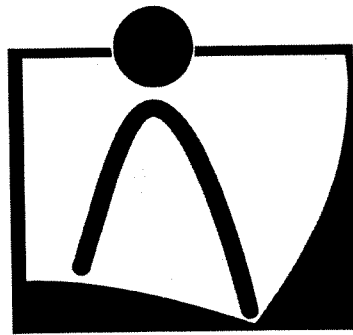


**Submission to the Legislative Assembly Public
Bodies Review Committee**

**Inquiry into the Allocation of Social
Housing**



NCOSS
COUNCIL OF SOCIAL SERVICE
OF NEW SOUTH WALES

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About NCOSS

The Council of Social Service of NSW (NCOSS) is an independent non-government organisation and the peak body for the non-government community services sector in NSW. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in New South Wales.

It was established in 1935 and is part of a national network of Councils of Social Service, which operate in each State and Territory and at the Commonwealth level.

NCOSS membership is composed of community organisations and interested individuals. Affiliate members include local government councils, business organisations and Government agencies. Through current membership forums, NCOSS represents more than 7,000 community organisations and over 100,000 consumers and individuals.

Member organisations are diverse including unfunded self-help groups, children's services, youth services, emergency relief agencies, chronic illness and community care organisations, family support agencies, housing and homeless services, mental health, alcohol and other drug organisations, local indigenous community organisations, church groups, and a range of population-specific consumer advocacy agencies.

Introduction

NCOSS welcomes this opportunity to contribute to the Committee's Inquiry into the Allocation of Social Housing.

NCOSS has a long history of involvement in social housing issues because ensuring that low to moderate income earners have access to appropriate, secure and affordable housing is an important element of any strategy to combat poverty and achieve social justice.

This submission concentrates on the first three terms of reference for the inquiry, namely:

- current levels of funding for the development of new housing stock,
- the effectiveness and appropriateness of housing allocations, and
- the role of community housing in meeting the demand for social housing.

Where relevant we consider recent policy developments at the Commonwealth and State levels in relation to the Commonwealth State Housing Agreement

(CSHA), Reshaping Public Housing, the Metropolitan Strategy and the report of the Legislative Council Inquiry into Community Housing.

For the purposes of this submission we consider the term social housing to encompass public, community, indigenous and affordable rental housing provided on a non-profit basis.

Current levels of funding for the development of new housing stock

Commonwealth State Housing Agreement (CSHA)

Traditionally capital funding (including loan funds in the past) from the Commonwealth under the Commonwealth State Housing Agreement (CSHA) has underwritten the construction of new housing stock for the provision of social housing. Generally CSHA agreements require matching funding contributions from the States and Territories. In 2003-04 CSHA funding to NSW totaled \$409 million, including base Commonwealth funding of \$239 million, matching state funding of \$117 million, Community Housing Program funding of \$22 million, Aboriginal Rental Housing Program funding of \$18 million and Crisis Accommodation Program funding of \$13 million¹.

By agreement CSHA funds can also be devoted to further housing programs, other than for social housing, such as RentStart for private renters, home purchase assistance programs, and research, advocacy, and consumer participation programs.

An agreed proportion of CSHA funds is also allocated to the Crisis Accommodation Program (CAP) to procure additional housing stock for homeless services funded under the separate Supported Accommodation Assistance Program (SAAP). While some SAAP services provide medium term accommodation, SAAP is not generally considered to be part of the social housing system.

Primarily as a result of Commonwealth Budget cuts, real national expenditure on CSHA assistance declined by 30 per cent between 1995-96 and 2004-05². This has seriously impacted on the social housing system at a time when the supply of affordable private rental housing has declined³ and moderate income

¹ *Housing Assistance Act 1996 Annual Report 2003-04*, Commonwealth Department of Family and Community Services, p. 7. The last three mentioned programs are referred to CSHA Identified Programs.

² *Report on Government Services 2006*, Productivity Commission, January 2006 p. 16.7.

