



National Shelter

Pre-Budget Submission

2021-22

Contact

Adrian Pisarski

adrian.pisarski@shelter.org.au

0417975270

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Summary

National Shelter welcomes the opportunity to make this submission. This submission builds on the recent work of National Shelter, other peak bodies and our member organisations and draws on the extensive work of the Australian Housing and Urban Research Institute (AHURI) and other researchers to propose a set of measures which will begin transforming our national housing system to produce sufficient affordable, well located, fit for purpose housing, to meet our nation's dramatic shortfall of social and affordable housing and insufficient responses to homelessness.

National Shelter welcomes the consolidation of housing responsibilities in the single portfolio allocated to Assistant Treasurer and Housing Minister The Hon. Michael Sukkar.

We recognised and welcomed the measures in the 2020/21 Budgets, specifically the establishment of Jobseeker, Jobkeeper and Homebuilder, and in the 2019/20 Budget, specifically the creation of a National First Home Deposit Scheme within the National Housing Finance Investment Corporation (NHFIC) which complements the measures in the 2017/18 Budget including the following:

- The change from a National Affordable Housing Agreement to a National Housing and Homelessness Agreement (NHHA);
- Development of a Bond Aggregator;
- Creation of an Affordable Housing Infrastructure Fund;
- Development of City Deals including affordable housing;
- Extension of funding to the National Partnership Agreement on Homelessness;
- Extension of Capital Gains Tax concessions to Managed Investment Trusts for Affordable Housing; and
- Stronger rules for foreign investment in housing.

The 2021/22 Budget is a chance to build on the 2017/18, 2019/20 and 2020/21 initiatives and help rebuild our social and affordable housing systems.

We also appreciate the Federal Government's role in response to COVID 19, especially in the establishment of the Jobseeker supplement and Jobkeeper program, these were welcome initiatives which we strongly support. We are extremely concerned about the impact of further reductions in the Jobseeker supplement and support returning this minimum level of income support to its full rate and advise against any further reduction to avoid a projected 24% increase in housing stress and a 9% increase in homelessness¹.

We are less convinced about the efficacy of Homebuilder as a program which we believe will have an inflationary impact on home prices (already perceived in some markets). While making home ownership more accessible to first homeowners the program risks drawing in owners to a market which still faces significant danger of price falls as economic impacts through 2021 and beyond work through our economy.

With interest rates at record lows, we believe it would be more effective to use the situation to establish capital programs to build new social housing. This measure avoids the inflationary impacts of programs like Homebuilder by establishing a supply of housing which does not compete with existing buyers and would help to alleviate price pressures in the market by removing demand, especially for lower priced rental housing.

National Shelter urges the Government and all parties to commit to a national plan and strategy to address social and affordable housing in Australia and enable governments, the private and community sectors to work together to solve the current housing affordability crisis. The shortage of housing for low and moderate-income households acts as a brake on productivity and inhibits the economic and social participation of households without access to appropriate, well located, affordable, secure and accessible housing.

¹ <https://everybodyshome.com.au/wp-content/uploads/2020/12/201215-Double-Return-Homelessness-Report-UpdatedProofed2.pdf>

Recent AHURI research estimates that over the next twenty years 727,300 additional social dwellings will be required² using an “infrastructure investment pathway” approach to construct and operate assets and services to deliver social and economic benefits to society.

The private rental market continues to fail low-income households (Q1 & Q2) based on research from AHURI in December 2019³.

The Federal Government should establish a growth fund (in addition to the NHA funding) which it uses to leverage additional new outcomes from States and Territories to begin building up Australia’s levels of social and affordable housing and to provide the subsidy gap required by private scale institutional investors to invest in affordable and social housing through Community Housing providers (CHPs).

We have long held that a growth fund would be part of a split funding arrangement and be paid to States and Territories on a per capita basis and allow the NHA Special Purpose Payment to transform into an operational fund paid on a per dwelling basis for social housing and also reflect the differences in homelessness levels experienced in different jurisdictions, funding their operations based on levels of relative homelessness. Recent stock transfers by State governments⁴ to the CHPs have accelerated the role of community housing within social housing while not lifting the overall supply of social housing. Transferred dwellings now attract a Commonwealth Rent Assistance (CRA) payment to the tenant which is then captured by the provider within their rent setting creating a de facto operational subsidy for CHPs. This arrangement creates an additional cost to the Commonwealth which is unmatched by States. Transfers also occur for tenancy management without any arrangement which could enable assets to be redeveloped and create additional supply.

One way of complementing the creation and development of net new additional supply would be through the creation of an Affordable Housing Infrastructure Booster (AHIB). AHIB is explicitly based on a recognition that the Federal Government is a leading partner in the development of social and affordable housing. AHIB is not intended as a substitute for State or Local Government policy, but a compliment – a booster – to enhance and unlock the provision of affordable rental housing. Existing Commonwealth initiatives, such as NHFIC’s Affordable Housing Bond Aggregator, National Housing Infrastructure Fund or Commonwealth Rent Assistance, and State level policies, e.g. Social and Affordable Housing Fund (SAHF) and Social Housing Growth Fund (SHGF) in NSW, should work in conjunction with AHIB. Similarly, AHIB should complement and enable planning policies and reforms, such as inclusionary zoning and density bonuses.

To pay for these and other measures the Federal Government should reform the tax treatment of housing to find the additional revenue required to offset these budget expenses.

To assist the Federal Government to facilitate the expansion of the roles of CHPs and to further develop policy and program options and allied policies and programs, tenant engagement, linkage between housing and allied services, tenancy law reform, broad consultation with community services and to provide a conduit between government and the community sector the Federal Government should return funding to peak bodies in the housing and homelessness sectors.

We recommend that the Federal Government:

2 Lawson, J., Pawson, H., Troy, L., van den Nouwelant, R. and Hamilton, C. (2018) Social housing as infrastructure: an investment pathway, AHURI Final Report 306, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/306>, doi:10.18408/ahuri-5314301.

