



# Submission

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## Response to the NSW Housing Strategy Discussion Paper – July 2020

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### ACKNOWLEDGEMENTS

This submission is prepared by ANGLICARE Sydney and Churches Housing with contributions and endorsement by BaptistCare NSW/ACT, Wesley Mission, Anglicare NSW South, West & ACT and Habitat for Humanity. It has had feedback and input from various individuals and agencies who have given permission for their views to be included and we thank them for their time and contribution. These include:

Mike Furner (BaptistCare), Rob Burnelek (Anglicare Sydney), Susan King (Anglicare Sydney), Lisa Ellis (Wesley Mission), Paul Mulrone (Habitat for Humanity), Dean Hart (Habitat for Humanity), Philippa Yelland (Churches Housing), Chris Pettett (Anglicare Sydney), Rob Powell (Churches Housing), Brad Braithwaite (Anglicare NSW South, NSW West & ACT).

## Overview

This submission is in response to the NSW Government invitation to interested parties to comment on the NSW Government's Housing Strategy Discussion Paper.

### Key Recommendations:

- Commit to increase the social and affordable housing stock in new developments – 15% for private land and 30% for public land.
- Mandate all Councils to develop an affordable housing contribution scheme and fast-track and extend the development incentives currently on offer to Local Councils through the SEPP 70 planning instrument.
- Establish an independent housing specialist entity to gather and analyse data on housing supply, demand and affordability in NSW. This could be modelled on the old Housing Supply Council.
- Improve and extend the incentives for NGOs (such as the National Rental Affordability Scheme (NRAS) and the Social and Affordable Housing Fund (SAHF)) to unlock church-based surplus provisional land in the delivery of social and affordable housing.
- Recognise the importance of investing in “Community Building” and “Social Inclusion” initiatives as part of any new housing programs that deliver positive social outcomes, while promoting community participation, inclusion and cohesion.
- Introduce a targeted stimulus package designed to weave some of the benefits of social housing (affordable rent, a stable tenancy, dwellings able to be modified for disabled tenants) into the private rental market.
- Increase investment in social and affordable housing, but hand over ownership and management of community housing to the community housing/not-for-profit sector, who are better-equipped to deliver the wraparound supports that are often needed by those who live in social and affordable housing.
- Introduce a green-star rating system for social and affordable housing that specifically reflects the operational costs of running a home on a low or very low income.
- Review residential tenancy rights in respect to tenure and the no-grounds eviction policy, especially considering the economic impact of COVID-19.

## Agencies

Agency	Description
Anglicare Sydney	<p><b>Anglicare Sydney</b> is a not-for-profit organisation of the Anglican Church and one of the largest Christian community service organisations in Australia. Anglicare exists to serve people in need in our community, enrich lives, and share the love of Jesus. In partnership with parishes and others, we provide a range of services that promote dignity, safety, participation and wellbeing for people in their relationships, homes and communities. Anglicare Sydney provides both long-term social and affordable housing as well as transitional accommodation for refugees and families impacted by domestic and family violence. We currently have a large development program underway which will see over 650 households assisted by the end of 2021. Anglicare Sydney provides community services for 35,000 clients each year, in addition to the over 4000 retirement and residential aged care services we provide. Anglicare Sydney partners with the Sydney Anglican Diocese to unlock underused church land to increase the stock of social and affordable housing in the Greater Sydney and Illawarra region.</p>
Anglicare NSW South, West and ACT	<p><b>Anglicare NSW South, West and ACT</b> is a diversified multi-service agency providing a range of community services across southern and western NSW and the ACT. Currently, Anglicare NSW South, West and ACT supports housing outcomes via its Specialist Homelessness Services, Crisis and Transitional accommodation, and a small but growing portfolio of Community Housing (Tier 3 registered). The agency partners closely with all three Anglican Dioceses covering southern and western NSW, providing a unique opportunity to potentially unlock underused church land to increase the stock of social and affordable housing in regional NSW.</p>
BaptistCare NSW & ACT	<p><b>BaptistCare NSW &amp; ACT</b> is a significant provider of human services with over 10,000 clients across aged residential, retirement living and home care, community housing for seniors and single parents' families, plus a range of community services including counselling, services for women escaping family violence, homelessness support, food services and no-interest loans. One of our key strategic focuses has been expanding how social and affordable housing for the most vulnerable in our society, with a target of 1500 dwellings by 2025. The great benefit of this housing being connected to a larger service organisation is the availability of wraparound services to support seniors and single parent families in achieving their goals in life.</p>
Churches Housing Inc.	<p><b>Churches Housing Inc. (CHI)</b> is the peak body for faith-based community housing providers and actively advocates for increases in social and affordable housing. For over 20 years Churches Housing Inc. (formerly Churches Community Housing) has been representing the church in the following areas of housing:</p> <ul style="list-style-type: none"> <li>• providing resources, information and consultation,</li> <li>• networking housing providers,</li> <li>• providing a communication link with government</li> <li>• researching and documenting housing initiatives and/or issues,</li> <li>• brokering partnerships within and outside the sector,</li> <li>• assisting the development of policies and plans,</li> <li>• assisting member organisations with registration renewal</li> <li>• assisting new members become registered as a CHP for the first time</li> <li>• being a catalyst for new development on church owned land, and</li> <li>• advocating for affordable housing to government at all levels.</li> </ul>