³ *Supply and demand in the low rent private market*, AHURI Research & Policy Bulletin Issue 50, February 2005.

households have been increasingly priced out of the home ownership market⁴. As a result of these trends Sydney in particular faces a serious housing affordability problem.

In contrast to reduced Commonwealth spending on social housing over the past decade, tax concessions for investors in housing have grown substantially with capital gains tax concessions adding to the benefits already available through negative gearing. As a result Commonwealth tax expenditures on investment housing have increased substantially, to the benefit of better off and generally older households, contributing to an unsustainable increase in house prices, at the expense of poorer and generally younger households⁵.

It is becoming increasingly difficult to identify just what proportion of CSHA funding is devoted to the creation of new (in the sense of *additional*) housing stock. It is clear that much existing social housing stock is in such poor condition that it needs to be replaced in the near future. There is also a severe mismatch between the housing needs of those on the waiting list and the nature of the available stock held by the Department of Housing⁶. As a result much of the capital works activity of the Department of Housing is focused on modifying or replacing existing dwellings to make them accessible to the frail aged and people with disabilities or otherwise more suitable to households on the waiting list.

Thus the 2005/06 Budget of \$656.7 million for the Housing Policy and Assistance Program in NSW is expected to result in a net increase in social housing stock levels of only 477, with 1,095 new dwellings being partly offset by 618 demolitions and sales⁷.

In conjunction with its Reshaping Public Housing measures, the NSW Government announced in April 2005 that it would be spending \$2.7 billion over a 10 year period to rebuild and upgrade 30,000 public housing dwellings. This program includes the construction or purchase of 12,000 new (*replacement*) dwellings, the modification of 10,000 dwellings to suit people with disabilities and the frail aged, and the refurbishment of 8,000 older dwellings. Of itself, this plan

⁴ See, for example, 'Housing cost worst in the world', *The Daily Telegraph*, 27 January 2006 reporting the findings of the Demographia International Housing Affordability Survey.

⁵ George Megalogenis: 'Families hit by friendly fire', *The Australian* 7 January 2006. The article quotes official data revealing that the capital gains tax concession introduced in September 1999 is now costing taxpayers \$4.39 billion a year.

⁶ Nearly half current public housing stock consists of 3 bedroom cottages, much of it built more than 30 years ago when 70% of applicants for housing were couples with children. Now applicants are increasingly single people or single parent families, with many on an age or disability support pension.

⁷ 2005/06 NSW Budget Commentary on the Housing Policy and Assistance Program, NSW Department of Housing, May 2005 p.27.

does not appear to involve any net increase in total social housing dwelling numbers⁸.

The financial pressures on the Department of Housing are highlighted by its need to seek additional funding from NSW Treasury to meet its working capital⁹ and maintenance requirements¹⁰ and the Government's imposition of additional rental charges on tenants as part of the Reshaping Public Housing package. We have yet to see any modelling that would convince us that these measures have placed the Department on a sustainable financial basis over the medium term.

The fundamental problem remains that the public rental housing system does not receive any recurrent funding from either the Commonwealth or NSW Governments to enable it to keep rent levels affordable for those who primarily derive their income from social security payments. With an increasingly targeted eligibility system, around 90% of tenants are now entitled to rebated (or income related) rents. The problem is that the number of tenants paying full market rents is insufficient to meet the resulting shortfall in rental income. This structural problem with the public housing budget will only be overcome if an improved form of Commonwealth Rent Assistance is extended to public housing tenants (enabling rental charges to be increased) or if the State agrees to treat rental rebates as a community service obligation to be funded in full out of consolidated revenue.

The following pages summarise our perspective on commonly suggested ways of attracting private investment into social or affordable housing, via the planning system, targeted tax measures and Public Private Partnerships (PPPs).

Use of planning mechanisms

To date the NSW Government has been cautious about using its planning powers to either require or encourage developers to contribute to the provision of affordable housing. While State Environmental Planning Policy (SEPP) 70 provides a legal basis for compulsory developer levies, to date approval has only been given for the implementation of schemes at Ultimo-Pyrmont and Green

⁸ See Hon Joe Tripodi MP: '\$2.7 billion investment in new and upgraded homes', Minister for Housing media release 27 April 2005. The statement says 'the total amount of public and community housing in NSW will remain at the current level of 145,000 homes.'

