

1.0 Executive Summary

Knox City Council welcomes the opportunity to make a submission to the National Housing and Homelessness Plan.

Overall, we recommend that the National Plan includes:

- projections and initiatives based on an interpretation of **key demographics**, with particular consideration given to groups with special housing needs or vulnerabilities to homelessness, such as:
 - **People who are homeless or sleeping rough**
 - **Single men (often with complex needs)**
 - **Seniors (over 55 years)**
 - **Women and children**
 - **First Nations peoples**
 - **People with a disability**
- **an objective to preventing homelessness** from occurring and encourage investment in local governments and community organisations to **support partnerships in prevention and research**
- support for **community awareness-raising of homelessness and housing issues**
- further investment to provide timely **outreach to those in need of support**
- long-term investment into **food and material relief programs** to ensure their sustainability and to encourage **joined-up services** offering practical assistance, housing advice and case management approaches.
- support for **crisis and transitional housing**
- **matching support for crisis housing with adequate long-term housing options** to avoid another pathway to homelessness for people exiting temporary housing
- support for a coordinated the best practice approach to the **development of a healthy and regulated rooming house sector**
- a commitment to developing a **National Indigenous Housing Strategy** that delivers equity in housing outcomes for First Nations people
- a commitment to **work with ACCOs across Australia to reconsider the national approach** to social housing requirements around **Confirmation of Aboriginality**
- **additional resourcing needed by ACCOs** to meet community demand for Confirmation of Aboriginality
- encouragement of **partnerships between the Aboriginal Housing sector and all levels of government**
- a commitment to work with the Victorian Government and Infrastructure Victoria to set and regularly review **ambitious social housing targets and develop a sustainable funding solution**
- support for **Housing First principles** within social housing models
- emphasis on **responsibilities shared by the private sector and all levels of government to deliver social housing**
- **greater certainty regarding funding models for community housing providers**
- encouragement of **greater housing diversity**, particularly for the needs of an **ageing population**
- encouragement for **developers to consider delivering affordable rental options**
- development of agreed **definitions of social and affordable housing**
- support for **localised planning and partnership approaches to social housing development**
- a commitment to **climate-responsive principles in planning**, so that all housing should be: close to public transport, amenities and jobs; accessible and designed to the needs of key cohorts; and be energy efficient.

2.0 Introduction

Knox City Council welcomes the opportunity to comment on the National Housing and Homelessness Plan to contribute toward a shared vision to improve housing outcomes and address homelessness.

Council is committed to increasing the supply of social and affordable housing, recognising that housing changes lives: the availability of affordable, sustainable and appropriate housing is the foundation for people to fully participate in the social, economic and community aspects of life. When housing is secure and adequate there is a significant positive impact on health, employment, and education.

Knox City Council has a proud history of supporting housing for vulnerable persons, including the donation of five parcels of land in the 1960s for the development of housing for seniors. Council retains and manages the nomination rights for these sites to the present day. Current and ongoing work also includes advocacy, policy, working with community partners and key agencies, as well as regional efforts, notably through the Eastern Affordable Housing Alliance (EAHA) for which Knox is the lead Council.

Knox City Council¹ recently adopted a Social and Affordable Housing Strategy (2023-2027) which calls upon the Federal Government to:

- Work with the states and territories to develop a:
 - National Housing and Homelessness Strategy with a holistic and long-term vision for improved connection and efficiencies in homelessness prevention; early intervention and response; including a plan for an additional 500,000 affordable dwellings across Australia over 5 years to meet the current shortfall.
 - National Indigenous Housing Strategy that delivers equity in housing outcomes for Aboriginal people
- Commit to national, state and regional targets, as supported by Infrastructure Victoria, to increase provision of social housing in Australia to meet the current shortfalls.
- Increase investment in social and affordable housing to meet community needs.
- Increase the maximum rate of Commonwealth Rent Assistance by at least 50%.
- Investigate tax and other incentives that encourage the supply of social and/or affordable housing

The submission below outlines local learnings relevant to the National Plan and our response to the Focus Areas in the Issues Paper.

Knox City Council also acknowledges the submission made by the Municipal Association of Victoria (MAV) to the National Housing and Homelessness Plan.