	We work alongside other Peak bodies active in the areas of housing and homelessness as well as the various state and federal government departments active in housing, representing the faith-based housing sector on a number of advisory forums and committees.
Habitat for Humanity NSWQ (HFHNSWQ)	<p><b>Habitat for Humanity NSWQ (HFHNSWQ)</b> aims to provide simple, decent, affordable housing within sustainable communities for families and individuals in need in Australia; and to build, improve or repair shelters, refuges and local or neighbourhood facilities for communities, families and individuals in need and to work with others to do so. We do this by:</p> <ul style="list-style-type: none"> <li>• enabling home ownership by building simple houses subject to no-interest loans</li> <li>• providing repairs and maintenance at minimal or no cost, usually to refuges or other supported accommodation and to disaster victims</li> <li>• providing other housing solutions within our skill set and resources.</li> </ul> <p>Wherever possible we seek to work in partnership with community development organisations. Much of the work will be done using professionally supervised volunteers.</p>
Wesley Mission	For over 200 years <b>Wesley Mission</b> has created long-term holistic solutions that address the needs of the whole person, not just their current challenges. We deliver more than 120 services across New South Wales, supporting over 200,000 people each year across every stage of life. Our services include housing and homelessness, mental health, aged care, disability support, counselling, child and parenting support, foster care and adoption. As a Tier 2 community housing provider we currently manage over 400 tenancies encompassing crisis, transitional and social and affordable housing across Sydney, Central Coast and Newcastle. We are committed to growing our community housing portfolio, aiming to have over 1,000 tenancies by 2025.

## General Comments

This group welcomes the release of the NSW Housing Strategy. Currently the faith-based sector has been the driving force for a significant portion of the building of new social and affordable housing in NSW, with over 2,000 units of housing currently being delivered by our members through the Social and Affordable Housing Fund. The faith sector has consistently been a collaborator in this space and has demonstrated this by putting forward land to be used in the development of social and affordable housing. We are seeing our membership living out our mission of unleashing church resources for housing through collaboration, partnerships, education and capacity building.

The faith-based sector has considerable capacity for further growth and development. Better use of our capacity and realisation of scale economies could be achieved through an industry plan that sets clear affordable housing growth targets and is underpinned by secure and adequate subsidy streams, and more cost-effective private financing approaches. Our strong balance sheets will enable us to invest in long-term affordable housing development and management.

A critical success factor in the implementation of the Housing Strategy is the application of a whole-of-government approach. This approach, whilst not new, is often plagued by considerable uncertainty about the practical application of this way of working. This commitment needs to ensure better continuity between housing and other sectors and across all levels of government and must include community building strategies.

Our agencies welcome further discussion and clarity on how these objectives can be achieved. This submission outlines further suggested actions for addressing these issues.

Housing in urban and regional contexts must differ due to a wide range of factors. Housing in the regional context needs to be achieved through an all-of-government strategy and community engagement to establish an understanding of how new housing can be incorporated in a way that is in line with economic development and community objectives. This includes a recognition of the potential displacement effect on regional communities when large infrastructure projects occur by increasing the responsibility on the project developer to invest in housing.

