



**FAITH
HOUSING
ALLIANCE**

National Housing and Homelessness Plan Submission

October 2023



The award-winning Bowden Brae affordable Retirement and Independent Living Village by FHA Member Uniting

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Executive Summary

The current context of Housing and Homelessness in our nation has placed Australia in a **national human rights crisis**.

The infrastructure for, and the investment in, housing and homelessness is an **economic driver**. It must happen now and into the foreseeable future as we are faced with world recession, global wars and increasing cost of living.

“We can start with housing, the sturdiest of footholds for economic mobility. A national housing program would be an anti-poverty effort, human capital investment, community improvement plan, and public health initiative all rolled into one.”

Professor Matthew Desmond
Maurice P. During Professor of Sociology at Princeton University
Principal research investigator of The Eviction Lab

We applaud the government’s initiative to develop a National Housing and Homelessness Plan (The Plan) in consultation with critical stakeholders. Such a plan has been absent, reflected in the complete failure of the current collapsed system and the resulting crisis. It presents an opportunity for a national response to a national crisis as all states and territories are impacted.

Faith Housing Alliance proposes that The Plan paves the way for drastic change to both address the national crisis and help economic recovery.

This submission contains a four-part Strategic Framework for The Plan (Section 3) as a step back from tactics - with **actionable recommendations** under each of these:

1. Governance
2. Housing Supply
3. Housing and Homelessness Services
4. Integrated Planning

Government remains ultimately responsible for fulfilling their role in providing social and affordable rental housing and addressing homelessness.

The role of not-for-profit (NFP) Community Housing Providers (CHPs) including Aboriginal CHPs are critical to the successful delivery of The Plan – the private sector has a role to play in addressing the crisis, however, Faith Housing Alliance believes that NFP CHPs are best equipped to deliver community housing and are regulated to protect the national interest.

The Faith sector has a unique and important role to play in executing The Plan. Faith Housing Alliance represents a significant number of faith-based organisations operating nationally and also State-based organisations. Our sector stands ready to help. It has as a long track record – with the longest history of delivering community housing. It has well positioned land, and other unique assets, including an army of volunteers across the country to help vulnerable people integrate back into their communities.

Introduction

About this submission

Faith Housing Alliance (FHA) welcomes the opportunity to provide input in the early phases of developing the 10-year National Housing and Homelessness Plan (The Plan or National Plan).

Inputs

Our members have contributed their aspirations for The Plan and feedback on the Issues Paper via consultation sessions attended by almost half of FHA's membership. In addition, a literature and evidence review formed the research basis of recommendations reviewed by members. A broader consultation with policy directors from other peak bodies also took place.

Areas of focus

This submission responds to the following focus areas of the seven tactical focus areas outlined in the Issues Paper, aligned with the expertise of our members:

- Homelessness
- Homelessness services
- Social housing
- The importance of planning, zoning, and development

Section 1: The role of the Faith Housing Sector

About us

Faith Housing Alliance (FHA) is the peak body supporting the faith housing sector. Many of our member organisations operate nationally, supporting communities across Australia.

Members – across Christian, Muslim, Jewish and other faith traditions – believe in social justice, compassion, respect, integrity, partnership, and innovation and are united by a common mission.

The faith housing sector includes:

- Faith-based organisations, including Community Housing Providers and Specialist Homelessness Services, many of whom have been providing support to the community for hundreds of years. Just four of these members provided 65% of the homes delivered under the NSW Social and Affordable Housing Fund (SAHF)
- Places of worship across all faiths who want to use their land for housing justice
- Faith leaders of all denominations and religions who see housing as a critical component of social justice
- Any individual, organisation, foundation, or program committed to housing justice, including architects and planners and other professional support organisations.

FHA is committed to partnering with Governments to address the urgent need for more social housing and affordable rental housing, and the vital wrap-around support needed to sustain tenancies and break the cycle of homelessness.

Faith Housing Sector: the “quiet” critical success partner

Placing people at the centre

Our purpose is built on faith-informed beliefs that involve caring for the whole person – body, mind and soul. This approach is founded on giving hope. To see individuals have a strong sense of belonging and to be part of inclusive communities - always working toward housing justice and fair and equitable housing outcomes for all.

Building thriving communities

As a sector, our priorities are not simply contractual requirements and financial imperatives; rather we provide a range of community programs as wrap-around supports as an integrated service response to help people flourish.

