



# CITY COMMUNITY SERVICES AND CULTURE COMMITTEE AGENDA & REPORTS

for the meeting

Tuesday, 19 September 2023  
at 5.00 pm

in the Colonel Light Room, Adelaide Town Hall

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Members – The Right Honourable the Lord Mayor, Dr Jane Lomax-Smith  
Councillor Giles (Chair)

Councillor Davis (Deputy Chair)

Councillors Abrahamzadeh, Couros, Elliott, Hou, Li, Martin, Noon, Dr Siebentritt and Snape

**1. Acknowledgement of Country**

At the opening of the City Community Services and Culture Committee meeting, the Chair will state:

'Council acknowledges that we are meeting on traditional Country of the Kurna people of the Adelaide Plains and pays respect to Elders past and present. We recognize and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kurna people living today.

And we also extend that respect to other Aboriginal Language Groups and other First Nations who are present today.'

**2. Apologies and Leave of Absence**

On Leave -

Councillor Giles

**3. Reports for Recommendation to Council**

- |     |  |         |
|-----|--|---------|
| 3.1 | Adelaide Aquatic Centre Redevelopment - Consultation Results   | 3 - 9   |
| 3.2 | National Housing and Homelessness Plan Issues Paper Submission | 10 - 23 |

**4. Closure**

## Adelaide Aquatic Centre Redevelopment - Consultation Results

Strategic Alignment - Thriving Communities

Public

Tuesday, 19 September 2023  
City Community Services and Culture Committee

**Program Contact:**  
Jennifer Kalionis, Associate Director City Culture

**Approving Officer:**  
Iliia Houridis, Director City Shaping

### EXECUTIVE SUMMARY

This report outlines the results of the community consultation undertaken on the draft Construction Licence (draft Licence) and the essential terms of the draft 42-year Lease Agreement (draft Lease Agreement) to facilitate the Adelaide Aquatic Centre Redevelopment (AACR) in Denise Norton Park / Pardipardinyilla (Park 2).

At the March 2022 State Election, the incoming Labour Government committed \$80 million to redevelop and operate a new Adelaide Aquatic Centre at Park 2. Through its 2023/24 Annual Business Plan and Budget, Council consulted with the community on its commitment for \$20 million in the Long Term Financial Plan for the purpose of demolition of the current venue to facilitate delivery of the AACR and reinstate a community oval on Park 2.

Consideration of the draft Licence and draft Lease Agreement through consultation is part of the process that follows earlier decisions by Council to seek investment for the redevelopment of the current Adelaide Aquatic Centre. Prior to this consultation process by Council, significant consultation had already been undertaken by the State Government on the project scope and location.

The purpose of Council's consultation was regarding the terms and conditions for the draft License and draft Lease Agreement. It is noted that the majority of responses represent a part of the community that does not support the project. Although the consultation on the draft Licence and draft Lease Agreement follows previous consultation processes and decisions regarding the State Government's AACR announcement, the results illustrate that there is still opposition to this project proceeding, or to elements of how it is proceeding.

Except for the submissions that sought to have the AACR built elsewhere, the concerns and objections raised regarding the draft License and draft Lease Agreement are minimal and are mitigated through commitments already in place, and outlined in this report.

The consultation closed on 3 August and generated 280 responses, 15% percent came from respondents within the City of Adelaide (postcodes 5000 and 5006) and 85% from outside the City of Adelaide. This report provides an overview and assessment of 'what we heard' from the community.

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### RECOMMENDATION

The following recommendation will be presented to Council on 26 September 2023 for consideration

THAT THE CITY COMMUNITY SERVICES AND CULTURE COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the assessment of the community consultation findings.
  2. Notes that a further report detailing the essential terms and the negotiated draft Lease Agreement will be presented to Council in November 2023.
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## IMPLICATIONS AND FINANCIALS

City of Adelaide 2020-2024 Strategic Plan	<b>Strategic Alignment – Thriving Communities</b> Outcome 1: Thriving Communities – 1.1 Leverage the Adelaide Park Lands to promote health, wellbeing and lifestyle experiences.
Policy	<a href="#">Adelaide Park Lands Management Strategy 2015-2025</a> Continue to enhance the Adelaide Aquatic Centre to meet community expectations. Generate a greater focus on servicing the play space and picnicking areas through increased offerings and better access to the existing commercial operations. <a href="#">Community Land Management Plan</a> The current Community Land Management Plan (CLMP) for Denise Norton Park / Pardipardinyilla (Park 2) envisages an Aquatic Centre – however it requires updating to accommodate the State Government project and the long-term leasing of the new Adelaide Aquatic Centre. Consultation on the CLMP occurred at the same time as consultation on the draft Licence and draft Lease Agreement. Results of the CLMP consultation will be presented to Council separate to this report.
Consultation	<i>Local Government Act 1999 (SA)</i> Section 202 – Community consultation occurred over a three-week period (13 July 2023 to 3 August 2023).
Resource	Undertaken within current operational resources.
Risk / Legal / Legislative	Risk mitigation approach has been considered in the Administrative actions in the Consultation Summary Report – view Link 1 <a href="#">here</a> .
Opportunities	The State Government’s Adelaide Aquatic Centre Redevelopment provides a unique opportunity re-build an aged and highly valued community asset.
23/24 Budget Allocation	Within existing resources
Proposed 24/25 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Not as a result of this report
23/24 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

