



20 October 2023

Department of Social Services
Australian Government

By email: HousingandHomelessnessPlan@dss.gov.au

Re: Submission regarding the National Housing and Homelessness Plan – Issues Paper

Thank you for the opportunity to provide a submission regarding the National Housing and Homelessness Plan – Issues Paper.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of twelve local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.8 million, one third of the population of Sydney, including Australia's most densely populated suburbs. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues raised.

SSROC welcomes the broad approach being taken to dealing with housing and homelessness issues in shaping a national plan and strategy for 10 years. However, an issues paper is not a draft plan with well-formed strategies. It is SSROC's expectation that a draft plan will also be the subject of further detailed consultations.

As housing and homelessness are not abstract ideas but rather strongly connected to place, local councils have a major role in driving and establishing place-based solutions to our housing and homelessness challenges, accommodating a growing population well connected to employment opportunities, and delivering critical services for our communities all at a time when our climate is warming rapidly. Improving livability and amenity in our urban settlements while ensuring their resilience will be fundamental for success with growing housing supply and ending homelessness.

SSROC is keen to see strong and identifiable actions provided in a new national housing and homelessness plan that will embed deep engagement and ongoing collaboration with local councils along with the other key stakeholders.

A new national plan needs to recognise and respond to the differences of States and Territories, their different housing markets and their related challenges. This response is unapologetically Sydney focused. A national plan will need to be adaptive and tackle the specific supply and demand challenges of housing in our global cities (Melbourne and Sydney) to be successful, given that such a large proportion of the Australian population already reside there and that they are set to be accommodating unprecedented levels of migration.

The problem of chronically unaffordable housing is a specific focus for SSROC councils. On one level, this recognises that expensive housing is a sign of success. When a global city like Sydney is attractive, many people want to live in and settle there, and with increased demand prices tend to rise.

Chronically unaffordable housing, however, is now damaging local businesses' ability to attract and retain key workers, impacting existing long term residents' ability to age in place, putting unprecedented demands on social housing and homelessness services and deterring would be



residents from securing a future in the SSROC region. Growing affordable rental housing supply is one specific area where we believe our councils can play a constructive role along with other parts of government and not for profit providers.

1 Understanding

Our understanding is that the Australian Government is developing a National Housing and Homelessness Plan (the Plan). It is doing this with state and territory governments to help more Australians get safe and affordable housing. The Plan will create a shared national vision to improve housing and outcomes and help address homelessness. It will set out important short, medium and longer-term changes to help people who are experiencing homelessness and improve housing.

The Plan will:

- set national goals and ways to achieve them;
- give a better understanding of housing and homelessness in Australia and what causes housing insecurity;
- identify ways to improve data collection and how it is used;
- look at how governments and the private sector can work together for good housing outcomes.

The Plan is a key part of the Government's reform agenda which also includes a complex array of programs and funding streams:

- a 15% increase to the maximum rates of Commonwealth Rent Assistance to assist low-income renters
- the \$10 billion Housing Australia Future Fund, the single biggest investment in social and affordable housing by a Federal Government in more than a decade, which will support the delivery of 30,000 social and affordable homes in its first 5 years
- a National Housing Accord (Accord), setting out a shared ambition to build 1.2 million new, well-located homes over 5 years from 2024¹
- an additional \$350 million over 5 years from 2024-25 to support funding of 10,000 affordable homes under the Accord
- providing tax incentives to support build-to-rent developments to reduce barriers to new supply in the private rental market

¹ States and territories will receive a "new home bonus" of up to \$3bn if they help reach an updated target of 1.2m new homes over five years, the national cabinet has agreed.

The prime minister, Anthony Albanese, announced that the incentive payment will give jurisdictions \$15,000 for every home delivered above the old target of 1m homes over five years from July 2024 in a bid to boost supply and improve affordability.

The federal government will also provide \$500m through competitive funding for local and state governments to help bring "well-located" new housing supply online by connecting essential services, amenities to support new housing development, or building planning capability.

