

NT Shelter

Submission to the National Housing and  
Homelessness Plan

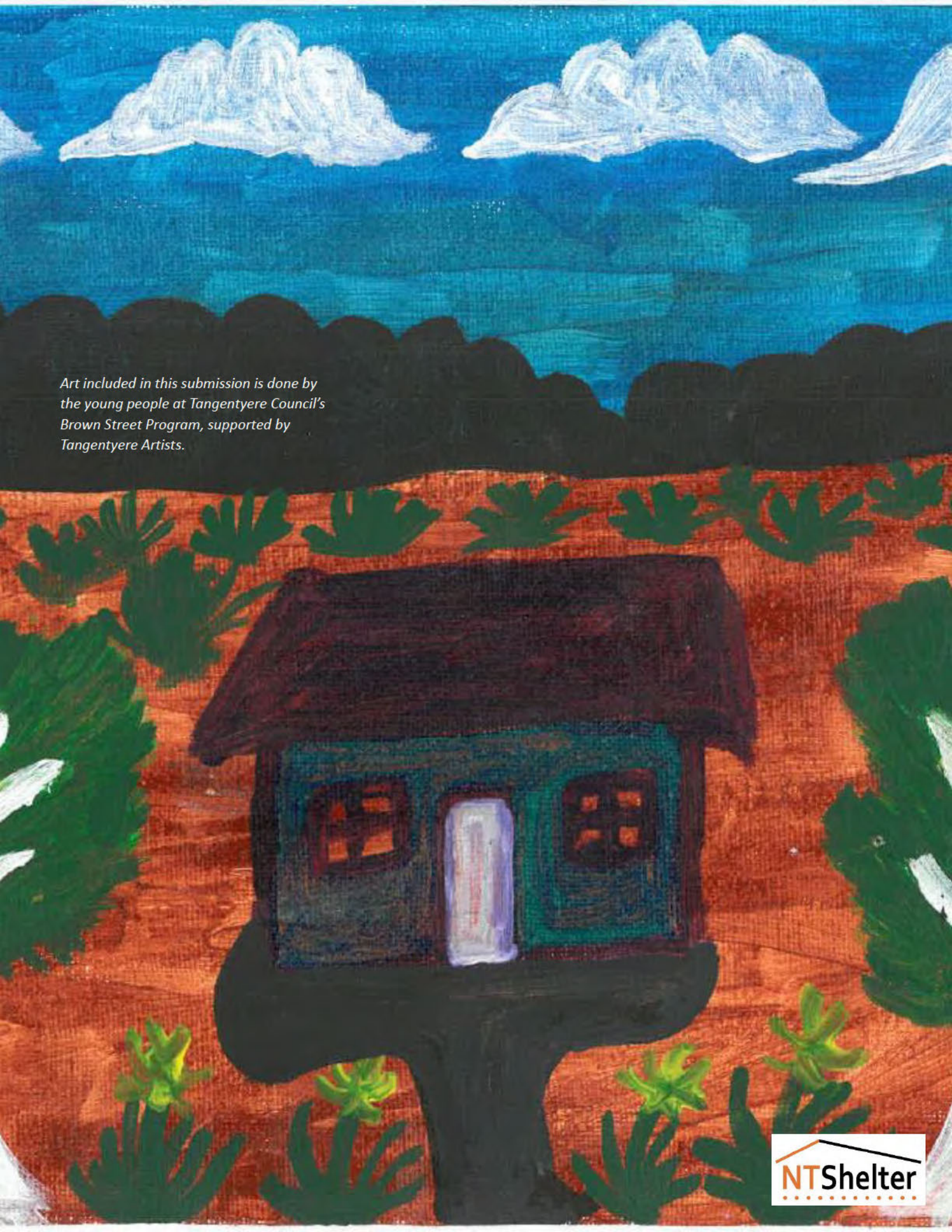
Primary Submission

NT Shelter  
October 2023



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A child's drawing on a textured surface. The top half shows a blue sky with white, fluffy clouds. Below the sky is a dark, scalloped horizon line. The middle section is a brown, textured ground. In the center, a dark brown house with a gabled roof sits on a thick, dark brown tree trunk. The house has a white door and two windows with orange panes. The bottom section is filled with green, leafy plants of various shapes and sizes.

*Art included in this submission is done by the young people at Tangentyere Council's Brown Street Program, supported by Tangentyere Artists.*

## NT Shelter

NT Shelter is the Northern Territory’s peak body for affordable housing and homelessness. We advocate for affordable and appropriate housing for all Territorians, especially those on low incomes who are particularly vulnerable and disadvantaged in the housing market.

NT Shelter’s work involves research and policy development, advocacy and communications, sector consultation and coordination, and capacity building.

NT Shelter is proud to work with and represent a range of organisations that make a significant contribution each day to the lives of people for whom housing is unaffordable and inaccessible. Our member organisations are specialist providers of services relating to housing and homelessness. Their focus is on low to moderate income Territorians who have a wide range of social and affordable accommodation needs, including crisis, transitional, short-term, low-cost, and supported housing. Many NT Shelter member organisations also provide professional services to support people who are experiencing homelessness or at risk of homelessness.

NT Shelter membership is as follows:



## Preamble

NT Shelter welcomes the opportunity to contribute this submission to the Department of Social Services (DSS) for the development of the National Housing and Homelessness Plan (hereafter National Plan). It should be read in conjunction with NT Shelter's supplementary submission to the Department, which was previously lodged.

The housing and homelessness challenges facing Australia are acute and complex; it is widely recognised that we are in a housing crisis.<sup>i,ii</sup> In the Northern Territory, the crisis is not only worse, but it is worsening for many.

A national housing strategy to address Australia's housing and homelessness crisis via an actionable pathway to supply the required level of social and affordable housing at scale, is something we have long called for.

NT Shelter's submission to the National Plan provides insight into the current state of housing and homelessness in the Northern Territory, the jurisdiction with the highest rates of homelessness in Australia.<sup>iii</sup> The questions raised in the National Housing and Homelessness Plan Issues Paper are important and, with this submission, we provide a response to several, but in the case of the Northern Territory it is also pertinent to consider the deleterious impact of chronic underfunding through the National Housing and Homelessness Agreement (NHHA).

The Northern Territory is being disadvantaged. The Australian Government provides approximately \$1.6 billion each year to State and Territory Governments to tackle homelessness and provide more social and affordable housing.<sup>iv</sup> Of this \$1.6 billion, the Northern Territory receives roughly \$20.4 million.<sup>v</sup> That is 1.3%. This is despite having 12 times the national rate of homelessness and more than 54% of its Aboriginal population living in overcrowded housing.<sup>vi</sup>

Funding allocations are closely correlated to outcomes. The impact of the current funding model sees vast geographies of the Northern Territory without homelessness programs; there is insufficient funding for urban centres and there is no funding for the 73 remote communities and more than 500 homelands and outstations. Programs focused on the prevention of homelessness are few and far between and instead our overstretched sector acts as an ambulance at the bottom of a cliff, dealing day-after-day with crises and resulting in 7.24 times the number of unassisted requests per capita.<sup>vii</sup> Programs that operate successfully in other jurisdictions are non-existent here, for example the Youth Foyer, Housing First and Common Ground models.

For too long, many families experiencing homelessness across the Northern Territory have received less favourable treatment and fewer opportunities for better housing outcomes than their counterparts in other jurisdictions as a result of a funding model which, if not changed, will increasingly be viewed as an artifice.

Through a supplementary submission to the National Plan, NT Shelter demonstrates how the operation of the NHHA's current method of funding allocation egregiously fails a disproportionately high and growing number of Territorians who typically experience the worst housing conditions and outcomes across Australia and provides guidance on how to proceed from here. NT Shelter's Supplementary Submission to the National Plan is available on our website: <https://ntshelter.org.au/submissions/>.

With such significant levels of homelessness and housing insecurity, a funding model based on need rather than population size is key if the Northern Territory is to have any chance of addressing its needs and circumstances. If current funding arrangements under the NHHA continue, the Northern Territory will be hard pressed to implement a National Housing and Homelessness Plan.

### Closing the Gap

In the Northern Territory, Aboriginal and Torres Strait Islander are overrepresented in the Northern Territory's homelessness statistics (87%).<sup>viii</sup> The majority (69.4%) of Indigenous Territorians rent, compared to 47.6% of the Northern Territory's general population.<sup>ix</sup> Stable and secure housing is a critical aspect of health and well-being and underpins outcomes in respect of education, employment, and participation in the economy. In particular, the provision and maintenance of safe, affordable, and appropriate housing is vital if we are to respond to the disadvantage and marginalisation of Australia's Indigenous peoples.

NT Shelter's member organisations include Indigenous-led organisations, and we acknowledge that a number of these services may also provide their own feedback to the National Plan. Further, NT Shelter supports the submission of Aboriginal Housing NT (AHNT),<sup>1</sup> the Northern Territory's peak Aboriginal housing body, and the extensive work that AHNT and its members do to improve housing outcomes for Indigenous Territorians.

### Summary

The causes of homelessness and housing insecurity are complex and diverse. Adequate planning to address Australia's homelessness and housing challenges must be ambitious, structural and cross conventional policy areas and levels of government.

This submission to the National Plan is informed by NT Shelter member organisations and stakeholders. It is also informed by recent research and reports conducted by NT Shelter, all of which are available on our website: <https://ntshelter.org.au/latest-reports/>. In this submission, we have focused in the first instance on homelessness and how a National Plan can adequately address its drivers, shifting focus towards primary, secondary, and tertiary prevention whilst maintaining adequate resources for the provision of a crisis response.

Our submission also assesses the current housing deficit and finds that the Northern Territory requires an almost 50% increase on the existing number of dwellings to accommodate our current and future housing needs to 2030. An estimated 19,000 or 40.5% of these dwellings are needed for social and affordable housing. In this submission we explore how capital can be attracted to deliver social and affordable housing at scale whilst delivering social and economic returns to investors. 19,000 homes cannot be built overnight; we provide recommendations as to what the Commonwealth Government can do to prevent rising homelessness and housing insecurity in the interim.

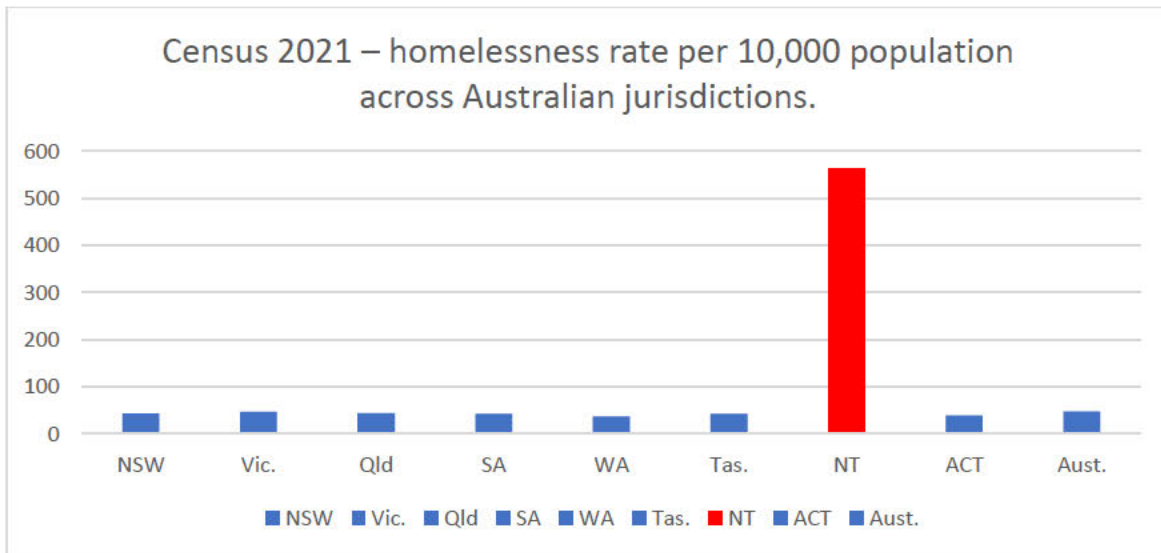
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<sup>1</sup> More information on the work of Aboriginal Housing NT (AHNT) can be found here: <https://ahnt.com.au/>.