# DISCUSSION

## Background

1. As part of the State Government's election promise, \$80 million was originally committed to redevelop the existing Adelaide Aquatic Centre in the Park Lands located in Denise Norton Park / Pardipardinyilla (Park 2).
2. The State Government, through the Department for Infrastructure presented their original proposal to Council, which included public consultation by the State Government with relation to the location within Park 2, where the south west corner of Park 2 was ultimately selected.
3. The State Government further developed their proposal and provided plans that took into account feedback from Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) and Council.
4. Importantly, to meet feedback received through consultation processes relating to the project, its scope and its location, the State Government determined to deliver on a request to increase the buffer zone to the residents of Barton Terrace West. This was achieved with the buffer increasing from approximately 40 metres to 70 metres.
5. As a result, the State Government also announced a change to the timing of the delivery of the project. To accommodate the increased buffer zone, the current facility requires earlier demolition. This has resulted in a period of time, currently August 2024 to December 2025, where current users will need to temporarily use alternate venues, until the new facility opens.
6. The State Government increased the scope of the building, however its physical footprint on the Park Lands was decreased by 1,000 square metres.
7. Council and Kadaltilla expressed a desire for fewer car parks at the facility on Park Lands. The State Government has predicated its design on increased visitations from the current 700-750,000 annual visitations to between 1.2-1.3 million annual visitations. This has necessitated a higher number of car parks, albeit on an overall reduced footprint for the development.
8. The State Government has also committed to an overall decrease in the total footprint of the building, car park and hard stand areas to provide a net return of Park Lands of 1,000 square metres. It also committed to look at further reductions of hard stand areas.
9. On 10 June 2023, the State Government announced that it had increased its investment to \$135 million as part of the 2023/24 State Budget process to accommodate its final design and cost escalations.
10. These design and program changes were noted by Council and Kadaltilla, with Council giving approval to enter into a Project Agreement with the State Government, subject to progressing and finalising its statutory obligations.
11. In consideration of those changes, Council made provision for up to \$20 million in the Long Term Financial Plan which was presented to the community as part of Council's consultation on its 2023/24 Annual Business Plan and Budget. The purpose of these funds were specific to the demolition of the existing centre and to reinstate a new community oval on Park 2, effectively in place of the current Adelaide Aquatic Centre.
12. At its meeting of 27 June 2023, Council received an update on the Adelaide Aquatic Centre Redevelopment (AACR) revised project timeline, confirmation of the final location of the redeveloped centre and an overview of the proposed Project Agreement between the Minister for Infrastructure and Transport (Minister) and The Corporation of the City of Adelaide (CoA). Two of the key guiding principles associated with the Project Agreement, are:
  - 12.1. agreement on a form of licence for the purpose of commencing construction that is in line with Council policy, and
  - 12.2. to negotiate a long-term lease to commence after construction is complete that does not exceed 42 years.
13. Community consultation was undertaken in accordance with Council Consultation Policy (2019) between Thursday 13 July and Thursday 3 August 2023 on:
  - 13.1. the draft Construction Licence to facilitate the construction of the State Government's AACR, and
  - 13.2. the essential terms of a draft 42-Year Lease Agreement for an area in Denise Norton Park / Pardipardinyilla (Park 2) between the Minister and CoA.
14. A comprehensive summary of the results of the community consultation, Administration commentary and recommended actions are in Link 1 to this report - view Link 1 [here](#).

## **Community Engagement Process and Methodology**

15. The consultation objectives and engagement approach are detailed in Link 1 to this report - view Link 1 [here](#).
16. All submissions that were emailed directly to the Your Say Adelaide email address were personally acknowledged by Administration and where necessary, Administration requested that additional residential information be supplied to enable a broader demographic analysis.
17. The content of each submission was reviewed and grouped into key themes to enable a statistical analysis.
18. In total 280 submissions were received from respondents:
  - 18.1. 5.7% reside in North Adelaide (postcode 5006)
  - 18.2. 9.3% reside in Adelaide (postcode 5000)
  - 18.3. 31.8% reside in South Australia
  - 18.4. 1.4% reside outside of South Australia, and
  - 18.5. 50.7% did not supply an address.
19. During the consultation period the Adelaide Park Lands Association (APA) proactively engaged their community to submit a standard 'pre-drafted' submission that reflected the collective views of the APA.

## **Representative Organisation Submissions**

20. Of the 280 submissions, 217 were pre-drafted submissions, representing 78% of the total submissions. Each individual submission has been included in the total summary of assessment. These groups included Adelaide Park Lands Association, North Adelaide Historical Society and the South West Residents Association, the three key themes raised were:
  - 20.1. Construct the new aquatic centre on a brownfield site
  - 20.2. Prioritising protection and conservation of the Park Lands
  - 20.3. World Heritage Listing.

## **Individual Responses**

21. A summary of the remaining responses received from individuals were consistent with the three key themes outlined above:
  - 21.1. 57% concerned with the site selection on the Park Lands and had preference for a brownfield site
  - 21.2. 36% seeking the prioritisation and protection of the Park Lands
22. The individual responses, also raised the following concerns:
  - 22.1. 12% concerned with prioritising sustainability and climate change mitigation
  - 22.2. 10% were concerned that the location had resulted in the early closure and loss of facility during the construction period
  - 22.3. 7% were concerned the site did not provide adequate public transport options and resulted in greater carparking on the Park Lands
  - 22.4. 2% were concerned that the project was a waste of money
  - 22.5. 2% were concerned with the impact on Aboriginal cultural heritage.

## **Responses Directly Attributable to the License**

23. Respondents highlighted the following concerns:
  - 23.1. License fee should not be nominal, but a commercial rate
  - 23.2. Size of the compound and alienation of Park Lands during construction.
24. 2.1% of respondents also supported the granting of the draft Licence and draft 42-Year Lease to commence after the AACR construction is complete.
  - 24.1. Supportive respondents recognised that a diversity of uses across the Park Lands encourages greater use by the community. These respondents:
    - 24.1.1. requested that adequate cycling infrastructure and good secure bike parking be included with this project.