Impact through unique assets

We also have unique assets in delivering this support, including places of worship, chaplains, and well-positioned land and properties all over the country. Many of our members have access to countless volunteers who are motivated to offer compassion and support that extends well beyond providing a roof.

Commitment and track record

Our members are some of Australia’s oldest and well-established charities, with a long history of service and expertise. As an example, our member Wesley Mission,

has offered social housing since 1815, built on the site of their first chapel in Sydney, New South Wales.

Benefits of partnering with the Faith Housing Sector

Social and affordable rental housing delivery in partnership with not-for-profit Community Housing Providers (NFP CHPs) has demonstrated various benefits. Faith-based organisations have played a valuable role in developing Australia’s social and affordable rental housing. For example, four of our faith-based member organisations developed 65%¹ of the housing supply delivered under the \$1 billion NSW Social and Affordable Housing Fund (SAHF).²

NSW Example: Potential to unlock underutilised faith-owned land

An initial pilot of a mapping tool, produced with funding from the NSW Community Housing Industry Development Strategy (CHIDS) in the last financial year, identified and conducted initial analysis on 2,434 parcels of land with places of worship located on them across NSW.



The pilot indicates the high potential for partnerships with the faith sector to unlock well-located faith-owned land as a complementary strategy to the NSW Government’s assessment of public land and policy to increase density in areas people want to live.³



The pilot can expand to replicate this data for each State and Territory across Australia.

Due to its relationships, networks and understanding of the faith sector, Faith Housing Alliance is best placed to deliver relevant tools to build the capacity of the faith sector to address the housing crisis in line with its mission.

Section 2: The change imperative

Housing is a precondition to living well. Without access to safe, secure and affordable housing, all other domains of life become inaccessible or are compromised. Addressing homelessness and the housing crisis is central to the security and dignity of all Australians.

A glimpse into the current national crisis:

- 122,494 people experience homelessness in Australia⁴
- 175,000 households are on waiting lists for social housing nationwide⁵, with 645,000 households currently having unmet housing needs⁶
- 1 million low-income households experience financial housing stress, spending more than 30% of their income on housing⁷

The housing crisis in Australia continues to deepen by all measures, in cities and regional areas, and in every State and Territory. The list above highlights people in greatest need who have the least resources and find no affordable options in the private market.⁸

Faith Housing Alliance (FHA) Members call for people most in need to be placed at the centre of The Plan, for their improved outcomes to be prioritised, for first steps to correct generational structural inequalities and for policy and targeted investment to deliver secure housing options that are foundational to living.

Recognising the intent of a National Plan

FHA commends the Federal Government and the Minister for Housing and Homelessness for responding to recommendations from peak bodies to establish a National Plan to meaningfully address homelessness and the housing crisis.

The Issues Paper demonstrates the Albanese Government's intent to "create a shared vision... to help more Australians get safe and affordable housing"⁹ and recognises that diverse housing options will be required.

The Issues Paper highlights the potential in setting national goals and ways to achieve them, asking questions to better understand root causes, the data needed to measure progress, a range of delivery models and the need to consult with various stakeholders, and FHA concurs with this approach.

Section 3: A Strategic Framework

Radical reform requires a strategic framework

A standalone Plan is insufficient; it must sit within a strategic framework. The Issues Paper identifies seven important tactical areas. Still, before delving into tactical siloed areas, the framework in which The Plan will sit must be considered to optimise outcomes and prevent further system failure.

Faith Housing Alliance (FHA) members believe the National Plan presents an opportunity to create fundamental change. Drastic directional change and new thinking is required as current plans, systems, and mechanisms have failed to deliver.

Previous discussion papers, *National Homelessness Strategy (2000)*¹⁰ and *Which Way Home? (2008)*¹¹ list similar issues for action, yet their subsequent strategies have not effected change, contributing to our current crisis.

AHURI outlines an appropriately bold Plan as being able to “shape and create the kind of housing markets we need, promote the right kind of innovation and channel resources to address pressing housing needs. This involves more than fixing market failures and filling the unprofitable gaps in the market.”³⁴

Underpinning the success of a National Plan, FHA calls for the Government to set the Plan within the context of:



Diagram 1. The context for a National Plan.