3 Hulse, K., Reynolds, M., Nygaard, C., Parkinson, S. and Yates, J. (2019) The supply of affordable private rental housing in Australian cities: short-term and longer-term changes, AHURI Final Report No. 323, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/323>, doi:10.18408/ahuri-5120101.

4 Productivity Commission ROGS 2019 part g chapter 18A.3 attachment tables

1. Invest in the Social Housing Acceleration and Renovation Program SHARP Cost \$7.2b over 4 years \$1.4b in 2021/225
2. Establish a long-term Affordable Housing Growth Fund: An Affordable Housing Growth Fund should be established with a commitment of \$1 billion in the first year, growing to \$15 billion over 15 years. This funding should be explicitly for expanding the stock of affordable housing and, over time, could be directed towards direct capital funding and investment in incentives for institutional investors to deliver net new additional supply at scale. Program guidelines should enable housing providers to draw on a range of affordable housing programs to deliver maximum affordability and provide mixed tenure developments. Given the design of a financing mechanism will take some time, funding in the first year should be delivered through a revived Social Housing Initiative National Partnership Payment to the states and territories for capital funding of social housing. Cost: \$1000 million in 2021-22
3. Establish a two-tiered payment system within NHHA with an operational cost paid per dwelling or relative to homelessness levels and a growth fund paid on a per capita basis. Cost: Nil
4. Establish an Affordable Housing Infrastructure Booster: A National Rental Affordability Incentive program should be reinstated after redevelopment to provide an incentive to leverage private and institutional finance into the delivery of affordable housing. The new incentive would be designed to encourage scale investment in scale affordable housing as an incentive to complement other funding sources to deliver mixed tenure developments using the community housing sector and private developers in concert. Cost of establishment \$20m in 2021-2022. Across the forward estimates \$60m 2022-23, \$100m 2023-24, \$200m 2024-25
5. National Shelter recommends the Federal Government undertake an inquiry to examine the best way to reform CRA considering all these issues but in the meantime:
6. National Shelter recommends that the Australian Government increase the maximum rate of Commonwealth Rent Assistance by 50%, that this amount be indexed to the rental component of CPI from 2021 onwards, and that eligibility be extended to all people who meet income test requirements, irrespective of their source of income. (Cost \$1.85b in 2021-22)
7. That the Commonwealth fund a national capacity development and engagement process to allow Aboriginal and Torres Strait Islander Peoples and organisations to fully consider and develop the concept of a National Indigenous Housing Pool (Cost in 2021-22 \$3m)
8. That the Commonwealth provide funding for NATSIHA (in cooperation with other peaks) to engage with Indigenous Community Housing Organisations to encourage and explore their inclusion and development as registered Housing Organisations within the ambit of the National Regulatory System for Community Housing (Cost in 2021-22 \$2m) In addition:
9. National Shelter supports the re-establishment of a National First People's Housing Program building on the success of NPARIH and the National Remote Housing Agreement that followed for both remote and urban/regional areas to expand the level of housing for First Peoples to be matched by participating state and territory governments. (Cost in 2021 \$1b and \$4b over the period of forward estimates)
10. That the Commonwealth provide additional funding to the NT (above the current NHHA funding and not as a reallocation from other jurisdictions) for specialist homelessness services of \$100m per annum for the next 10 years indexed at CPI. Cost \$100m in 2021-22
11. Deductions for expenses for investments in assets such as property and shares should be limited and the existing tax concessions for residential property investment replaced by a new rental housing investment incentive.
12. Income tax deductions for expenses (such as interest payments on debt) relating to passive investments in such assets yielding capital gains (such as housing, shares and collectables) should

be limited to income received from those assets, including capital gains realised on subsequent sale. This should apply to all new investments of this type entered into after 1 January 2017.

13. Part of the revenue saved from this measure should be used to introduce a two-tier rental housing investment incentive paid as an annual tax offset for a fixed period (such as 15 years) in respect of new dwellings or improvements for residential rental purposes, below a fixed construction cost. A higher rate would apply to dwellings defined as 'affordable rental housing', as part of a wider package of incentives to support investment in affordable housing.

Additionally, we recommend the Federal Government prioritise the following initiatives to complement these budget adjustments:

- Utilise Federal Government funding (NHHA) and a growth fund and/or other incentives to improve transparency and accountability between the Federal and State/Territory Governments to encourage reforms to their planning systems, changing from stamp duty to land tax and to make more well-located land available for affordable housing;
- The Federal Government should negotiate with States and Territories to identify a specified proportion of NHHA funding/growth funding or both be dedicated to ICHOs to enable a growth strategy to be developed for Indigenous Community Housing;

National Shelter recommends that all funding for homelessness service provision be separately identifiable within the NHHA and States and Territories publicly report their contribution to funding Specialist Homelessness Service provision;

- Continue to reform the provision of affordable housing including social housing via transfers of public housing to the CHP sector with commitments to title transfer at negotiated levels, with at least one third transferred by 2025;
- Negotiate to re-establish funding for housing and homelessness peak bodies to provide advice to governments on housing and homelessness policies and programs, to support evidence-based policies and funding measures by Federal Government and to advocate publicly for improved housing and homelessness responses.

Introduction

National Shelter welcomed the measures in the 2017/18 Federal Budget towards a comprehensive national affordable housing plan, specifically the creation of a National Housing Finance Investment Corporation including:

While NHFIC has led to lower the cost of financing and provide additional land and infrastructure to help develop more affordable housing they would be complemented by capital growth funding which we believe is a major missing element of any comprehensive national housing plan.

The Federal Government has begun a process to reform the incentives in place in Australia to attract institutional investment into social and affordable housing. This plan includes incentives for private investment and from other levels of government, especially the States and Territories. The NAHA and its predecessor the Commonwealth State Housing Agreement (CSHA) have suffered from poor accountability, transparency and insufficient resources to undertake the task of providing sufficient affordable and social housing supply.

We make this submission to suggest reforms of the tax treatment of housing and other measures to assist with the additional costs identified in measures in this submission to address the large shortfall of social and affordable rental housing in Australia.