3.0 Key housing issues in Knox – local learnings relevant to the National Plan

It is critical that a National Housing and Homelessness Plan considers local community demographics, current and projected housing stock and provides for tailored housing opportunities that meet these needs.

For instance, the Knox Social and Affordable Housing Strategy 2023-2027 is based on an extensive evidence-based approach, to understand the key drivers of housing supply and demand.

Knox currently has 1,503 social housing dwellings with a further 159 homes funded through Homes Victoria and in development. This will bring the total supply of social housing in Knox to 1,652 dwellings.

¹ Knox City Council, Housing Changes Lives: Social and Affordable Housing Strategy 2023 – 2027, pg. 62, available at: [https://www.knox.vic.gov.au/sites/default/files/2023-06/Knox Social and Affordable Housing Strategy - 2023-05-31.pdf](https://www.knox.vic.gov.au/sites/default/files/2023-06/Knox%20Social%20and%20Affordable%20Housing%20Strategy%20-%202023-05-31.pdf)

Between now and 2041, analysis of current trends suggests a need for a further 5,020 affordable housing dwellings, of which:

- 1,140 should be dedicated social housing
- 150 dedicated places available for crisis/supported accommodation (for those at long-term risk of homelessness)
- The remaining 3,730 dwellings would be affordable rental properties, which facilitated through the private housing market with Federal and/or State Government support.

As well as increasing the supply of social and affordable housing, we must also meet a variety of needs within our community. Specific cohorts have been identified within Knox as requiring support with suitable housing:

- People who are homeless or sleeping rough
- Single men (often with complex needs)
- Seniors (over 55 years)
- Women and children
- First Nations peoples
- People with a disability

Each cohort has unique housing needs that will be relevant across Australia. For example, rough sleepers and single men with complex needs may require crisis or transitional housing. Seniors are more likely to need smaller dwellings, whereas women and children will likely require multi-bedroom dwellings. People with a disability may require some form of modified housing, including single-level dwellings, accessible hallways and bathroom facilities.

In summary, the National Housing and Homelessness Plan's projections and initiatives should be based on an interpretation of key demographics for local areas, with particular consideration given to groups with special housing needs or vulnerabilities to homelessness.

4.0 Our response to the Issues Paper Focus Areas

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

The Knox community is aware of a rise in homelessness, including rough-sleeping. At the 2021 Census, 595 people were identified as experiencing homelessness or being marginally housed in Knox. This represents an increase of 16% between the 2016 and 2021 Census dates. The more obvious form of homelessness where people are living in improvised dwellings, tents or ‘sleeping rough’ makes up the smallest share of homelessness in Knox.

We highlight the following considerations for the National Housing and Homelessness Plan to address homelessness:

- The National Plan should include **an objective to preventing homelessness from occurring** and encourage investment in local governments and community organisations to **support partnerships in prevention and research**. For instance, Knox is working with local agencies to tackle the causes of family violence. Federal Government resourcing to extend this work would reduce homelessness among women and children in the longer term.
- Knox Council also seeks to **reduce the stigma of homelessness and rough-sleeping** within our community, and **asks the Federal Government to support work to raise community awareness of homelessness and housing issues broadly**. The stigmatisation of homelessness means people are more reluctant to seek help, particularly early on. This exacerbates the severity of people’s issues, placing further pressure on the housing and health sectors at the point of crisis.
- Long-term, holistic and flexible support is needed for community outreach services to work in conjunction with housing agencies and local government in offering prompt support for people sleeping rough. Knox Council works closely with specialist outreach services which are often dependent on short-term funding and have limited resources working across a region stretching multiple local government areas. Given the transient nature of rough sleeping, **further investment is needed to provide timely outreach to those in need of support**.
- Similar to other regions, the Knox community is experiencing growing numbers of people relying on emergency food and material relief for medium- to long-term support. These services act as critical ‘homelessness prevention’ supports, as well as often providing much needed social support, interaction and food for many Knox residents. The National Plan should consider **long-term investment into food and material relief programs** to ensure their sustainability and to **encourage joined-up services** offering practical assistance, housing advice and case management approaches.
- Knox Council notes the vital **importance of crisis and transitional housing** to support homelessness and asks for this to be emphasised in the National Plan. Of those at risk of long-term homelessness in Knox, it is assumed that approximately half of these people will need some form of special or supported accommodation. For instance, given the figures in section 2 above, Knox will require at least a further 150 dwellings/places in crisis or transitional housing by 2041.
- However, support for **crisis and transitional housing must also be matched with adequate long-term housing options** to avoid another pathway to homelessness for people exiting temporary housing. Knox’s local providers observe a lack in social and affordable housing for people to transition into either in the Knox local government area or the wider Eastern Metropolitan area.
- While a rooming house (boarding house) provides a roof over someone’s head, our engagement with stakeholders and clients often regarded this model as problematic due to their poor quality and reduced safety. Many single men report they would ‘rather sleep rough’ than stay in a rooming house. In consultation with the