⁹ For its working capital requirements, it received a first payment of \$20 million in 2005-06 towards a total allocation of \$190 million over 4 years; see *2005/06 NSW Budget Commentary on the Housing Policy and Assistance Program*, NSW Department of Housing, May 2005 p.2.

¹⁰ For its maintenance requirements, it received an initial loan of \$125 million, with \$100 million to be spent in 2005-06, as part of an in principle agreement to provide total loan funding of \$1 billion, see *2005/06 NSW Budget Commentary on the Housing Policy and Assistance Program*, NSW Department of Housing, May 2005 p.12.

Square in the City of Sydney and within the City of Willoughby. With these schemes, the level of the developer contribution varies as follows:

- Willoughby – equivalent to 4% of accountable floor space,
- Green Square – equivalent to 3% of total floor area for residential developments and 1% for non-residential developments, and
- Ultimo-Pyrmont – equivalent to 1.1% of total floor area for non-residential developments and 0.8% for residential developments¹¹.

Despite having the lowest rate of developer contribution, the Ultimo Pyrmont scheme is the most developed of the three, partly because it also obtained substantial Commonwealth capital funding under the now abolished Building Better Cities program as well as a State Government funding contribution based on 4% of the proceeds of sales of state-owned land in the redevelopment area. The Ultimo Pyrmont scheme is administered by City West Housing Pty Ltd, which also administers the Green Square scheme. Note that to achieve social mix and financial viability, the City West properties house a mixture of very low income, low income and moderate income tenants¹². It thus has a much wider target group than current restrictive income eligibility limits for public and community housing.

NCOSS has been told that other affordable housing schemes are being developed by the State Government for the former ADI site (bordering Blacktown and Penrith local government areas), Penrith Lakes, Sydney Olympic Park and Redfern Waterloo. We have been seeking to obtain clarification from the Government about the details and extent of these, and when they will commence.

NCOSS believes there is considerable scope to make greater use of the planning system to generate additional affordable housing stock. We have consistently argued this position in our lobbying efforts in relation to the Metropolitan Strategy. We were pleased that the final strategy, released last December, outlined a number of commitments including that the Government will:

- provide guidance on the use of negotiated planning agreements to provide affordable housing as part of the provision of social and physical infrastructure on major development sites (C4.3.1),
- provide advice on the use of density bonus schemes, where an increase in development density is offered in exchange for the provision of affordable housing (C4.3.2),

¹¹ *State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes)*.

¹² For the purposes of SEPP 70 very low income households receive less than 50% of the Sydney median household income, low income households receive between 50-80% and moderate income households between 80-120%. See *State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes)* p.4.

- allow for inclusionary zoning which requires an affordable housing levy from certain development, such as in urban renewal centres and corridors and major sites (C4.3.3), and
- provide for affordable housing as part of the proposed standard Local Environmental Plan (LEP) being developed under the planning reform agenda (C.4.3.4)¹³.

While welcoming these commitments, NCOSS is concerned that no timetable has been given for their implementation and the Government remains reluctant to adopt a formal target for the level of affordable housing stock that will be generated from these measures.

NCOSS also welcomes the decision by the Premier Mr Iemma to establish an Affordable Housing Interdepartmental Committee, with broad terms of reference, to develop policy options for the expansion of public and affordable housing¹⁴. We await with interest the outcome of this process.

Public Private Partnerships (PPPS)

Another suggested mechanism for obtaining private investment in social housing is through Public Private Partnerships (PPPS).

While there has been testing of the market in relation to several redevelopment proposals in Sydney, only the Bonnyrigg project appears to be actually proceeding. That project seeks to substantially reconfigure the Bonnyrigg estate and in so doing ensure that public housing provides no more than 30% of the resulting housing stock. In order to reduce the number of public housing dwellings at Bonnyrigg without any net overall loss in stock numbers, the private partners will be required to provide replacement social housing stock in other parts of the Fairfield and adjoining local government areas.