24.1.2. recognised that trees will be lost but see this as an opportunity for additional trees to be planted as part of the AACR project.

### **Responses Directly Attributable to the Lease**

25. Respondents highlighted that:
- 25.1. Full particulars of the actual Lease were not provided.

### **Analysis of Consultation Responses**

26. We note that common amongst the majority of the submissions were three key themes. Below is commentary with regard to those concerns.
27. Construct new aquatic centre on a brownfield site
- 27.1. These responses were the majority and were seen across the 217 pre-drafted submissions and some of the individual responses.
- 27.2. The State Government have previously advised of work they undertook to assess alternative sites when first announcing the project. The details of those assessments were not formally provided, but the advice provided to Council as the basis for not progressing with an alternative site was that none met the State's criteria for size, location and financial viability of the project, including the cost to acquire land.
- 27.3. It is further noted that in the previous term of Council, all major political parties were approached to seek funding contributions towards replacement of the current facility. This was on the basis that the current facility is at the end of its useful life, requires significant maintenance and as currently operating requires annual subsidisation by Council to support the community to continue its use of the facility and offset the operational loss of the venue.
28. Prioritising protection and conservation of Park Lands
- 28.1. Respondents considered AACR a lost opportunity to return existing site to Park Lands for more green space and biodiversity.
- 28.2. The draft License and draft Lease provided for consultation adhere to all legislative and policy requirements as they relate to the Park Lands.
- 28.3. Their purpose is to ensure that any uses approved for the Park Lands are managed in accordance with the expectation of Council and in line with its policies and governing legislation.
- 28.4. In review of the submissions received it is evident that respondents deemed the use of the Park Lands for the purposes of an Aquatic Centre inappropriate, and on that basis sought that the draft License and/or the draft Lease not be endorsed, as opposed to any issues with the draft License or Lease themselves.
- 28.5. The Community Land Management Plan (CLMP) for Park 2, including the revisions that have been out to consultation do envisage an Aquatic Centre on Park 2. The CLMP has been part of a separate consultation process and report.
29. World Heritage Listing
- 29.1. Council has supported the progress of a Joint World Heritage Bid for Adelaide and its Rural Settlement Landscapes (World Heritage Bid) Submission with support from the State Government to progress to the Tentative Bid Submission Phase.
- 29.2. In the preliminary work to date, there is no indication that any of the northern Park Lands and the current or proposed uses of those Parks (Parks 2 – 6) create a threat to the bid proposal.
- 29.3. This portion of the Adelaide Park Lands represents a largely intact and highly representative and consistent application of the original form of Colonel Light's Plan. It should be noted that this is consistent with the East, South and West boundaries of the Park Lands and its Squares.
- 29.4. Whilst we acknowledge the concern raised, there is no evidence on the work undertaken to date that the granting of a Licence and Lease presents any risk to the progress of the World Heritage Bid.
30. Consideration of the other issues raised through the balance of the individual responses is provided below:
31. Environmental impacts/sustainability outcomes associated with development
- 31.1. State Government has completed an Environmental Assessment Report for the project as part of the State Commission Assessment Panel (SCAP) planning assessment.



- 31.2. DIT have presented a range of Water Sensitive Urban Design (WSUD) principles, the northern orientation of the facility for passive solar benefits, its commitments to planting and landscape and a range of Environmental Sustainable Development (ESD) principles applied to the built form.
- 31.3. DIT have committed to using locally sourced and low carbon emission materials and for the new facility to be powered using 100% renewable energy, attracting a 5-star Green energy rating.
32. Early closure of existing Adelaide Aquatic Centre
- 32.1. It is notable that this concern included support for the delivery of the new venue, but focussed on the impact of having to attend elsewhere during the demolition and construction to facilitate delivery of the new venue.
- 32.2. The current venue will remain operational until demolition, which is currently scheduled for August 2024.
- 32.3. The State Government have committed through the Office for Recreation, Sport and Racing to provide alternative locations for the groups and individuals during the period where the current facility will not be available, and the new facility is under construction. The State Government will work with users of the current facility to link them to alternatives over the coming year.
- 32.4. As stated previously, to meet the need to move the facility further north into Park 2, it is not possible for the State Government to progress delivery of the new facility without demolishing the current facility.
33. Lack of public transport options to new AACR, and increased Car Parking on the Park Lands
- 33.1. Council also provided this feedback to the State Government, which recommended consideration of a reduction in the size of all hard stand areas and the number of car parks, as a result DIT committed to:
- 33.1.1. Look at further reductions to the overall hardstand and to consider car park removal in the future should public transport improve along with any increases in alternative active modes of transport.
- 33.1.2. Council remains committed to looking at removal of other hard stand and car parks on the Park Lands.
34. Loss of trees and loss of recreational facilities (Barton East/West Ovals)
- 34.1. Kadaltilla expressed concern about the potential loss of up to 15 significant and / or regulated trees and recommended all measures be taken to reduce the loss through the design phase and building process.
- 34.2. Kadaltilla requested a commitment from DIT to a net increase in the tree canopy in the area of the proposed lease.
- 34.3. DIT has committed to replanting in excess of the number of trees proposed for removal, with final details to be provided as they finalised their detailed designs.
- 34.4. Administration is working with DIT to formalise the tree planting plan, which includes semi mature replacements and seeks a minimum replacement ratio of between 3:1 and 6:1 for those trees proposed for removal.
- 34.5. Some responses also illustrated conflict with other objectives or priorities sought by this proposal. In this instance, some respondents prioritised the loss of trees and recreational facilities over the increased buffer to the residents of Barton Terrace West and supported development on the original site on Park 2 over the final site selection.
- 34.6. Council has made provision in the LTFP through its endorsed 2023/24 Annual Business Plan and Budget to deliver a new community oval on Park 2.
- 34.7. Council will receive a Prudential Report on that investment in September.
35. 97.9% of respondents raised concerns which reflected non support for the license on the basis of non support for the State's project. On that basis, the results relating to specific feedback on the License and Lease Agreement were minimal. These responses were not related directly to the consultation content but centred on the State Government's AACR project more broadly. These respondents raised concerns about the AACR project and some included:
- 35.1. climate responsiveness through the re-establishment of vegetation.
- 35.2. loss of trees and the impact of this loss on bird life and resident koala population.
- 35.3. concern about whether Kaurana Traditional Owners had been engaged in relation to the AACR project.