## Context: The Homelessness Crisis in the Northern Territory

The Northern Territory has a significant and disproportionate level of homelessness at twelve times the national average.<sup>x</sup> On the night of Census 2021, 13,104 Territorians were experiencing homelessness.<sup>xi</sup> This is almost 6% of the total population of the Northern Territory (232,605).<sup>xii</sup> Despite holding just 1% of the total population of Australia, the Northern Territory accounts for 11% of the country's homeless population.

Figure 1.1: The Northern Territory has 12 times the national rate of homelessness.



It is important to note that the Northern Territory recorded the highest net undercount (6%) of any Australian jurisdiction for Census 2021.<sup>xiii</sup> Nationally, the net undercount for Aboriginal and Torres Strait Islander people, who are 26.3% of the Northern Territory population, was 17.4%.<sup>xiv</sup> Both undercounts have a bearing on the ABS data included in this submission and may mask the true number of Territorians, particularly First Nations Territorians, experiencing homelessness.

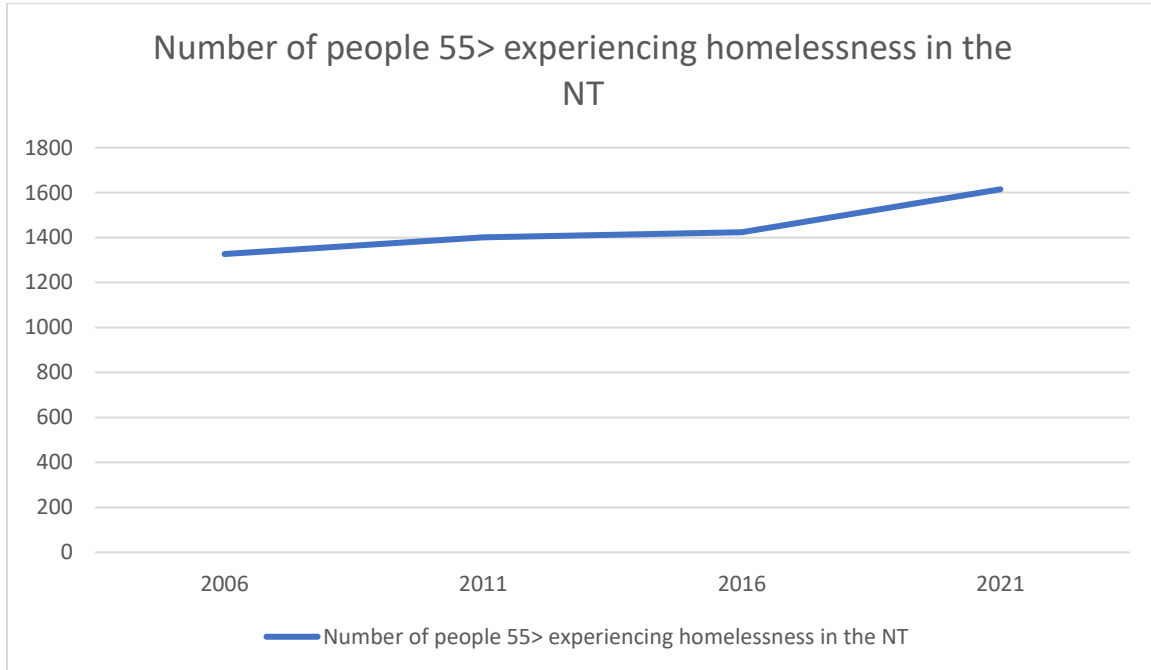
The overwhelming majority (87%) of the Northern Territory's homeless population are Aboriginal or Torres Strait Islander.<sup>xv</sup> At a national level, First Nations Australians account for 20% of Australia's homeless population.<sup>xvi</sup>

It is not only in relation to First Nations Australians that the Northern Territory performs poorly. Data published by the Australian Institute of Health and Welfare (AIHW) and the Australian Bureau of Statistics (ABS) shows that across most NHA priority cohorts, the Northern Territory has higher rates of homelessness than the rest of Australia.<sup>xvii, xviii</sup>

Between Census 2016 and Census 2021, the Northern Territory saw a 13.4% increase in the number of older Territorians (55+ years of age) experiencing homelessness.<sup>xix</sup> Australia as a whole saw a 4% increase.<sup>xx</sup> The rate of older Territorians experiencing homelessness is 13.7 times the national rate. In

their submission to DSS on the National Plan, Council on the Ageing (COTA) NT<sup>2</sup> examines the housing landscape for older Territorians and makes a number of recommendations for the National Plan.

Figure 1.2: The number of Territorians aged 55 and over experiencing homelessness in the Northern Territory is increasing.



Children and young people (>25 years of age) represent almost 50% of the Northern Territory's homeless population.<sup>xxi</sup> Nationally, they are 37.4% of the homeless population.<sup>xxii</sup>

### Overcrowding in the Northern Territory

Severe crowding accounts for 76% of homelessness in the Northern Territory.<sup>xxiii</sup> This is not a trend that is mirrored nationally; the rate of severe crowding in the Northern Territory is 426 per 10,000 population compared to the national rate of 18.8 per 10,000.<sup>xxiv</sup> For young Territorians aged 12-24, this rate is substantially higher at 724 per 10,000 population compared to national rate of 35.8 per 10,000.<sup>xxv</sup> Almost all (98%) Territorians living in severely crowded dwellings are Aboriginal and/or Torres Strait Islander.<sup>xxvi</sup> A further 5,060 Territorians were marginally housed in crowded dwellings on the night of Census 2021.<sup>xxvii</sup>

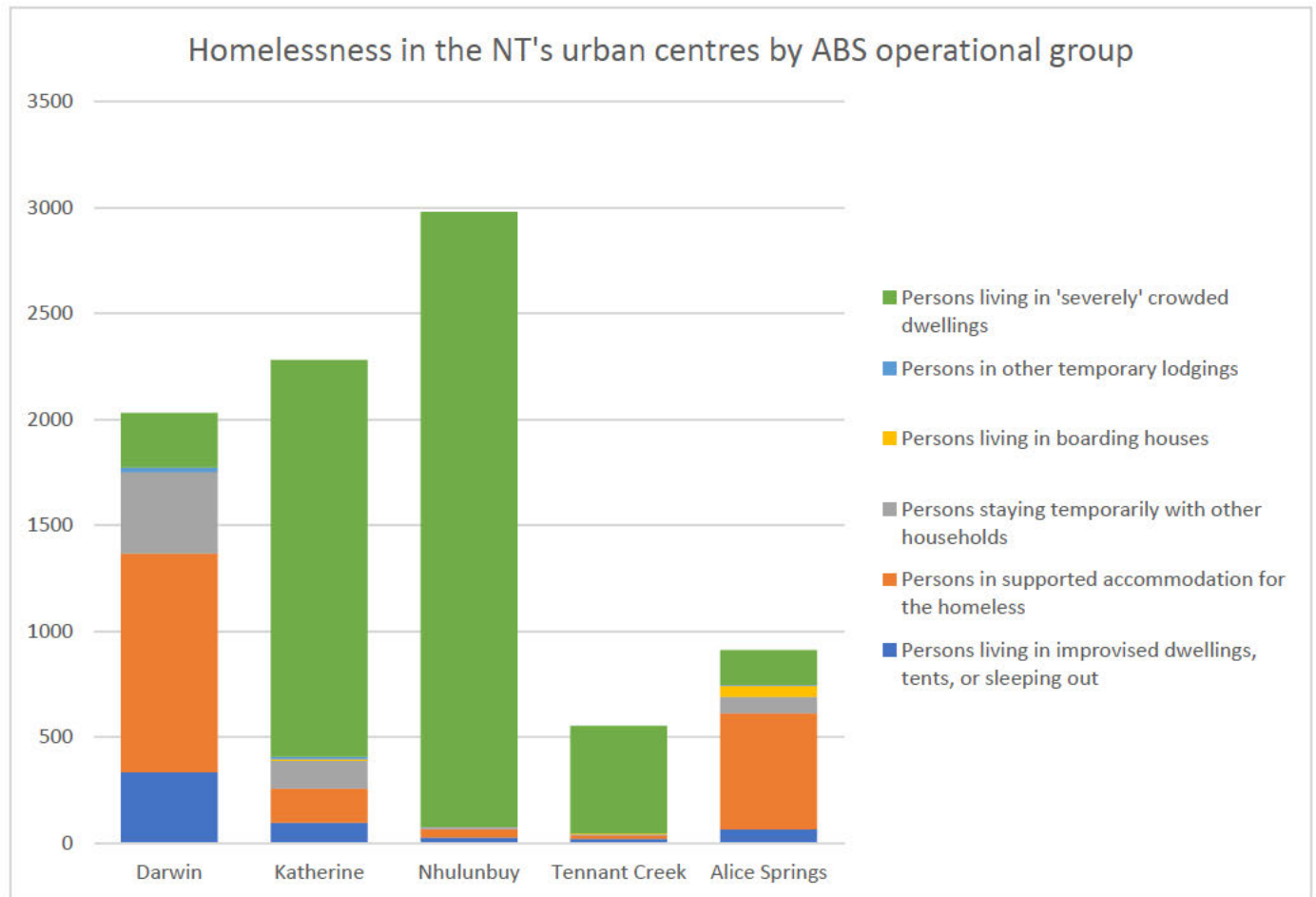
Despite the progress of the Remote Housing Investment Package, 54.3% or 2,437 homes in remote Northern Territory remain overcrowded.<sup>xxviii</sup> It is estimated that the Northern Territory requires over 5,000 new three-bedroom dwellings to alleviate the undersupply of housing in remote communities.<sup>xxix</sup>

Overcrowding is not unique to the remote parts of the Northern Territory. In the urban centres of the Northern Territory, people living in 'severely' crowded dwellings account for 65% of total homelessness.<sup>xxx</sup> In the urban centres of Katherine, Nhulunbuy and Tennant Creek, persons living in 'severely' crowded dwellings are the majority operational group.<sup>xxxi</sup>

<sup>2</sup> Cota NT is the leading not-for-profit organisations representing the rights and interests of people over 50 in the Northern Territory. More information is available at: <https://www.cotant.org.au/>.



Figure 1.3: The types of homelessness experienced in the Northern Territory's urban centres.



Town camps and community living areas (CLAs) situated in and around the Northern Territory’s urban centres experience unique challenges related to crowding. The lack of availability of short-term accommodation in many urban centres contributes to variable levels of crowding in town camps and CLAs as visitors ebb and flow to urban centres to access services, conduct business, visit friends and family and attend events. Town camps and CLAs support the mobility of Aboriginal people across the Northern Territory, filling the gap that a lack of available, well-located, and affordable short-term accommodation leaves.