The basic concept entails giving private financiers and developers the right to develop and sell private housing on what is currently publicly owned land, in return for the provision of replacement social housing stock at both Bonnyrigg and elsewhere. Doing so will require the relocation of hundreds of public housing tenants during the redevelopment process, at considerable social cost.

In our view, it remains to be seen whether the outcomes of the Bonnyrigg project will be of net benefit to both the taxpayers of NSW and to social housing tenants. We certainly would not support any further PPP public housing projects until this project has been finalized and its provisions subject to proper public scrutiny.

¹³ *City of Cities: A plan for Sydney's future*, Department of Planning, December 2005, p.148-149.

¹⁴ *City of Cities: A plan for Sydney's future*, Department of Planning, December 2005, p.145.

Leased stock

Headleasing provides another mechanism by which privately owned housing stock can be secured for the provision of social housing.

It is projected that the Department of Housing will have obtained some 8,600 leased properties by June 2006, with two thirds of these being devoted to community housing¹⁵.

In addition to such arrangements, NCOSS has urged the State Government to consider granting targeted State tax concessions, especially land tax exemptions, for investors who agree to lease housing stock on a long term basis to non-profit housing associations for use as community or affordable housing.

The effectiveness and appropriateness of housing allocations

In this section we consider current arrangements for the allocation of social housing and the likely implications of the NSW Government's Reshaping Public Housing reforms.

Current allocation arrangements

Under current arrangements access to social housing is tightly targeted and generally involves lengthy waiting times. Eligibility is primarily based on an income test, with single applicants required to have a weekly income of less than \$395. Different limits apply to different household forms. The upper income limits have not been increased for more than a decade, with the result that an increasing number of low income households are no longer eligible to go on the waiting list. A segmented waiting list applies, with five segments including wait turn and priority housing.

The level of targeting is emphasized by recently published data on the characteristics of applicants newly housed in 2004-05¹⁶.

In that year, 'low income' households represented 94.2% of all new allocations for indigenous housing in NSW, 94.0% of new allocations for public housing and

¹⁵ By the end of 2005-06 the projected total is 8,617 dwellings, with 5,732 allocated to community housing, 2,666 to public housing and 219 to crisis accommodation. There is currently no leased stock used for indigenous housing. See *2005/06 NSW Budget Commentary on the Housing Policy and Assistance Program*, NSW Department of Housing, May 2005 p.27.

¹⁶ Taken from *Report on Government Services 2006*, Productivity Commission, January 2006, various tables.

88.9% of new allocations for community housing. These are generally households earning the equivalent of the maximum rate social security payment for their particular household type.

'Households with special needs' comprised 74.0% of new community housing tenancies in NSW, 55.7% of new public housing tenancies and 51.5% of indigenous housing new tenancies. The special needs category covers households that have a household member with a disability, a principal tenant aged under 25 or over 75, or households with indigenous members.

'Greatest need' applicants constituted 73.9% of all new community housing allocations in NSW, 22.8% of new public housing allocations and 10.1% of indigenous housing allocations. The greatest need category includes the homeless, those in inappropriate housing or in housing that is adversely affecting their health, or those that have very high rental housing costs.

The downside of current allocation arrangements

While the practice of tightly targeting eligibility and allocation practices has superficial appeal, it does have a number of clear downsides, particularly for public housing.

The first downside is that a highly targeted social housing system tends to become a marginalized form of housing, separate from the mainstream housing system. This tends to beget an 'us or them' mentality that undermines community support for social housing.

The second downside is that the more tightly targeting there is on income grounds, the less scope there is for rental payments from moderate income earners to cross-subsidise the costs of housing those on very low incomes. (This problem is less severe in community and indigenous housing because tenants have access to Commonwealth Rent Assistance, which enables very low income tenants to pay relatively higher rental payments).

All other things being equal, a system where 20% of tenants pay market rents is likely to be more financially sustainable than one where only 10% pay market rents. The fact is that all States and Territories have been producing operational deficits on their public housing budgets in recent years¹⁷. Eventually this leads to demands for increased rental charges, one-off funding injections from State budgets, deferral of essential maintenance spending and so on.