## Summary

36. Prior to the consultation being undertaken, the Council had resolved to partner with the State Government for the AACR to be in Park Lands, with the construction of the project and the ongoing use of the facility to be facilitated via a draft Licence and draft Lease Agreement (respectively).
37. The purpose of the consultation was to seek feedback on the draft Licence and draft Lease Agreement.
38. The consultation results did not respond directly to the purpose of the consultation process, rather comments related to the location of the AACR within the Park Lands.
39. As a result, the majority of the 'No' vote is aligned to the existing decision of Council relating to location, not necessarily to the draft Licence or draft Lease Agreement.
40. In good faith, all comments received will be sent to the Minister with the aim to help inform final designs and management outcomes for the AACR.

## Kadaltilla / Adelaide Park Lands Authority

41. At its meeting of 24 August 2023, Kadaltilla / Adelaide Park Lands Authority considered the results of the draft Licence and draft Lease Agreement consultation and resolved to provide Council the following advice:
  - “1. *Receives the community engagement findings.*
  2. *Endorses the assessment of the community consultation findings provided in Item 6.2 on the Agenda for the meeting of Kadaltilla / Adelaide Park Lands Authority held on 24 August 2023.*
  3. *that a further report detailing the essential terms and the negotiated draft Lease Agreement will be presented to Council in November 2023.*”

## Next Steps

42. Subject to Council's consideration of the consultation findings on 26 September 2023, the Lord Mayor and Chief Executive Officer (or delegate) are authorised to finalise negotiations for the draft Licence.
43. To accommodate AACR project timeframes, the draft Licence will need to be finalised prior to the formal set up of works compound in (Park 2) proposed to commence in October 2023.
44. Notes that a further report detailing the essential terms and the negotiated draft Lease Agreement will be presented to Council in November 2023.

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## DATA AND SUPPORTING INFORMATION

**Link 1** - Consultation Summary Report

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## ATTACHMENTS

Nil

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- END OF REPORT -

## National Housing and Homelessness Plan Issues Paper Submission

Strategic Alignment - Thriving Communities

Public

Tuesday, 19 September 2023  
City Community Services and  
Culture Committee

**Program Contact:**

Sarah Gilmour, Associate  
Director Park Lands, Policy &  
Sustainability

**Approving Officer:**

Iliia Houridis, Director City  
Shaping

## EXECUTIVE SUMMARY

The purpose of this report is to seek a Council decision on a submission to the Australian Government on the National Housing and Homelessness Plan Issues Paper (Issues Paper).

The Australian Government is developing a National Housing and Homelessness Plan (the Plan) in collaboration with State and Territory governments. The Plan intends to consider the housing system as a whole to improve housing outcomes and help address homelessness in Australia. The Plan will set out a shared vision to inform housing and homelessness policy in Australia over the next 10 years.

To inform the development of the Plan, the Commonwealth Government released an Issues Paper with an overview of some of the known issues in the housing and homelessness systems and posing a series of discussion questions.

The issues paper acknowledges current State Plans, which includes the current South Australian Government policies; Our Housing Future 2020-2030, Future Directions for Homelessness Strategy and Aboriginal Housing Strategy 2021-2031.

Consultation on the Issues Paper opened on 7 August 2023 and closes on 29 September 2023.

The City of Adelaide's (CoA) draft submission addresses the discussion questions, including the roles of all tiers of government across the housing spectrum.

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## RECOMMENDATION

The following recommendation will be presented to Council on 26 September 2023 for consideration

THAT THE CITY COMMUNITY SERVICES AND CULTURE COMMITTEE RECOMMENDS TO COUNCIL  
THAT COUNCIL

1. Endorses the City of Adelaide Submission on the National Housing and Homelessness Issues Paper contained in Attachment A to Item 3.2 on the Agenda for the Special meeting of the City Community Services and Culture Committee held on 19 September 2023.
  2. Authorises the Lord Mayor and Chief Executive Officer to make minor amendments, if required and submit the City of Adelaide Submission on the National Housing and Homelessness Issues Paper contained in Attachment A to Item 3.2 on the Agenda for the Special meeting of the City Community Services and Culture Committee held on 19 September 2023.
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## IMPLICATIONS AND FINANCIALS

City of Adelaide 2020-2024 Strategic Plan	<b>Strategic Alignment – Thriving Communities</b> Council will create a city that is welcoming, inclusive and accessible to all. Support health and housing for vulnerable people and young people.
Policy	The submission draws on Council's adopted policy and advocacy positions contained in its Homelessness, Social Housing and Housing Affordability Policy as well as work in progress to update Council policy statements for Housing and Homelessness.
Consultation	Council Members were provided an opportunity to input into the draft submission. Administration and AEDA Administration input is captured via submissions earlier this year to the Parliamentary Inquiries into Housing Availability and the Worsening Rental Crisis.
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	A submission to the National Housing and Homelessness Plan Issues Paper is an opportunity to advocate for Council's housing and homelessness policy positions.
23/24 Budget Allocation	Not as a result of this report
Proposed 24/25 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Not as a result of this report
23/24 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

