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Submission to Department of Family and Community Services on Social Housing in NSW: A discussion paper for input and comment

The Illawarra Forum operates across the regions of Wollongong, Shellharbour, Kiama and Nowra. We welcome the opportunity to contribute to the discussion into social housing in NSW, as the issue of safe, affordable and secure housing affects the service delivery of most of our member organisations.

This submission has been prepared following consultations with Illawarra Forum members.

About the Illawarra Forum

The Illawarra Forum, established in 1990, is the peak body working for community services and organisations in the Illawarra and the Shoalhaven. It supports community organisations, promotes expertise and innovation in community development, fosters industry development and provides advocacy for social justice. The Illawarra Forum is an independent organisation governed by a committee of management elected annually by the membership.

The Illawarra Forum represents the non-government community services industry in the Illawarra and Shoalhaven, which consists of approximately 300 organisations which provide support to vulnerable people across the region including:

- Social housing providers
- Homelessness services
- Home and community care services
- People with disability
- Individuals and families with multiple layers of social and financial disadvantage
- Victims of domestic violence and sexual assault
- Youth work programs
- Community health services, including mental health and drug/alcohol services
- Community legal centre services
- Community development and community capacity building programs.

The Illawarra and Shoalhaven regions are areas of particular vulnerability and social and locational disadvantage, with high levels of unemployment including youth unemployment which is above the national average (15.6% in December 2014 against a national average of 13.1%)¹. The region suffers with a vulnerable economy, dependent for much of its history on two key industries; steel manufacturing and coal mining, both of which have been in a state of decline for some time. In addition, newly arrived and refugee families, and local Aboriginal communities contribute to the complexity of housing need in the Illawarra and Shoalhaven. This regional disadvantage has impacted on affordable, secure and safe housing.

Through our role as the Voice, Influence and Leader of the community services industry, the Illawarra Forum has worked to improve housing security and availability in the region. Activities include making a submission to NSW Legislative Council Select Committee on Social Public and Affordable Housing in 2014, and subsequently appearing as witnesses to the Inquiry, an Issues Paper on Homelessness (Illawarra Forum, 2012), a Fact Sheet on Social Housing (Illawarra Forum, 2009), the establishment of a Social Housing Forum through the South East/Illawarra Tenant Participation Resource Service, and training for generalist NGOs on housing strategies.

General Comments

The Illawarra Forum welcomes the principles on which the discussion paper is based, and acknowledges the values of the pillars as set out in the paper.

The Minister's foreword includes the statement "Until now, success has been measured by sustaining tenancies, not by improving outcomes". A shift towards improving outcomes for social housing tenants is a policy direction which would be strongly supported by the Illawarra Forum and our members. However, such a shift can only be supported by the provision of wrap-around services, which would require an alignment of policies across a range of NSW portfolios including Health, Community Services, Transport, Police, Education and Communities, State Revenue and others.

Policy decisions made by other departments impact strongly on social housing, some examples being the recommendations under the Richmond Report², changes to disability service provision under NDIS³ etc. A truly supportive direction which would provide opportunities and improve outcomes would ideally be underpinned by a whole of government approach which would also see the alignment of Federal Government policies to ensure outcomes are achieved.

Only through policy alignment can the necessary strengthening of products and services that connect tenants with employment, education, training and other community engagements be sustained.

We further note that the transition from a 'housing-for-life' attitude to a 'safety net when needed' and 'pathway to independence' approach will take time to be adopted and implemented. While such a direction is progressive and significant, it is important that social housing tenants are not made to feel threatened or at risk of homelessness, during the period of change and new direction.

¹ Australian Bureau of Statistics (ABS) labour force participation statistics

http://lmip.gov.au/default.aspx?LMIP/LFR_SAFOUR/NSW/Illawarra

² Richmond Report <http://nswmentalhealthcommission.com.au/node/1521>

³ NDIS <http://www.ndis.gov.au/>

Importantly, it must be recognised that for some people, housing independence is an unrealistic dream and social housing will still remain the only viable option for housing throughout their life.

This is implicit within some of the data cited in the discussion paper, e.g. “...*Of households relying on government benefits, over two thirds are supported by the Age or Disability Support Pensions*”. Clearly these people will continue to be reliant on Government-provided housing, either through Housing NSW products, or those offered by Community Housing providers. In these instances, quality of life for people in social housing should be addressed, as in this case the ‘pathway for client independence’ might be through improvement in their quality of life within the social housing system.