<file:///Users/mark/Downloads/National%20cabinet%20agrees%20to%20build%201.2m%20new%20homes%20in%20bid%20to%20tackle%20housing%20crisis%20%7C%20Australian%20politic.html>

- increasing the Housing Australia's (previously National Housing Finance and Investment Corporation) liability cap by an additional \$2 billion. This will allow Housing Australia to provide more loans to community housing providers for social and affordable housing, supporting around an additional 7,000 dwellings
- widening the remit of the National Housing Infrastructure Facility, making up to \$575 million available to invest immediately in social and affordable rental homes
- expanding eligibility for the Home Guarantee Scheme to help more people buy a home sooner
- offering states and territories an additional \$67.5 million to address homelessness as part of a one-year extension to the National Housing and Homelessness Agreement
- a \$2 billion Social Housing Accelerator payment to State and Territory Governments, which will create thousands of homes for Australians on social housing waiting lists.

SSROC welcomes the development of a long-term plan to tackle a long-term housing problem. While these financial commitments and incentives are impressive, it will be important that the plan demonstrate clear, workable, costed strategies to achieve the stated targets.

In Australia [City Futures research](#) estimated that in 2016 there was a shortfall of around 650,000 social and affordable houses. This research was [updated in 2022](#), and again in January 2023, to reflect the 2021 census data. The updated analysis showed that there were 659,000 households in the bottom two quintiles who were either homeless or in rental stress. The analysis also estimated that this number would rise to close to one million by 2041 if no action was taken.

Clearly on this subject, the Plan needs to be much more ambitious in setting meaningful supply targets for new social and affordable housing and then provide delivery mechanisms that are appropriate to this scale. It will be counter-productive setting targets for market housing that large sections of the population will be unable to afford to buy or rent². It will also stymie delivery at scale as developers and their banks will need to ensure project feasibility and profitability.

SSROC Recommendations

Set higher targets for social and affordable housing supply for the life of the National Plan. *Ten percent (10%) of total housing supply or 120,000 dwellings or 24,000 dwellings p.a. nationally seems a reasonable aspirational target.*

Define “Well located” housing in terms of three key dimensions: proximity to transport and jobs; access to good amenity and community infrastructure (including affordable housing); and the housing’s location’s capacity to be promote resilience, safety and security in a changing and warming climate.

National Planning Reform Blueprint

The National Cabinet met in Brisbane in September 2023 to deliver on a range of priorities for Australians, focusing on enhancing the security and affordability of housing. At the heart of these efforts is the National Planning Reform Blueprint (Blueprint). The National Housing and Homelessness Plan will as a priority need to coherently incorporate and more fully articulate these directions. The Blueprint offers “a multi-faceted approach encompassing planning, zoning, land allocation and other measures said to amplify housing supply and affordability.”

² A broad approximation is that new market housing is priced around the third quartile on completion.

Critically this initiative underscores the promotion of medium and high-density housing within well-connected locales, adjacent to existing public transportation hubs, amenities, and places of employment.

Local councils already have a critical role to play in the legislated strategic planning framework, and make considerable effort to create opportunities for growth, by preparing strategic documents in consultation with the state-based Departments of Planning that set out the vision and planning for additional housing and employment in their areas. New planning measures need to recognise the value and spatial intent of existing masterplans (and those under development) that coherently incorporate well located housing growth into planned precincts that have already achieved community and government support.

The Blueprint³ encompasses the following key components:

- updating state, regional and local strategic plans to reflect their share of housing supply targets
- undertaking planning, zoning, land release and other reforms, such as increasing density, to meet their share of housing supply targets
- streamlining approval pathways, including strengthened 'call in powers' and prioritising planning amendments to support diverse housing across a range of areas, e.g. by addressing barriers to subdivision for appropriate medium density housing
- reforms to support the rapid delivery of social and affordable housing
- reforms to address barriers to the timely issuing of development approvals
- consideration of the phased introduction of inclusionary zoning and planning to support permanent affordable, social and specialist housing in ways that do not add to construction costs
- rectifying gaps in housing design guidance and building certification to ensure the quality of new builds, particularly apartments
- improving community consultation processes
- adequately resourcing built environmental professionals, including planners, in local government.

How this planning agenda is integrated into the National Housing and Homelessness Plan will be key to its success. The 1.2 million home growth target is supported by \$3.5 billion in incentives for states and territories to effectively provide these additional homes.