## DISCUSSION

1. The purpose of this report is to seek Council approval of a submission to the Australian Government on the National Housing and Homelessness Plan Issues Paper (Link 1 view [here](#)).
2. Submissions opened on 7 August 2023 for any person or organisation wishing to provide input into the development of the National Housing and Homelessness Plan.
3. Council Members were invited to provide preliminary feedback to develop the draft City of Adelaide submission on 15 August 2023.
4. The Issues Paper poses the following questions for consideration:
  - 4.1. How can governments and community service providers reduce homelessness and/or support people who may be at risk of becoming homeless in Australia?
  - 4.2. How can governments, across all levels, best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander peoples?
  - 4.3. How can all levels of government, along with housing organisations, institutional investors, not-for-profits, and private industry, improve access to social housing, which includes public housing and community housing?
  - 4.4. What should governments, private industries, the not-for-profit and community sectors focus on to help improve access to housing and housing affordability in the private market?
  - 4.5. How could governments work better with industry, community services and other organisations to improve housing outcomes for all Australians?
  - 4.6. How can governments and the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change?
  - 4.7. Is there anything else you would like to tell us.
5. With the focus of each question on the roles and opportunities for all tiers of government, the submission provides an opportunity for CoA to highlight:
  - 5.1. Work that we are already doing, including facilitating programs for vulnerable people in the city (including people experiencing homelessness) and contributions to housing supply (both indirect and direct);
  - 5.2. Where assistance is needed from higher levels of government, including additional social housing and changes to tax measures to incentivise housing provision;
  - 5.3. Opportunities for the future, including work being developed through the CoA Housing Strategy and Homelessness Policy that are currently under development.
6. The submission has been informed by recent submissions to State and Commonwealth Parliamentary inquiries, the Lord Mayor's Homelessness Round Table, Capital City Committee Adaptive Reuse Forum and Council's Discussion Paper – Developing a sustainable model to support people experiencing homelessness in the City.
7. The submission aligns with the progress on the draft Housing Policy that will be presented to the City Community and Culture Committee on 3 October 2023.

### Next Steps

8. The next steps include:
  - 8.1. Pending Council decision on the draft submission, it will be submitted to the Australian Government by 29 September 2023.
  - 8.2. Written submissions may be published on the Department of Social Services website.

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## DATA AND SUPPORTING INFORMATION

Link 1 [Developing the National Housing and Homelessness Plan | engage.dss.gov.au](#)

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# ATTACHMENTS

**Attachment A** – Draft Submission on National Housing and Homelessness Issues Paper

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- END OF REPORT -

## City of Adelaide Submission

### National Housing and Homelessness Plan Issues Paper 2023

#### Background

The City of Adelaide (CoA) welcomes the opportunity to provide a submission to the National Housing and Homelessness Plan Issues Paper.

Following the outcomes and recommendations arising from this investigation, the City of Adelaide supports appropriate action by the Commonwealth Government to improve access to secure, accessible and affordable housing for all Australians and to reduce homelessness in the community.

For the CoA, a liveable city is one that is a great place to be, whether as a resident, business owner in one of the city's precincts, a student of one of our world class universities, or a visitor to our famed festivals, cultural institutions or attractions.

The availability of secure, appropriate and affordable housing is a key component of liveability. The qualities that make our city liveable for those who are already here are also the attributes that may attract others to make the City of Adelaide home.

Like most Councils in Australia, the CoA has experienced challenges with housing supply, affordability and accessibility, and homelessness over recent years. This has been further exacerbated through COVID-19. In the CoA this includes increased pressures which are generally unique to capital cities. For example, increasing rates of homelessness, managing migration out of the city and accommodating international students. It is a priority for Governments at all levels to ensure the availability and affordability of diverse forms of housing in the city centre.

Traditionally Local Government has played a role in housing supply, through strategic land releases and affordable housing support via rate rebates to not-for-profit housing providers.

The CoA has taken a more active role and contributed to housing supply through:

- Acquiring land and undertaking strategic amalgamations which are then sold to housing providers at a subsidised price, including the rental market.
- Rezoning land to enable affordable housing development.
- Contribution to costs such as land acquisition, holding charges, road widening and relocation of services.
- Directly undertaking the role of developer including delivery of affordable housing.
- Partnering with the State Government to facilitate housing supply outcomes and grant funding to support housing providers in the city.
- Promoting opportunities for development with institutional investors, particularly around Purpose Built Student Accommodation (PBSA) and Build To Rent (BTR) asset classes.
- Instituting new approaches to unlock under utilised property in the city through adaptive reuse, which will also contribute to economic, social, heritage and climate outcomes.

Local Government's role in housing is evolving due to market failure in certain housing assets. The CoA is committed to making appropriate interventions to foster and grow a new affordable rental asset class to provide appropriate housing for city workers and residents. Failure to do so and continued reliance on State and Commonwealth Government policy and intervention is a high risk to a capital city council.

This does not however, detract from the need for a multi-faceted approach to housing growth with partnerships between Local and State Government, community housing providers and the private sector to achieve housing outcomes beneficial to the community.

The unique role that capital cities occupy nationally should also be considered here. The challenges of densifying population within capital city local government areas provides a different level of consideration and challenge. Adelaide is aiming to double its CBD population between now and 2036. In context, there is a decline in CBD retail, office occupancy has not returned to pre Covid-19 levels (albeit at stronger levels in Adelaide than in other capital cities), residential vacancy rates are extremely low (at or under 1%). The push to grow the international student market and progression of the establishment of Adelaide University, resulting through the merger of the University of Adelaide and the University of South Australia, are all contributing factors for population growth. Fewer numbers of people living and working in CBDs puts pressure on bricks and mortar services business and retail and overall city vibrancy and economic development and growth.