Furthermore, the discussion paper fails to recognise the role of Community Housing providers in housing and supporting vulnerable people, and of their importance in the social housing delivery context. There was very little mention of their role in the future and how they might support the department’s policy direction.

The Illawarra Forum is strongly supportive of Community Housing, and commends the exploration of the many successful models of community housing provision, and of increasing their role in providing housing for vulnerable people by stock transfer and by enabling them to expand their portfolios by leveraging assets to build new homes.

The concept of transitioning out of social housing, while laudable for those tenants who are capable of maintaining a residential tenancy, is limited by the availability of appropriate affordable private rental properties.

Rental affordability in the Illawarra region is a major issue, and there are minimal properties available which would be affordable to those members of our community who earn the least income – Commonwealth benefit recipients and minimum wage earners.

The *Anglicare Australia 2014 Rental Affordability Snapshot* indicates that in the Illawarra, Shoalhaven, and Southern Highlands (classified by Anglicare as the Illawarra Region), only between 4% and 5% of all available rental properties could be classified as affordable to the cohort of minimal income earners. For example, only 199 properties out of 1037 available were affordable and appropriate for families with more than one child⁴. The lack of appropriate private tenancies means that competition for properties is intense, and the most vulnerable people, including those on Commonwealth benefits, will be less likely to obtain appropriate private rental properties.

Many of the affordable properties have major issues of transport accessibility, being located in outlying areas which are difficult to access by public transport. The Illawarra and Shoalhaven covers approximately 5784 square kilometres along the south east coast of New South Wales. The region is extremely diverse, with urban centres such as Wollongong City (NSW’s third largest city), Shellharbour City, and Nowra; large suburban sprawl, many outlying villages, and rural areas. The diversity of settlement and the vast distances has resulted in many people in the Illawarra and Shoalhaven experience geographic and social isolation.

⁴ Anglicare Australia 2014 Rental Affordability Snapshot
http://www.anglicare.asn.au/site/rental_affordability_snapshot.php

Transport disadvantage is a significant issue throughout much of the Illawarra, and in particular in suburbs with low socio-economic indicators, such as Port Kembla, Warrawong, Warilla, Albion Park, Bomaderry, Nowra, Ulladulla, and the Bay & Basin area. The lack of viable transport prevents disadvantaged people from taking advantage of educational opportunities and training including work experience and apprenticeships.

We strongly recommend that any policy which encourages a transition to private rental be aligned with transport policies which enable access to appropriate and affordable public transport, and which enable disadvantaged people to take advantage of education, training, and employment opportunities, as well as to participate in social and community events; which will reduce social isolation and the incidence and severity of mental illness.

Participants also expressed concerns that NSW is behind other states in achieving a transfer of 35% of social housing stock to community housing, in accordance with the National Housing Agreement.

Pillar 1: A social housing system that provides opportunity and pathways for client independence

Pillar one reflects both the goals of most not for profit community service providers, but also goal 13 of the NSW 2021 State Plan to “Better protect the most vulnerable members of our community and break the cycle of disadvantage”⁵. However, it must be recognised that housing is a primary human need and secure housing is often the very basis for improving client outcomes. Many people who are currently living in social housing face complex issues and pressures; and often tenants are doing well *because* they have a secure roof over their head and can therefore turn their attention to addressing other issues.

Independence is a relative concept, and the ability to live independently will vary from person to person. For true equality of independence to exist, we must ensure equity of outcomes, not just equity of opportunity; and that will mean resources and supports must be tailored to each individual client.

A social housing system that provides opportunity and pathways for client independence will also recognise that all social housing tenants are not equal, that their needs are often diverse and complex; and that many face multiple issues such as mental illness, drug and/or alcohol addiction issues, domestic violence and family breakdown.

We recommend that Housing NSW take a person-centred approach so that each client will receive the appropriate inputs and measurements for improved outcomes.

The value of early intervention and suitable education cannot be emphasised enough in creating opportunities and pathways to independence for social housing tenants. Early intervention can support family units and assist individuals to build their self-esteem and capacity to participate in education. It is very important that education and training for individuals is suitable and relevant and is offered in an accessible manner.