The balance between supply and demand will always be at the forefront of discussions around affordable housing where the provision of housing is largely left to the free market to resolve, as is currently the case in Australia. This balance is currently weighted towards developers. Several experts across the housing sector have already called for higher targets of 15% for private land and 30% for public land, in order to have a long-term and significant impact on the housing crisis across Greater Sydney (Troy et al 2016). Our agencies support this call and outline further suggestions to support supply in Part 3 below.

The following points outline what we see as key actions and concerns and address the selected questions raised in the discussion paper.

## **Discussion Point 1: Influence and Data**

**What influence would you or your organisation have in contributing to the joint delivery of a NSW Housing Strategy? What data or insights could you provide to support responsible action plans?**

Our agencies deliver affordable housing solutions across NSW and have well-established services in a wide range of communities. We have extensive on-the-ground insights into the need for housing across NSW especially amongst the more vulnerable end of society.

Our insights are supported by rental affordability, demographic and ageing data. For example, since 2008, Anglicare Sydney in collaboration with the broader Anglicare Australia network has produced a Rental Affordability Snapshot, a point-in-time study of rental affordability for people on Government benefits and low incomes across Australia. This study provides insights and data on the issue of housing affordability from the perspective of low-income earners.

## **Discussion Point 2: Vision**

**What are your views on this vision? What outcomes should a NSW Housing Strategy focus on?**

While the Strategy seeks to drive improvements and change, the vision is, in our view, too broad and does not adequately reflect the continuum of housing (Figure 1, p.3), especially the supply of social housing and private rental properties to ease pressure in the rental market. There is also insufficient attention paid to the creation of more affordable opportunities for renters to enter the home ownership market.

We emphasise the need for numerical targets in the Strategy and against the various housing categories (social and affordable, home ownership etc). Targets and measurable actions establish a broader base for strategic thinking and planning and ensure there is accountable implementation measures across the housing continuum. The importance of targets was recently stated as a key recommendation in Anglicare Sydney's 2020 Rental Affordability Snapshot (RAS) report – 'The NSW Government needs to fund the provision of essential social housing stock and commit to numerical targets for both affordable and social housing in the Sydney and Illawarra regions for the next five to ten years.'

Whilst boosting housing supply is essential, the Strategy's focus on increasing the gross supply of housing will not solve the affordability issue. Given that NSW is experiencing a social housing crisis with 51,014 approved applicants for public and community housing waiting on the NSW Housing Register, the provision of essential social housing stock must be paired with a commitment to numerical targets for both affordable and social housing.

### **Discussion Point 3: Supply**

#### **There are a range of actions we could take to support supply. Which ones should be prioritised in the NSW Housing Strategy?**

This submission supports the view that there needs to be a diversity of approaches that drive supply because where and how someone chooses to live is about more than just the dwelling itself. For this reason, we support any efforts to integrate NSW's housing policy with its economic, social and environmental policies. We would like to see a shift towards a more cohesive and comprehensive policy framework which factors in an individual's lifestyle and culture, along with their financial limitations and housing preferences. This, together with Commonwealth, State and local strategic planning process, planning instruments, goals, policies and implementation activities, will lead to a NSW Housing Strategy that 'builds communities, not just housing'.

We would like to see a specific commitment to increase the social and affordable housing stock in new developments. The scarcity of affordable housing for low income households has the potential to seriously impact individual, family and community well-being. Inclusionary zoning could meet this need, especially where significant infrastructure investment is likely to lead to increased land values, thereby pricing a lot of lower-income households out of the market. In the Greater Sydney region, the disparity between new suburbs with no inclusionary zoning policies in place and other suburbs where there is a concentration of social and affordable housing is concerning, as it further entrenches already existing socioeconomic issues. The Greater Sydney Regional Plan, released by the Greater Sydney Commission in March 2018, prioritised a range of housing choices of different prices and the provision of affordable rental housing for households on low and very low incomes (Greater Sydney Commission 2018). The Commission's plan recommends an inclusionary zoning Affordable Rental Housing Target of 5-10% for all new floor space. This Target applies to both future private and government urban renewal or land release areas. Several experts across the housing sector have called for higher targets of 15% for private land and 30% for public land, in order to have a long-term and significant impact on the housing crisis across Greater Sydney (Troy et al 2018). We support this higher rate of inclusionary zoning.