As a capital city, having distribution of housing supply across the housing and homelessness system visualised on page 17 of the Issues Paper, is critical to support a diverse population of renters and homeowners. It should encapsulate young professionals, international students, families, singles, key and essential workers, individuals with social and affordable housing needs and transitional accommodation. This in turn supports investing and development outcomes for the private sector, community housing providers and government.

There is strong alignment between Commonwealth, State and Local Government on the need to prioritise access to housing. The Commonwealth Government has an opportunity to take advantage of this for the benefit of all Australians by working with Local and State Government, industry and the CHP sector, to ensure the fulfilment of affordable and accessible housing as a human right for its residents.<sup>1</sup> The CoA is currently reviewing its Homelessness, Social Housing and Housing Affordability Policy (Attachment 1), to strengthen its role in responding to the housing need.

The CoA acknowledges the measures implemented and proposed by the Commonwealth Government to improve the supply of housing.<sup>2</sup>

In 2023, CoA made submissions relating to housing as part of its ongoing advocacy to State and Commonwealth Government:

- [State Government inquiry into 'SA housing availability and affordability'](#) (May 2023– attachment 2).
- [Senate Inquiry into the 'Worsening rental crises in Australia'](#) (July 2023 – attachment 3).

This submission draws on some aspects of these previous submissions to reinforce the need for a coordinated response to the current housing crisis from all levels of government. The submission is focused on government's response to the key issues.

## Attachments

1. [City of Adelaide - Homelessness, Social Housing and Housing Affordability Policy](#)
2. City of Adelaide Submission - SA Housing Availability 2023
3. City of Adelaide Submission – Worsening Rental Crisis in Australia 2023
4. Developing a sustainable model to support people experiencing homelessness in the City of Adelaide – CoA Homelessness Discussion Paper - ACC2023/104037

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<sup>1</sup> [Right to an adequate standard of living, including food, water and housing | Attorney-General's Department \(ag.gov.au\)](#)

<sup>2</sup> [Billions to boost social and affordable rental homes | Treasury Ministers, Budget Paper No. 1 | Budget 2023–24](#)



## City of Adelaide Response to Issues Paper Summary

### Questions for Consideration

#### 1. How can governments and community service providers reduce homelessness and/or support people who may be at risk of becoming homeless in Australia?

As a capital city, the CoA has higher rates of homelessness than its metropolitan counterparts, partly due to the centralisation of services and amenity in the city. Cities also host regional and remote communities who visit to access services, cultural events or to visit family and friends.

Within the CoA there is limited crisis and transitional accommodation which is at capacity due to demand and limited alternative long term options, including social and affordable housing availability (e.g., Uno Apartments). Transitional accommodation must be established with appropriate wrap around services for their cohort. Increasingly in CoA there are people who require ongoing supports through supportive housing, demand for which is also not able to be met with suitable housing and services.

Where individuals are able to transition out of supportive or crisis accommodation there needs to be pathways to appropriate and affordable housing.

Nationally, the ongoing reduction of social housing and increasing housing unaffordability further compounded by the cost of living pressures, has contributed to increased housing stress. This is making already vulnerable Australians more vulnerable to experiencing homelessness. While Adelaide may be the capital city with the lowest average rents nationally<sup>3</sup>, wages are typically lower in South Australia with higher levels of unemployment which reduces capacity to pay private rents. Currently 33.3% of renters in the City of Adelaide experience housing stress,<sup>4</sup>

Solutions to homelessness cannot be considered without increases in transitional housing, social housing and improvements in housing affordability. In addition, helping some vulnerable people who have experienced homelessness maintain a home, also needs to be supported by wrap around services.

Across the CoA there are significant resources dedicated to support for homelessness including social planning, community safety, place coordination, grants and community facilities. Council funds the Adelaide Zero Project and supports the SA Housing Authority's Homelessness and Vulnerable People project through the provision of data about rough sleepers.

The Adelaide Zero partnership works towards functional zero homelessness using the "Advance to Zero methodology", and a housing first approach.<sup>5</sup> **Achieving functional zero is more than housing outcomes and requires:**

- A reduction to inflow into the Inner City month on month through collaboration, data analysis, system improvement and listening to the voices of those who experience rough sleeping homelessness
- sustained existing tenancies and support for the diversion of people out of homelessness services
- ability to house people.

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<sup>3</sup> [Melbourne no longer Australia's cheapest rental market | CoreLogic Australia](#)

<sup>4</sup> [Housing Stress & Need | City of Adelaide | housing monitor](#)

<sup>5</sup> [Advance to Zero - AAEH](#)

To achieve Functional Zero Homelessness by 2026 in the CoA, there would need to be a 2% reduction in inflow of people experiencing homelessness and 20 housing outcomes per month<sup>6</sup>. The CoA supports the State Government's goal of additional housing in the city as well as the regions, and redevelopment of public housing assets.

Local government has the potential to assist with the co-ordination of service providers working in their areas. Local government can also support services provision for example, providing options for emergency shelter during Code Red and Code Blue events. The CoA has properties that could be adapted and made available in these circumstances. It is important to note however that this is homelessness management response for the short term and does not directly address the reduction of homelessness.

The CoA is exploring options to take a more proactive approach towards homelessness, particularly in the areas of prevention and early intervention. The Lord Mayor recently hosted a Homelessness Round Table to bring together experts from across the sector to identify service gaps, practical opportunities for CoA to support early intervention and prevention of homelessness, opportunities and challenges with data collection and ways in which CoA can support and advocate to State and Federal Government for relevant transitional accommodation and services that directly address the reduction of homelessness. Information gathered from the round table is being used to inform the development of a new Homelessness Policy.