⁵ NSW 2021 https://www.nsw.gov.au/sites/default/files/initiatives/nsw_2021_goals.pdf

Ageing in place, combined with person centred practice is an excellent pathway to client independence as through home care, home modifications etc. our older population are encouraged to stay in their own home and community. For example, a client-driven approach to the housing needs of an older couple, one of whom has a disability, might lead to a suite of interventions across agencies, such as HACC services, NDIS funded interventions and social and respite support services. In many situations, an integrated case-management approach is required, which would also enable better utilisation of services available in HNSW, and across other community-based housing providers.

Within this pillar, the discussion paper states: “... *social housing tenants report lower educational achievement, high levels of unemployment, poorer health and higher rates of mental illness than the NSW average.*” This statement supports a very good argument for proven practice initiatives such as a client-driven approach, wrap around services, and integrated case-management. Such initiatives require a fundamental shift in interagency, interdepartmental and cross jurisdiction collaboration. They are predicated on effective policy and practice across a range of sectors and policy areas, such as mental health care and crisis support, policing and justice, transport and community safety. Integrated policies help ensure that opportunity and pathways for client independence are identified and managed across policy areas and funding streams.

Any interagency model must also value the not for profit community sector as a partner in service delivery, and a key player in providing the necessary supports and interventions to transition tenants to independence. Indeed we note that the case studies included in the discussion paper incorporate a range of supports including case workers, housing support workers, and health outreach workers.

The Shellharbour Better Futures Local Solutions program is a good example of using an interagency approach to address complex issues. Like many social housing tenants, a large percentage of the participants in this program suffered multiple disadvantages including low educational attainment, mental health issues, relationship violence, and family dysfunction. The Federal government funded a very successful interagency project to target participants and promote partnerships with multiple community organisations to provide a range of tailored supports.

An interagency, interdepartmental and cross jurisdiction approach to collaboration is also supported by the research into mental health and employment conducted by the Department of Employment as part of the Council of Australian Governments’ (COAG) National Action Plan on Mental Health 2006-2011 which highlights the importance of support and assistance for people with mental health issues in dealing with anxiety and depression while in employment and stressed the importance of whole of community support.⁶ Such research is highly relevant to the social housing context as many social housing tenants live with mental illness.

Another area which must be addressed in order for clients to successfully transition out of social housing is the impetus to move out of social housing if income from employment is sustained for six months. Our members were concerned that the current system discourages

⁶ Council of Australian Governments research into mental health and employment
<https://employment.gov.au/council-australian-governments-research-mental-health-and-employment>

casual work because if someone earns too much in a 6 month period, they become ineligible for social housing.

This is particularly harmful for people living with mental illness which is episodic in nature. We recommend that social housing tenants who attain employment be supported to remain in social housing for a minimum two years.

This will enable them to solidify their position, and give them time to prepare to transition into the private rental market, or into home ownership. In addition, there should be opportunity for transitioning tenants to re-enter public housing should their employment cease, or their private sector rental fail - as opposed to being back at the bottom of the list again if things don't work out.

Another way to support successful transition into independence and to secure the future for vulnerable people living in private tenancies would be the removal of 'without grounds' notices of termination. Currently if a tenant receives a 'without grounds' notice, they are not entitled to know why the landlord wants to end the tenancy. This leaves tenants open to unfair termination and discrimination.

Furthermore, the NSW Civil and Administrative Tribunal (NCAT) must terminate a tenancy after a landlord applies for a termination following a 'without grounds' notice, no matter what the circumstances, or what hardship it would cause to the tenant.

We recommend that the provision for 'without grounds' notices be removed and that tenancies can only be terminated when there are reasonable grounds, such as breach of residential tenancy agreement, or if there is good reason why vacant possession is required.

We also recommend that the Residential Tenancies Act be amended to so that tenants who are outside the fixed term of their tenancy cannot be subject to excessive rent increases. As the Tenants' Union of NSW point out "NSW is the only state or territory with no limit on the frequency of rent increases during periodic agreements"⁷.