Our submission is based upon National Shelter's role as Australia's peak housing advocacy organisation, our Policy development Housing and Infrastructure, Housing for Aboriginal and Torres Strait Islanders and Ending Homelessness. developed over recent years in consultation with our members across the country, using the most recent evidence from AHURI and other researchers.

Additionally, National Shelter works with Homelessness Australia, the National Association for Tenants' Organisations, and the Community Housing Industry Association (CHIA) in the development of our policy and program recommendations. We also work with allied peaks like Australian Council of Social Service (ACOSS) and others to inform and prosecute policy ideas.

About National Shelter

National Shelter is the peak non-government organisation representing the interests of low-income housing consumers and has been in operation since 1976. It comprises representatives of Shelter bodies in all States and Territories, and also includes national bodies Homelessness Australia, the Community Housing Industry Association, Brotherhood of St. Laurence, National Council of the St Vincent de Paul Society, and the National Association of Tenant Organisations.

National Shelter Vision: Australia needs a National Housing Strategy to ensure that all citizens, especially people living on low incomes, can access the housing they need and want, that is affordable, appropriate, safe and secure. The Minister for Housing could take responsibility for the implementation of the Strategy, coordinating and facilitating the policies, legislation and resources necessary to lead and engage State and Territory governments and the range of inputs required for its development.

Why the budget must address housing affordability

Australia's housing crisis has reached staggering proportions with new reports showing the number of households in housing need has reached 1.3m predicted to rise to 1.7 million by 2025.⁶ At 30 June 2020, nationally there was a total of 399,377 households and 418,937 social housing dwellings⁷ but an estimated 433,000 in need of social housing⁸.

In the Committee for the Economic Development of Australia (CEDA) report, Housing Australia⁹, Yates describes Australia's changing housing and demographic profile showing how an increase in renters is reflecting our diminishing level of home ownership during a decline in our social and affordable housing levels saying that, "A failure to address housing affordability problems can jeopardise achievement of other government goals such as those relating to economic growth and employment" and calls for the Federal Government to:

- Set an initial minimum headline target of an Australia wide annual net increase of 20,000 dwellings affordable to low-income households with access to jobs, transport and appropriate services and ensure enforceable arrangements are in place to meet this target.
- Coordinate funding requirements and provide financial incentives for State and Territory Governments to meet the annual targets for affordable housing provision in a cost-effective manner and to meet any remaining financing shortfall through direct subsidies in the form of tax incentives to housing producers or income support to tenants (see Affordable Housing Infrastructure Booster).

Additionally, over one-third of low-income CRA recipients still carry a net housing cost burden of more than 30 per cent of household income after CRA is deducted from rents. Whilst CRA reduces housing stress it is still inadequate to keep most recipients out of housing stress and poverty. Among those worst affected are the unemployed who have received no boost to their income support for two decades until the recent supplementary payments included in Jobseeker. ACOSS, The Brotherhood of St Laurence and other

6 Rowley, S., Leishman, C., Baker, E., Bentley, R. and Lester, L. (2017) Modelling housing need in Australia to 2025, AHURI Final Report 287, Australian Housing and Urban Research Institute, Melbourne, <http://www.ahuri.edu.au/research/final-reports/287>, doi: 10.18408/ahuri-8106901.

7 <https://www.pc.gov.au/research/ongoing/report-on-government-services/2021/housing-and-homelessness/housing>

8 Lawson, J., Pawson, H., Troy, L., van den Nouwelant, R. and Hamilton, C. (2018) Social housing as infrastructure: an investment pathway, AHURI Final Report No. 306

9 Yates, J, in CEDA, Housing Australia 2017

organisations have reported that the jobseeker payment (which included the full supplement) meant that for the lowest income households living was elevated to an acceptable level.

Research released by AHURI in December 2019¹⁰ found the private rental market continues to fail to deliver sufficient supply of affordable rental housing to low-income households (Q1 & Q2) demonstrating a shortfall of 305,000 dwellings available and affordable by the bottom 40% of households in the bottom 40% of income distribution.

The 2020 Rental Affordability Index showed there were no affordable rentals in Australia for people in receipt of Jobseeker, even after the supplement effectively doubled the income levels relative to rents, and that Hobart and Adelaide are our least affordable markets for renting. Even households on average household incomes struggle to afford rental housing and the unaffordability of renting is spreading to much of regional Australia.¹¹

Other AHURI research estimates that over the next 20 years 727,300 additional social housing dwellings will be required¹² using an “infrastructure investment pathway” approach to construct and operate assets and services to deliver social and economic benefits to society.

Homelessness continues to grow in Australia, increasingly due to a lack of affordable housing, and is now estimated at over 116,000 people on any given night¹³. Client numbers of Specialist Homelessness Services have climbed to and all time, unacceptable high of 290,500¹⁴

Housing as Infrastructure

National Shelter believes a vital shift in thinking about housing needs to be made. Economists¹⁵ and planners have overlooked the role of housing as infrastructure and the social housing and affordable housing as essential infrastructure supporting economic, social and cultural participation.

We are pleased to see the inclusion of social housing as an infrastructure component of the next Infrastructure Australia audit process as an element of social infrastructure, its recognition is long overdue.

Affordable housing is essential to productivity and we welcome the now Cabinet level Minister with oversight to develop a National Housing plan and strategy to ensure appropriate adequate housing for a changing population and to ensure lower income households are included in planning, economic opportunity and as part of urban and regional development.

COVID 19 has impacted to lower our immigration levels enabling housing supply to potentially outstrip demand in general markets which should lower the overall price of housing and reduce demand in our rental markets¹⁶. However, we have seen the return of approximately 450,000 Australians from overseas. These changes establish an even greater imperative to boost the social housing supply by direct investment in construction and acquisitions complementing the nearly \$10b investments announced by State governments since the advent of COVID.^{17 18}

10 Hulse, K., Reynolds, M., Nygaard, C., Parkinson, S. and Yates, J. (2019) The supply of affordable private rental housing in Australian cities: short-term and longer-term changes, AHURI Final Report 323, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/323>, doi: 10.18408/ahuri- 5120101.