The NSW Housing Strategy also needs to fast-track and extend the development incentives currently on offer to Local Councils through the SEPP 70 planning instrument. The 2019 amendment to SEPP 70 entered all LGAs into SEPP 70, thereby removing the administrative burden of individual LGAs needing to be entered into SEPP 70. However, we are concerned that a few Councils only have taken the next step and developed an affordable housing contribution scheme. We recommend that all Councils be mandated to develop an affordable housing contribution scheme, and that further incentives be provided to them by the NSW Government to do so.

#### **What data able to be collected or held by the NSW Government could help you deliver new housing?**

Currently, the data relating to measures of affordable housing outputs lacks specificity. We echo the concerns of others in the sector that there is no industry-wide model for measuring affordable housing needs. This is important to give assurance that service outcomes will be aligned with the pattern and mix of needs (rather than being dictated by the ad hoc opportunities which have driven recent growth). Our agencies strongly support improved data collection on the quantity and location of social and affordable housing, as well as the projected inclusions of social and affordable housing across LGAs. We would like to see better access to this data, to help our agencies highlight roadblocks and identify parts of the sector that could be targeted to

improve the quantity of social and affordable housing. A solid data base would also be the basis for accountability across the sector and more informed policy making.

This submission recommends that that state government establish an independent housing specialist entity to gather and analyse data on housing supply, demand and affordability in NSW. This could be modelled on the old Housing Supply Council.

### **How could Government help to enable a greater supply of new housing in both Greater Sydney and Regional NSW? How can Government better facilitate housing in regional communities?**

We support the view that the continuum of housing must meet the housing needs of all people, at all stages of their lives. However, we are concerned that Local Councils are not adequately equipped nor supported to deliver on these housing outcomes, especially amongst the more vulnerable. There is a lack of consistency in the way Local Councils approach social housing. For example, in some LGAs there are still large developments going ahead or proposed without any affordable housing component at all. We acknowledge that the need for affordable housing varies across LGAs and would like to see Local Councils equipped and supported by the NSW Government to deliver affordable housing in a way that meets the needs of their communities. We would like to see the coordination between State and Local councils improve. State planning and housing agencies are involved in housing processes, and there are also a raft of local government processes that deal with housing considerations in various ways, including in relation to planning – these processes need to be streamlined and standardised across the various agencies involved.

We welcome the greater use of government-owned land for housing. We recommend this idea be developed and extended to include a comprehensive and collaborative review of the unoccupied and vacant government properties (e.g. those held by utility companies, station masters cottages, etc) that focuses on ways in which these properties could be redeveloped by the community housing sector, rather than being sold off opportunistically based on land value or left unoccupied.

We would like to see a greater investment by the NSW Government in subsidy schemes similar to the National Rental Affordability Scheme (NRAS), which could leverage church land in the provision of more affordable housing. There are also opportunities to continue to simplify the SAHF program in any future iterations, as our agencies are concerned about the very high cost of application to win such a grant.

As old social housing stock is sold off, it must be replenished with similar new dwellings (with the same number or more bedrooms to meet the diversity of needs in the community) and in the same Local Government Area to ensure that there is housing stock available as the needs of people change, and a mix of social housing across the city forming integrated communities. Further, all proceeds of any public housing sale need to be directed into a pool of funds for public housing.

Housing supply in both Greater Sydney and Regional NSW should be in line with economic development. As the economy changes in the wake of COVID-19, we would like to see a continuing commitment by the NSW Government to continue supporting the development of affordable housing across the regions. We expect to see the need for social and affordable housing grow in the coming months and years.

We would like to see a Housing Strategy that demands greater integration between housing and infrastructure developers during the early stages of project design. Major infrastructure projects need to address the long lag times between planning/construction and actual need for social and affordable housing in the region much earlier on, so that existing communities are not displaced.

**What role can you play as a member of industry, council or community to deliver additional housing supply?  
How can the NSW Government support you to do this?**

The faith-based sector is uniquely placed to help the NSW Government deliver a greater supply of housing in both greater Sydney and regional NSW. This is because our agencies have access to land, development expertise, and also provide the wraparound supports that help enable people to thrive in their communities. We would like to see the NSW Government improve and extend the incentives for NGOs (such as the National Rental Affordability Scheme (NRAS) and the Social and Affordable Housing Fund (SAHF) to unlock church based surplus provisional land in the delivery of social and affordable housing in both urban and regional areas of NSW.