As noted by Matt Collins, CEO of PIA Australia, "Whilst planning [and Councils] can enable the right housing in the right place, planning alone can't deliver more houses because the decision to act on planning approvals largely rests with property owners and developers,"

"Developers and property owners make the decision to build based on a range of factors including the availability and cost of finance, taxation settings, sales rates, profitability, and other market factors."⁴

A key recommendation of the Committee for Sydney's report on *Chronically Unaffordable Housing* (2023) is to bring Sydney in line with other global cities by introducing an inclusionary zoning target for all rezonings with appropriate transitional provisions.⁵

³ <https://www.pm.gov.au/media/meeting-national-cabinet-working-together-deliver-better-housing-outcomes#a1>

⁴ <https://www.planning.org.au/news-archive/2021-2023-media-releases/planners-welcome-national-cabinets-planning-reform-blueprint>

⁵ Committee for Sydney, *Chronically Unaffordable Housing*, September 2023, <https://a21234.hostroomcdn.com/wp-content/uploads/2023/09/Committee-for-Sydney-Chronically-Unaffordable-Housing-September-2023.pdf>

Developer contributions should be reinvested in accordance with the priorities of the local government area in which the development is located, in partnership with the relevant council. Monetary contributions provided in lieu should be enabled to be mixed and ‘stacked’ by CHPs with their other finance and funding sources to maximise local housing outcomes.

SSROC strongly supports:

- the inclusion of discrete social and affordable housing targets within the global national housing supply targets;
- the phased introduction by councils of inclusionary zoning and planning measures to support permanent affordable, social and specialist housing in ways that do not add to construction costs, in part by timing their introduction with up-zonings so that the developer contribution costs are in effect passed back to the original landowner receiving the planning windfall prior to the development application process.
- Councils sharing in the financial incentives being provided to states and territories.

SSROC Recommendation

Co-design Government policies and governance measures, especially those for new mandatory inclusionary zoning schemes with councils to ensure Local Government is a genuine partner at the administration and delivery level.

2 Comments

2.1 Affordable housing

SSROC welcomes the acknowledgement of, and support for, affordable rental housing as part of the housing spectrum that will be addressed by the National Housing and Homelessness Plan.

It is SSROC’s position that permanently affordable rental housing (used in this submission to include social housing) remains the key housing challenge and must be considered as a form of both social and economic infrastructure. It is essential for a functioning economy, and to ensure Australia remains a place of opportunity for all to have a fair go.

The National Housing Accord recognises the critical need for affordable housing alongside social housing. The National Housing Accord announced by the Commonwealth Government in October 2022 as part of the Federal Budget includes the delivery of up to 20,000 additional affordable homes over 5 years from 2024⁶. States and Territories are to expedite zoning, planning and land release for social and affordable housing.

SSROC Recommendation

Better define affordable rental housing across jurisdictions to bring clarity to expected outcomes based on spatial, demographic and business needs, permanency of provision and the setting affordable and social housing delivery targets

⁶For the purposes of this Accord, “affordable housing” is generally taken to refer to rental housing that is provided at below market rent to qualifying tenants (usually between 70 and 80 per cent of market rent). Where states include home ownership in their affordable housing policies and/or programs, this will be included in the definition of affordable housing alongside rental housing, where those policies are consistent with the objectives of the Accord to provide more long-term supply of affordable housing for those who need it.

<https://ministers.treasury.gov.au/sites/ministers.treasury.gov.au/files/2022-10/national-housing-accord-2022.pdf>

2.2 Essential workers

While there is no universal or standard definition of key /essential workers they:

- Perform important public services like nurses, teachers, police but also cleaners and care workers;
- Population serving (service need greatest where there is concentrated population);
- Required to be physically present (and live proximate).

However, those on low to moderate incomes means accessing housing in expensive housing market areas is difficult.

Prices and rents are highest in job-rich, high amenity areas (that are also preferred by high income households and investors competing for the same housing). In recent times this has been exacerbated by housing expenditure accelerating relative to wages. To make matters worse there is little affordable housing provision as part of market driven renewal or redevelopment.

Affordable Housing supply is therefore critical to attracting essential workers and investment and therefore to productivity at the national state and local levels. Infrastructure NSW notes that “Access to affordable and quality housing is a key enabler for prosperous and thriving communities.

Workers often avoid accepting employment in areas where appropriate housing is unavailable. This can disrupt business activity and the provision of critical frontline public services like policing, health and education. This poses a risk to NSW agencies’ goals of providing equity of access to services regardless of location”⁷.