Finally in terms of the physical planning for social housing into the future, the Illawarra Forum supports the development of housing designs that promote flexible living arrangements and supports community cohesion. The Port Phillip Housing Association⁸ in Melbourne, for example, provides a model for low cost social housing development that promotes quality of life and safety through community networks. This would include examining examples of innovative approaches to improving access to more affordable housing such as rent-control regulations as in San Francisco and New York in the United States, not-for-profit housing companies (social enterprises)⁹, housing models which encourage community-building and quality of life¹⁰ and best practice models for community housing organisation and collaboration.¹¹

⁷ van Reyk, P. for Tenants' Union of NSW (2015). 'Rental Reform for Housing Justice' in *Inner Sydney Voice*, Autumn 20 15 www.innersydneyvoice.org.au

⁸ PPHA - Port Phillip Housing Association <http://www.ppha.org.au>

⁹ See, for example, Community Housing Ltd in Victoria (www.chl.org.au/)

¹⁰ Examples of these can be found in Victoria. An example of a private initiative is the UK-based Places for People (www.placesforpeople.co.uk/)

¹¹ For example, the Scottish Federation of Housing Associations (www.sfha.co.uk/), or the Community Housing federations of NSW (www.communityhousing.org.au/) and Victoria (www.chfv.org.au/).

Recommendations:

- Adopt an interagency, interdepartmental and cross jurisdiction approach to collaboration which includes alignment of policies across NSW government portfolios.
- Ensure that transition out of social housing is supported by transport policies which support people to access education, employment opportunities, and support services – especially in regional and remote NSW areas which are particularly vulnerable to transport disadvantage.
- Housing NSW to take a person-centred approach so that each client will receive the appropriate inputs and measurements for improved outcomes.
- Provide wrap around services to assist people to be independent.
- Explore Community Housing models and ways to increase their offerings and maximise to Commonwealth rental subsidies, including stock transfer.
- Adopt the recommendations by the Select Committee on Social, Public and Affordable Housing, that the NSW Government should establish an advisory council to report to the responsible Minister for Housing involving representatives from key government agencies, not-for-profit organisations, industry bodies and associations, academics and other housing experts.
- Coordinate responses to complex needs across Commonwealth and NSW government jurisdictions.
- Integrate housing strategies across government jurisdictions, including supporting mixed housing developments which include community housing properties, privately owned properties and social housing properties to address the stigma of living in social housing.
- Adopt supported housing accommodation models such as the Mind Australia¹² model in South Australia where people with mental health issues are supported to live in social housing.
- Support transition into the private rental market or home ownership for a minimum of two years with opportunity to re-enter entry into public housing if things don't work out.
- Removal of provision for 'without grounds' notices.
- Residential Tenancies Act to be amended to so that tenants who are outside the fixed term of their tenancy cannot be subject to excessive rent increases.
- Develop integrated housing models which provide low cost social housing which promotes quality of life and safety through community networks.
- Provide access to suitable and relevant education by ensuring education providers such as TAFE are funded appropriately to deliver courses on an outreach basis in the community.
- Examine innovative approaches to improving access to more affordable housing both in Australia and overseas.

Pillar 2: A social housing system that is fair

We note that the discussion paper states that *“approximately 40% of three and four bedroom dwellings appear underutilised. At the same time, 11% of one and two bedroom dwellings are potentially over-occupied”*. Across the Illawarra there is a significant

¹² Mind <http://www.mindaustralia.org.au>

proportion of eligible applicants who require single-person housing and there is a serious lack of this type of housing in the Illawarra.

The Illawarra Forum is concerned by any recommendation that suggests a 'bedroom tax' be implemented, or compulsory relocation be instituted as a solution. We highlight the economic and social advantages of keeping people in their own communities of support.

The provision of appropriate housing types to meet client needs would be assisted through closer alignment with demographic data and portfolio management. At present, demographic data resides in NSW Family and Community Services while the portfolio management imperative is with Land and Housing Corporation. We recommend an alignment between the two agencies to better plan for the future housing needs of the state.

There is a strong perception among participants in our discussion groups that NSW housing pathways are limited due to inefficient and outdated Information Technology systems which drive responses that are inconsistent with needs of people requiring affordable housing in the Illawarra. We recommend investment in appropriate Information Technology systems in order to improve the experience of tenants and of those on the waiting list.

Participants also raised concern about former tenants, particularly those people who are evicted from social housing due to poor behaviour. This may often result in a large debt to Housing NSW or to a Community Housing provider, which prevents their re-entry to social housing. This could be addressed by actively working with tenants to ensure they know the long-term consequences of their actions, to address complex issues such as mental illness or addiction which may lead to the behavioural problems, or by enabling people to work off debts through the Work Development Order scheme.

As an example, we cite the case study of a former social housing tenant who was evicted after causing serious damage to his Housing NSW property. He was subsequently found to have been living with undiagnosed schizophrenia. He has now been diagnosed and a medication management plan in place to treat his mental illness. He will need to manage his illness throughout his life, and is unlikely to be able to work in order to pay off his debt. However, he is ineligible for social housing because of his previously incurred debt.