**Discussion Point 4: Diversity**

**There are a range of actions we could take to support housing diversity. Which ones should be prioritised in the NSW Housing Strategy?**

We recognise that the NSW Government’s jurisdiction does not regulate the aged care sector, but we suggest that the NSW Housing Strategy must prioritise housing for seniors in an increasingly ageing society, especially among those who do not have any capital assets. The number of people aged over 65 is expected to increase by 85% in the next 25 years, meaning that the need for affordable and supported accommodation for this cohort is burgeoning. While many older Australians will downsize – and thereby partly or wholly fund their retirement and old age – low-income households aged over 55 that have been renting do not have this option. When they are no longer employed, it is difficult for them to sustain themselves in the private rental market without significant government subsidies. We would like to see continued partnerships between the government and the non-for-profit and church sector, who have an established history of caring for the vulnerable and housing the elderly. For example, the SAHF development partnerships with Anglicare Sydney and BaptistCare will deliver a total of 1050 affordable homes. The Anglicare Sydney SAHF partnership focuses on providing housing for women over the aged of 55 and Aboriginal and Torres Strait Islander women over 45 – many of these developments are co-located with residential aged care homes, and thereby provide the continuity of care for older people through retirement living and into old age. We anticipate the need for developments like these will be even greater given the economic shocks brought about by COVID-19. Many of the larger faith-based housing providers are also significant providers of aged care – the jurisdictional separation of these two sectors inhibits a timely and cost-effective response. We recommend an industry working group to help shape the detail of this part of the strategy going forward.

**How can the NSW Government best support councils and industry to deliver housing for people with disabilities and other complex needs such as mental health, domestic violence and substance abuse?**

We would like to see a Housing Strategy that acknowledges and responds to the diversity of complex needs that people face when seeking shelter. Greater communication and collaboration between housing developers and community service providers during the planning and development phase would achieve better outcomes for those with complex needs.

Community building needs to be a more explicit part of the NSW Housing Strategy to ensure that housing for all people with complex needs such as those with disabilities, Aboriginal and Torres Strait Islander people, older people, victims of domestic violence, those with mental health concerns and those affected by substance abuse includes essential wrap around supports and community building initiatives. As an example of the need for wrap around services, Wesley Mission identifies that over 90% of applicants for affordable housing have more than one diagnosed mental illness or disability. We would like to see a commitment to include basic community services in or near new housing developments, along with detailed plans to ensure adequate infrastructure (transport, health services, education) is located close by. For example, a number of our

agencies are involved in the delivery of the SAHF project, and all these sites will contain a community services hub which will provide access to various supports that may be needed by the people who will live there. A core part of successful community building will be the inclusion of appropriate housing options for people with various complex needs in all larger developments. For example, larger developments could be mandated to make all ground floor apartments accessible.

The use of and reliance upon boarding houses and refuges as housing for those with complex needs must be re-examined. While we acknowledge the importance of boarding houses in the current housing environment, we would like to see greater thought placed on the configuration of these spaces to consider the mental and emotional wellbeing of those living there. For example, women impacted by domestic and family violence are often placed in refuge accommodation with common areas, which undermines their need for safety, privacy and a sense of control over their environment. We would like to see a trauma-informed approach to design for housing for at-risk groups such as recently arrived refugees and those fleeing situations of family and domestic violence. BaptistCare is delivering purpose-built housing units for this cohort in Sydney, Wollongong, the Central Coast and Lismore, that includes essential wraparound services such as counselling, no-interest loans and educational support to enable victims of domestic and family violence to re-establish their lives.

Specific attention must be given to building the Aboriginal housing sector and to reinstating a strong Indigenous voice within the industry. Along with improving the cultural proficiency of mainstream services, the retention of robust and culturally adapted housing services for Aboriginal households is essential to both government and community ambitions to 'close the gap' in indigenous disadvantage.

We remain concerned that there is a discontinuity between the NSW Housing Strategy and other significant policy areas impacting on people with complex needs. For example, Commonwealth-led policy in areas such as aged care needs to be better aligned with state-run housing policy for seniors. Under the current system an older person requiring a home care package needs to be able to prove secure tenancy – a status that state-run housing is often unable to provide. A remedy in this space requires both a holistic approach to service delivery and the preparedness and capacity of agencies and government departments to work collaboratively in the best interests of and with the older person. It also requires an appropriate mix of services and supports to assist the older person. For example, BaptistCare is providing housing for seniors at risk of homelessness that will, as much as possible, enable them to age in place and minimise the potential of needing to relocate to an aged care home in the future. Their developments include fully accessible bathrooms, level access, and allow carers to come in and provide services where needed.