When key workers cannot access housing near jobs this has a number of interrelated negative consequences for the workers, their communities and local businesses.:

- Long commutes coupled with housing stress exacerbate worker burnout.
- Unmet housing needs and aspirations become a driver for household relocation.
- Retention problems disrupt community embeddedness and create risks for the quality and functioning of critical public services.
- Limits capacity of these workers to be ‘on call’ and respond to emergency situations.
- Local businesses have ongoing recruitment problems due to a reluctance to move to high-cost areas to take up positions.

SSROC Recommendation

Establish and embed the case and priority for providing affordable rental housing for key and essential workers based on proximity to work in the National Plan.

2.2 The status quo and business as usual are not options

The current arrangements and reliance on the market supply solutions are not working. It is unlikely that they will be fit for purpose given the ambition to deliver 1.2 million new homes over the

⁷ Infrastructure NSW, May 2022, *State Infrastructure Strategy 2022-2042: Staying Ahead*
<https://www.infrastructure.nsw.gov.au/media/3706/state-infrastructure-strategy-2022-2042-full-report-print-friendly-version.pdf>

next five years and the industry's past long run performance. Changes need to be made to housing delivery. (See section 2.3)

The orderly provision of this scale of housing growth needs a clear strategic narrative for the growth for our cities and regions that honors and builds on state and region plans to make positive tradeoffs for our citizens – both new and existing residents.

2.3 The limited role of increasing market housing supply

As noted, developers and property owners make decisions to build based on a range of factors including the availability and cost of finance, taxation settings, sales rates, and profitability. New players now need to be added to the mix to help with this task. Tier 1 and 2 CHPs and government development agencies can work counter cyclically to boost the level of market housing supply especially in construction down turns.

2.4 Bringing Affordable Housing to Scale

In the OECD, Australia has a low supply of social and affordable housing.

According to the recently released SIGMAH calculator⁸ the 40,000 social and affordable homes to be supported under the Commonwealth's National Housing Accord and Housing Australia Future Fund over the next five years will create an additional \$4.4 billion worth of wider benefit over the next four decades. That is over and above the appreciating value of the underlying assets. Once constructed, the dwellings built under the Housing Accord and Housing Australia Future Fund will deliver around \$16.2 billion in cost of living relief, primarily through lower rental costs compared to equivalent rentals in the private sector.

*Bringing Affordable Housing to Scale*⁹ is the title of a paper by the Committee for Sydney that highlights the need to move from business-as-usual models to deliver the quantum of social and affordable housing that is needed by our population. Strengthened policy settings are necessary but not sufficient.

The focus of the Committee for Sydney paper, therefore, is the part of the spectrum that remains most elusive and most urgent – the scaling up of *permanently affordable rental housing* as part of the community housing sector.

Current models do not deliver affordable housing for the longer term, or for lower income households, due to the low yields that inevitably result from housing people with limited rent-paying capacity. The paper asks what is needed to scale up the production of affordable housing to meet our new ambitions for over 600,000 affordable homes.

2.4.1 Foundations for bringing affordable housing to scale

The *Bringing affordable housing to scale* report identifies four essential elements for a better affordable housing system that can operate at scale and deliver the pipeline of affordable housing and implement the National Housing and Homelessness Plan:

1. A permanent source of funding as a clear signal to the entire housing system, and to increase the building stock;
2. A planning system that expedites affordable housing projects, ensuring timely delivery;

⁸ The SIGMAH calculator provides Commonwealth and State Governments, local councils, community housing organisations and the broader social and affordable housing sector with a robust tool to estimate Wider Social and Economic Benefits (WSEB). This allows decision makers to understand how much less public expenditure a government will incur from areas such as health, policing, and community services by making homes available to those who need them. The calculator also estimates private benefits such as higher consumption, income and educational attainment. Further information about SIGMAH can be found at <https://www.communityhousing.com.au/sigmah/>

⁹ Committee for Sydney, *Bringing Affordable Housing to Scale* 14 December 2022, <https://sydney.org.au/policy-library/bringing-affordable-housing-to-scale/>

3. Reliance on the not-for-profit community housing provider (CHP) sector as the primary long-term owner and manager of permanently affordable housing;
4. Sustainable sources of finance – debt and investment capital — that recognise the low-risk attributes of permanently affordable housing as an asset class.