¹⁷ *Sustainable financing for public housing authorities*, AHURI Research and Policy Bulletin Issue 41, April 2004.

The third downside of tighter targeting is that growing numbers of disadvantaged households are concentrated in areas that have high levels of social housing. This is particularly the case with the Department of Housing's large public housing estates, which are home to about 30% of all public housing households in NSW. In fact almost half of all the state's public housing dwellings are located in just 10 local government areas in Western and Inner Sydney, the Hunter and Illawarra¹⁸.

NCOSS has long expressed concern about the need to reduce locational disadvantage, especially on public housing estates. We are supportive of community regeneration efforts if they lead to measurable improvements in opportunities for low income households. We point out, however, that there is a clear contradiction in Government efforts to achieve a greater social mix on estates at the same time as it tightens the eligibility and allocation requirements for access to social housing.

Reshaping Public Housing

The Government's April 2005 Reshaping Public Housing package entails far reaching changes to way that public housing operates in NSW. Particularly relevant to this inquiry is the decision to replace 'public housing for life' (in reality continuous tenure of indeterminate duration) with a system of fixed term leases of varying duration and to introduce a housing need test¹⁹ alongside the income test in determining an application for housing assistance.

These new arrangements are due to commence from July 2006. From that date applicants will have to pass a housing need test as well as an income test. Households allocated housing will be assessed for a short term (up to 2 years), medium term (5 year) or long term (10 year) tenancy agreement. Six months before the end of their agreement their income and housing needs will be reassessed to determine if they will be offered a further tenancy agreement and, if so, for what period. It has been made clear that there will be no guarantee that a tenant will be offered a further tenancy agreement at this review stage.

To date the detailed criteria to be applied to these processes and the extent of transitional assistance, if any, to be offered to those considered ineligible for continuing public housing have not been discussed in any detail with the sector. We expect that draft proposals will be released for public comment in the very near future.

¹⁸ In descending order these local government areas were Blacktown, Campbelltown, Wollongong, South Sydney, Bankstown, Parramatta, Liverpool, Fairfield, Newcastle and Randwick. Source: *Number of dwellings owned by the NSW Department of Housing in Local Government Areas as at 30 June 2003*, Department of Housing table.

¹⁹ 'Major changes to public housing', Hon Bob Carr MP, media release by the then Premier, 27 April 2005.

From the outset NCOSS has expressed its opposition to this aspect of the Government's agenda. The changes deliberately undermine the security that is one of the key strengths of the social housing system. One of the key failures of the private rental market in Australia is its inability to provide security of tenure. This results in significant costs and disruption to the education, work, travel and recreation arrangements of private tenant households. We see no advantage in reshaping the public housing system along similar lines, wasting time and energy in churning people through various segments of the housing and supported accommodation systems.

NCOSS very strongly believes that short term fixed term tenancy agreements should be the exception rather than the rule in our social housing system. We believe that households newly allocated a public housing tenancy should be offered a long term (10 year) agreement unless there are strong grounds for believing that their circumstances will substantially improve in the immediate future and that such improvements will be sustained for an extended period.

Nominated housing

Also relevant to the Committee's consideration of allocation systems is the whole concept of nominated housing. By this we broadly mean arrangements whereby set numbers of public or community housing places are set aside for agreed categories of special need households who have access to support services provided through other government (non-housing) programs. Often these arrangements result from agreements negotiated between two or more government agencies.

There are currently two such programs in operation, the Housing and Accommodation Support Initiative (HASI) and the Port Jackson Supported Housing Program.

HASI is jointly funded by the NSW Departments of Health and Housing and aims to improve housing stability and community participation for people with mental illness through providing them with access to community based accommodation and coordinated support services. Housing is provided to HASI clients by DOH or community housing associations, clinical support is provided by Area Mental Health Services and 3 non government organisations are contracted to act as Accommodation Support Providers. The HASI model has been shown to work well but the number of places available is extremely limited.