FHA proposes a strategic framework with four components:

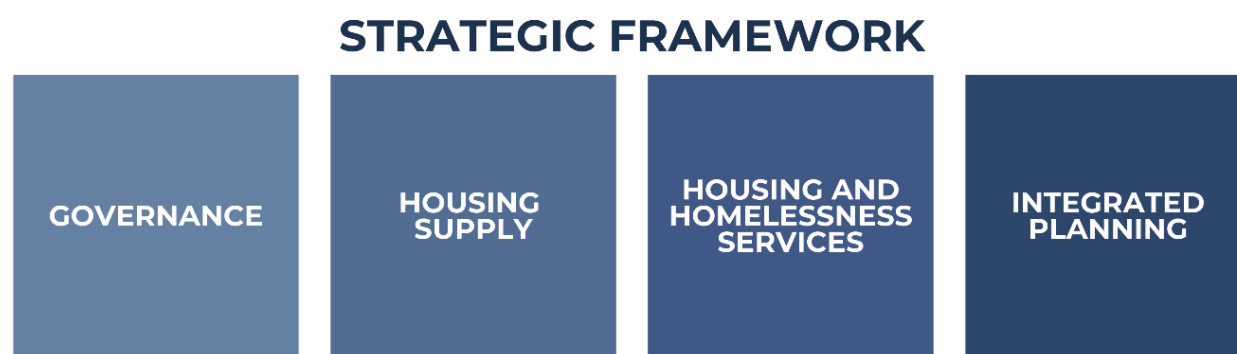


Diagram 2. Strategic framework shaping FHA tactical recommendations.

3.1 Governance

National alignment requires a national mission-oriented strategy and guiding principles

Australia is one of many developed nations wrestling with the challenge of grossly inadequate housing. Housing systems worldwide are increasingly being controlled by people whose primary goal is growing and leveraging capital. The Plan must outline mission-oriented guiding principles to put human flourishing at the centre and to frame strategies within the context of internationally agreed-upon values. Anything less jeopardises Australia’s human rights reputation on the global stage.

Article 11 of the International Covenant of Economic, Social and Cultural Rights (ICESCR) outlines a right to housing in the right to an ‘adequate standard of living’. Australia signed the ICESCR in 1973 and ratified it without reservations in 1975. The provision recognises “the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions”.¹² Similarly, The UN’s Sustainable Development Goal 11.1 outlines: “By 2030, ensure access for all to adequate, safe and affordable housing and basic services...”¹³ The link to poverty as a driver to homelessness and housing insecurity is obvious.¹⁴

Mariana Mazzucato argues that any new economic thinking and policy responses from governments must be grounded in a mission-oriented and human rights-based approach before it can then align collaborators and partnerships.¹⁵

Measurable success requires legislative accountability and capacity

The Plan will guide an array of innovative partnerships, but it is still the Government’s responsibility to ensure adequate housing for its citizens. This requires actively shaping the housing market and not just “tinkering around the edges”.³⁴

Legislation can establish housing as a human right, protecting the right to shelter and human dignity. Similarly, legislation could uphold the principle of homelessness prevention rather than just providing a homelessness response.

Legislation should make provisions for the institutions required to support The Plan and their survival beyond the current electoral cycle.

Provisions could also be made to ensure sufficient funding for contractual outcomes and the requirement for cooperation at all levels of government, along with the bodies accountable for The Plan's oversight and success.

In 2017, Canada's National Housing Strategy (NHS) introduced rights-based legislation to implement the government's commitment to the progressive implementation of the right to housing; the subsequent National Housing Strategy Act was implemented in 2019, requiring all future governments to maintain an NHS.¹⁶ Canada's example provides learnings for Australia's National Plan, including improving accountability through legal recourse and hearings.¹⁷

A national crisis requires national leadership and coordination

The success of The Plan will hinge on the interdependence of all levels of government and on Federal departments, agencies, and regulators to be held to account. Structural reform will require broad, cross-portfolio coordination across areas such as social services, health and aged care, education, immigration, justice, Veterans' and Indigenous affairs and treasury.

Recent precedents of whole-of-government coordination measures to manage a crisis include establishing the National Cabinet in Australia's response to the COVID-19 pandemic¹⁸ and the National Disability Insurance Scheme (NDIS) in developing agreements with states and territories leading to a national rollout supported by the appointment of governance structures, reporting arrangements and monitoring.¹⁹

An international example of effective coordination is Japan's whole-of-government efforts to reduce suicide, shifting responsibility from the Ministry of Health to the Cabinet Office, becoming a shared responsibility of all Ministers. Japan saw a significant and progressive decline in its suicide rate, regularly reviewing its strategies.²⁰

Noting that the interim National Housing Supply and Affordability Council²¹ assembled to advise the Minister for Housing and Homelessness has too narrow a mandate to be considered the equivalent of a National Cabinet or the National Disability Insurance Agency (NDIA).