11 http://shelter.org.au/site/wp-content/uploads/RAI-2020-FINAL_compressed.pdf

12 Lawson, J., Pawson, H., Troy, L., van den Nouwelant, R. and Hamilton, C. (2018) Social housing as infrastructure: an investment pathway, AHURI Final Report 306, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/306>, doi:10.18408/ahuri-5314301.

13 <http://www.abs.gov.au/ausstats/abs@.nsf/lookup/2049.0Media%20Release12016>

14 <https://www.aihw.gov.au/reports-data/health-welfare-services/homelessness-services/overview>

15 <https://cityfutures.be.unsw.edu.au/research/projects/strengthening-economic-cases-housing-productivity-gains-better-housing-outcomes/>

16 <https://www.nhfc.gov.au/media-resources/media-releases/nhfc-releases-first-flagship-housing-report/>

17 <https://www.ahuri.edu.au/research/covid-19/covid-19/covid-19-stimulates-government-spending-on-housing-and-homelessness>

18 <https://www.budget.vic.gov.au/place-call-home-victorias-big-housing-build>

Housing agreements between the Federal Government and the States/Territories have been reduced to welfare housing agreements focussed only on the lowest income highest need households. This approach has been counter-productive to good housing and productivity.

A broader approach to housing policy is required to link housing to an infrastructure approach.

Social Housing Acceleration and Renovation Program (SHARP)

The SHARP proposal

The Social Housing Acceleration and Renovation Program (SHARP) aims to build 30,000 social housing units over a four-year period, plus accelerate the maintenance and renovation of existing social housing stock. As well as the benefits of increasing social housing available to low-income households, the construction process will provide much-needed jobs and economic stimulus Australia-wide following the Black Summer bushfires and the COVID-19 shutdown of a range of industries.

Importance of the construction industry

In the year to December 2019, construction provided \$145.9 billion to gross value added, or 7.8 per cent of total gross value added in Australia. In February 2020, 1.2 million people were employed in the construction industry, represent 9.1 per cent of Australia's 13 million jobs.

Direct and indirect economic impacts

Given the uncertainty around the economic outlook, a range of scenarios have been developed. On average over the four-year period, the SHARP would support between 15,500 and 18,000 full-time equivalent (FTE) jobs. This comprises both direct construction jobs and other jobs.

The SHARP is estimated to raise output in Australia by \$15.7 billion to \$18.2 billion in total over the four years of construction and increase GDP by between \$5.8 billion to \$6.7 billion.

Potential for construction stimulus to fill economic gaps

Investment in social housing has the unique potential for a greater, more reliable economic stimulus than other potential investments. This is because:

- Generally, residential construction can still occur safely even if a second wave of infections requires social distancing measures to be put back in place;
- The decline in residential construction activity, beyond June 2021 is estimated to be significant, which means there are many jobs at risk;
- The ability of the housing construction industry to use workers across a range of skill sets provides opportunities for many types of workers;
- Private housing oversupply could potentially be absorbed by the social housing sector. Over the longer term, a greater supply of social housing can be expected to have flow on economic impacts, as:
 - Modest income workers can live closer to their jobs
 - Families can have security of tenure
 - Children a more stable education

Overall improvements to health and wellbeing from good quality, social and affordable housing will increase the productivity of workers and therefore the economy.

The National Housing and Homelessness Agreement (NHHA)

The NHHA has now replaced the previous NAHA and NPAH into a single payment system. It is an ongoing Specific Purpose Payment (SPP) with the Commonwealth providing \$6.313 billion to the States and Territories over the four years from 2020/21.

The NHHA now makes permanent funding previously unsecured in the NPAH which is welcomed. National Shelter also welcomes the indexation of the NHHA at Wage Cost indexation 1 although believes this level of indexation is still inadequate to meet the rising cost of service delivery. There are 3 additional problems we identify with the NHHA:

1. Social Housing as a proportion of total housing
2. Transparency and accountability
3. Outcomes and measurement
4. Equal Remuneration Order

Social housing as a proportion of total housing:

The total number of social housing dwellings has fallen in 2020, from 429,316 in 2019 to 428,497 in 2020¹⁹ also the share of social housing as a proportion of all housing is declining. Over the 9-year period to 2019, the proportion of social housing has gradually fallen from 5.1% to 4.7%. In Victoria this is a staggeringly low 2.8%. All levels of government need to commit to increasing spending on social housing and we welcome the new Victorian investment of \$6b over 4 years as game changing for that State.

The NHHA requires both an ongoing maintenance cost (the SPP) plus a long-term housing growth fund dedicated to creating net additional supply. The establishment of a growth fund would also provide the Federal Government with leverage to obtain reforms from States and Territories essential to the development of a housing reform process. The growth fund should be established to ensure reform and the development of an incentive to encourage private sector investment and complement adjustments to tax treatments.

Within the SPP the level of funding for specialist homelessness services is only estimated which risks erosion within the SPP over time. We recommend that the homelessness component be separated or otherwise made discreet with the overall SPP.

Transparency and Accountability

The NAHA has been plagued by a lack of transparency and accountability problems with constant accusations from the Federal Government about States and Territories obscuring SPP funding outcomes or utilising the NAHA SPP as a “one-way ATM” that has failed to boost supply²⁰.

State budgets have become so obscure that it is impossible to track net increases or decreases in social housing supply or the real cost of providing social housing through State Governments, but stated in the Independent Pricing and Regulatory Tribunal in NSW (IPART) report in the review of rent models for social and affordable housing is, “We estimate that the additional explicit subsidy required to fund the current difference between tenant rent contributions and market rent is \$945m per annum.”²¹

The Productivity Commission has reported that the States and Territories contributed \$4.3 billion in 2019-20²² to social housing with the Federal Government providing approx. \$1.6b including homelessness contributions.

There is an urgent need to understand the real cost of providing social housing both in terms of construction but ongoing subsidy. If we don't know the true cost of housing it is difficult to garner the support required to build it, the investors to invest in it or the providers to manage it.