The Port Jackson Supported Housing Program is a Department of Housing initiative to expand the range of housing options for people who are homeless, frail aged, people with a disability, people with a mental illness and other people

with support needs in the inner city region of Sydney. Housing provides funding for a limited number of housing places, which are administered by a community housing provider, with access restricted to clients in receipt of a support package from one of 20 or so registered support partners, who can be other government agencies or non government organizations. Note that unlike HASI the Port Jackson program does not involve any additional funding to expand the availability of community support packages.

As part of the Reshaping Public Housing agenda there is likely to be consideration given to the creation of further arrangements to combine the availability of housing and support services. The proposed Housing and Human Services Accord provides a framework under which this might occur.

NCOSS is concerned at indications that the Government may seek to do so without properly consulting with the non-government sector about appropriate partnership arrangements, and purely through reprioritizing existing Budget allocations. We have pointed out to the Government that without an increased investment in social housing giving greater priority to applicants with high support needs can only come at the expense of others seeking housing on a wait turn basis or those who do not currently have access to a support package. Equally we have noted that without an increased investment in support services giving greater priority to social housing tenants can only occur at the expense of other consumers of support services who live in private rental or who are home owners.

The role of community housing in meeting the demand for social housing

Community housing is a modest but growing element of the overall social housing sector in NSW. As at 30 June 2005 there were some 200 community housing providers providing rental accommodation to over 10,000 households. The majority of these tenancies are managed by 43 housing associations and 40 housing cooperatives, with a further 125 community service organizations managing smaller numbers of properties²⁰. (All this data excludes crisis accommodation services provided under the SAAP program).

NCOSS supports the expansion of all elements of the social housing system because there are substantial unmet needs to be met. We see an expanded community housing sector as offering particular advantages as follows:

- the flexibility to respond and adapt to local community need,

²⁰ *Commonwealth-State Housing Agreement national data reports: CSHA community housing*, Australian Institute of Health and Welfare, January 2006, p.10-11.

- links with the local community to build place-based responses to community need,
- a heightened capacity for tenant involvement, particularly through governance structures, and
- the ability to maximize social housing resources through the use of concessions and benefits available to not-for-profit providers and by drawing in new resources for clients through partnerships with both non-government and government agencies²¹.

We note that survey data continues to show very high levels of customer satisfaction with community housing. In the most recent survey 48% of NSW community housing tenants said they were very satisfied overall and a further 38% indicated they were satisfied²².

The November 2003 report by the Legislative Council Standing Committee on Social Issues²³ outlined a comprehensive agenda for the further development of the community housing sector. Action is underway to implement two of its key recommendations, namely the development of a five year strategic policy framework and the introduction of legislation to recognize and support community housing in this State.

To date community housing stock has mainly come from either headleased properties from the private sector or the transfer of (previous public housing) stock from the Department of Housing. The Commonwealth has agreed to further stock transfers, from public to community housing, to a maximum of 2,500 properties over the life of the current 5 year CHSA agreement²⁴.

To optimize its future role in the housing system the community housing sector needs to be able to develop an asset base by having title to properties. It is only by having such an asset base that they will be able to borrow or be in a better position to enter into joint venture arrangements with the private sector or local government bodies.

There is potential for affordable housing projects developed via the planning system to assist some community housing associations to grow and acquire substantial assets, as City West Housing Pty Ltd has done. Under the

²¹ *Developing requirements for legislation that recognises and supports NSW community housing: options paper*, ARTD, September 2005, p. 4.

²² Results of April/May 2005 customer satisfaction survey, reported in *Commonwealth-State Housing Agreement national data reports: CSHA community housing*, Australian Institute of Health and Welfare, January 2006, p.30.

²³ *Report on Community Housing*, Legislative Committee Standing Committee on Social Issues, November 2003.

²⁴ *Commonwealth State Housing Agreement: bilateral agreement for NSW 2003/04 to 2007/08*, Signed on 25 June 2004, p.14-15.