AHURI's review of international housing strategies shows, "there is a strong lesson about the importance of a dedicated housing agency for leading policy development, coordinating with relevant other agencies, and providing accountability".³⁴

AHURI recommends that Housing Australia could perform the function of lead Agency, if significantly bolstered from its current state – strengthened by legislative powers, increased capacity to deliver policy and with data to support monitoring. "Its roles would include policy coordination across government agencies, as well as research support to the National Housing Supply and Affordability Council, and policy delivery on home ownership products and social housing finance."³⁴

Noting also, the importance of alignment between other National Plans and strategies, including, but not limited to;

- Australia's Disability Strategy²²
- Closing the Gap measures²³
- National Plan to End Violence Against Women and Children²⁴
- National Mental Health and Suicide Prevention Plan²⁵
- National Children's Mental Health and Wellbeing Strategy²⁶
- National Action Plan for the Health of Children and Young People²⁷
- National Framework for Protecting Australia's Children²⁸
- Veteran Transition Strategy²⁹
- National Skills Agreement³⁰
- Aged Care reforms³¹ and other plans as developed.

Key Recommendations – Governance

Recommendation 1: Establish a statutory basis for housing as a human right

- Establishes obligation to conduct the National Plan by human rights principles;
- Commits to end homelessness
- Creates governance structures for Plan accountability
- Requires cooperation and collaboration of key stakeholders
- Underpins sufficient resources and capacity to deliver The Plan

Recommendation 2: Install a dedicated National Housing Agency

- Responsible for Plan oversight and accountability, with sufficient powers to address bottlenecks
- Leads coordinated cross-portfolio approach with Federal agencies and regulators
- Consults and coordinates with State and Territory Governments, shaping agreements to deliver Plan objectives
- Guides and provides recommendations to Local Councils to improve design and quality standards and approval pathways
- Collates and sources relevant data to measure the success of the Plan
- Consults and engages with a wide range of necessary stakeholders, including peaks, industry, Aboriginal and Torres Strait Islander communities, consumers and advocacy groups, among others

Recommendation 3: Strengthen the National Housing Supply and Affordability Council

- Recruits Council members to collectively have an appropriate balance of qualifications, with at least one member from social housing and affordable rental housing, and at least one member from specialist homelessness services, from the community housing providers. We propose the faith housing CHPs or peak offer an excellent resource here.
- Monitors Plan delivery and oversight of the Agency
- Commissions research and evaluates in partnership with industry, consumers and academics

3.2 Housing Supply

Delivering social housing requires consistent investment

Effectively, Australia's social housing system capacity has been cut by more than half since the 1990s. Social housing stock in Australia increased by just 2.6% for 2016-2021, compared to strong household growth of 8.2%.³²

If governments had continued to build at the same average rate as the thirty years before 1985, Australia would have 330,000 extra social housing units today.³³ This would go part of the way to meeting current and future unmet housing needs, with research recommending growing social and affordable rental housing by 950,000 dwellings by 2041,³⁴ including specific targets in regional areas³⁵.

An essential shift following establishing housing as a human right is investing in social housing as critical infrastructure and a resource for the safety and dignity of all Australians. Critical infrastructure requires ongoing investment, which will in turn drive economic productivity and social wellbeing and the potential to contribute to environmental sustainability.³⁶

The passing of the Federal Government's Housing Australia Future Fund (HAFF)³⁷ and the budget provisions to deliver The National Housing Accord³⁸ (The Accord) in partnership with the States is encouraging. It will be essential to bring together different perspectives to develop sound and innovative solutions across the housing continuum for such a large-scale and complex program. Further, a coordinated approach between all the relevant Ministers and their government departments, plus broader stakeholders, is critical to ensure the development and effective implementation of The Accord across States and Territories.

Lack of housing options also means that Australia's homelessness service system provides many expensive short-term solutions and limited access to long-term housing, further entrenching homelessness rather than providing a pathway out. Homelessness significantly impacts the economy's strength and is estimated to have cost NSW \$2.5 billion over six years.³⁹ Maintaining appropriate levels of social housing empowers housing-led solutions to homelessness foundational to a Housing First approach.

Effective affordable rental housing requires good governance

In addition to social housing, providing affordable rental housing is an integral part of the housing mix needed to address the current crisis. Providing low-cost housing, capped at 30% of very low/low to medium household income, is important to ensure households are not experiencing financial housing stress.