There are significant negative impacts associated with overcrowding, including antisocial behavior, child safety and wellbeing concerns, and food theft.<sup>xxxii</sup> Family strain heightened by overcrowding can lead to the breakdown of relationships and family violence.<sup>xxxiii</sup> Overcrowding is also associated with adverse health outcomes including the transmission of infectious disease and psychological stress.<sup>xxxiv</sup>

*“...their houses are too crowded and too unstable to even breathe in. They [young people] are exposed to domestic abuse and you can’t get that space where you can get space to yourself.”* 15 – a young person consulted as part of an NT Shelter, Office of the Children’s Commissioner NT project looking into youth homelessness in Alice Springs, available here: <https://ntshelter.org.au/latest-reports/>

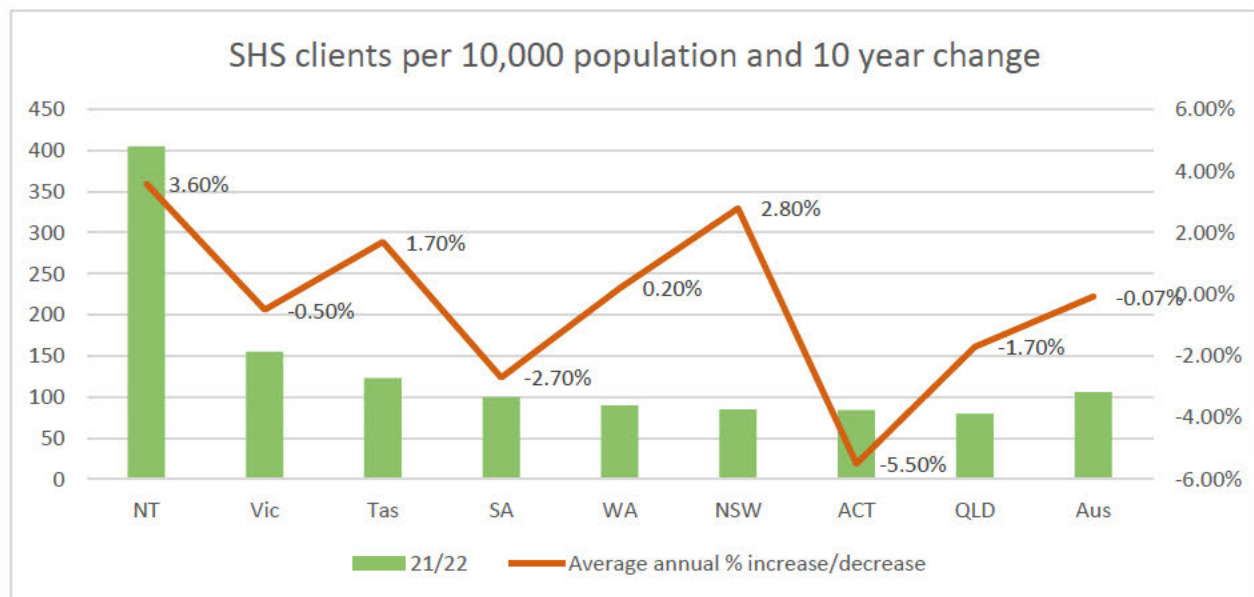
### Specialist Homelessness Services in the Northern Territory

The Territory has the highest rate of people accessing specialist homelessness services (SHS) (405.1 clients per 10,000) almost four times the national rate (106.2 per 10,000).<sup>xxxv</sup> One in 25 Territorians received homelessness assistance in 2021-22.<sup>xxxvi</sup>

In the ten years to 2023, the rate of Territorians receiving assistance from SHS has increased 3.6%; a pace far greater than the national trajectory.<sup>xxxvii</sup> In most other jurisdictions, the rate has decreased or remained relatively stable.<sup>xxxviii</sup>

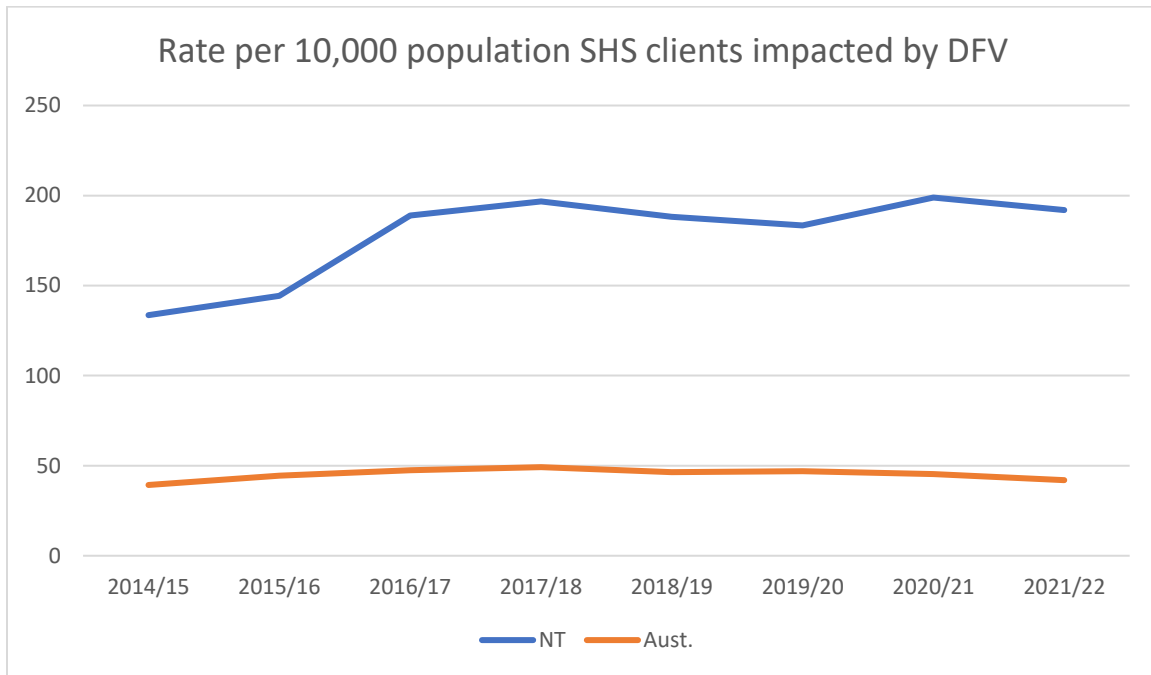
For some cohorts, increased presentations to homelessness services are particularly stark. Whilst nationally the rate of young people (15-24 years of age) presenting alone to SHS has decreased overall in the eight years to 2022, the rate has risen by 55.8% in the Northern Territory.<sup>xxxix</sup> The most common reason that young people seek assistance is housing crisis.<sup>xl</sup>

Figure 1.4: In most other jurisdictions, the rate of presentations to SHS is decreasing or remaining relatively stable.



In the 2021-22 reporting period, the Australian Institute of Health and Welfare (AIHW) reported that family and domestic violence (DFV) was the top reason clients sought assistance from specialist homelessness services.<sup>xi</sup> In the Northern Territory, this client cohort is 53% and increasing, compared with 37% nationally.<sup>xiii</sup>

Figure 1.5: Rate of SHS clients who are impacted by family and domestic violence, Australia and the Northern Territory.



Specialist Homelessness Services in the Northern Territory also support the highest rates per 10,000 of clients with disabilities (7.7 compared to 2.8 nationally), young people presenting alone (56.7 compared to 15.3 nationally), children on care and protection orders (12.7 compared to 3.1 nationally), clients aged 55 and over (33.9 compared to 9.9 nationally), clients with problematic drug and/or alcohol use (26.4 compared to 9.1 nationally) and clients exiting custodial arrangements (8.5 compared to 3.5 nationally).<sup>xliii</sup>

AIHW data shows that whilst Territorians who are housed but at risk of homelessness are well-supported to maintain their housing through support from Northern Territory homelessness services, a minority (25%) of those who are homeless upon presentation are assisted into housing.<sup>xliiv</sup>

In the Northern Territory, the level of unmet demand for specialist homelessness services rises year-on-year, increasing 53% over in the last five years alone.<sup>xliv</sup> Despite this, no homelessness services exist outside of the Northern Territory’s urban centres, leaving vast geographies without support. More than 86% of homelessness funds are invested into SHS operating in Darwin and Alice Springs.<sup>xlvi</sup>

## Case Study, Catherine\*: Disability and Access to Housing

██████████  
██████████ She is an amputee and uses a wheelchair while she waits for a prosthetic limb. Her ██████████ in a domestic violence incident.

Catherine is a priority public housing applicant and has been waiting for housing since 2016. She is eligible for transitional housing, but the unit she was offered was found not to be appropriate to her access needs. Other transitional housing providers with accessible units had no availability.

While she waits for an accessible unit to become available or for a public housing allocation, Catherine moves from family member to family member or stays in short term accommodation when an accessible room is available.

Despite having an NDIS plan, Catherine is unable to fully realise the potential of these supports in unstable accommodation.

Often, conflict arises amongst ██████████ because they need to move their ██████████ so that Catherine can navigate her wheelchair around the houses she is temporarily staying at.

Catherine's ██████████ son worries about his mum and the family's mobility means he doesn't consistently attend school.

Catherine is stressed because she is constantly worried about accommodation. When she can, Catherine showers at a health service.

Catherine's story is not unique in the Northern Territory.

Whilst the Northern Territory has committed to implementing the new National Construction Code including mandatory minimum accessibility standards, there is a dearth of existing social housing stock that is accessible to people with disability who have mobility restrictions.

20,500 Territorians (one in nine) live with a disability, yet this cohort do not have the same opportunities to access housing as the general population. People with disability are at a higher risk of homelessness, housing insecurity, housing dissatisfaction, poor quality housing, and housing unaffordability than the general population<sup>xlvii</sup>.

People with disability living in social housing, are less likely than the general population to report having a positive experience; they are less likely to enjoy better health, improve their job situation, start or continue with education and training, and feel able to cope with life events<sup>xlviii</sup>.

For Catherine, inaccessible social housing dwellings meant additional barriers across the housing continuum.

The right to exercise choice over one's housing is paramount to the rights of people with disability and, without an increase in affordable, universal housing, housing choices for people with disability will continue to be limited and access to housing will continue to arise as a barrier to the full inclusion of people with disability in society.

*\*To ensure the confidentiality of the woman described in this case study, her real name has not been used.*

## The Economics of Homelessness

There is a substantial, growing body of evidence that quantifies the costs of homelessness across a range of domains. It is not our intention to reproduce the full extent of the academic and grey literature research undertaken in this field. Instead, we refer to some of the estimated cost savings and benefits of providing last resort emergency housing, and longer-term stable housing, as an alternative to homelessness.