community housing sector, the National Plan should support a coordinated the best practice approach to the **development of a healthy and regulated rooming house sector.**

4.2 Aboriginal and Torres Strait Islander Housing – How can governments, across all levels, best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander peoples?

Knox has a higher than average growth rate in persons identifying as First Nations, with 1022 people at the 2021 Census. We recognise that rates of home ownership are far lower for Aboriginal and Torres Strait Islander People, rates of homelessness are far greater, and First Nation Peoples are far more likely to rent, to be housed in social housing, and to receive Commonwealth Rent Assistance.²

Knox is committed to working with local First Nations community groups and Aboriginal Community Controlled Organisations (ACCOs), such as Aboriginal Housing Victoria (AHV). At July 2022, AHV had 203 Aboriginal and Torres Strait Islander households in Knox on their register. Based the 2021 Census count, this means almost 20 percent of all First Nations people living in Knox are awaiting social housing. This is a significant concern.

Difficulties associated with providing Confirmation of Aboriginality can impede access to housing for the First Nations community. Of the five ACCOs operating in Victoria, only two currently provide Confirmation of Aboriginality, and neither services the Knox area. Hence, the figures cited almost certainly underestimate the level of housing need amongst the First Nations community in Knox.

We note that AHV will make submissions to the National Plan based on strong knowledge and connections with local First Nations communities. We recognise their expertise in advising what's required to improve housing outcomes for First Nations People.

We ask for the Federal Government to:

- **develop a National Indigenous Housing Strategy** that delivers equity in housing outcomes for First Nations people
- **work with ACCOs across Australia to reconsider the national approach** to social housing requirements around Confirmation of Aboriginality
- **provide additional resourcing needed by ACCOs** to meet community demand for Confirmation of Aboriginality
- **encourage productive partnerships** between the Aboriginal Housing sector and all levels of government.

4.3 Social housing – How can all levels of government, along with housing organisations, institutional investors, not-for-profits, and private industry, improve access to social housing, which includes public housing and community housing?

A National Plan should ensure sustainable social housing growth is continued to be delivered by all state and territory governments.

We highlight the following considerations for the National Plan regarding social housing:

² Aboriginal Housing Victoria, Strategic Plan 2014-2025, pg. 10. Available at: https://ahvic.org.au/cms/uploads/docs/ahv-strategic-plan_2014-2025.pdf