Compelling international examples of establishing provisions to govern and expand affordable rental housing include Austria and Finland. Austria's national legislation, The Limited Profit Housing Act (1946), helped to establish good business practices and auditing while ensuring value for money for tenants⁴⁰. Finland's Housing Finance and Development Agency is a dedicated Agency with an affordable housing finance function. This Agency collaborated with municipalities to unlock municipal land contributions and invest in transport

infrastructure to promote local affordability and deliver a greater share of well-located not-for-profit housing⁴¹.

Without a clear definition, active governance and provisions in the legislation, affordable housing may not be affordable to the very low/low to medium income households it purports to serve. Affordable rental housing would be best managed by registered CHPs, ensuring any 'profits' are reinvested in housing and homelessness solutions, maximising the investment in this form of housing.

In addition, AHURI suggests, "alternate programs such as NRAS, head leasing and rental brokerage programs can help to generate affordable supply from existing stock".⁴²

The role of NFP CHPs is critical in the delivery of the plan

Social housing is currently delivered by a combination of government, Aboriginal CHPs and NFP CHPs. While government remains ultimately responsible for fulfilling their role in providing social housing and addressing the national homelessness crisis, FHA believes that NFP CHPs are best equipped and regulated to deliver community housing in the national interest.

NFP CHPs are regulated in terms of the **Community Housing Provider Act 2012** and must be registered with the **Registrar of Community Housing**, who regulates CHPs. In addition, the **National Regulatory Code** sets out performance requirements in terms of the National Law for CHPS, on areas including tenant and housing services, governance, probity etc. Tenants also have recourse to the Housing Appeals Committee for complaints and appeals processes.

In rapidly scaling up supply, the private sector and superannuation funds have a role to play in supporting NFP CHPs in their role to deliver social housing on behalf of the Australian Government. This may include financing and development support to NFP CHPs. In contrast to NFP CHPs, the private sector is constrained by shareholder expectations and fiduciary duties.

A key goal for the Plan should be to explore preserving the role of regulated NFP CHPs in legislation to protect the national interest.

Addressing housing supply requires taxation reform

Treasury and regulators also affect housing policy, and a comprehensive plan to address the national crisis must consider all levers.

Australia's current tax policy adds inflationary pressure to the price of housing and disproportionately benefits higher-income households. Establishing a human rights foundation to the Plan highlights the disparity between a mission-oriented approach and current tax settings which commodify housing as a wealth generation tool.

A key goal for the Plan should be to explore taxation settings, in particular for capital gains tax and negative gearing, to prioritise long-term housing outcomes.

Key Recommendations - Housing Supply

Recommendation 4: Rapidly scale up the supply of Social Housing

- Target: Social housing to be 10% of housing stock by 2050, with an interim goal of meeting the OECD average of 7% by the end of the 10-year Plan period. Noting dependencies of funding, skills and labour shortages, and construction materials.⁴³
- Facilitates the delivery of housing-led approaches to end homelessness, helping to shift from crisis orientation to homelessness prevention

Recommendation 5: Increase supply of Affordable Rental Housing

- Establish a clear definition of 'affordable rental housing' and capture data to establish the number of affordable rental dwellings, need and the gap between supply and demand
- Preserve affordable housing status of homes in perpetuity to ensure the value of any investment

Recommendation 6: Deliver taxation reform aimed at affordability and supply

- Explore all forms of tax reforms and incentives to escalate supply and in line with the Plan's mission-oriented goals, including (but not limited to) a review of Negative gearing, Capital Gains Tax, Vacancy taxes (including for short stay rentals and foreign owned vacant homes)⁴⁴

Recommendation 7: Strengthen the role of Not-for-Profit Community Housing Providers

- Explore legislating the role of NFP CHPs in delivering community housing
- Explore optimal mix of housing delivery role in terms of government vs NFP CHPs
- Create an industry development strategy to support the growth of a robust not-for-profit community housing industry
- All States and Territories to become part of the National Regulatory System for Community Housing (NRSCH),⁴⁵ to support Plan accountability and measurement

3.3 Housing and Homelessness Services

Improving housing security requires investment in wrap-around supports

Research has shown the critical importance of combining safe and secure housing with ongoing support to improve wellbeing and deliver sustainable solutions to end homelessness.⁴⁶ Housing First approaches that harness rapid rehousing and wrap-around supports are recognised as the most successful model to end homelessness for people with high support needs.⁴⁷

NSW made a long-term provision for wrap-around support in its Social and Affordable Housing Fund (SAHF), with early indications of encouraging improvements for vulnerable tenants.