Accessing crisis homeless services is often a last resort. People experiencing homelessness are often heavy users of non-homeless services like the health system, welfare services and the justice system. The Australian Housing and Urban Research Institute (AHURI) reported that in 2010 dollars the average annual costs to these three sectors for a homeless person was \$25,343.<sup>xlix</sup> The cost of a person with stable housing on these same sectors was \$2,588.<sup>i</sup> AHURI also noted that the cost of supporting a homeless person in accommodation was \$4,890.<sup>ii</sup>

These costs are more severe when we look at young people experiencing homelessness. The Foyer Foundation estimates that the lifetime cost to governments of supporting a young person that has accessed an SHS is \$386,000.<sup>iii</sup> 48% of this cost is incurred by the Australian Government and 52% by state and territory governments.<sup>liii</sup>

In our view, it is reasonable to assume that the total “system costs” that are saved by providing housing to persons categorised as homeless, including those living in severely overcrowded dwellings in remote and very remote communities, are likely to be substantially higher. This is due to substantially high costs of providing services and other costs of doing business in remote communities, including access and logistics over great distances. An example is the cost to medivac a patient with rheumatic heart disease from a remote community for emergency treatment. In the Northern Territory, the cost of aeromedical evacuations is borne by the Department of Health, which in 2018 quoted a cost of \$141.59 per minute flight time.<sup>liv</sup> For a one-hour return medical retrieval, this equates to a total cost of \$8,495.<sup>lv</sup> Rheumatic heart disease and overcrowded housing are inextricably linked.<sup>lvi</sup>

In a submission to the Australian Productivity Commission, Associate Professor Robert Parker, President of the Australian Medical Association (NT), compared the health costs of two people experiencing the same condition. One was a resident of remote Arnhem land and the other was a resident of Campsie in NSW. Dr Parker estimated the costs to the NSW health service in providing care to be \$638.52, the cost to the NT health service to achieve the same health outcome came in at \$38,364.18.<sup>lvii</sup> Research into the prevalence of scabies in remote Aboriginal and Torres Strait Islander populations also highlights the necessity for affordable and appropriate housing in the treatment of this preventable disease.<sup>lviii</sup> The expected health care cost per patient diagnosed with crusted scabies in the Northern Territory is \$35,418, resulting in an overall cost of \$1,558,392 for managing all patients diagnosed in the Northern Territory in any given year.<sup>lix</sup> By far, the biggest component of the healthcare costs fall on the hospital system.<sup>lx</sup> This investment can often be wasted when the patient returns home to an unhygienic and overcrowded living space only to be reinfected.

The provision of housing for people experiencing homelessness provides benefits in terms of health cost savings, reduced crime, improved human capital, community pride and social justice, avoided property blighting, volunteering benefits and economies of scale and scope in the last resort housing sector. The University of Melbourne’s Sustainable Society Institute quantified the economic benefits of addressing

homelessness for an entire community (Melbourne) and found that for every \$1 invested in housing beds to address crisis homelessness, \$2.70 worth of benefits are generated for the community.<sup>lxi</sup> The annualised value of all benefits is estimated at \$25,615 per new bed provided.<sup>lxii</sup>

As the costs to governments of supporting young people experiencing homelessness are more severe than adults, so are the savings generated by housing this cohort. In the case of the Foyer Model, it is estimated that on a per person basis, Foyers create an average of \$84,000 in benefits for the Australian Government across taxation uplifts, welfare, housing, and federal health savings.<sup>lxiii</sup> The model also creates \$89,000 in benefits for state and territory governments through the avoided social housing, state health, and justice costs.<sup>lxiv</sup>

## Context: The Housing Crisis in the Northern Territory

The Northern Territory has a developing community housing sector and too little stock of social and affordable housing assets. Modelling contained in the Northern Territory Government's Housing Strategy shows a shortfall of 8,000 to 12,000 social and affordable homes required across the NT by 2025, approximately 75% of which are estimated to be for social housing, reflecting the order of magnitude of the gap between the current level of social housing supply and what is needed.<sup>lxv</sup> On pages 23 to 26 of this submission, we assess the Northern Territory's housing need in greater detail, estimating that 19,000 social and affordable dwellings are needed by 2030.

Despite the overwhelming need, over the last 20 years, social housing stock has declined almost 30% in the Northern Territory.<sup>lxvi</sup> In most other jurisdictions and nationally, it has increased.<sup>lxvii</sup>

Figure 1.6: Social housing stock has declined almost 30% in the Northern Territory in the last 20 years.



This mismatch between supply and demand for social housing translates into lengthy wait-times for public housing and a lack of housing options for transitional and longer-term purposes. For those eligible for public housing, the waitlist ranges from two to ten years in urban areas. As of October 2023, 5,049 families were awaiting allocation on the Northern Territory's urban public housing waitlist.<sup>lxviii</sup> Between July 2022 and June 2023, only 237 allocations were made.<sup>lxix</sup>

It is an indictment on the Northern Territory housing system that NT Shelter frequently hears reports from services that the biggest barrier facing many of their vulnerable clients is a lack of housing. We hear that NDIS plans cannot be delivered effectively, that young people *street-walk* or *day-break*<sup>3</sup> because their houses are too crowded to return to and that women and children attempting to escape DFV are forced to return to violent situations to avoid homelessness.

When it comes to unmet housing need, the Northern Territory is again an outlier. Analysis of 2021 Census data found that almost 6% of Darwin households and 21% of regional households in the Northern Territory had unmet housing need on census night.<sup>lxx</sup> Whilst nationally the distribution of unmet need broadly aligns with the population, with the highest numbers of affected households in the major capitals, the Northern Territory has a low population and a significant number of households in stress.

47.6% of the Northern Territory population was renting at the time of the 2021 Census compared to just over 30% nationally.<sup>lxxi</sup> Despite this high portion of the population renting, the Northern Territory is both one of the least affordable jurisdictions in the country in which to rent a property<sup>lxxii</sup> and the jurisdiction with the least protections for renters; legal 'no grounds' evictions, the absence of an independent bond board and very limited protection against rent increases, regardless of their magnitude, contribute to the risk of people becoming homeless. The regional and remote townships of the Northern Territory have historically low supply and high demand markets.

A 2018 report commissioned by CHOICE, National Shelter, and the National Association of Tenant Organisations (NATO),<sup>lxxiii</sup> found that renting is not a one-size-fits-all experience and that particular cohorts of renters like those with disability and young renters face additional barriers. 16% of renters with disability had been served with a 'without grounds' eviction, compared to 9% for the general population and renters with disability are almost 2.5 times more likely to experience issues with home inspections from their landlord than renters without disability.<sup>lxxiv</sup> For young Territorians, the private rental market is simply out of reach. A 2023 report from Anglicare NT looked at the rental properties available in the Northern Territory over a weekend in March 2023 and found that no properties were affordable to individuals receiving Youth Allowance.<sup>lxxv</sup> This included shared accommodation.

*"There needs to be legislation regarding rent rises. Mine went from \$425 at end of lease to \$580, that's an almost 40% increase. [I've] been here four years, always paid rent, kept house in excellent repair. [I] was told if I don't like it, move on. Couldn't risk saying no and ending up homeless due to low vacancies and highly competitive viewings/applications. My income is \$1,480 a fortnight, my rent is \$1,160."*

A quote from a Northern Territory renter, provided as part of a survey run by NT Shelter.

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<sup>3</sup> As described by young people in Alice Springs, *street-walking* or *day-breaking* means staying up all night, generally in public areas and finding a safe place to sleep during the day.

## The Economic Implications of Insufficient and Inappropriate Housing

Access to safe, affordable and appropriate housing is a fundamental human need and one enshrined in international human rights law.<sup>lxxvi</sup> The absence of suitable housing for low to moderate income earners leads to either severe rental stress or homelessness. Both have significantly adverse implications, in economic and social terms, on both individuals and society as a whole.

In a literature review on the subject of social and affordable housing as social infrastructure undertaken by Swinburne University of Technology, substantial social and economic benefits from constructing 100 social or affordable dwelling units per annum were recorded.<sup>lxxvii</sup> The conclusion reached was that the wider social and economic benefits can be large for both individuals and society, and “in some cases can equal the funding gap that currently prevails in social and affordable housing provision”.<sup>lxxviii</sup>

Indeed, Infrastructure Australia included social infrastructure in its 2019 infrastructure audit, recognising the role that social housing has in supporting economic growth and quality of life.<sup>lxxix</sup>

In respect of the known impacts between housing and health, it is well established that severely overcrowded housing is one of the most important factors in the transmission of preventable infectious diseases, and increased prevalence of chronic illness within households.<sup>lxxx</sup> This is especially the case for Aboriginal communities in the Northern Territory, where there is a high burden of disease generally.<sup>lxxxi</sup> In particular, there is a high incidence of disease associated with poverty and generally not found elsewhere across Australia. We have touched on several of these already including scabies and rheumatic heart disease. Australia remains the only developed country in the world where trachoma, a preventable eye infection that causes blindness, still occurs.<sup>lxxxii</sup> There is also a higher incidence of other illness which results in disproportionately higher rates of hospital admissions for gastroenteritis and other conditions.<sup>lxxxiii</sup>

Research reported in the Medical Journal of Australia undertaken by Menzies School of Health Research and others showed that people presenting as frequent attendees at the Katherine hospital emergency department were 16 times more likely to be homeless than not homeless.<sup>lxxxiv</sup>

It is also well established that homelessness, and a lack of safe, affordable and appropriate housing that places people at risk of homelessness, drives adverse social and economic outcomes associated with DFV, mental health, and education.<sup>lxxxv</sup> These are, of course, high and ongoing cost burdens on the Northern Territory budget.

The Northern Territory is far from where it needs to be in terms of ensuring adequate housing, support services and legislative protections are available and accessible to all people, especially those experiencing poverty and disadvantage. Stable and secure housing is a critical aspect of health and well-being and underpins outcomes in respect of education, employment and participation in the economy. In particular, the provision and maintenance of safe, affordable and appropriate housing is vital if we are to respond to the disadvantage and marginalisation of First Nations peoples.



## Addressing Homelessness Via the National Plan, Prevention is Better than Cure.

As this submission has shown, homelessness in the Northern Territory is at a crisis point. As a result of receiving the lowest financial support per capita through the NHHA and supporting the highest rate of SHS clients in the country, homelessness programs in the Northern Territory are forced to focus on the crisis end of homelessness. With the need for a crisis response so great, there is little time or financial resources devoted to preventing homelessness. Just 25% of NHHA funding for homelessness services in the Northern Territory is invested in preventative programs.<sup>lxxxvi</sup>

To reduce the number of people experiencing homelessness, the Northern Territory requires investment in preventing the experience in the first place. Currently, we are applying a band aid to cancer, rather than removing the tumour.

The causes of homelessness can be broken down into three categories:

- Structural factors such as poverty, discrimination, lack of affordable housing, and the impact of colonialism on First Nations people.
- Systems failures, in particular people transitioning out of public institutions (child welfare, hospitals, and corrections).
- Individual and relational factors where personal circumstances, such as crises (e.g. unemployment), mental health and DFV lead to homelessness.

These causes are compounded in the Northern Territory.

In 2021, median personal income for Indigenous Territorians was \$323 per week, just 34% of the Territory-wide median of \$936.<sup>lxxxvii</sup> While non-Indigenous households in the Northern Territory experience the least poverty compared with other non-Indigenous households in Australia, Indigenous households in the Northern Territory experience the highest rates of poverty; nearly 45% of all Indigenous households in the Northern Territory are located below the poverty line.<sup>lxxxviii</sup> The Northern Territory leads the nation in other contributing factors also with three times the national rate of DFV-related assault,<sup>lxxxix</sup> the highest alcohol consumption per capita (173% greater than the national average) and the highest rates of hospitalisations and deaths due to alcohol misuse in Australia<sup>xc</sup>.

