safety to the Australian community.

The proposal successfully mandated automatic fire sprinklers in new shared residential apartments and hotels less than 25 metres in effective height and above three levels. From the 1<sup>st</sup> of May 2019, sprinkler protection is now mandatory for these residential buildings in every Australian State and Territory. As such, the Coalition welcomes the opportunity to provide the attached feedback to the Commonwealth's *Housing and Homeless Review*. Our submission is focused on improving home fire safety for some of our highest at-risk groups through the mandatory provision of safe, reliable, cost-effective and fit-for-purpose home fire sprinklers.

The Coalition seeks the mandating of automatic fire sprinklers in safe and affordable housing through an informed, measured introduction that ensures these fire safety systems are properly designed, installed, certified and maintained. Automatic fire sprinklers are already required in most classes within the NCC; however, fire sprinklers are not universally required in residential buildings,

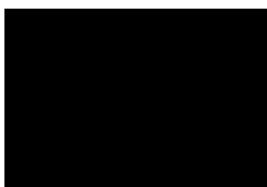
including Class 1a homes, despite this occupant class being over-represented in Australian preventable residential fire fatalities (**Attachment A**, BNHCRC, 2019<sup>1</sup>).

While residential fire sprinklers bring important benefits of improved property protection, lower relocation and rebuild costs, and better social, economic and environmental outcomes in the event of a fire, this submission is focusing on occupant safety. The risks posed by a typical modern home fire are effectively reduced by operating sprinklers, with Australian and international studies indicating **around a 90% improvement** in occupant survivability for sprinklered buildings. As such, HFSCA commends the Commonwealth for seeking broad and specialist input into the development of these important public safety policies, and is pleased to offer the following recommendations:

1. The Department of Social Services mandates the installation of automatic fire sprinklers for all new Commonwealth-funded affordable dwellings built with the first Occupancy Certificate (or equivalent) after a deadline developed in close consultation with industry and other key stakeholders.
2. Collaboration to confirm competent practitioners will design, install, certify and maintain home fire sprinklers. HFSCA would welcome the opportunity to support confirming and streamlining the regulatory processes in each State and Territory to deliver consistent, compliant and quality home fire protection at the most affordable cost.
3. HFSCA has developed a low-cost, low-maintenance residential sprinkler design that is recognised by the National Construction Code as a Deemed to Satisfy solution for mandatory sprinklers in identified shared residential accommodation buildings. HFSCA therefore offers a briefing to Department of Housing officers to raise awareness of this lifesaving solution and explore collaboration opportunities.

HFSCA agrees for this submission to be published. Should you require any further information or clarification, please contact [REDACTED]

Yours sincerely



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Home Fire Sprinkler Coalition Australia

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<sup>1</sup> [Coates, L. et al. Preventable residential fire fatalities in Australia July 2003 to June 2017.](https://www.bnhcrc.com.au/sites/default/files/managed/downloads/preventable_residential_fire_fatalities_july_2003_to_june_2017_bushfire_and_natural_hazards_crc.pdf) (Bushfire and Natural Hazards CRC, 2019).  
[https://www.bnhcrc.com.au/sites/default/files/managed/downloads/preventable\\_residential\\_fire\\_fatalities\\_july\\_2003\\_to\\_june\\_2017\\_bushfire\\_and\\_natural\\_hazards\\_crc.pdf](https://www.bnhcrc.com.au/sites/default/files/managed/downloads/preventable_residential_fire_fatalities_july_2003_to_june_2017_bushfire_and_natural_hazards_crc.pdf) and <https://www.bnhcrc.com.au/publications/biblio/bnh-5807>



**Home Fire Sprinkler Coalition Australia**

**Submission to Issues Paper on Housing and Homelessness in Australia**

**Consultation Questions**

**3.1 Homelessness**

1. *What are the different challenges for people experiencing homelessness in urban, regional, and rural areas?*

No comment.

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

No comment.

3. *How can the homelessness system more effectively respond to those at risk of, or already experiencing homelessness?*

No comment.

- a. *How can the homelessness system ensure those at risk of homelessness or in crisis receive appropriate support to avoid homelessness or so they are less likely to fall back into homelessness?*

No comment.

- b. *What actions can governments take to facilitate early intervention and preventative responses?*

No comment.

4. *How can governments capture better evidence on 'hidden' or 'invisible' homelessness (e.g. couch surfing, living in a car and overcrowding)?*

No comment.

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

No comment.

### 3.2 Homelessness services

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

No comment.

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

No comment beyond acknowledgement that housing dignity and safety should be universal rights.

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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

No comment.