Social and affordable housing delivery models which pair the provision of a safe and secure dwelling with ongoing support are known to provide notable societal

savings, including reduced health, justice, and other costs associated with homelessness.

A study by FHA member, BaptistCare, suggests a three-fold social return on investment (including a range of health, wellbeing, economic, employment and other social benefits) for safe and secure living combined with wrap-around tenant support services provided as part of their faith-based delivery model.³²

Similarly, a study by FHA member, Anglicare, found that participation in wrap-around tenant services which include community activities offered within the broader faith-based organisation offering (i.e., beyond the CHP) helps to establish a strong foundation for engagement, inclusion, friendship, and wider community reintegration.⁴⁸

Preventing homelessness requires adequate funding for services

Specialist homelessness services do not have the resources to respond to everyone who needs help, leading to missed opportunities for prevention and re-entry to homelessness, whilst creating significant costs and pressures on acute health, child protection and justice systems.⁴⁹

Key Recommendations – Housing and Homelessness Services

Recommendation 8: Ensure extended wrap-around supports to keep people housed

- Fund for long-term wrap-around supports to be included in all agreements
- Provide multi-level support packages, including high-level (intensive) supports to be tailored to tenant needs
- Implement a Housing-First approach with intensive wrap-around supports as a core response for people with complex needs

Recommendation 9: Adequately fund homelessness services to meet demand

- Commit to fund the National Housing and Homelessness Agreement at \$100 million pa. for the next ten years (indexed at CPI) – this must cover wages and staffing costs as set out in the Equal Remuneration Order
- Increase contract terms to five years to support workforce and human resource capacity of specialist homelessness services, an important measure in delivering improved services

3.4 Integrated Planning

Delivering housing at speed requires an integrated approach

Planning is an essential lever to have any hope of meeting The Accord target of '1 million new, well-located homes'. Better planning systems are needed to support the efficient rollout of all new social housing and affordable rental housing under the Plan and to meet the timeframes within its 10-year scope.

The Planning Institute Australia recommends an integrated planning process to “reduce infrastructure outlays, utilise space capacity and concentrate activity near clusters of services and transport choices.”³³

In the context of the Plan, an integrated planning pathway could support coordination and consistency at all levels of government with the aim of speeding

up delivery of social and affordable rental housing while achieving good design, diverse housing forms and sustained tenancies.

As recommended by National Shelter, “such strategies could include enabling co-design of common base models which can be tailored to suit the needs of individual jurisdictions, co-funding policy design work or offering matched funding for trial initiatives and exploring opportunities to streamline access to State/Territory owned land and planning approval pathways.”⁵⁰

Unlocking land requires an innovative planning approach

New South Wales as an example

States and Territories have a diverse range of planning laws, with most local planning controls and decision making delegated to local governments. It is important for States and Territories to intervene where necessary to ensure that appropriate land resources can be efficiently developed for the purpose of social or affordable housing. In Victoria such controls are known as the Victorian Planning Provisions. In NSW, State environmental planning policy (SEPP) is a legal document that has the capacity to override or replace local environmental plans (LEPs) and applies across the State.

This means that SEPPs can: establish that certain types of development are permissible; and set development standards, even when these measures are not supported by local councils.



Diagram 3. NSW planning provisions

The following table provides precedents where the NSW Government has created a SEPP to facilitate efficient delivery of important types of development. Similar policies apply in other jurisdictions:

Provision for:	Relevant SEPP:
Schools	State Environmental Planning Policy (Transport and Infrastructure) 2021
Boarding houses, Build-to-rent housing, Senior's housing, Group homes, Secondary dwellings, Social and affordable housing	State Environmental Planning Policy (Housing) 2021
Dwelling houses, Dual occupancies, Recreational facilities (indoor), Entertainment facilities, Subdivisions	State Environmental Planning Policy (Exempt and Complying Development Codes) 2008

The case for a Faith SEPP (as a Chapter of the Housing SEPP)

In NSW a significant portion of places of worship sites are zoned SP1 Special Activities or SP2 Infrastructure which effectively prohibits almost all kinds of developments aside from being a 'Place of Public Worship' under a LEP.

This is a challenge because it prevents faith communities from actively seeking to meet the housing and or social needs of their communities.

Any developments other than for places of worship require a Planning Proposal costing \$100,000s and often up to two years to be adopted.