The health system has long understood the need for preventative treatment responses. Health departments are adept at looking at a crisis and introducing programs to prevent the crisis from growing, eventually reducing it to manageable and affordable levels. Preventative actions can be broken down into three categories that are applicable to homelessness.

- Primary prevention: intervening before homelessness occurs.
- Secondary prevention: screening to identify and target homelessness amongst priority groups before its onset.
- Tertiary prevention: crisis intervention and management when homelessness arises.

To overcome the crisis in homelessness all governments must adopt similar principles of early intervention. A preventative response to homelessness must be a cross-sector response. The assertion that homelessness is only the concern of the homelessness sector or one government agency, must be challenged. The expectation that the sector alone will address homelessness, ignores the structural

drivers of homelessness and results in demand-led programs that are often unlinked to broader strategy and designed primarily in response to crisis.

SHS-funded services in the Northern Territory and in other jurisdictions have little influence in the government agencies that have within their purview child protection, corrections and justice, health, education, planning, construction and welfare, yet many of the drivers of homelessness highlighted above sit within these areas or are worsened by government policy failures.

Expenditure on homelessness programs is seen as a welfare response, a cost to the budget, a cost to Australian taxpayers, however governments are often institutional drivers of homelessness through policy failures. The government agencies that contribute to homelessness must also invest in its prevention.

Tackling and preventing homelessness is a complex public services matter, rather than simply a 'housing matter'. Shifting the focus of policy, practice, and resources towards long-term, housing-led solutions, away from the provision of emergency, temporary and hostel service should be the goal of any homelessness strategy.

True prevention requires a holistic response from government. The Northern Territory's crisis-led response should be seen as a safety net when all other preventative actions have failed.

The NHHA identifies priority cohorts that jurisdictions are required to address in their respective homelessness strategies. Whilst reducing the incidence of homelessness amongst these cohorts is a requirement of the NHHA, a lack of resourcing has led to the status quo being maintained and new crisis end programs being added to cover these cohorts. With the exception of DFV responses financed by Territory Families, responses for other priority cohorts continue to rely on NHHA financing.

NT Shelter posits that the National Plan include a strategy to end homelessness. This Strategy must hold as a core tenet that homelessness is a complex issue requiring a holistic response. The Strategy must be coauthored and shared by the Departments whose policies often drive homelessness.

In lieu of a specific strategy to end homelessness, States and Territory Governments should be required to provide their own comprehensive and collaborative approach shared by the departments responsible for housing, families and children, health, aged care, education, and justice. Each department identifying, addressing, and financing their own responsibilities in preventing homelessness.

Additionally, the NHHA must provide sufficient funding to address the needs of each jurisdiction and require that funds be invested into preventative actions and programs.

Whilst a shift from prioritising an investment in the crisis response to one that emphasizes the prevention of homelessness is necessary; a shifting of focus can only occur through increased funding targeted at preventative programs. The Northern Territory simply cannot afford to increase preventative measures at the expense of crisis responses.



## Case Study, Annette\*: Homelessness and Health

Annette is a [REDACTED]-year-old Aboriginal woman who recently celebrated the birth of a baby with her partner.

Prior to the birth of her son, Annette was a resident of [REDACTED]. However, her son was born with profound disabilities [REDACTED]. Doctors advised against the family returning to [REDACTED] due to the high care needs of their baby, including the need to live in a controlled, secure, and hygienic environment that would allow for the safe storage of medical equipment.

The family was supported to apply for public housing, however as 2021 priority applicants they are unlikely to be housed until at least 2027.

With nowhere to live after being exited from hospital care, Annette and her family moved into an [REDACTED] property temporarily. This property was paid for by the Department of Health, given that neither parent were able to work due to the high needs of their new baby.

Due to the temporary nature of the accommodation, the family spent several months moving from one hostel to another before being added to [REDACTED] Homelessness Response Group (HRG).

The HRG was born out of necessity. Too many people experiencing or at risk of homelessness with high and/or complex needs were falling through the cracks.

Through the HRG, the family was accommodated in a transitional housing program.

Annette's story shows that a holistic approach to homelessness works. It shows that government departments beyond housing are financially impacted by homelessness and have a role to play in its prevention.

*\*To ensure the confidentiality of the woman described in this case study, her real name has not been used.*

## Responsibilities and Opportunities

Focusing on the primary, secondary and tertiary prevention of homelessness via a cross-agency approach, this submission now provides examples based on the Northern Territory experience.

### Primary Prevention

The longer young people experience homelessness, the higher the risk that they will continue to experience it over the course of their life causing long term impacts, including intergenerational impacts, and at significant personal and economic cost to the individual, the government, and the broader community.<sup>xcv</sup>

Homelessness can have a significant impact on a young person's education; homelessness is associated with decreased engagement in the classroom and poor academic achievement.<sup>xcvii</sup> Canadian studies show that between 63% and 90% of homeless young people did not complete high school.<sup>xcviii</sup> In Australia, 72% of young people presenting alone to SHS between July 2021 and June 2022 were not enrolled in any form of education or training at the start of their support period.<sup>xcix</sup> Adverse impacts on education engagement can lead to a vicious cycle. While positive educational environments are a protective factor for children,<sup>cx</sup> children not engaged in or achieving positive results at school are at greater risk of a wide range of adverse outcomes including poorer health and wellbeing, elevated risk of anxiety or depressive symptoms, and increased risk-taking behaviours such as substance use and violence.<sup>cxv</sup>

Aside from housing crisis, the most common reason that young people present alone to homelessness services is relationship/family breakdown.<sup>cxvii</sup>

In the Northern Territory, the Department of Education has a comprehensive reach across urban, regional and remote communities. The education system can play a key role in preventing youth homelessness from occurring and, if and when it does, supporting students to remain engaged in education while assisting them to exit from an experience of homelessness. Schools and their staff already play a central role in the welfare of their students and can identify young people who may be undergoing family stress or breakdown and support them to preserve their family connections, avoiding a potential experience of homelessness.

To aid in the prevention of youth homelessness, the education system must enter into strong partnerships with SHS and collaboratively build programs and policies that elevate the role a school can play in preventing and resolving a student's experience of homelessness. Preventing homelessness increases the likelihood that a young person will remain engaged with the education system and results in better outcomes for the individual, school, and society more broadly.

The Northern Territory Department of Families, Housing and Communities benefits from children and young people exiting their care into stable and appropriate accommodation. In the Northern Territory 12.7 SHS clients per 10,000 population have been under a care and protection order.<sup>cxviii</sup> This is 3.5 times the national rate.<sup>cxix</sup> Within a year of leaving care, a third of this cohort are homeless, over 50% are experiencing mental health issues, and 30% are unemployed.<sup>c</sup> Within four years, these numbers grow to 54% experiencing homelessness, 70% attending an emergency department, and increases in mental health issues and interactions with the justice system, including 10% receiving a custodial sentence.<sup>ci</sup>

Even within the Department of Territory Families, Housing and Communities, responses to youth homelessness typically sit within the purview of Housing rather than being a cross-agency responsibility.

There is an opportunity for Territory Families to extend out of home care programs to include housing models such as the Youth Foyer model as part of transitions out of care. This shouldn't be seen as a Housing response, but rather as part of the process of supporting children who are under the care of the State.

The Northern Territory Department of Health and Aged Care would also benefit from a preventative approach to homelessness. Macquarie University researchers identified that the median cost of treating a person in hospital was \$81,481.<sup>cii</sup> Remote healthcare, including the cost of patient transport, results in increased costs to the health system. The high cost of healthcare delivery to people experiencing homelessness requires a coordinated, society-wide approach to combatting homelessness.

A lack of appropriate housing can lead to increased health issues and increased transmission of chronic health conditions.<sup>ciii</sup> This is particularly prevalent in overcrowded housing.<sup>civ</sup> Expensive treatments are wasted when a patient is forced to return to unhygienic accommodation and illness reoccurs.

Appropriate housing and accommodation should be recognised as a health response when treating vulnerable people experiencing chronic health issues. The provision of accommodation to people and their families forced to travel to receive treatment is a health response.

Preventing homelessness also involves examining the housing continuum at its weakest points. Housing departments provide accommodation to some of the most vulnerable people in our community. Often as a result of these vulnerabilities, such tenancies risk failure. To ensure vulnerable people have the capacity to maintain a tenancy, many housing departments fund transitional housing programs. In the Northern Territory, a majority of these programs are run by SHS. Families can exist in these programs for a number of years and, if successful, develop links within their local communities. The children of these families attend local schools, parents use local transport, shop at local stores, volunteer and establish support structures. They also live under the rules and support of the service provider, often there are rules around alcohol and visitors.

However, once a transitional housing program is completed, families often have to relocate in order to be housed. This might mean enrolling children in new schools, losing their local community supports, negotiating new neighbours and living in a household that no longer has rules and supports attached. The establishment of a new tenancy is a vulnerable time and it often coincides with a reduction in supports.

Transitional housing must operate on Housing First principles; that is, the dwelling an individual or family is supported into in the first instance, should be the house they stay in. This reduces the disruption that causes homelessness, directly reducing the incidents of homelessness and the demand for homelessness services while creating sustainable tenancies.

### Secondary Prevention

The imprisonment rate in the Northern Territory is five times the national average (1,026.7 adults per 100,000 compared to the national rate of 200.9 adults per 100,000).<sup>cv</sup> Almost three-quarters of people in prisons in the Northern Territory have been in prison previously.<sup>cvi</sup> A lack of suitable and stable accommodation poses a barrier for many individuals to meet bail requirements, especially those in rural, regional or remote areas or those experiencing homelessness.<sup>cvi</sup> 54% of people leaving prison in

Australia exit into homelessness.<sup>cviii</sup> The Northern Territory has the highest rates of prisoners accessing SHS programs in Australia, at 8.5 per 10,000. Nationally this figure is 3.5 per 10,000.<sup>ciix</sup>

The links between homelessness and custody, both prior to incarceration and post-release, are well-established. There are key reasons for the Northern Territory Department of Attorney General and Justice to focus on homelessness as a means of reducing both interactions with the justice system and recidivism. In the Northern Territory, the net operating expenditure including capital costs on adult prisons is more than \$224 million, with a further \$47 million spent on children's incarceration.<sup>cx</sup> Programs aimed at preventing homelessness amongst those exiting their services, should be funded and implemented by the justice system.

The Northern Territory has both the highest rates of homelessness<sup>cxii</sup> and DFV<sup>cxiii</sup> in Australia. DFV and access to safe and affordable housing are inextricably linked. Inadequate housing is widely understood to be a risk factor for DFV<sup>cxiii</sup> and DFV is the top reason that people, predominantly women, leave their home in Australia.<sup>cxiv</sup> Nationally 48% of people fleeing DFV were parents with children.<sup>cxv</sup>

Episodes of trauma and homelessness can have repeat and lasting effects on young people. Many of these effects have already been highlighted but others include adverse impacts on mental and physical health, physical safety and exposure to sexual exploitation and violence.<sup>cxvi</sup> The longer homelessness is experienced by a young person, the higher the risk that they will continue to experience it over their lifetime.<sup>cxvii</sup> The rapid rehousing of families fleeing DFV will have a significant impact on the trauma experienced by all involved, resulting in fewer repeat interactions with the homelessness system, particularly for the child/ren.

Understanding that for every episode of DFV that results in a family unit breakdown also results in the requirement of a new place to live; investing in preventative and restorative programs to lessen instances of DFV and family breakdown will have a marked effect on the demand for additional housing.