### 3.3 Aboriginal and Torres Strait Islander Housing

1. *What are the main cultural, social and economic factors that must be considered by governments and providers (including ATSI CCHOs) when considering how to improve housing outcomes for Aboriginal and Torres Strait Islander people? How can governments best work with communities and the Aboriginal community controlled housing sector to support better housing outcomes for Aboriginal and Torres Strait Islander people, including embedding the Priority Reforms of the National Agreement on Closing the Gap and promoting self-determination?*

The AFAC/BNHCRC 'Preventable Fire Fatalities' report highlights the over-representation of ATSI people in fire-related deaths (please see <https://www.bnhcrc.com.au/publications/biblio/bnh-5807>). The installation of home fire sprinklers can help address this identified risk in these communities.

2. *How can governments best work with communities and the Aboriginal community controlled housing sector to support better housing outcomes for Aboriginal and Torres Strait Islander people, including embedding the Priority Reforms of the National Agreement on Closing the Gap and promoting self-determination?*

No comment.

3. *How can governments ensure diverse Aboriginal and Torres Strait Islander voices are included in the development of housing and homelessness policies and programs?*

No comment.

4. *What are the ideal short, medium and long-term policies and programs government can pursue to improve the supply of housing for Aboriginal and Torres Strait Islander people, including increasing the capacity and capability of ATSI CCHOs?*

HFSCA recommends that any design guidelines developed for Commonwealth-funded programs include the mandatory installation of home fire sprinklers.

### 3.4 Social housing

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

HFSCA strongly supports 'safe housing' be 'fire safe housing' through the mandatory installation of home fire sprinklers.

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

No comment.



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

No comment, other than reinforcing the primary principle that no matter where the home is built, it needs to have home fire sprinklers installed.

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

With the speed at which modern fires develop and so more quickly threaten the lives of occupants, the fire safety of occupants and the property are an immediate issue.

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

In the critical area of home fire safety, HFSCA strongly supports the mandatory installation of home fire sprinklers.

6. *What are the most-effective wrap-around supports required to support Australians in social housing to maintain their tenancies? Are there existing effective models that could be scaled up?*

No comment.

7. *What future role should the community housing sector play in Australia and what initiatives and funding mechanisms would support this?*

No comment.

- a. *Are there any capacity and capability constraints impacting on future growth of the community housing sector?*

No comment.

8. *What changes to community housing regulation could improve outcomes for tenants, the community housing sector, governments and investors?*

In the critical area of home fire safety, HFSCA strongly supports the mandatory installation of home fire sprinklers.

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

No comment.



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

No comment, beyond noting the availability of housing that would have been either partially or fully destroyed by fire if not for the life and property-saving capability of home fire sprinklers.

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

HFSCA recommends providing identified occupants and their home with the single most effective fire safety protection – automatic fire sprinklers.

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

No comment.

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

The aforementioned AFAC/BNHCRC 'Preventable Fire Fatalities' report provides comprehensive data and information on the fire risk to people who live in social housing, and so can be basis for informed decision-making.

### **Affordable housing**

1. *How can governments encourage delivery and availability of affordable housing in the short, medium and long-term? How can governments partner with institutional investors to support more housing development (particularly affordable housing)?*

No comment.

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

No comment.

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

HFSCA would welcome the opportunity to support streamlining the regulatory processes in each State and Territory to deliver consistent, compliant and quality protection at the most affordable cost. Areas of potential targets for incentivising home sprinklers include provisions



within the NCC, improvements to local planning conditions, and streamlining State and Territory regulation needs to improve efficiency and effectiveness.

### 3.5 Housing costs, home ownership and the private rental market in Australia

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

No comment.

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

No comment.

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

HFSCA believes housing policy needs to take into account the real economic cost/value of installing automatic fire sprinkler systems in different types and sizes of buildings, and different geographic locations.

#### Home ownership

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

No comment, beyond reiterating HFSCA recommends that all new development should be sprinklered.

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

HFSCA can confirm that the post-incident costs of a home fire, including potential rebuild costs, are significantly lower if the home and its occupants are protected by a fire sprinkler system.

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

No comment, beyond reiterating HFSCA recommends that all new development should be sprinklered.





## Rental Properties

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

No comment.

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

No comment.

### 3.6 The importance of planning, zoning and development

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

No comment.

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

No comment.

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

No comment.

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

No comment.

5. *How can the development assessment process address community concerns, so the length of appeals processes is minimised, and developers efficiently resolve issues and gain approval?*

No comment.

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

No comment.



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

HFSCA supports the sprinklering of entire new housing estates, with the possibility of cost offsets in the provision of required community infrastructure.

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

No comment.

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

HFSCA recommends that all new housing developments should be sprinklered.