1 A Permanent Source of Funding

Affordable housing requires a subsidy to make it financially viable – below-market housing is, by definition, not something the market can produce without assistance.

The sources of finance required to deliver a project need to be repaid. There will be income from rents, potentially supplemented by rent assistance. But, when tenants are lower income households, there will always be a gap between the cost of housing provision and what occupiers can affordably pay.

There is no magic solution that can challenge the fact that affordable housing requires a subsidy. The National Housing and Homelessness Plan must be a plan to secure sufficient long-term Government subsidy (up front capital grants, ongoing rental subsidies, credit mechanisms or a combination of all three).

The National Housing Future Fund is important but much more is needed.

2 A planning system that expedites affordable housing projects

NSW needs its planning pathways to ensure they provide fast and predictable outcomes. Our councils can point to regional strategies and regulation and guidance documents, which keep standards high and protect NSW residents from poor outcomes. Good master plans also accelerate the development process as many spatial decisions are made ahead of the development application process.

The Committee for Sydney report emphasises it is the process that is the problem, not the standards. An expedited planning process for affordable housing can be achieved with no reduction in urban outcome in planning or design. This will need to be developed in close consultation and collaboration with councils along with the resources and timely coordination from the state planning agencies.

3 Reliance on the not-for-profit community housing provider (CHP) sector

Registered community housing providers, which reinvest their surplus into more housing for people in need, should be the primary owner and manager of permanently affordable housing.

While acknowledging the continuing role and scale of state public housing, relative to CHPs this model has its growth limits when resources are so constrained. However, policy change at federal government level (both recent and in the establishment of the Bond Aggregator) point to a future with third-party sources of finance, and partnerships between CHPs and the private sector to scale up the industry. CHPs are progressively developing partnerships with local councils and a growing number can access affordable housing contributions paid by private developers.

Accordingly, our view is that expanding the stock of permanently affordable housing ultimately rests primarily with the non-government sector.

In NSW CHPs already play several roles:

- lead developer for projects generally of <100 dwelling scale
- long-term owner of housing
- property manager
- provider of tenant services
- coordinator of wrap around support services.

This will complement the continued role of public housing authorities in the production of housing, as this channel will continue to be an important part of the system.

Among the benefits to government of relying on CHPs for more affordable housing supply (whether on their own, in partnership with others or via acquisition) is that surpluses would be reinvested for the same purpose. Dividends will not be at risk of being diverted away from affordable housing supply.

Beyond this, CHPs can leverage their tax advantages (e.g. exemption from GST, and other state and local taxes and duties), as well as benefiting from the eligibility of their tenants for Commonwealth Rent Assistance (unavailable to public housing tenants).

This is not new ground; CHPs in the UK and USA are significant entities in their own right and operating with this growth function in their housing systems.

4 Sustainable sources of finance

The Committee for Sydney paper notes that ‘Australia is a wealthy nation with abundant capital available in the form of both debt and equity.’

With respect to senior debt, which forms the vast majority of affordable housing finance, the federal government established the National Housing Finance and Investment Corporation (NHFIC), now *the Housing Future Fund (HFF)*. NHFIC’s positive and significant impact on the sector has been welcome, and it would be the logical agency to take on an expanded mandate to place Commonwealth investment in affordable housing. Equivalent institutions in the UK and US are there for the long run, providing a stable backbone of lending to the sector.

NHFIC, now the HFF needs to be scaled up as all Australian states address the problem more completely.

SSROC welcomes the announcement of the Housing Accord and the new energy being invested in federal and state coordination of housing affordability. The federal government requires a clear signal from the states and territories as to the scale that NHFIC needs to become – NSW needs to signal its intentions and how local councils can participate.

The National Housing and Homelessness Plan needs to decide how it would like to see private capital involved in the sector and, if so, in what form. There is not a settled view on affordable housing as an asset class yet, because the planning requirements and approach to subsidies differ wildly in different parts of the country.

Sometimes the smallest and cheapest apartments for sale in a market-rate project are deemed ‘affordable,’ or short term affordable rental housing with an expiry date. But these affordable property approaches, well-intentioned as they may be, are not solutions for permanently affordable rental housing. NSW and the rest of Australia needs to articulate a clear framework for a scaled-up program that all actors in the housing system including CHPs and local governments can work within.