### Tertiary Prevention

When tenancies are under stress and at risk of failing, often a crisis response is seen as the solution. Ordinarily a tenant is offered a referral to a Tenancy Support Program delivered by an SHS provider. In many situations it is a crisis intervention when the tenancy is in imminent danger of failing. The tenancy support program is primarily focused on the issues of rent, maintenance and anti-social behaviour.

NT Shelter's review into Tenancy Support Programs delivered in Darwin,<sup>cxviii</sup> found that tenants requiring tenancy support had myriad underlying complex issues that compromised tenancies, including financial stress, dependence on public transport, mental illness, chronic disease, disability and infirmity, overcrowding, unemployment, limited employment experience, DFV, elder abuse, child protection, incarceration, alcohol and drug use and abuse and being the sole carer of grand/children. Tenants at risk of eviction often have higher needs than the tenancy support offered; a single parent of multiple children with complex health issues cannot focus on yard maintenance when the needs of their children and their health dominate their priorities.

Various government agencies and departments have an opportunity to work in partnership to jointly design, finance and implement programs that focus on the maintenance of tenancies. Saving an at-risk tenancy should not solely be the domain of one department as sustaining that tenancy has a direct impact on the demand of services and budgets across government.

## Case Study, Jane\*: Homelessness and DFV

Jane escaped from ongoing and long-term domestic violence with her [REDACTED] children. She accessed crisis DFV accommodation [REDACTED]. With few exits into medium and long-term housing, her family, at continued risk of violence [REDACTED], moved [REDACTED] with the support of Jane's case worker.

Shortly after Jane's move, the father of her children and the perpetrator of violence against them, commenced legal proceedings, placing a recovery order with the courts for the return of the children.

Jane and her children subsequently returned [REDACTED] for court proceedings. Jane had no financial resources or accommodation and limited supports. Despite being court ordered to return, Jane was expected to pay for her and her children's travel expenses and secure her own accommodation.

Jane managed to secure transitional accommodation [REDACTED].

With the stress of the situation Jane developed issues with substance use. She developed depression and anxiety and attempted suicide. Her children's behaviour also changed; they were scared to be in [REDACTED]. Their school attendance became sporadic, and they fell behind.

The perpetrator of abuse reported neglect of the children. Territory Families became involved and soon removed Jane's children from her care.

The children's father refused custody of the children and they were put into care of the State. Without the children in her care, Jane was no longer eligible for the transitional housing property she was living in and was forced to sleep rough.

Territory Families could not return Jane's children to her unless she was in stable accommodation.

*\*To ensure the confidentiality of the woman described in this case study, her real name has not been used.*

## Addressing Housing Need Via the National Plan

NT Shelter is pleased to provide a range of feedback, ideas and solutions in relation to addressing the significant need for social and affordable housing across Australia. We do so under the following structure:

- Addressing the level of housing need
- Well located homes
- Configuration and typology
- Housing features and inclusions
- Financing the supply of housing
- Managing the interim

### Assessing the Level of Need

Various estimates of the current and forecast level of unmet housing need across Australia have been made. Notable among these is the work of Rowley, Bentley, Leishman, Lester and Baker in 2017 which estimates the level of unmet housing need of 1.3 million households (14% of all households), estimated to rise to 1.7 million households by 2025.<sup>cxix</sup> Further research released in 2018 estimates that over the next 20 years, an estimated 727,300 social dwellings will be required.<sup>cxx</sup>

These estimates likely understate the actual demand for social and affordable housing across Australia given several factors over more recent years. These include rising inflation and a cost of living crisis, a worsening rental crisis across Australia with a sharp decline in properties available to rent on the private rental market, spiralling rent rises and record low vacancy rates, a resizing of family household composition to smaller households and rising levels of immigration.

These factors are at play across the Northern Territory as they are in every other jurisdiction across Australia. The Northern Territory Government, in 2018, estimated a shortfall of 8,000 to 12,000 social and affordable homes by 2025.<sup>cxxi</sup> The number is now likely to be in the order of, or exceeding, the upper estimate given the aforementioned factors but also, notably, as a consequence of bullish economic growth and population projections. Rising waitlists for social and affordable housing reinforce this.

The Northern Territory Government has set an ambitious plan to have a \$40 Billion economy by 2030, with a population of 300,000.<sup>cxixii</sup> This target exceeds the Government's earlier projection of 283,775 for 2031<sup>cxixiii</sup> and assumes final investment decisions to proceed for several major projects. Should industry development goals be realised, an estimated 35,000 jobs will be created and the population will grow by 19% on its current estimate of 251,654.<sup>cxixiv</sup>

In the Northern Territory's remote communities, there are currently 5,133 homes, of which 4,484 are occupied. The Northern Territory Government estimates that 54.3% of homes, or 2,787, remain overcrowded.<sup>cxixv</sup> In order to close the gap on unmet Aboriginal housing need across remote communities, town camps, community living areas and homelands, it is essential that Commonwealth and Northern Territory Government investment in housing continues until overcrowding is eliminated.

We can derive approximate housing requirements out to 2030 from the above information, as follows:



Table 1: Estimating current and future housing need.

	Dwellings	Remarks
Current dwellings	96,564 <sup>cxxvi</sup>	Occupied and non-occupied private dwellings, and non-private dwellings
Additional social and affordable dwellings (needed now)	12,000	High end of Northern Territory Government Housing Strategy estimate and includes: <ul style="list-style-type: none"> <li>• 2,787 overcrowded remote homes</li> <li>• 5,806 urban public housing applicants<sup>cxxvii</sup></li> <li>• 1,200 (10% increase in social and affordable housing demand since release of plan (rental crisis) – estimate</li> <li>• 2,200 affordable, key worker and GEH housing – balance of demand</li> </ul>
Housing for 35,000 additional jobs (needed by 2030)	35,000	Mix of 1, 2 and more bedrooms depending on family composition and job rosters (e.g. whether family will relocate). Assumes that net overseas migration skilled visa targets are included, which may not be the case)
Total housing units required	143,564	
Increase in housing units (dwellings) by 2030	47,000	48.6% increase on current dwellings in the NT

In terms of establishing a broad estimate of the number of affordable houses for rent that are needed, we can look at the weekly median rent and the proportion of households not in public housing (or on public housing waitlists (who would be required to pay more than 30% of their gross household income on rent.

In the Northern Territory, median weekly rent at the time of the 2021 Census was \$325 per week.<sup>cxxviii</sup>

There are 81,278 individuals in the Northern Territory who receive an income less than \$1083 per week (48.3% of total income earners),<sup>cxxix</sup> the level of income below which 30% or more of income would need to be spent on rent.

Given the establishment of mining and gas developments and the intended creation of high-technology industries such as a data hub for Darwin, it is fair to assume that a good proportion of the 35,000 newly created jobs will pay higher than median weekly incomes, although a reasonable proportion will be supporting roles in lower paying services industries – professional, semi-professional, and otherwise. For the sake of the exercise, let's assume 20% of jobs created. This equates to 7,000 dwellings.

The total social and affordable housing demand to 2030 could therefore be summarised as follows:

Current shortfall in demand – social and affordable	12,000
Housing to support new industries – below market rent	7,000
<b>Total</b>	<b>19,000</b>

There are further factors to take into consideration when assessing the level of housing supply required to meet anticipated future demand, and these are particularly important in regional and remote settings.

In many of Australia's capital cities and larger regional centres there are well diversified economies that comprise a range of industries. Population growth in capital cities is far more organic than in smaller economies such as the Northern Territory and other regional economies that are heavily reliant on one or a small number of local industries. The need to grow the Northern Territory economy with a broader range of industries will lessen the impact of cyclical impacts from overreliance on mining, oil and gas.

Interventions by the Northern Territory Government are needed, and underway, in order to establish new industries in the Territory and unlock new development and jobs across a huge landmass with significant infrastructure challenges. This has significant implications for housing.

Some of these are:

- The geographic location of the natural resources to be developed.
- The extent and condition of local essential infrastructure (roads, ports, airport, utilities, telecommunications, medical facilities etc.).
- The existence or otherwise of a local community(ies).
- The presence or otherwise of key social infrastructure and amenities (schools, library, parks, police, community support organisations etc.).
- The availability of existing private and non-private dwellings.
- The longevity or otherwise of the job-creating industry or project. For example, life of mine.

In considering these factors, it is far from certain at this stage that the forecast 35,000 additional jobs in the Northern Territory by 2030 will result in demand for permanent housing of the same or similar magnitude. It may be that the economics are not sustainable for some projects and that alternative options, including temporary worker accommodation to support fly-in-fly-out (FIFO) workers may be necessary.

This means that when assessing the extent of future housing need across Australia, using the Northern Territory as a notable example, regional economic development factors will be particularly important in driving the demand for housing as well as the built form and typology. For example, depending on the location of the new industry or project, and the rostering of operations, it may be that congregate living for key workers is more suitable than detached permanent dwellings for workers and their families.

It will be a matter for the Northern Territory Government to determine and/or negotiate the conditions precedent for development of new industries and projects across the regions, including any royalties to be paid or other corporate social responsibility requirements to be met. Done well, this can ensure the delivery of community benefits, including the provision of appropriate and affordable housing for local workforce (and, potentially, legacy housing stock available to the local community upon project wind-up).

We believe the abovementioned challenges and factors should be given due consideration as part of the development of the National Housing and Homelessness Plan. In practice, we expect it will be an

ongoing process of interaction with the newly formed National Housing Supply and Affordability Council in order to build a clearer demand and supply profile to meet Australia's future housing needs.

### Well-Located Homes

The National Housing Accord 2022 contains commitments to undertake expedited zoning, planning and land release to deliver social and affordable housing in well located areas.<sup>cxxx</sup>

An independent review of the land development and release to market processes was undertaken in the Northern Territory subsequent to the delivery of the Northern Territory Budget in 2021. In its final report,<sup>cxxxi</sup> the review examined the profile of future demand for serviced land, land supply constraints, current land under development, the sub-division development process, development application and assessment, authority approvals and expediting survey plans and titles. Importantly, the review examined the fast-track planning approval process.

The report noted that in the event of a high growth population scenario, consideration of sufficient land for social and affordable housing "is critical to support population growth and the economy, in particular within lower-income sectors and industries such as tourism, hospitality, health, education and social services".<sup>cxxxii</sup> It was noted that in such a scenario, current and future Titled land could be provided at a discounted price to affordable and social housing providers.

Indeed, the Northern Territory Government owns significant tracts of Crown Land. While there are some parcels of vacant Crown Land in city locations, the majority is in outlying suburbs or on the fringe of urban areas. Most of the city area is privately owned or freehold title and the absence of inclusionary zoning legislation means that there are limited opportunities (such as head leasing) to incentivise a social and affordable housing component.

Most new developments in the Territory occur through the release of Crown Land on the urban fringe. Affordable and social housing developments mandated as a condition for development consent for greenfield developments within reasonable proximity of the city are available given the relatively small size of Territory urban communities.

Substantial Crown Land reserves are available for new developments over the coming forty years, and to that extent the Northern Territory Government is reasonably placed in terms of having sufficient land available to deliver the requisite level of sub-market housing outcomes. These include several significant parcels of Crown Land in and around Darwin and other urban areas that will meet demand for decades to come (e.g. Holtze and Kowandi). Having said that, there are still lengthy lead times to bring titled land to market, including the need to negotiate land use agreements with Traditional Owners of the land and other potential heritage and environmental constraints. These lead times will be severely tested as the Northern Territory Government and its partners endeavour to reach the housing build targets set out in the Housing Accord.