Some of the opportunities identified for local government included:

- Community development staff/services at Council libraries/community centres etc.
- Increase community awareness of available support services (i.e. volunteers provide information to the community).
- Rent and rate relief.
- Supporting social connectedness.
- Adaptive reuse of buildings to facilitate additional housing supply.
- Bringing groups together/building networks.
- Advocacy to State and Commonwealth Government.

CoA supports additional Commonwealth resourcing and funding directly to the local government sector. Increased funding for specialist homelessness services and tailored responses to homelessness will assist those experiencing, or at risk of, homelessness.

### **First Nations People**

CoA encourages the Commonwealth Government to engage with First Nations people to understand the needs, barriers and opportunities for housing. Suitable housing improves the health and wellbeing of people and should be available to all Australians.<sup>7</sup> The CoA supports the recommendations and actions from the South Australian Aboriginal Housing Strategy 2021-2031 being fulfilled.

First Nations people are overrepresented among those experiencing homelessness and underrepresented as homeowners. First Nations people face intersectional challenges in accessing suitable housing. Housing solutions in the regions, addressing lower levels of inter-generational wealth transfer, health inequalities and economic participation limit access to housing.

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<sup>6</sup> CoA Lord Mayor's Homelessness Roundtable presentation by Toward Home Alliance, 10 August 2023

<sup>7</sup> [South Australian Aboriginal Housing Strategy | SA Housing Authority](#)

The CoA has supported temporary accommodation for regional and remote visitors through initiatives such as Puti on Kurna Yerta, which was a culturally led temporary and transitional accommodation and service hub in the Adelaide Park Lands during Covid-19.

All levels of government have a role to play in supporting First Nations leaders to lead conversations about transitional accommodation solutions and identify long-term strategies to address housing outcomes. Housing options are needed in the regions, greater metropolitan area and CBD.

An example is the Tika Tirka housing on Gilbert Street, Adelaide, completed in 2019, which provides accommodation for Aboriginal and Torres Strait Islander students from remote and outer regional communities studying in Adelaide.

### **Older Women**

The CoA supports housing inventions for vulnerable communities. Across Australia older people (55 years and older), especially women, are increasingly represented in the demographics of people experiencing or at risk of homelessness.<sup>8</sup> Intersecting policy issues contribute to greater vulnerability for older women including access to financial resources, gender pay gaps, gaps in superannuation due to lower incomes and caring roles, and the impacts of domestic and family violence.

## **2. How can governments, across all levels, best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander peoples?**

CoA encourages the Commonwealth Government to engage with First Nations people on culturally led responses to housing outcomes.

Housing challenges for Aboriginal and Torres Strait Islander people need to be addressed considering the history of racism and dispossession faced in Australia.

Areas of focus for policy makers in urban areas may include tenancy support specific to Aboriginal people, services provided by Aboriginal organisations, increased cultural safety in service provision, and developing strong sector networks.<sup>9</sup>

CoA's Stretch Reconciliation Action Plan 2021-2024 identifies CoA's commitment to work with Aboriginal Community controlled organisations, non-government and government organisations to identify opportunities to support the delivery of programs to community involving health, housing and social wellbeing.

At the Lord Mayor's Homelessness Round Table on 10 August 2023, key gaps in supporting Aboriginal and Torres Strait Islander peoples who are homeless, or at risk of homelessness were identified, including, acknowledging a need for combined leadership, education within community and reflecting difference across all groups.

## **3. How can all levels of government, along with housing organisations, institutional investors, not-for-profits, and private industry, improve access to social housing, which includes public housing and community housing?**

There is a need to address the underfunding and development of public and social housing. Current policy settings at the national level drive demand for investment in housing, and position housing as an asset class rather than a home.

A shared national multi-faceted response is required to improve access to public and community housing. Institutional investors and private industry have traditionally only contributed to social housing supply when incentivised for example through the National Rental Affordability Scheme or NDIS. Continuing labour and materials supply and cost

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<sup>8</sup> [Alternative housing models for precariously housed older Australians | AHURI](#)

<sup>9</sup> [Urban Indigenous homelessness: much more than housing | AHURI](#)

pressures impacting on project commencement could be offset through taxation or other incentives to deliver social housing.

A focus on public and private investment in housing is needed including acknowledging social housing and affordable housing as essential infrastructure to appropriately house all Australians.

The CoA has asked the State Government to increase its delivery of social housing<sup>10</sup> and review delivery structures. Additional housing could be achieved through partnerships with Community Housing Providers (CHPs) to increase housing stock beyond what an individual provider might offer. This is seen as an effective funding model to increase the supply of affordable housing and to benefit from the discounted rates available to CHPs.<sup>11</sup>

#### **4. What should governments, private industries, the not-for-profit and community sectors focus on to help improve access to housing and housing affordability in the private market?**

The CoA recognises that there are a range of barriers to the supply of housing even when there is political will and funding to increase rental supply through new builds. There are actions government can take to redistribute existing housing stock in addition to encouraging new housing stock.

Housing tenure in the CoA like other capital cities, is markedly different from Greater Adelaide or Australia as a whole, with 49.9% of residents in CoA renting in the private market, compared with a Greater Adelaide average of 22.1%.