2.4.2 Better Delivery Models to Bring Affordable Housing to Scale

To be successful in achieving affordable housing growth attention needs to be paid to affordable housing delivery systems.

The Committee for Sydney paper notes that there are two primary delivery models for affordable housing delivered by CHPs.

At a high level, there are two primary delivery models for affordable housing in NSW (and potentially elsewhere):

1. Mixed income developments on government-owned land, including renewal of public housing estates.
2. Ongoing funding to community housing providers to undertake projects.

Both models can be improved to deliver at scale through the support of specific strategies in the National Plan. The Committee for Sydney paper recommends, and this submission endorses, a partnership model.

- In partnership with state agencies, like the Land and Housing Corporation, scale up the CHP sector to be responsible for delivery, ownership and management of the permanently affordable housing system.
- Develop a large-scale program of procurement for rapid expansion of the stock and to attract institutional capital.
- Encourage partnerships with larger developers (infrastructure, property) as required, depending on the project type.

The effective use of government subsidies should have regard to careful spatial planning and not just be applied anywhere and everywhere. All local government areas require affordable housing, but the goal of helping as many people as possible will be aided by subsidies being prioritised to locations within each LGA where surplus land has been discounted or gifted by governments or charitable bodies, there can be efficiencies in scale and does not come at a market premium. SSROC advocates for funds and developer contributions to be reinvested in accordance with the priorities of the local government area (and their local housing strategies) in which the development is located.

SSROC Recommendation

Re-engineer the housing assistance system to bring affordable rental housing to scale

Enable registered community housing providers to help achieve affordable housing delivery at scale, with support from new reliable and predictable sources of public funding and finance to ensure delivery models and the pipeline of projects achieve this priority over the 10-year life of the Plan.

2.5 Translating density done well into measurable outcomes to create inclusive, income-diverse communities

As noted, the National Planning Blueprint underscores the promotion of medium and high-density housing within well-connected locales, adjacent to existing public transportation hubs, amenities, and places of employment.

Sydney seems set to embark on the rapid redevelopment and densification of precincts that surround transport hubs such as stations and metros. Proximity to transport, jobs and services will make them 'well located' and the focus of higher housing targets. This urban transformation is a once in a generation opportunity to get it right, do density well and sustain diverse and thriving communities.

There are uniform presumptions that there is underutilised precinct capacity to handle this unquantified growth and that liveability will automatically be enhanced. There is however, evidence that such redevelopment using current practices will also accelerate the loss of essential workers living in these areas as well as displace established low income renting communities.

Furthermore, greater population will ultimately lead to a greater demand for a range of community infrastructure.

It has therefore become important to know when and where there will be population-driven demand for more housing, infrastructure and other services over the short medium and longer term



(next 25 years). Under the recent National Cabinet decision there is a new national target to build 1.2 million new well-located homes over five years, from 1 July 2024. This ambitious target will be supported by the Housing Support Program, a \$500 million competitive funding program for local and state governments to kick-start housing supply in well-located areas through targeted activation payments for things like connecting essential services, amenities to support new housing development, or building planning capability.

Furthermore, 'the Australian Government has committed \$200 million over two years, commencing in 2024-25, to establish the new *Thriving Suburbs Program* to deliver investment in locally-driven urban and suburban infrastructure and community projects.'

And 'the urban *Precincts and Partnerships Program* will support transformative investment in urban Australia based on the principles of unifying urban places, growing economies and serving communities. The Australian Government has committed \$150 million over three years, commencing in 2024–25.

This program will fund both the development of precincts to facilitate planning, design and consultation, leading to business cases for investment-ready proposals, as well as a stream for the delivery of larger scale precinct projects.'

"This program will support the delivery of best-practice investment in urban infrastructure, connecting people and communities to services and opportunities that improve liveability and inclusion."

It will be critical that this work of the Commonwealth Department Infrastructure Transport, Regional Development, Communications and Arts is integrated and coordinated with the strategies of the National Plan.

Potentially some precinct relevant metrics (presumably a mix of precinct and regional measures) could help shape best practice investment. Metrics potentially could support Council/State Government benchmarking which in turn would inform a precinct's current infrastructure capacity and help identify unmet needs at different population growth sizes.