19 <https://blogs.unsw.edu.au/cityfutures/blog/2021/01/social-housing-production-continues-to-languish-while-demand-is-soaring/>

20 <https://www.theguardian.com/australia-news/2017/apr/10/scott-morrison-says-housing-agreement-a-one-way-atm-that-has-failed-to-boost-supply>

21 [https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/pricing-reviews-section-9-publications-review-of-social-and-affordable-housing-rent-models/final-report-review-of-rent-models-for-social-and-affordable-housing-july-2017-\[w172737\].pdf](https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/pricing-reviews-section-9-publications-review-of-social-and-affordable-housing-rent-models/final-report-review-of-rent-models-for-social-and-affordable-housing-july-2017-[w172737].pdf)

22 <https://www.pc.gov.au/research/ongoing/report-on-government-services/2021/housing-and-homelessness/housing>

Outcomes and measurement:

The NAHA/NHHA has also been plagued by a lack of data and an inability to measure outcomes. National Shelter recommends restoring a National Housing Council to pick up the functions of the defunct National Housing Supply Council (NHSC/NHC). The restoration of the NHSC would provide timely data on housing supply especially the critical level of supply affordable and available to low and moderate-income households. A restored NHSC could also be used to establish other critical indicators on need, supply and data on under-occupancy, overcrowding, the private rental market and ownership changes. National Shelter recommends any restored NHSC should have housing consumer interests represented.

Tax and Housing

Australia's current tax treatment of housing adds inflationary pressure to the price of housing. Capital gains tax concessions and negative gearing provide much greater benefits to existing owners and people who can afford to invest while leaving people living on low incomes languishing in a tired and expensive rental market. There are no capital gains tax concessions (CGT) on owner-occupied housing, nor any land tax, we have a 50% discount on CGT concessions for those who invest in rental housing, with the ability to deduct losses on rental housing against any income source through negative gearing. These tax settings help to commodify housing instead of promoting housing as a primary place of residence and home rather than an investment.

At the State and Territory level, our governments are understandably interested in maintaining the income from stamp duty on housing transactions but are also vulnerable to decreases in revenue and budgetary fortunes during downturns in property cycles.

Overall, our current taxation measures detract from revenue which could be more purposefully applied to attracting at scale private investment into affordable and social housing managed by a vibrant and purposeful set of community housing providers (CHPs) and/or State and Territory housing authorities to alleviate housing stress and poverty. Tax reform and the additional revenue it may generate²³, if partially re-directed, is a vital negotiating point in the future of funding agreements between the Federal Government and the States and Territories. We promote five reforms as follows:

- **Remove the exemption on CGT for homeowners²⁴;**
- **Reduce the CGT discount for individuals and trusts to 25 percent;**
- **Limit negative gearing and quarantine passive investment losses so they can only be written off against other investment income;**
- **Encourage and provide incentives to State and Territory Governments to exchange stamp duties for a disaggregated land tax over twenty years; and**
- **Encourage and provide incentives to State and Territory Governments to introduce vacancy taxes on residential housing that is untenanted or unoccupied for a period of greater than 6 consecutive months, returning any savings of revenue to an affordable housing fund.**

One half of the savings generated from these measures, estimated be worth \$5.3 billion per year²⁵, would generate \$2.65 billion per year for the Federal Government to fund incentives for institutional scale

23 1 Nearly \$80b total tax is foregone annually in CGT exemptions for principal residence, CGT discounts to investors and negative gearing deductions <https://static.treasury.gov.au/uploads/sites/1/2018/01/2017-TEs.pdf> and <https://grattan.edu.au/wp-content/uploads/2018/03/901-Housing-affordability.pdf>

24 Removing the exemption of CGT for home owners may need an accompanying threshold and mechanism to defer payment to be taken from an estate on death

25 <https://grattan.edu.au/wp-content/uploads/2016/04/872-Hot-Property.pdf> (Grattan Phase in a 25 per cent discount over five years through reducing the value of the CGT discount by 5 percentage points each year.)

investment in affordable and social housing, and with dollar for dollar matching from State and Territory Governments, would amount to a significant increase in funding for affordable housing.

Vacancy Taxes

National Shelter welcomed the initiative in the 2017 budget to charge foreign investors purchasing investment properties but leaving them vacant. While the revenue generated from this measure is expected to be modest (\$20m over the forward estimates) it sends an important market signal.

National Shelter recommends the revenue gained from this initiative should be directed into a fund controlled by the NHFIC to support the development of affordable housing.

Foreign Resident Capital Gains tax

The Government will also bolster the foreign resident capital gains tax withholding regime by increasing the withholding rate from 10 per cent to 12.5 per cent, as well as increasing the number of foreign residents caught by the regime by reducing the threshold from \$2 million to \$750,000. These changes applied from 1 July 2017 and reduce the risk that foreign residents avoid paying a capital gains tax liability they owe in Australia.

These changes to improve the integrity of capital gains tax rules for foreign investors are estimated to have a gain to revenue of \$600 million over the forward estimates.

National Shelter welcomes these changes and recommends the revenue raised should be directed to a capital fund to boost social and affordable housing supply.

Commonwealth Rent Assistance

Commonwealth Rent Assistance (CRA) provides assistance to low-income renters in private rentals and community housing and prevents even more widespread housing stress and housing affordability issues, among this group. However, CRA has not kept pace with increasing rents and household costs.

The Harmer Pension Review found that because the rate of CRA is indexed to overall inflation, not to increases in rents, pensioners are on average \$9 to \$10 per week worse off over the period from 2000 to 2009 (Commonwealth of Australia, 2009). In addition, many low-income households are not eligible for CRA because it is only available to people on income support payments.

The Grattan Institute has argued for an increase in CRA of 40% as the most effective means of decreasing poverty among retirees. National Shelter believes more holistic approaches are required to boost social and affordable housing as well as providing private market assistance are required²⁶.

ACOSS is calling for an increase to CRA of 50% to more adequately subsidise private rental costs for low-income tenants. For a single person without children, this increase would see CRA rise from \$70 to \$105 per week (costing approximately \$1,850 million).