There are no regulations for urban infill development in terms of providing a proportion of social and affordable housing. With lengthy public housing wait lists and only a small affordable housing supply, more ambitious objectives in future land releases will need to be put in place by Government (i.e. a designated proportion of social and affordable housing as part of Requests For Proposal objectives). Consistent with the important concept of "well located housing", key workers on lower and moderate

incomes need to be close to their place of employment, be able to have good access to transport and community infrastructure and live in communities with good amenity.

Opportunities for “gentle density” across Darwin’s suburbs can be progressed, with the potential to achieve higher yield on large blocks through sensible infill in the form of low-rise apartments, townhouses and appropriate sub-title developments. This will require close collaboration and consultation with local communities in order to ensure that any greater density is “density done well”. This should include consideration of other investment by Governments into the community in the form of childcare, educational, sporting, cultural and community infrastructure as part of a deal that ensures that liveability is enhanced. Done well, gentle density can lead to more vibrant communities, as the case of Pyrmont and Ultimo in New South Wales over the past 20 years has shown.<sup>cxxxiii</sup>

Other initiatives can also be considered in order to incentivise additional development of well-located housing. National &/or local Incentives such as a replacement national rental affordability scheme, or Territory Government head leasing programs of future market supply, could encourage further development of social and affordable housing where required.

But with such a huge mountain to climb in respect of the current and forecast future demand for social and affordable housing not only in the Northern Territory but across Australia as a whole, there is far too much risk for unconditional release of residential land to the market. In our view, 30% of all land released by the Crown for residential use should be mandated as social and affordable housing. The mandated requirement should be 10% for new developments on freehold land. Providing clear and consistent messaging to the development sector and building industry on the need for social and affordability will ensure that costs and yields can be incorporated into proposals, with land values and project margins reflected accordingly and without risk to the project proponents.

### Configuration and Typology

There needs to be a reasonable level of flexibility in terms of the typology of housing according to family composition, cultural considerations, mobility and tenure, climate and individual preferences.

A National Housing and Homelessness Plan needs to acknowledge the specific housing needs of Australia’s First Nations people. It needs to accommodate design and type of housing that enables communities to thrive, as outlined by our First Nations communities themselves. This has implications for household configuration and design, as well as materials used and options available. The Plan should encourage greater innovation and adoption of best practice in the design and delivery of culturally appropriate housing for Australia’s First Nations people.

The Plan should also recognise the high levels of mobility between remote Aboriginal communities in the Northern Territory and urban centres. For example, the regional centre of Katherine is a major service hub for the Big Rivers region – a region with an area the size of Victoria and Tasmania combined. Sufficient shorter stay housing and accommodation stock is needed that is culturally appropriate for Aboriginal people who travel to centres like Katherine for cultural, family, medical, sporting and other reasons. It is a key part of the “housing continuum” in the Northern Territory that helps prevent further homelessness. Funds released from the Commonwealth Government to support better housing outcomes need to be sufficiently flexible to be spent according to where the needs are greatest, which may not always be in the form of a standard house or block of apartments.

In a similar vein, the National Housing and Homelessness Plan will also need to take into account a varying blend of housing typologies to meet the needs of specific housing cohorts. For example, best practice guidelines indicate that victim survivors of domestic, family and sexual violence (DFS) can appropriately be housed in well-designed refuge / shelter, or under a “core and cluster” model, or in independent living accommodation.<sup>cxixiv</sup> More than 50% of those presenting to specialist homelessness services in the Northern Territory have experienced DFS.<sup>cxixv</sup> It is likely that the housing needs of victim survivors will be best served by a range of housing options across the three typologies according to the range of housing projects undertaken, the recommendations of service providers having regard to client safety and rehabilitation, and the preferences of victim survivors themselves.

We recommend that consideration be given to the establishment of a Best Practice Centre for Social and Affordable Housing Design, with oversight from AHURI, to create opportunities for learning and the promotion of case studies and best practice in the design, construction and delivery of innovative social and affordable housing projects. This could help ensure that new housing supply takes into account specific cohort needs when designing and constructing new homes, for example:

- Best practice design guides for Domestic and Family Violence, Specialist Disability Accommodation (SDA housing) and successful adaptation of the latest National Construction Code standards for accessible housing and energy efficiency.
- Climate resilient social and affordable housing.
- Mixed tenure developments with excellent results in community connection and engagement.
- Modular housing.
- First Nations housing innovation e.g. Wilja Janta.<sup>cxixvi</sup>

There is a huge amount of unmet Aboriginal housing need in remote communities where there are no established housing markets. This makes home purchase extremely challenging although there are considerable efforts by Indigenous Business Australia and others to identify models for greater equity in housing or, ultimately, full home ownership. Again, this presents an important opportunity for information sharing and adoption of best practice to ensure that all Australians have an opportunity to participate in home ownership, whether that be through direct ownership or some other model such as shared equity.



*“It’s really bad [in] these tin sheds. In summer it’s really hot and in winter it’s really cold. I just have a little gas stove that I’m using to cook, and I have to walk to the nearest house to use their bathroom and shower. I’d like to be somewhere where it’s nice and cool.”*

*68-year-old [redacted] lives in dilapidated tin sheds [redacted] while she waits for public housing. Quote taken from ABC News.*

Photo courtesy of John Fitz Jakamarra, respected Warumungu elder and recipient of the Fitzgerald Justice Award 2021.

## Housing Features and Inclusions

In the twenty first century, it is unfathomable that there are no minimum standards for residential properties under residential tenancy laws for several jurisdictions, including the Northern Territory. This is an aspect of reform that should be a qualifier for any State under any future incentive schemes such as the recently announced Commonwealth Government New Homes Bonus.

Minimum rental standards must include the following:

- a vermin proof rubbish bin,
- a functioning toilet,
- adequate hot and cold-water connections in the kitchen, bathroom and laundry,
- external windows that have functioning latches to secure against external entry,
- a functioning cooktop, oven, sink and food preparation area,
- a functioning single action deadlock on external entry doors,
- functioning heating (and cooling) in the property's main living area,
- minimum insulation,
- window coverings to ensure privacy in any room the owner knows is likely to be a bedroom or main living area.

Ensuring that new housing is appropriate for a changing climate, robust and resilient is increasingly important. It is also essential that, as part of delivering a fairer deal for renters across Australia, that sensible protocols such as the National Framework for Minimum Energy Efficiency Rental Requirements are adopted.<sup>cxxxvii</sup>

There must be an expectation that all State and Territory Governments incorporate changes to the National Construction Code into their respective jurisdictions. These include, as an absolute minimum, implementation of silver standard design guidelines for accessibility in accordance with the *Livable Housing Design Guidelines*<sup>cxxxviii</sup> and a seven-star NatHERS energy rating for new builds.<sup>cxxxix</sup>

The stakes of various States not adopting liveability, accessibility, energy efficient, climate-adaptive and healthy housing are too high to ignore. The process of designing and building housing is expensive. Housing that is constructed today is intended to have longevity – 50 years or more into the future. The costs of deconstruction, demolition or retrofitting housing that is not fit-for-purpose are foreseeable, preventable, and a waste of taxpayer funds. Public value requires investment in technologies and standards that are known and applicable today and are the subject of national agreement.

It is therefore completely unacceptable that the Northern Territory Government has decided to not implement NatHERS seven-star standards for new builds – the standard that is now in place in all other jurisdictions. There should be repercussions in not doing so.

The Commonwealth Government, where appropriate, needs to exercise the leverage it has under any successor funding agreement with State and Territory Governments to the NHHA. The Commonwealth Government has the potential to withhold or delay payment of funds should the States not deliver on their commitments under the NHHA or from National Cabinet. It is unacceptable for belligerent States to refuse to implement nationally agreed standards that provide much needed and improved standards of housing across Australia.

An alternative to withholding or delaying payment of funding is to ensure that the adoption of measures agreed to at National Cabinet is a precondition for participation in any incentive payments or programs that the State(s) in question may otherwise benefit from e.g. New Homes Bonus.

### Financing the Supply of Housing

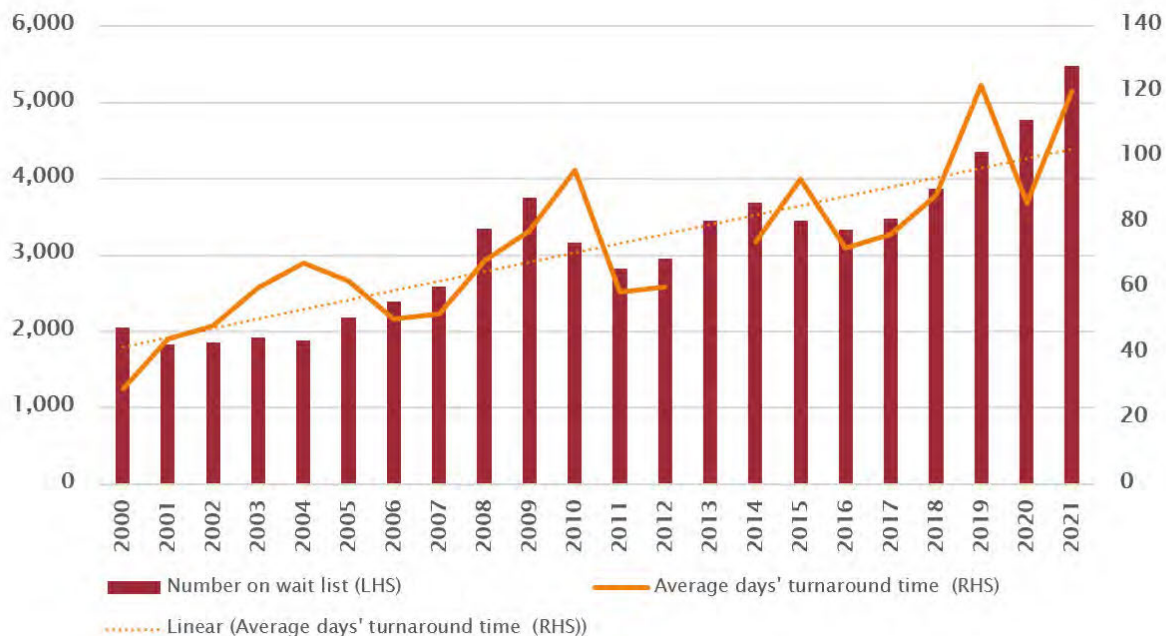
Delivering the social and affordable housing that Australia needs, at scale, is expensive. Traditionally, the public housing model has involved co-funding from the Commonwealth and State governments. The post-World War Two era has shown that social housing can be built at scale when it is clear national priority.

The lines have been somewhat blurred over the past two decades as to the Commonwealth Government’s role in direct provisioning of public housing. This has resulted in significant underinvestment in public housing across all jurisdictions, including the Northern Territory.

For its part, the Northern Territory has an aged stock of housing. Several housing assets pre-date cyclone Tracy and are in very poor condition. Maintenance has been deferred on many housing assets and there have been precious few new builds, especially in urban centres over the past 20 years.

The Northern Territory Government has also lost its way in terms of the turnaround time for getting vacant public housing assets available for new tenants, with the average duration having blown out from 29 days to 120 days.<sup>cx1</sup>

Figure 1.7: Public housing waitlists and turnaround times in the Northern Territory.