The proposed Meanwhile Use policy is generally supported, especially where existing buildings may remain vacant for longer periods of time. However, in our experience, it may not work for people with complex needs who are often anxious about their next accommodation and seek and benefit from permanency. Likewise, for people with disabilities or the aged, Meanwhile Use may present unnecessary challenges as it is often aged stock with accessibility challenges. It may make most sense for people without mobility issues to use such buildings for transitional housing.

## **Discussion Point 5: Affordability**

**There are a range of actions we could take to support housing affordability and/or the supply of affordable housing. Which ones should be prioritised in the NSW Housing Strategy?**

This strategy is an opportunity to invest in actions that increase and improve the quality and availability of affordable housing, and homes for the vulnerable. The provision of affordable housing depends on a consistent and long-term strategic commitment and plan. The lack of consistent action in this space over the last 20 years has meant NSW's affordable housing stock has diminished as a percentage of all available housing. NSW is currently facing a shortage of 200,000 affordable rental dwellings for households on low incomes (lowest two

quintiles), with population growth and demographic change increasing this shortfall to 300,000 dwellings by 2040 (Shelter NSW 2019). Further, recent findings from the City Futures Research Centre estimate that, in order to catch up to the demand for social and affordable housing, 30% of all new residential construction would need to be earmarked for these tenures. Across Sydney, only 50% of the demand for affordable rental dwellings is currently being met (Troy et al, 2018). We know from the SAHF experience that it takes industry approximately 5 years to deliver on large social and affordable housing projects, so successful delivery of affordable housing must be a long term, bipartisan effort. The Commonwealth government needs to play a central role in coordinating this long-term vision.

Anglicare Sydney's Rental Affordability Snapshot 2020 shows that applicants waiting for social housing dwellings are generally reliant on the private rental market and frequently enter into rental stress or remain at risk of homelessness. Some of these people look to informal share housing arrangements to meet their housing needs. Existing houses may be illegally subdivided, or sheds and outbuildings easily (and legally) constructed. Owners then illegally convert these outbuildings into dwellings using temporary walls and which may be serviced by inadequate plumbing and electricity. Research undertaken by Gurran et al (2019) identified the Fairfield LGA as one of the hotspots for this type of development which targets low-income earners, the unemployed and older people who have reached retirement age without stable housing. The emergence of this unregulated housing is symptomatic of a system that is failing to meet the needs of those most vulnerable to housing stress. We would like to see a stimulus package that includes a focus on people most at risk of unstable housing or homelessness, and that delivers jobs and long-term social, environmental and economic benefits. For example, for low-income households the benefits of getting into social housing are affordable rent, a stable tenancy, and dwellings able to be modified for disabled tenants. In some regional areas, social housing may be the only existing form of rental housing. A targeted stimulus package designed to weave some of these benefits into the private rental market may go some way towards reducing the burden on the government-provided social housing.

### **What new or improved measures, subsidies or otherwise, could assist first home buyers?**

Our agencies remain most concerned about individuals and families who are experiencing the financial hardship of paying high rents on low incomes. It is these households who bear the weekly burden of juggling housing costs with other expenses to ensure they continue to have a home. After housing costs have been paid, they must address their family's essential needs of paying utility bills, food, education, travel, medical expenses and so forth. The prospect of home ownership is generally out of reach for these households.

Projects such as the First Home Owners Grant and the recent Federal Government HomeBuilder stimulus package, in our view, may support higher-income earners but does little to support low and very low income earners into stable and affordable housing. In addition, the First Home Owners Grant has been, for some time, ineffective at lifting home ownership rates and we would argue, counterproductive, as it has mostly served to inflate the market, favouring developers and builders. Where households are taking between 8-22 years to save a 20% deposit for a home, Australian leaders and the community at large now acknowledge the difficulty for younger Australians to achieve home ownership, with the result being that more Australians are renting in the private market than ever before. Over half of Australian renters do so because they simply cannot afford to buy their own property (CHOICE 2017:6).