New research from AHURI argues that CRA requires more substantial reform. Ong, Pawson and colleagues argue that CRA is poorly targeted, is only available to income support recipients, has been eroded over time, is regionally invariant and isn't available to over 240,000 low-income private renting households²⁷ so requires more substantial reform than simply raising either the overall rate or the maximum rate.

Ong et al acknowledge that a 30% lift in the maximum rate of CRA by 30% would improve affordability outcomes for 623,800 recipients but argue improving targeting would cut the population of low-income private renter income units in housing stress by 371,200 or 44 per cent. At the same time, it would generate an annual cost saving of \$1.2 billion.

²⁶ <http://shelter.org.au/site/wp-content/uploads/National-Shelter-9-Priorities.pdf>

²⁷ https://www.ahuri.edu.au/__data/assets/pdf_file/0020/65423/Executive-Summary-FR342-Demand-side-assistance-in-Australias-rental-housing-market-exploring-reform-option.pdf

Any saving must be repurposed to building social and affordable housing supply or further extending eligibility for CRA, but for National Shelter would provide the annual growth fund for social and affordable housing we have long advocated.

The AHURI report authors also note that de-coupling CRA from income support arrangements may create some Constitutional and potentially jurisdictional issues which means that a fuller government review of CRA should be established to work through reforms and resolve any implementation issues prior to proceeding.

Various other issues in the existing CRA arrangements also require examining to improve the operation of rent assistance over time including students whose income is too low to qualify, variations between rental markets while CRA is a fixed payment, the eligibility between different forms of social housing where public housing tenants are ineligible while community housing tenants are eligible. Other issues also in need of addressing are the level of indexation, the problem of CRA contributing to rental inflation in identified markets and if CRA would be better paid within social security entitlements or remain as a supplementary payment.

During 2020 the government introduced the supplementary Jobseeker payment which is now in the process of being withdrawn. Had Jobseeker been continued at its full original rate it may have reduced the need to increase CRA but as it is now being withdrawn hundreds of thousands of low income renters are again experiencing severe rental stress.

- National Shelter recommends the Federal Government undertake an inquiry to examine the best way to reform CRA considering all these issues but in the meantime:
- National Shelter recommends that the Federal Government increase the maximum rate of Commonwealth Rent Assistance by 50%, that this amount be indexed to the rental component of CPI from 2021 onwards, and that eligibility be extended to all people who meet income test requirements, irrespective of their source of income (cost \$1.85b in 2021-22).

The provision of rent assistance will not in itself promote adequate supply, although it does provide an important subsidy to community housing organisations which in certain conditions can make the difference between viability and non-viability of social housing projects.

The recommendations here need to be seen alongside recommendations about changing private rental investment, and more specifically about rent and subsidy arrangements in social housing. Rent assistance provides an important component in the financial viability of community housing providers and any changes to CRA will need to be evaluated for their impact on this sector.

Affordable Housing Infrastructure Booster

The National Rental Affordability Scheme (NRAS) is being wound down after a successful run providing over 36,000 new affordable housing dwellings. NRAS established an appetite for investment in affordable rental housing but needed adjustments to its administration and operation to continue as an effective scheme enjoying multi-party political support. The need for a program to continue to develop affordable rental housing is more critical than ever. The Community Housing Industry Association (CHIA) has developed a new approach to supporting the development of affordable rental housing within the parameters of an infrastructure approach.

As described by CHIA, "The Affordable Housing Infrastructure Booster (AHIB) aims to generate dwellings to be let at least 20% below local market rents for 20 years, targeted to low and moderate-income households. The AHIB mechanism lets the desired housing outcomes and locations determine the financial boost that is provided so as to enable affordability, rather than the financial boost conditioning the type of housing and locations that can be provided. AHIB is responsive to variation in construction cost, land cost and local rent levels.

Like some international initiatives, AHIB involves a tax credit that CHPs can use to raise capital investors. This capital injection can help fund construction and thus reduces the borrowing requirement and debt servicing costs for an affordable housing project. The AHIB could also work well alongside a housing capital

aggregation vehicle which could provide a pathway for pooling funding to secure interest from larger institutional investors

The modelling that underpins the proposal demonstrates a much higher-level housing that can be retained, or re-invested, beyond the initial 20-year affordability period. AHIB is thus a vehicle for a long-term strategy to provide an infrastructure of affordable housing in Australian cities and neighbourhoods.

Unlike NRAS and some comparable international programs, AHIB does not operate with a priori determined annual levels of support or project level subsidies. Instead, registered providers tender for the boost required to service borrowing costs at prudential standards and to meet acceptable rates of investor returns. Registered providers can thus start by considering what type of housing is required where and then bid for tax credits to enhance the financial viability of the project.

The AHIB is designed to attract other 'contributions' such as State, Territory and Local Government co-investment; planning concessions and via cross subsidisation from market sale or rental housing."

Whilst this approach is similar to NRAS it differs in key areas. National Shelter supports the development of the AHIB and asks that the 2021-22 budget should allocate resources to establish the AHIB.

The AHIB would be developed slowly to provide 3,000 incentives in 2022-23, 5,000 in 2023-24 lifting to 10,000 in 2024-25

- Establish an Affordable Housing Infrastructure Booster to provide an incentive to attract scale institutional investment in affordable rental housing.

Specialist Homelessness Funding

National Shelter has welcomed the inclusion of the National Partnership Agreement on Homelessness within the NHHA. There are still risks involved within the funding arrangement and inconsistencies we highlight:

- Homelessness funding should be identified as a discrete component in the NHHA.
- Both social housing and Specialist Homelessness Services could be vulnerable to a change in the mix or makeup of State and Territory allocations.
- The Northern Territory experiences a level of homelessness beyond the funding it receives to provide appropriate service responses.

National Shelter recommends that all funding for homelessness service provision be identifiable and States/Territories specify their contribution to funding SHS provision.

National Shelter generally promotes the national perspective but believes a special case needs to be made for the Northern Territory.

National Shelter acknowledges the positive role played by the National Partnership Agreement on Remote Housing and its predecessor the National Partnership Agreement on Remote Indigenous Housing and the new commitment to more remote housing in the Northern Territory by the Federal and Territory Governments, these will help.