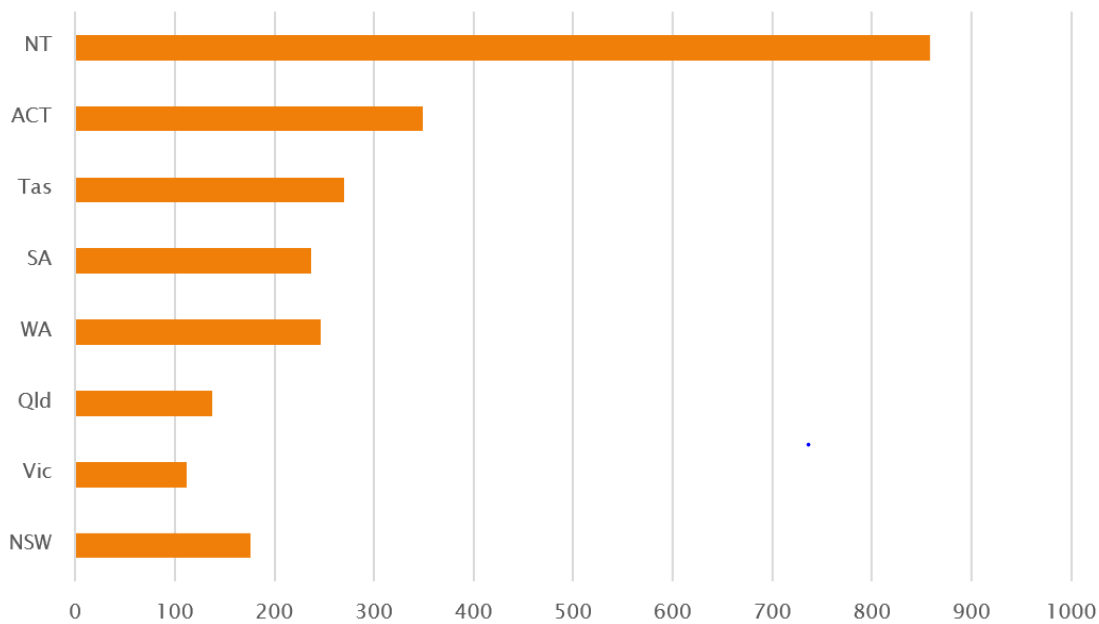
It is abundantly clear that the traditional model of public housing provision has not been working in the Northern Territory.

In an extremely important and positive initiative, the Northern Territory Government released its Community Housing Growth Strategy in 2022 which will see up to 40% of its public housing assets to the registered community housing sector to manage.<sup>cxli</sup> The opportunity for locally based, registered community housing providers to manage social housing stock, at scale, will enable what is currently a nascent industry to develop and, ultimately, leverage the assets it is managing to deliver more social and affordable housing.

However, this initiative, while significant, will not alone go close to meeting the financing gap that is invariably associated with the delivery of sub-market housing. There will inevitably be a gap between social housing rents (typically 25% of income) and affordable housing rents (up to 74.9% of market rent) and market rents. This subsidy gap needs to be financed in the form of an ongoing operational subsidy and/or capital grant.

The Northern Territory Government will necessarily be the provider of last resort for meeting the housing needs of Territorians. It is firmly in the Northern Territory’s interests for its government to demonstrate the large amount of its own revenue that it spends on recurrent housing expenditure (operational and capital) relative to other States, as part of advancing funding on the basis of where it is needed most.

Figure 1.8: State and Territory spend on social housing per person (population) over the last five years.



The best prospects for financing the expensive business of delivering social and affordable housing for the foreseeable future is as follows:

- Commonwealth and State / Territory Governments – share burden of heavy lifting.
- Marginal but increasing additional housing stock from growing CHPs.



- Institutional Investment.
- “License to operate” contributions from corporations – for larger scale mining and gas developments.

Institutional investment from Australian superannuation funds appears to have significant potential. Industry superannuation representatives have indicated an appetite for investing in housing in the Northern Territory if the conditions are right. As is well known, institutional investors require predictability, investment timeframes in the order of 20 years, political stability (i.e. certainty of continuation) and, crucial in the context of the Northern Territory, scale.

We expect it will be very challenging to attract institutional investment into housing in the Northern Territory on an individual project or small-scale basis. As a minimum, some level of aggregation with other developments will be needed to reach the required scale threshold. This may be in the form of the issuance of bonds through a bond aggregator, similar to issues previously released to the market by NHFIC. It is notable that these issues were well subscribed.

Earlier in our submission, we referred to the regional economic development aspects of delivering housing to regional and remote communities in the Northern Territory to align with new industry and jobs. For example, let’s assume there is an opportunity for a significant tourism export opportunity in East Arnhem. For the development to proceed, not only will key worker and tourist accommodation be required but road upgrades, an airstrip, port infrastructure and telecommunications upgrades may be needed. There may also be opportunities to upgrade the local school and provide pathways to employment and small business growth. The inclusion of other infrastructure components into a regional community infrastructure project, which includes housing, may provide a level of scale that is more appealing to external investors.

When housing is seen as essential infrastructure, it can perhaps be aggregated with other classes of infrastructure in the form of an infrastructure bond (or similar) that is tradeable.

In short, we will need to be creative in terms of attracting capital into projects that will deliver social and economic returns to investors. Models that meet the needs of investors and large-scale philanthropy, potentially across the globe, will need to be established and promoted should the Commonwealth and State Governments have sufficient appetite to share the costs with others. The provision of housing at scale should be sufficient to attract institutional investment, as has been the case in the United States (where Australian superannuation funds already invest in housing).

### Managing the Interim

There is a significant construction lag with the delivery of new housing supply. To add to the timeline, it is highly likely that there will be difficulties in attracting and retaining skilled construction workers to some if not many regions. Supply chain challenges for building materials and the workforce capacity within Councils across Australia to process development applications in a timely way are also likely to require attention. It will take a herculean effort to deliver 1.2 million homes across Australia over the next five years.

While Australia awaits the long overdue and much needed supply of social and affordable housing under the Social Housing Accelerator, the Housing Australia Future Fund and the Housing Accord, the struggles of those who are homeless or at risk of homelessness will continue.

There are things that the Commonwealth Government can do and should do to prevent even further levels of homelessness which will otherwise occur in the interim. These are:

1. Increasing the rate of Commonwealth Rent Assistance by a further 35%; and
2. Extending the tenure of NRAS entitlements for those that have not expired for a further 5 years.

According to the latest NRAS quarterly performance report, there will be 17,776 dwellings with entitlements still in place at the end of 2023. The NRAS scheme may not be perfect but there is still time to act to prevent 17,776 assets being lost from Australia's stock of affordable housing.

Increasing the rate of CRA by a further 35% will help ensure that more Australians do not experience homelessness as a consequence of the current cost of living crisis.

Australia will soon have a National Housing and Homelessness Plan. This will create a pathway to begin to address the huge deficit of unmet housing need. We do not want to take two more steps backwards before we take our first step forward. The Commonwealth Government should put the above two, or similar, interim measures in place to prevent further homelessness. Do not let more swimmers drown while the breakwater is being constructed – leave those few remaining lifeguards we have in place.

## Summary of Recommendations

### Recommendation #1

**Fund the Northern Territory based on need, not population:**

*The Australian Government provides approximately \$1.6 billion each year to State and Territory Governments to tackle homelessness and provide more social and affordable housing. Of this \$1.6 billion, the Northern Territory receives 1.3%. This is despite having 12 times the national rate of homelessness. If current funding arrangements under the National Housing and Homelessness Agreement continue, the Northern Territory will be hard pressed to implement a National Housing and Homelessness Plan. NHHA funding should be based on need, not population share.*

### Recommendation #2

**Focus the National Plan on ending homelessness in Australia via prevention whilst simultaneously adequately resourcing a crisis response:**

*To overcome the homelessness crisis, the National Plan must adopt principles of early intervention, shifting the focus of policy, practice, and resources towards long-term, housing-led solutions and away from the provision of a crisis response. Whilst this shift is necessary to stem the tide of homelessness, the Northern Territory cannot afford to increase preventative measures at the expense of a crisis response, and both must be adequately resourced in the interim.*

### Recommendation #3

**In the National Plan, include a whole-of-government response to homelessness:**

*The expectation that one sector or agency will alone address homelessness ignores the structural drivers behind the issue. The drivers of homelessness are complex and addressing the issue must be a collaborative and holistic whole-of-government response, rather than solely the purview of housing and homelessness-specific agencies.*

### Recommendation #4

**In the National Plan, include a strategy to address Australia's current and future housing need:**

*NT Shelter estimates that the shortfall of housing in the Northern Territory to 2030 is in the order of 47,000 dwellings (19,000 of which are needed for social and affordable housing). The National Plan must consider jurisdictional population targets, key major projects, and regional economic development factors, building a clear demand and supply profile to inform a strategy to address Australia's current and future housing needs.*

### Recommendation #5

**In the National Plan, set expectations that 30% of all State-owned Crown land released for residential use be social and affordable housing and 10% in the case of privately held land:**

*The National Plan must include initiatives to incentivise the development of well-located housing and mandate that 30% of all land released by the Crown for residential use must be for social and affordable housing. The mandated requirement should be 10% for new developments on freehold land. Providing clear and consistent messaging to the development sector and building industry on the need for social*

*and affordable housing will ensure that costs and yields can be incorporated into proposals, with land values and project margins reflected accordingly and without risk to the project proponents.*

#### Recommendation #6

**Establish a Best Practice Centre for Social and Affordable Housing Design:**

*New housing supply must take into account the specific needs of priority cohorts. We recommend that consideration be given to the establishment of a Best Practice Centre for Social and Affordable Housing Design, with oversight from AHURI, to create opportunities for learning and the promotion of case studies and best practice in the design, construction, and delivery of innovative social and affordable housing projects.*

#### Recommendation #7

**State and Territory Governments must adhere to nationally agreed standards that ensure an improved quality of housing across Australia:**

There must be an expectation that all State and Territory Governments adhere to nationally agreed standards that provide an improved quality of housing across Australia. Where appropriate, the Commonwealth Government must exercise leverage should jurisdictions not deliver on their commitments under the NHHA or from National Cabinet with respect to minimum standards under residential tenancy laws, the National Framework for Minimum Energy Efficiency Rental Requirements, silver standard design guidelines for accessibility under the National Construction Code and the NatHERS seven-star energy rating.

#### Recommendation #8

**In the National Plan, include a plan to attract capital into projects that will deliver social and affordable housing:**

The best prospects for financing the delivery of social and affordable housing in Australia are Commonwealth and State and Territory Governments, additional stock from growing CHPs, institutional investment and “license to operate” contributions from corporations. We will need to be creative in terms of attracting capital into projects. Models that meet the needs of investors and large-scale philanthropy will need to be established and promoted should the Commonwealth, State and Territory Governments have the appetite to share the costs with others.

#### Recommendation #9

**Increase the rate of CRA by a further 35% and extend the tenure of remaining NRAS entitlements for a further five years:**

*While Australia awaits the overdue supply of social and affordable housing, homelessness will continue at crisis point. In the interim, the Commonwealth Government must immediately increase the rate of CRA by a further 35% and extend the tenure of NRAS entitlements for a further five years, for those that have not expired.*

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