Local Council's cannot be relied upon to rezone Places of Worship or adopt clauses to allow for community housing developments that are compatible with surrounding land uses e.g., Clause 5.3 (NSW)

The Californian Precedent

California lawmakers have passed a bill that aims to give churches and colleges [universities] the right to develop affordable housing on their own property, bypassing local restrictions that currently prevent apartments from being built on empty parking lots and underutilised land.

The Bill⁵¹ allows non-for-profit higher education institutions and faith organisations to develop 100% affordable housing projects "by right." That means they could side-step lengthy, expensive and uncertain reviews imposed by local governments that often oppose such projects. The bill passed the State Assembly in October 2023 and cleared a final vote in the state Senate, with only two senators voting no.

National coordination requires engagement with Local Councils

There are many examples where well-resourced local councils have made great contributions to the improvements in the design and development of social and affordable rental dwellings. It is important that any National oversight and planning reforms continue to consult local authorities to garner their support and reap the benefits of their local knowledge and planning expertise.

Maximising investment requires national alignment with mission-oriented principles

Research shows that a lack of clarity around the role of local government authorities (LGAs) in addressing homelessness has played a marked role in an uncoordinated response to homelessness.⁵² For example, Section 7.11 (NSW) developer contribution waivers are inconsistently applied to NFP CHPs in different LGAs. These contributions can be a significant proportion of the development cost and are often applied in the same way to large commercial developers and NFP CHPs alike, which does not support their mission to provide community housing. It should not be a case on 'one size fits all'.

For example, a \$1.18 million Section 7.11 (NSW) contribution was to be levied on a \$13.8 million social and affordable housing development in NSW by an FHA member CHP, before it was challenged and eventually overturned by Council⁵³. Other concerns at the local planning level include the risk of conversion of social and affordable rental properties in new developments (in terms of inclusionary zoning requirements) back to market levels after an initial period of compliance.

The Plan's capacity for national leadership could develop a national policy framework for developing and delivering inclusionary zoning to boost supply, considering the balance between mandatory and voluntary incentives and noting also international examples of where inclusionary zoning has helped to provide social and affordable housing outcomes at scale.⁵⁴

Key Recommendations - Integrated Planning

Recommendation 10: Establish an integrated planning pathway

- Proposed National Housing Agency to spearhead coordination with State/Territory and Local governments to reduce cost complexity, delay and planning risk
- Develop policy framework for inclusionary zoning to boost supply
- Simplified/streamlined development assessment criteria for diverse housing types

Recommendation 11: Implement innovative measures to unlock faith-owned land for housing

- Develop planning controls to facilitate conversion of places of worship to include social and affordable housing (such as a specific chapter in the NSW Housing SEPP to unlock land zoned as 'Places of Worship' as detailed above
- Exemptions (or reductions) from assessment fees and charges for social and community housing projects
- Explore relaxed parking ratios to unlock well-located faith-owned land

Recommendation 12: Implement design quality standards and support innovation

- Foster good design, sustainability and accessibility
 - o Apply the Livable Housing Design Standard (gold) to any housing built under the Accord and any future government-funded or incentivised housing to improve accessibility
 - o Amend the National Construction Code to include the Livable Housing Design Standard (silver) to improve accessibility
- Allow and facilitate diverse building types for rapid housing supply e.g. Prefab and modular
- Develop models of inclusive renewal to ensure place-based outcomes

Section 4: Shared Recommendations

FHA is working to ensure access to safe, healthy and secure affordable rental housing for all.

FHA policy positions also reflect the close collaboration between FHA member organisations with their own policy teams and our National and NSW Housing and Homelessness peak partners. These shared goals are listed in the following section and are reflective of the close collaboration between the peak partners and the collective goals that we share.

Member submissions

We commend to you the independent submissions by our members: Shelter NSW, St Vincent de Paul Society – Vinnies NSW and Wesley Mission.

Peak body submissions

We refer you to submissions from our colleagues and prominent peak bodies: ACOSS, CHIA and National Shelter (joint), Homelessness NSW, NCOSS, PDWA.