This precinct-based work could also impact on the use of NSW Government surplus land around stations and so provide social and affordable housing on this land in line with the NSW Government's policy.

SSROC Recommendation

The National Plan develop some precinct relevant metrics (perhaps a mix of precinct and regional measures) to help maintain liveability and inclusive communities undergoing urban renewal and growth.

2.6 Ensuring Local Government is a genuine partner in the National Housing and Homelessness Plan

To ensure consistency and minimise uncertainty, the National Housing and Homelessness Plan needs to ensure Government policies and governance measures clearly articulate how Local Councils will be consulted and engaged on key matters including:

- the setting of housing targets for regions.
- development of Infrastructure Opportunities Plans.
- regional affordable and social housing infrastructure prioritisation, investment decision-making and planning.
- the way grant payments are made to a council for the council to provide the regional infrastructure like parks and open space to support new housing supply.

- negotiations with developers regarding Commonwealth land that also affect council levies.

Such engagement and reporting will be critical and foundational to developing a shared National Plan that accommodates both local and state priorities as far as possible, and which ensures that the priorities remain contemporary over time. It will be important for making sure the development of infrastructure opportunity plans and programs are meaningful and relevant to councils.

SSROC Recommendations

Ensure annual social and affordable housing infrastructure delivery plans are developed, published and reported on regionally to transparently enable councils to plan, integrate and where appropriate participate and or partner in specific placed-based social and affordable housing infrastructure projects.

Consult widely with local government in all jurisdictions and other stakeholders on the future draft National Housing and Homelessness Plan.

3 Summary of Recommendations:

SSROC recommends that the National Housing and Homelessness Plan:

1. Set higher targets for social and affordable housing supply for the life of the National Plan.
2. Define 'Well located' housing in terms of three key dimensions: proximity to transport and jobs; access to good amenity and community infrastructure; and the housing's location's capacity to be promote resilience, safety and security in a changing and warming climate.
3. Co-design Government policies and governance measures, especially those for new mandatory inclusionary zoning schemes with councils to ensure Local Government is a genuine partner at the administration and delivery level.
4. Better define affordable rental housing across jurisdictions to bring clarity to expected outcomes based on spatial, demographic and business needs, permanency of provision and the setting affordable and social housing delivery targets
5. Establish and embed the case and priority for providing affordable rental housing for key and essential workers based on proximity to work in the National Plan.
6. Re-engineer the housing assistance system to bring affordable rental housing to scale
7. Enable registered community housing providers to help achieve affordable housing delivery at scale, with support from new reliable and predictable sources of public funding and finance to ensure delivery models and the pipeline of projects achieve this priority over the 10-year life of the Plan.
8. The National Plan develop some precinct relevant metrics (presumably a mix of precinct and regional measures) could help maintain liveability and inclusive communities undergoing urban renewal and growth
9. Ensure annual social and affordable housing infrastructure delivery plans are developed, published and reported on regionally to transparently enable councils to plan, integrate and where appropriate participate and or partner in specific placed-based social and affordable housing infrastructure projects.
10. Consult widely with local government in all jurisdictions and other stakeholders on the future draft National Housing and Homelessness Plan.



4 Conclusion

Thank you for the opportunity to provide a submission regarding the National Housing and Homelessness Plan – Issues Paper.

SSROC member councils cover a large portion of Greater Sydney and have a direct interest in supporting and advocating for changes to improve and sustain place-making, good quality housing and deliver more inclusive communities. Councils play a vital role in delivering infrastructure for their local communities as they grow.

In order to make this submission within the prescribed timeframe, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC. I will contact you further if any issues arise as it is reviewed. If you have any queries, please do not hesitate to contact me or Mark Nutting, SSROC Strategic Planning Manager on 8396 3800.

SSROC looks forward to participating in further National Housing and Homelessness Plan consultations around the draft Plan when it is produced. This will be particularly important, as the National Plan will set out strategies for how all levels of government, including local councils, with the private and community sectors can work together to better support all people being well housed.

Yours faithfully

A handwritten signature in black ink that reads 'Helen Sloan'.

Helen Sloan

Chief Executive Officer

Southern Sydney Regional Organisation of Councils