The Northern Territory experiences more than 10 times the national level of homelessness at 5.6% of its population compared to 0.47% nationally²⁸. The Territory receives a much lower proportion of the NHHA given its much lower population but is underfunded in its means to appropriately respond to its high level of homelessness. While funding for social housing and homelessness are contained in the NHHA allocations making it a state jurisdictional matter to apply funding, the entire Territory allocation for NHHA of \$18.9m²⁹ (1.3% of national funding) is insufficient to meet the service requirements for a homeless population of 13,721.

²⁸ OECD Affordable Housing Database, HC3.1 Homeless Population, last updated 24/7/17

²⁹ <https://ntshelter.org.au/wp-content/uploads/2019/05/2019-National-Housing-and-Homelessness-Forum.pdf>

- National Shelter recommends providing additional funding to the NT (above the current NHHA funding and not as a reallocation from other jurisdictions) for specialist homelessness services (SHS) of \$100m per annum for the next 10 years. Cost in 2021 \$100m. SHS services should provide both support services and social and affordable housing especially in remote areas of the NT.

Aboriginal and Torres Strait Islander Housing

Aboriginal and Torres Strait Islander peoples continue to experience the highest levels of housing stress, homelessness and overcrowding in Australia.

The Report on Government Services 2019, the Productivity Commission reveals that, despite some improvements, nearly 30% of Aboriginal and Torres Strait Islander public housing tenants live in accommodation that does not meet basic acceptable standards (defined as having working facilities for washing people, washing clothes, storing/preparing food, and sewerage, and no more than two major structural problems)³⁰.

It is difficult to engage in school/work/community when you don't have access to basic living standards. Investing in adequate housing contributes to better social, education and health outcomes, and conversely an absence of adequate accommodation or severely overcrowded accommodation undermines other government efforts aimed at closing the gap.

Despite funding provided through the National Partnership Agreement on Remote Indigenous Housing (NPARIH), significant housing disadvantage remains for Aboriginal and Torres Strait Islander peoples in remote areas.

National Shelter urges a continuation of funding to lift the levels of housing disadvantage in remote communities.

Over 75% of Aboriginal and Torres Strait Islander households live in urban and regional areas, rather than remote settings and continue to suffer discrimination in rental markets across Australia. Reforms to the community housing sector through the NAHA and the introduction of a national regulatory scheme for community housing (NRSCH), have been poorly applied to Indigenous Community Housing Organisations (ICHOs).

ICHOs have been subject to a process of transferring out of the Federal jurisdiction and into State/Territory jurisdictions with varied success. This situation has left many ICHOs, particularly in Queensland, outside the system without access to desperately needed maintenance funding because of a failure to register as providers for many. ICHOs in many cases own land and housing but are now unable to utilise the potential benefits of being registered as providers which is wasting a base to grow housing specifically targeted at Aboriginal and Torres Strait Islander households.

The Federal Government has also now passed legislation allowing previous caveats over ICHO properties with a Commonwealth interest to be lifted which represents a breakthrough in the ability to negotiate with ICHOs to bring them into community housing registration.

In an as yet unpublished report, "Reimagining Indigenous Housing, Health and Wealth: The necessary ecological response to unlock the potential in the Indigenous Estate" (developed by authors Professor Kerry Arabena and Shane Hamilton, commissioned by Shelter WA and funded by the Department of Health and Ageing) the authors propose a long-term vision to rewrite the means by which Aboriginal and Torres Strait Islander peoples; housing is produced and managed building on the national Indigenous Estate, moving away from a welfare dependency model to a wealth producing ecological model of housing production.

It is argued in the report that there is a need to establish a National Indigenous Housing Pool to help manage the disparate "Indigenous Housing Estate" using A National Indigenous Housing, Health and Wealth Authority that connects the Indigenous Estate to the Indigenous Housing Pool.

³⁰ Productivity Commission ROGS 2019 table 18A.39

Working with the now established National Aboriginal and Torres Strait Islander Housing Association (NATSIHA) as members of the governance committee overseeing the report's production National Shelter is also developing the advocacy strategy and practical policy steps which will be required to implement the vision. Within this process and prior to the report's formal release we have identified a number of steps appropriate for consideration within this budget submission. They include:

- That the Federal Government fund a national capacity development and engagement process to allow Aboriginal and Torres Strait Islander peoples and organisations to fully consider and develop the concept of a National Indigenous Housing Pool (Cost in 2021-22 \$3m).
- That the Federal Government provide funding for NATSIHA (in cooperation with other peaks) to engage with Indigenous Community Housing Organisations to encourage and explore their inclusion and development as registered Housing Organisations within the ambit of the National Regulatory System for Community Housing (Cost in 2021-22 \$2m)
- National Shelter supports the re-establishment of a National First People's Housing Program building on the success of NPARIH and the National Remote Housing Agreement that followed for both remote and urban/regional areas to expand the level of housing for Aboriginal and Torres Strait Islander peoples to be matched by participating state and territory governments. (Cost in 2021 \$1b and \$4b over the period of forward estimates)

Income support

The coronavirus supplement was a welcome increase to income support arrangements during 2020. National Shelter believes that income support payments should be permanently lifted to include the full coronavirus supplement and establish a new standard minimum income floor for income support payments in Australia.

ACOSS has developed a highly regarded rationale for lifting the base rates of all income support payments to provide a minimum income level to lift recipients out of poverty. National Shelter supports a permanent increase to Jobseeker payments to:

- Set a minimum income floor across the working age payments system set at the current pension rate (including the Pension Supplement). This is currently \$472 per week for a single person.
- Increase base rates of allowances to this income floor. This would require an increase of \$185pw to the single maximum rate of JobSeeker payment and \$235 per week for single, maximum rate of Youth Allowance. This measure would simplify the income support system, while securing fairness. (Note: These increases would apply to all allowance payments, including Austudy and Abstudy).