We are further concerned that people who currently are on the waiting list for social housing are being penalised if they fail to respond within a specified time frame to contact from Housing NSW. Many people who are on the social housing waiting list don't have a permanent address or consistent contact details. Because they have no permanent address, often they 'couch surf' or stay at hostels which prevents them being contacted in a timely fashion. While many have a mobile phone, they often change numbers and miss the deadline to respond, which may result in them being taken off the waiting list. We recognise there are exceptions for those in jail or a mental health facility are concerned, however this is a punitive measure and we recommend the policy be reviewed.

Another policy which needs to be reviewed is the 'succession of tenancy' arrangement, for example in situations where the child of a tenant is nearing adulthood when a parent dies. If succession is not possible, then a transition period should be granted to allow the person time to find somewhere else to live

There is a great deal of concern about choice-based letting as it is a system which discriminates against people who are not able to represent themselves. Such as system

would also reverse the onus and would seem to contradict the policy of accepting one of two offers.

Similarly, the Illawarra Forum does not agree with rent models which differentiate access to properties in highly sought after areas. These areas are often those with greater access to transport, education and employment opportunities. Such a policy would therefore force people to choose between their capacity to pay and their capacity to improve their future and/or that of their children.

We do however agree with investigating the possibility of tenants having more of an input into where they would like to live as this could improve their access to family and community supports and maximise their access to transport, schools and other facilities.

Recommendations:

- Improve communication between NSW Family and Community Services Land and NSW Housing Corporation to enable better alignment between portfolio management and demand, and to drive better planning for future housing needs of the state.
- Investment in appropriate Information Technology systems in order to improve the experience of tenants and of those on the waiting list.
- Extend the time clients on the waiting list have to respond to the request from the Department of Family and Community Services regarding their interest in public housing and use more innovative methods of reaching out to the potential tenants e.g. social media, local media etc.
- Review the 'succession of tenancy' arrangement.
- Investigate the possibility of tenants having more of an input into where they would like to live to improve supports and maximise outcomes.
- Ensure all new tenants participate in a 'How to sustain a successful tenancy' programme that includes budgeting, gardening, maintenance etc.
- Support place based planning and community development programs.

Pillar 3: A social housing system that is sustainable

The shortfall in housing stock available for eligible public housing clients has been at crisis point for many years, and the management of demand has put greater imposts on public funds. For example, there is an enormous cost in keeping women and families escaping domestic violence in motels and caravan parks, which are often inappropriate and frequently unsafe environments for young children. But we oppose demand management through 'churn'. We would not want to support policies which force vulnerable people out of social housing to make room for other disadvantaged people.

While investing in new social housing properties may be initially expensive, this would be offset by a corresponding reduction in expenditure on emergency accommodation. Housing people in secure, appropriate and safe accommodation would also have flow on savings in areas such as health and mental health, criminal justice, police etc.

We further cannot support policies which use rent-setting as a way of moving people out of high value properties, or which set rents at such high rates that people on low incomes

cannot afford them. We would not want to see high value properties vacated due to high-priced rent. And would not want these vacancies used as an excuse to sell off all high value properties as this would result in rich monoculture suburbs which are not inclusive, and which lack social diversity. Such a sell off would also deprive social housing tenants of the opportunity to socialise with a broad range of community members, and to take advantage of incidental mentorship and role modelling.

We recommend instead, innovative ways of increasing housing stock. Public housing should be classified as public infrastructure, and a sustainable funding model designed accordingly. Viewing housing stock as public infrastructure would also enable access to existing pockets of funding including Waratah Bonds.

Demographic characteristics of vulnerable and needy groups have changed substantially over the past few decades, and the need for affordable housing now extends beyond traditional family groups to a range of individual and family situations.¹³

With this in mind, the Forum recommends that the costs of maintaining old housing stock be assessed against the construction of new purpose-built housing on a location-by-location basis. In some areas of the Illawarra, it may be cheaper to knockdown single dwellings and rebuild medium density or higher density dwellings, than to maintain, repair and retrofit. Cost effectiveness would be augmented if a new development could fit multiple tenant types. Thus, for example, a large dwelling that houses four people but is past its life expectancy could be replaced with a medium-density development that houses a mix of tenancies on the same block.