- We encourage the Federal Government to **work with the Victorian Government and Infrastructure Victoria to set and regularly review ambitious targets and develop a sustainable funding solution in order to meet shortfalls in social housing dwellings as soon as possible.** In Victoria, the independent advisory body, Infrastructure Victoria, assists the state government with recommendations around social housing targets in a 30-year infrastructure strategy³. Targets are informed by national benchmarks. This strategy is renewed every 3 to 5 years, giving opportunities for Infrastructure Victoria and governments to modify and realign targets as needed.
- The National Plan should also **support Housing First principles within social housing models.** This involves the prioritisation of housing without requirements around behaviour or acceptance of treatment or assistance, and the provision of wraparound supports to sustain tenancies. Housing First is recognised internationally as the most successful model to end homelessness for people with high support needs who have experienced long term or recurring homelessness.⁴ Knox Council is one of thirteen Councils from across Melbourne’s eastern and south eastern metropolitan regions which make up the Regional Local Government Homelessness and Social Housing Charter. The Charter Councils seek systemic change to increase the supply of permanent, safe, appropriate and timely housing for our most vulnerable community members, and to embed Housing First as a key foundational principle.
- Stigma associated with social housing also significantly influences community resistance to new social housing developments as well as social exclusion experienced tenants. As mentioned in section 3.1, the National Plan can **support broad community awareness-raising around homelessness and housing issues which will also reduce stigma for people living in social housing.**
- **The National Plan should emphasise the responsibilities shared by the private sector and all levels of government to deliver social housing.** Knox Council’s Social and Affordable Housing Strategy strives for this shared approach, including through a target to guide developer contributions toward social housing. There is no mandate or incentives for developer contributions within Victoria, as there are in other states such as South Australia⁵. Our strategy adopts a position advocated by Dr Marcus Spiller of SGS Economics and Planning that the cost of essential infrastructure should be shared three ways between Federal and State Governments and the private sector. We have identified targets based on this position with the aim of one-third of all social housing needs to be met by the private sector.
- We also ask for the Federal Government to help **provide certainty and communicate widely about the funding models for Community Housing Organisations (CHOs) and support partners/investors to better understand the constraints CHOs work with.** We have observed that negotiations are highly complex, with considerations including land lease or purchase, mixed tenancy prospects, loans, grants, projected income, assets and equity. Community housing providers require certainty of cashflows to meet obligations⁶. We note that the peak organisation, Community Housing Industry Association (CHIA), will also provide a submission to the National Plan outlining specific considerations and concerns.

³ [1.-Victorias-infrastructure-strategy-2021-2051-Vol-1.pdf \(infrastructurevictoria.com.au\)](https://www.infrastructurevictoria.com.au/1.-Victorias-infrastructure-strategy-2021-2051-Vol-1.pdf)

⁴ [Housing First Principles and National Webinar series – Homelessness Australia](#)

⁵ [Housing Plan for South Australia](#) (introduced in 2005),

⁶ Community Housing Industry Australia, 2023, [Senate Inquiry Housing Legislation Submission \(communityhousing.com.au\)](#)

4.4 **Housing costs, home ownership and the rental market – What should governments, private industries, the not-for-profit and community sectors focus on to help improve access to housing and housing affordability in the private market?**

Following national trends, Knox has observed local increases in median rent costs and house prices, lower vacancy rates, and limited or no affordable options for very-low or low income households within Knox's private housing market. Without intervention, it is estimated that up to 80 percent of Knox's housing need will not be met by the private market.

We encourage the National Plan to consider the following regarding the private market:

- **Greater diversity of housing**, particularly for single and older-person households, is needed to respond to an **ageing population**. For instance, Knox's shortfall of 1 and 2 bedroom dwellings means that people are forced into paying higher rents for dwellings larger than they need. This is a particular concern for our ageing community with a growing number of older adults living in unsuitable housing, as there are fewer options for people to downsize within their local community. We know that ageing in place is important to our community and requires a greater diversity of housing stock.
- As mentioned above, governments can mandate and incentivise private development contributions toward affordable housing. A national approach would provide certainty and consistency for all stakeholders. The provision of affordable rental properties can be included within this requirement. **Developers should be encouraged to consider delivering affordable rental options** including through partnership with or sale to an affordable rental provider such as a community housing provider.
- **Agreed definitions of social and affordable housing** are needed across states and territories, including income measures used to determine affordable housing. This will provide consistency needed to assist negotiations between Council and developers.

4.5 **Planning, zoning and development – How could governments work better with industry, community services and other organisations to improve housing outcomes for all Australians?**

Knox City Council acknowledges the MAV's submission to the National Plan, including key considerations around planning, zoning and development in upholding the interests of local communities and social housing residents.

We encourage the National Plan to consider the need for **localised planning and partnership approaches to social housing development to ensure housing is well-located and integrated into communities**. This prevents social housing from 'standing out' within their neighbourhoods and reduces the risk of community resistance to new social housing developments.

4.6 Climate change and housing security – How can governments and the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change?

Knox City Council recognises that we are in a state of climate emergency. People who live in social and affordable housing have limited incomes, and increasing energy prices result in high levels of vulnerability to both heat and cold stress during extreme weather events. Furthermore, the impact of extreme weather events can result in the displacement of community members from their homes.