National Shelter also supports the ACOSS case that:

In addition to increases remaining in place, depending on circumstances of need, people would also receive one or more of the following supplements:

- Housing Supplement: Increase the maximum rate of Commonwealth Rent Assistance by 50% from \$70 to \$105 per week for a single person without children to more adequately subsidise private rental costs for low-income tenants³¹.
- Disability and Illness Supplement: Introduce a Cost of Disability and Illness Supplement that recognises the additional costs faced by people with disability. This Supplement should be at least \$50 per week². This is in addition to ACOSS's long-standing call for broader access to the Disability Support Pension to avoid people with disability ending up on JobSeeker Payment.
- Single Parenting Supplement: Introduce a Single Parent Supplement that recognises the added costs of single parenthood. The Single Parent Supplement should be at least \$200 per week (and must reflect number and age of children). This could be paid via Family Tax Benefit Part B.

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- Roll together universal payments like the Energy Supplement into base rates of income support to simplify the system, recognising that they are intended to assist with basic household expenses.
- Index income support payments twice per year to wages as well as prices.
- Income support payments must not be subject to mandatory cashless debit or income management.
- Ensure all parents receiving income support payments are eligible for childcare subsidies (including additional, transition to work subsidies).
- Establish an independent mechanism to advise on income support payment settings .
- Establish a Social Security Commission to guide the parliament on income support payment adequacy and other settings over time.

Recommendations:

1. Invest in the Social Housing Acceleration and Renovation Program SHARP Cost \$7.2b over 4 years \$1.4b in 2021/2232
2. Establish a long-term Affordable Housing Growth Fund: An Affordable Housing Growth Fund should be established with a commitment of \$1 billion in the first year, growing to \$15 billion over 15 years. This funding should be explicitly for expanding the stock of affordable housing and, over time, could be directed towards direct capital funding and investment in incentives for institutional investors to deliver net new additional supply at scale. Program guidelines should enable housing providers to draw on a range of affordable housing programs to deliver maximum affordability and provide mixed tenure developments. Given the design of a financing mechanism will take some time, funding in the first year should be delivered through a revived Social Housing Initiative National Partnership Payment to the states and territories for capital funding of social housing. Cost: \$1000 million in 2021-22
3. Establish a two-tiered payment system within NHHA with an operational cost paid per dwelling or relative to homelessness levels and a growth fund paid on a per capita basis. Cost: Nil
4. Establish an Affordable Housing Infrastructure Booster: A National Rental Affordability Incentive program should be reinstated after redevelopment to provide an incentive to leverage private and institutional finance into the delivery of affordable housing. The new incentive would be designed to encourage scale investment in scale affordable housing as an incentive to complement other funding sources to deliver mixed tenure developments using the community housing sector and private developers in concert. Cost of establishment \$20m in 2021-2022. Across the forward estimates \$60m 2022-23, \$100m 2023-24, \$200m 2024-25
5. National Shelter recommends the Federal Government undertake an inquiry to examine the best way to reform CRA considering all these issues but in the meantime:
6. National Shelter recommends that the Australian Government increase the maximum rate of Commonwealth Rent Assistance by 50%, that this amount be indexed to the rental component of CPI from 2021 onwards, and that eligibility be extended to all people who meet income test requirements, irrespective of their source of income. (Cost \$1.85b in 2021-22)
7. That the Commonwealth fund a national capacity development and engagement process to allow Aboriginal and Torres Strait Islander Peoples and organisations to fully consider and develop the concept of a National Indigenous Housing Pool (Cost in 2021-22 \$3m)
8. That the Commonwealth provide funding for NATSIHA (in cooperation with other peaks) to engage with Indigenous Community Housing Organisations to encourage and explore their inclusion and

development as registered Housing Organisations within the ambit of the National Regulatory System for Community Housing (Cost in 2021-22 \$2m) In addition:

9. National Shelter supports the re-establishment of a National First People's Housing Program building on the success of NPARIH and the National Remote Housing Agreement that followed for both remote and urban/regional areas to expand the level of housing for First Peoples to be matched by participating state and territory governments. (Cost in 2021 \$1b and \$4b over the period of forward estimates)
10. That the Commonwealth provide additional funding to the NT (above the current NHHA funding and not as a reallocation from other jurisdictions) for specialist homelessness services of \$100m per annum for the next 10 years indexed at CPI. Cost \$100m in 2021-22
11. Deductions for expenses for investments in assets such as property and shares should be limited and the existing tax concessions for residential property investment replaced by a new rental housing investment incentive.
12. Income tax deductions for expenses (such as interest payments on debt) relating to passive investments in such assets yielding capital gains (such as housing, shares and collectables) should be limited to income received from those assets, including capital gains realised on subsequent sale. This should apply to all new investments of this type entered into after 1 January 2017.
13. Part of the revenue saved from this measure should be used to introduce a two-tier rental housing investment incentive paid as an annual tax offset for a fixed period (such as 15 years) in respect of new dwellings or improvements for residential rental purposes, below a fixed construction cost. A higher rate would apply to dwellings defined as 'affordable rental housing', as part of a wider package of incentives to support investment in affordable housing.

Additionally we also recommend the government prioritise the following to complement these budget adjustments:

- Consolidate the Ministers for Housing, Community Housing and Homelessness as a Minister for Housing within an Urban and Regional Development or Infrastructure portfolio;
- Utilise Commonwealth funding (NHHA) and a growth fund and/or other incentives to improve transparency and accountability between the Commonwealth and States and to encourage State level reform to planning, changing from stamp duty to land tax and to make more well-located land available for affordable housing;
- The Commonwealth should negotiate with states to identify a specified proportion of NHHA funding/growth funding or both be dedicated to ICHOs to enable a growth strategy to be developed for Indigenous Community Housing;

National Shelter recommends that all funding for homelessness service provision be identifiable and states specify their contribution to funding SHS provision;

- Continue to reform the provision of affordable housing including social housing via transfers of state housing supply to the NFP sector with commitments to title transfer at negotiated levels, with at least one third transferred to the NFP sector;
- Negotiate to re-establish funding for housing and homelessness peak bodies to provide advice to governments on housing and homelessness issues, policy and programs and to advocate publicly for improved housing and homelessness responses.

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