We recognise that the First Home Loan Deposit Scheme launched in early 2020 has enabled many renters to access finance to buy their own home through the National Housing Finance and Investment Corporation guaranteeing up to 15% of the mortgage value. This allows consumers to avoid Lender's Mortgage Insurance and to buy a home with a 5% deposit. This is not without potential limitations and the Scheme may expose customers to unaffordable housing if, for example, the interest rates go up significantly. We would like to see this Scheme extended, with appropriate regulation to protect lower income earners.

We support the introduction of shared-equity schemes as a means of helping lower income households buy a home. Low- to medium-income households that are attempting to buy their first home in unaffordable housing markets have been greatly assisted by shared-equity schemes in Victoria. The Barnett Model in Victoria provides housing opportunities for people with low incomes. The prospective home-owner secures a loan on 63% of the value of an apartment, while the Barnett Foundation advances the remaining 37%. This advance does not attract fees or interest and is payable on the sale of the unit. This model has attracted significant interest from the development industry in Melbourne and has delivered 34 secure and affordable homes to date (Raynor et al 2018).

We support further investigation into Community Land Trusts as a form of affordable housing for first-home buyers. Regulatory change would be an essential component of making this happen, but if successful could change the face of affordable housing as Churches and other agencies may offer land for this purpose.

**What role can you play as a member of industry, council or community to improve housing affordability?  
How can the NSW Government support you in this?**

In our view, State-managed housing is unsustainable. We would like to see increased government investment in social and affordable housing, but the ownership and management of community housing is, in our view, a role for the community housing/not for profit sector, who are better equipped to deliver the wraparound supports that are often needed by those who live in social and affordable housing. At some level the various business models represented by our agencies can help reduce the burden on taxpayers to fund long-term investment in social and affordable housing. We would like to see the government leverage our connections, resources and expertise in delivering social and affordable housing for the vulnerable and elderly and the associated wrap around supports that build and sustain community. A close working relationship with key players in this industry and a solid regulatory framework to keep members accountable are vital in seeing the non-for-profit sector sustainably partnering with government to provide housing for the vulnerable and elderly over the long-term.

**Discussion Point 6: Sustainability, Resilience and Safety**

**There are a range of actions we could take to support housing sustainability, resilience and safety trends.  
Which ones should be prioritised in the NSW Housing Strategy?**

We are broadly supportive of the main themes in this section of the Discussion Paper, especially the emphasis on a greater investment in environmentally friendly housing design. While there is increased movement in this area among home owners, there has historically been little attempt to apply resource innovation to social and affordable housing blocks. Little thought in terms of block orientation, for example, has resulted in energy deficient housing stock. Solar infrastructure needs to be built into the planning and design stages, and new developments need to meet minimum standards with targeted support for energy efficient builds and upgrades that can lessen the operational costs of running a home. We would like to see a green-star rating system for social and affordable housing that specifically reflects the operational costs of running a home on a low or very low income – new developments should conform to this system to ensure utility bills for households living in social and affordable housing do not make up an inordinate portion of their income. Ultimately, affordable housing must provide well-built, well-insulated and energy- and water-friendly homes that will enable some of the most disadvantaged households to stay warm, plus create jobs and aid in economic development. There are existing projects that are ready to go or can be scaled up.

However, the Strategy needs to expand on the themes of safety and wellness. At a basic level, greater investment in the development of affordable housing is needed as stable shelter is an essential contributor to people's health and wellbeing. But housing that delivers safety and wellbeing must also incorporate the cultural, environmental, personal and professional elements of the lives of those who live there. This means

we need to see more detailed plans on how to design successful housing for larger families, seniors, renters, Aboriginal and Torres Strait Islanders, low-income households, people with disability, refugees, victims of domestic and family violence and others. The design of and investment in social and affordable housing must consider the complex needs of these groups, and others, and include community-led interventions that increase connection and lessen social isolation, access to transport and education, green spaces, along with accessible and regular community services that address the varying needs of the community. Therefore, it is essential that NSW's Housing Strategy be developed in consultation with the economic, social and environmental policies that govern the state.

We would like to see a review of residential tenancy rights in respect to tenure and the no-grounds eviction policy, especially considering the economic impact of COVID-19. Such a review should focus on the viability of longer-term leases of five to ten years and protections for people who are renting, with a view to delivering greater security for renters.

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