Ensuring that forthcoming social and affordable housing developments are energy efficient as they are being designed and built, is an investment in the health and wellbeing of future residents. The outcome would be buildings that are well insulated, well oriented, more comfortable, and resilient to increasing temperature and designed for low-energy use.

We ask for the National Plan to **commit to climate-responsive principles in planning, so that social and affordable housing should be:**

- Close to public transport
- Within easy reach of local services, amenities and jobs
- Be accessible and designed to the needs of the target cohort (including the overall dwelling size and number of bedrooms)
- Be energy efficient

4.7 Additional comments – 2021 data limitations

Knox notes that the National Housing and Homelessness Plan Issues Paper draws on Census data from 2021, and uses this information in the statement that the rate of homelessness has remained relatively stable over the past two decades.

We encourage the Federal Government to consider the context of 2021 data when developing the National Plan.

Use of 2021 Census data on housing should take into consideration the impact of the COVID-19 pandemic and restrictions, and temporary supports available during this time.

The 2021 Census was conducted in the midst of the COVID-19 pandemic, at a time in which additional support payments were available to support the lowest income earners in our community. This short-term additional support may therefore have provided temporary relief of some housing stress and appears to be reflected in the Census data.

Any apparent stable or declining trends in homelessness are at odds with reports from local service providers, which indicate increasing demand. Recent economic indicators also suggest growing pressure on household budgets, and in turn housing stress. For these reasons, Knox used 2016 Census data in developing social and affordable housing projections.

We therefore suggest the Federal Government consider various data sources when developing the National Plan, particularly in regard to responding to homelessness and housing trends in Victoria (and especially metropolitan Melbourne).

5.0 Conclusion

Overall, Knox City Council asks the Federal Government to include the following in the National Housing and Homelessness Plan:

- Projections and initiatives based on an interpretation of **key demographics**, with particular consideration given to groups with special housing needs or vulnerabilities to homelessness, such as:
 - **People who are homeless or sleeping rough**
 - **Single men (often with complex needs)**
 - **Seniors (over 55 years)**
 - **Women and children**
 - **First Nations peoples**
 - **People with a disability**
- **an objective to preventing homelessness** from occurring and encourage investment in local governments and community organisations to **support partnerships in prevention and research**
- support **community awareness-raising of homelessness and housing issues**
- further investment to provide timely **outreach to those in need of support**
- long-term investment into **food and material relief programs** to ensure their sustainability and to encourage **joined-up services** offering practical assistance, housing advice and case management approaches.
- support **crisis and transitional housing**
- **match support for crisis housing with adequate long-term housing options** to avoid another pathway to homelessness for people exiting temporary housing
- support a coordinated the best practice approach to the **development of a healthy and regulated rooming house sector**
- develop a **National Indigenous Housing Strategy** that delivers equity in housing outcomes for First Nations people
- **work with ACCOs across Australia to reconsider the national approach** to social housing requirements around Confirmation of Aboriginality
- **provide additional resourcing needed by ACCOs** to meet community demand for Confirmation of Aboriginality
- encourage **partnerships between the Aboriginal Housing sector and all levels of government**
- work with the Victorian Government and Infrastructure Victoria to set and regularly review **ambitious social housing targets and develop a sustainable funding solution**
- support **Housing First principles** within social housing models
- emphasise the **responsibilities shared by the private sector and all levels of government to deliver social housing**
- **provide greater certainty regarding funding models for community housing providers**
- encourage **greater housing diversity**, particularly for the needs of an **ageing population**
- encourage **developers to consider delivering affordable rental options**
- develop agreed **definitions of social and affordable housing**
- support **localised planning and partnership approaches to social housing development**
- commit to **climate-responsive principles in planning**, so that social and affordable housing should be:
 - Close to public transport
 - Within easy reach of local services, amenities and jobs
 - Be accessible and designed to the needs of the target cohort (including the overall dwelling size and number of bedrooms)
 - Be energy efficient

We thank the Federal Government for this opportunity to contribute toward the National Plan. We look forward to working with government, our community and all other stakeholders toward a shared long-term vision to end homelessness and ensure safe, secure and affordable housing for everyone.

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