There have been successful precedents in several areas of the Illawarra, for example small housing developments in the beach suburbs of the northern Illawarra which already provide models of more effective use of government-owned land. Social housing has been integrated into suburbs such as Thirroul, Woonona and Bulli; and the substantial infrastructure in these areas has ensured the tenant populations are easily absorbed into communities. We recommend the government further promote such developments, and change its current policy of selling off social housing property in these and other suburbs along the coastal fringe.

We also recommend that any new developments utilise Universal Housing Design principles which ensure long term suitability through the erection of homes that are practical and flexible, and which meet the needs of people of different ages and abilities over time.

Any program to address housing needs must to be supported by sustainable funding mechanisms. Research is needed into innovative policies and practices for financing social and affordable housing, exploring successful initiatives in Australia and elsewhere, such as the various social housing/home ownership opportunities available through the Government of Western Australia's Shared Home Ownership Scheme¹⁴; or the ACT Government's Land Rent Affordability Scheme which enables purchasers to rent their block but buy their house, paying an annual rental of either 2 per cent or 4 per cent of the block's value.

¹³ NSW Auditor (2013) *Making the Best Use of Public Housing*
<http://www.audit.nsw.gov.au/publications/performance-audit-reports/2013-reports/making-the-best-use-of-public-housing/making-the-best-use-of-public-housing>

¹⁴ Government of Western Australia *Shared Home Ownership scheme*
<http://www.dhw.wa.gov.au/sharedstart/Pages/default.aspx>

Affordable housing options could also be increased through incentivising investment in affordable housing. For example, the NSW Government could work with the Federal Government to develop tax offsets for people investing in social housing – either as developers or landlords. The cost of negative gearing to government income has been well researched by the Grattan Institute, which recommends that the Commonwealth gradually ease these tax breaks incentives¹⁵. But Government could better direct the negative gearing offsets so that they were only available to landlords who provide affordable housing.

We also support Grattan Institute's recommendation about reforming state and local planning systems so residents, developers, governments and local councils can achieve a long-term, negotiated approach to development. For example, local government could offer concessions for developers to encourage affordable housing. Such concessions could include reduction in Section 94 contributions, or exemptions from Section 94 contributions, loosening of restrictions for parking requirements, or greater floor space ration allowances.

Housing NSW could also reduce its overheads, as well as contribute to positive outcomes for its clients by adopting social procurement policies to implement maintenance on its properties. Social housing tenants could also be supported to establish small businesses to take on maintenance or cleaning contracts. Training and employing social housing tenants to maintain properties will not only improve client outcomes but will also reduce the amount of damage to properties as residents will have personal relationships with the individuals who are responsible for upkeep.

The Illawarra Forum also notes the huge potential untapped value of the equity contained in housing stock owned by the government. We believe this equity could be utilised to address constrained resource issues. The value of existing holdings could readily underwrite borrowings to fund new building on government-owned land, or new land and dwelling developments. Rental payments by tenants to Housing NSW could then be used to service these loans.

Recommendations

Investigate the feasibility of the following:

- Cost-benefit analysis of the impacts of increasing the social housing portfolio against the reduction in expenditure in emergency accommodation, health, mental health, criminal justice etc.
- Social housing/home ownership opportunities such as those available through the Government of Western Australia's Shared Home Ownership scheme or the ACT's Land Rent Affordability Scheme.
- Tax offsets for people investing in social housing – either as developers or landlords including changes to negative gearing incentives to favour landlords who provide affordable housing,
- Opportunities to utilise alternative sources of funding to increase the portfolio including Social Benefit Bonds or infrastructure bonds such as the NSW Waratah Bonds.
- Inclusion of affordable housing targets in NSW state planning and in Local Government planning.
- Local Government Incentives to encourage affordable housing including Section 94 concession, increased floor space ratios, relaxed parking requirements etc.

¹⁵ Grattan Institute (October 2013) Report No. 2013-12, *Renovating housing policy* http://grattan.edu.au/wp-content/uploads/2014/03/800_Renovating_Housing.pdf

- Use of Social Procurement policies to promote opportunities for social housing tenants to take up maintenance contracts on NSW Housing properties.
- Use of funds raised from sale of property being put back into the construction of new social housing properties as opposed to the maintenance of old stock.
- Leverage equity contained in housing stock to fund new building on government-owned land, or new land and dwelling developments.

Thank you for the opportunity to comment on the social housing discussion paper. We would be happy to discuss our comments or recommendations in more detail if required.



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