Additional Recommendations

Additional work to support the development of The Plan

The submissions process is just the beginning of the engagement that peaks would like to see to support the development of the National Plan. Additional opportunities to engage include:

- A nationwide analysis of housing needs to inform the location of new homes
- Think tanks to explore lessons from recent international experience
- Establishing clear and specific plans for how social and affordable rental housing to be delivered under the Housing Australia Future Fund (HAFF) and National Housing Accord (the Accord) will be delivered
- Stronger engagement with peak and industry organisations like Faith Housing Alliance

General Measures

- Establishment of a national social and affordable housing regulatory system
- Funded responses to address unmet housing needs in regional, rural and remote communities in collaboration with State and Territory governments
- Increased assistance for low to moderate-income households to enter home ownership

Clarification of definitions

Review of current definitions and terms used in the Plan such as:

- Homelessness: the current statistical definition of the Australian Bureau of Statistics⁵⁵ or the United Nations definition 'not having stable, safe and adequate housing, nor the means and ability to obtain it'.⁵⁶
- Affordable Housing to be clarified as Affordable Rental Housing, and further defined⁵⁷
- Other key terms such as: Housing Need, Adequate Housing and others.⁵⁸

Supporting Community Housing Providers

- State/Territory governments to create more efficient processes and to
 - o Enable co-design of common base models
 - o Co-funding policy design work
 - o Offering matched funding for trial initiatives
 - o Exploring opportunities to streamline access to land and planning approval pathways
 - o Tendering pre-qualification schemes to reduce cost and time invested in bids

Income support

- Reform of income support and Commonwealth Rent Assistance payments to create a closer link to housing costs
- FHA supports ACOSS led calls to 'Raise the Rate' of Jobseeker and other income support payments to at least \$78 a day to prevent homelessness and lift people out of poverty

Aboriginal Housing

- More social housing and incentives for the development of affordable rentals designed to meet the specific needs of Aboriginal people, families and communities to meet Closing the Gap target 9A: 'By 2031, increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88 per cent'.

Specialist Disability Accommodation

- Deliver a targeted housing action plan for people with disability as a priority group
- Implement a transition plan to move from institutional care to more individualised living arrangements improving wellbeing, independence, choice and control⁵⁹

Protecting Tenants' Rights

Tenancy law reform to improve renter's rights and conditions informed by the nine principles identified by the National Association of Renter's Organisations:

- Better protections against no-cause evictions
- Fair Limits on rent increases
- Safe, accessible and healthy homes for renters
- Better enforcement and accountability of rental laws
- Bonds lodged with an independent authority
- Protection of private information and from unlawful discrimination
- Appropriate protections for renters not covered by residential tenancies legislation
- Access to free advice, assistance and advocacy for renters
- Collect and make publicly available data to review progress and shape policy

Energy and the impact of climate change

- Support for existing social housing to be climate change ready and implementation of a national climate change home retrofit strategy
- Healthy homes meeting energy, condition and amenity standards

Conclusion

Faith Housing Alliance is grateful for the opportunity to contribute to the development of a National Housing and Homelessness Plan, in the face of this national human rights crisis and the opportunity it offers to help economic recovery which is desperately needed.

The Issues Paper provided proposed seven topics. These are important, but we propose that this is an opportunity for radical change – more of the same will NOT be able to deliver a turn-around of current system failure.

Indeed, to successfully address this national crisis requires a step back from the tactics of a solutions-based plan, to conduct a radical rethink for a Housing and Homelessness Strategic Framework including governance and accountability, within which such a Plan would be situated.

Our submission lays out a **comprehensive Strategic Framework** for The Plan with **actionable recommendations** under each of these:

STRATEGIC FRAMEWORK

GOVERNANCE	Recommendation 1: Establish a statutory basis for housing as a human right Recommendation 2: Install a dedicated National Housing Agency Recommendation 3: Strengthen the National Housing Supply and Affordability Council
HOUSING SUPPLY	Recommendation 4: Rapidly scale up the supply of Social Housing Recommendation 5: Increase supply of Affordable Rental Housing Recommendation 6: Deliver taxation reform aimed at affordability and supply Recommendation 7: Strengthen the role of Not-for-Profit Community Housing Providers
HOUSING AND HOMELESSNESS SERVICES	Recommendation 8: Ensure extended wrap-around supports to keep people housed Recommendation 9: Adequately fund homelessness services to meet demand
INTEGRATED PLANNING	Recommendation 10: Establish an integrated planning pathway Recommendation 11: Implement innovative measures to unlock faith-owned land for housing Recommendation 12: Implement design quality standards and support innovation

Diagram 4. Overview of Strategic Framework and recommendations.

Faith Housing Alliance stands ready to support this work. Many of its members operate nationally, have a long history and successful track record as for purpose Not-For-Profits. As the faith housing sector, they hold unique assets which distinguish them as community housing providers and social justice organisations, for partnership.

If you wish to discuss this submission, please contact Amanda Bailey, Head of Communications and Engagement

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Faith in action – Housing for all



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This submission is made with the support of the following members:



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