Government's current thinking it is likely, however, that such opportunities will be restricted to key strategic redevelopment corridors and centres identified in the Metropolitan Strategy, as well as state-owned sites. If this is the case, such growth is likely to be directed to a relatively small number of housing associations or affordable housing providers.

This means that resolving the question of the transfer of title of CSHA properties managed by them remains the key to placing the community housing sector on a firmer footing for the future.

In relation to the cooperative housing sector there is also scope to explore options for the development of cooperative home purchase schemes. Under such schemes cooperative members/shareholders contribute capital towards the purchase of cooperative properties. If the member later leaves the project their original capital is returned. Capital gains in property values are usually vested in the cooperative to be used to ensure affordability for future shareholders.

Conclusion

NCOSS welcomes the Committee's interest in the future of social housing in this state. There are many important issues raised by the terms of reference for this inquiry, as befits the major challenges facing social housing providers and consumers.

It is clear that the number of NSW households in housing (affordability) stress continues to grow. This situation will not be turned around without energetic government action, at Commonwealth and State levels, across portfolios. Most of all we urgently need additional capital investment in the system from government sources and from the private sector via the planning system.

Given the breadth of the Committee's inquiry, we have not attempted to provide a long list of detailed recommendations on all issues to do with public, indigenous, community and affordable housing. We would instead recommend that the Committee particularly turn its attention to:

- the need for reporting systems to Parliament and the community that separate out progress on acquiring new stock for each category of social housing separately from progress on replacing or upgrading existing stock,
- the need to provide the public housing system with a guaranteed source of income that allows it to continue providing affordable rebated rents for low income earners without having to incur operational deficits,

- the need to clarify the extent to which the planning system will be used to generate additional affordable housing stock in line with the Government's Metropolitan Strategy announcements,
- the need to publicly scrutinize the Bonnyrigg PPP project when it is finalized, before considering any further public housing PPP projects,
- the case for providing targeted state land tax concessions to private investors who agree to lease housing stock on a long term basis to non profit community housing associations for the provision of affordable housing,
- the implications of further targeting of eligibility on community support for social housing, the financial viability of the system and further concentrating disadvantaged people on large scale public housing estates,
- the principle that under the new system of fixed term renewable tenancies short term tenancies should be the exception not the rule,
- the need for full and proper consultation with interested stakeholders about proposals to reserve some social housing places for clients receiving a support package from another government or non-government agency, and the need for additional resources to do so, and
- the need for continuing work on expanding the community housing sector, including consideration of options for the transfer of title over CSHA stock they are managing.

Finally NCOSS notes that the likely timeframe for the conduct of the Inquiry overlaps with a number of expected Government announcements which impact directly on the Inquiry's terms of reference. These include the details of the new renewable tenancy agreement system and the work of the Premier's Affordable Housing Interdepartmental Committee. It may be of value for the Committee to have further discussions with key stakeholders when the details of these measures are known.

References

- Annual Report 2003–04 Housing Assistance Act 1996 (2005:35-42), Commonwealth Government 2005
- Australian Government's Productivity Commission Report on Government Services 2006: Part G Housing, Commonwealth of Australia 2005
- Australian Institute of Health and Welfare (AIHW) 2002, 2003, 2003, 2004, 2005, CSHA National Data Reports: Public Rental Housing, Canberra
- BERRY, M., Affordable Housing Project Background Paper Prepared for the Brotherhood of St Laurence in partnership with Committee for Economic Development Australia, RMIT University December 2002
- Department of Housing 2005 Housing Trends, 200,
- Department of Planning, NSW Government's Metropolitan Strategy City of Cities: A plan for Sydney's Future, December 2005.
- KELLY, S, CROFT, Q., GILLETT, P., SHEPPARD, A., Housing Affordability on the Far North Coast of NSW – A report commissioned by the Bananacoast Community Credit Union, presented to the Affordable Housing Solutions Conference, Byron Bay September 2005
- MULLINS, P. WESTERN, J. "Examining the links between housing and nine key socio cultural factors", for the Australian Housing and Urban Research Institute (AHURI) Queensland Research Centre, November 2001
- NCOSS Measuring Up March 2005