Low rental vacancy rates have contributed to an increase of Adelaide (suburb) rents by over 10% over a 12 month period (May 2022 to May 2023).<sup>12</sup> In the CoA, over a third of private market renters pay over 30% of their income in rent.<sup>13</sup> A widely used measure to define households in housing stress.<sup>14</sup>

The CoA has facilitated the delivery of mixed use residential developments with varied housing typologies. This has contributed to housing supply and diversity in the city. The CoA has continued NRAS style provisions in select CoA properties past their original term.

#### **Institutional investment in housing**

The CoA has identified a need for interventions in the housing market to foster and grow a new affordable rental asset class for city workers and residents.

A shift in policy settings to reduce focus on small scale private investment in housing and elevate social housing and affordable rental housing through institutional investment is crucial. This includes through the examination of current tax settings, which encourage instability in the private market through small scale investors seeking benefits from tax treatments over the short to medium term.

The CoA is supportive of the tax measures implemented by the Commonwealth Government in the recent Budget to encourage investment in Build-To-Rent accommodation and opportunities for affordable Build-To-Rent accommodation. CoA encourages the State and Commonwealth Governments to partner with local governments to initiate and deliver housing projects. Funding for supporting

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<sup>10</sup> City of Adelaide Submission to Federal Community Affairs References Committee Inquiry - The Worsening Rental Crisis - 2023

<sup>11</sup> Professor Hal Pawson from UNSW City Futures Research Centre

<sup>12</sup> [SQM Research - Property - Residential Vacancy Rates - 5006](#)

<sup>13</sup> [State of the Nation's Housing Report 2022-23 | The National Housing Finance & Investment Corporation \(NHFC\)](#)

<sup>14</sup> [Local Affordable Housing Plan Toolkit](#) – Housing SA

infrastructure to assist in the delivery and ongoing liveability of additional housing in the city is needed.

### **Nationally Uniform definitions: Affordable housing**

Definitions vary nationally. The South Australian definition of affordable housing identifies a price point at which housing (or land) can be offered for sale. Aligning the gazetted sale price to market prices impacts the affordability of housing (for purchase) under this approach when market values are increasing. Likewise State Governments should be required to legislate an affordable rental price.

An alignment of key definitions and terms that extend beyond affordable to accessible housing, homelessness measures and others, will aid in the aligning the nationally approach.

### **Private rental market reform**

In 2023, the South Australian Government amended the *Residential Tenancies Act 1995 (SA)* to better protect prospective tenants.<sup>15</sup> This includes making the practice of rent bidding illegal and requiring landlords and property managers to protect data about tenants and prospective tenants. Limits have been placed on the types of data which can be requested from tenants and reducing the maximum amount of bond required. The South Australian Government has publicly announced its intention to reinforce a tenant's rights to rent with pets and has commented publicly on no cause evictions.<sup>16</sup> These are important changes and should be encouraged nationally.

Currently the Australian Capital Territory (ACT) is the only Australian jurisdiction which has in place guidelines to prevent tenants from excessive rent increases. In the ACT rent increases are limited to a prescribed amount (inflation plus 10% of the inflation amount) unless a higher rent rise is deemed appropriate through ACT Civil and Administrative Tribunal.<sup>17</sup> Models such as this could be considered to stabilise the private rental market and improve affordability.

Some of the improvements to housing outcomes the CoA considers necessary have been raised in submissions to both State and Federal Parliamentary inquiries this year including:

- Normalising longer private rental tenures - Australia has some of the shortest 'long term' tenancies globally. Most rental agreements typically cover 6-12 months, with landlords required to provide 30 days notice if the lease will not be renewed. The normalisation of longer tenancies for interested renters would improve stability in tenure. In the absence of stronger legislation against excessive rent increases, longer tenures reduce the frequency of which landlords could increase rents. In normalising longer tenures, governments should consider amending legislation to be less restrictive to tenants making alterations to property. For example, tenants should be permitted to hang pictures and make other superficial changes which can make a house a home.
- Mechanism to report landlords - There is a mechanism needed for tenants to report problematic landlords. While residential tenancy databases or 'tenancy blacklists' have been used for some time in Australia, often unregulated, there is no way for tenants to know if they are signing a residential tenancy agreement with a landlord who has previously acted unethically towards tenants. Due to the power imbalance between renters and landlords, renters often do not enforce their limited rights for

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<sup>15</sup> [Residential Tenancies \(Protection of Prospective Tenants\) Amendment Act 2023 | South Australian Legislation](#)

<sup>16</sup> [More Rights for Renters | Department of Treasury and Finance](#)

<sup>17</sup> [Renting and Occupancy Laws - Justice and Community Safety Directorate \(act.gov.au\)](#)

fear of eviction. Lessons should be learned from Victoria's register of unsuccessful landlords.

- Improving rental conditions - In Australia, tenants in the public and private rental markets are more likely to live in unhealthy housing (mould, cold, damp, heat) and poor housing conditions, including overcrowding than owner occupiers.<sup>18</sup> Renters should not have to choose between reporting poor housing conditions and maintaining a roof over their head.

### **Regulatory and Planning Reforms**

Planning policy for the CoA is not seen as a limiting factor on development or growth. However, opportunities to amend planning policy within the Planning and Design Code to encourage residential development have been identified. The CoA is working with the State Government on refinements to planning policy within the Planning and Design Code (and other Planning Instruments) to facilitate improved housing supply and living affordability outcomes.

With almost 50% of housing in the CoA providing 2 bedrooms, adaptability of floorplates in medium and high-density developments (in particular) are needed to provide a wider range of dwelling sizes in response to changing demands and variable needs across the community. Combined with this adaptability, universal design requirements are critical for ensuring that more housing stock is suitable for people with disability and enables residents' opportunities to age in place.

Council's Disability Access and Inclusion Plan advocates for the delivery of housing outcomes for people with disability, including seeking additional NDIS Specialist Disability Accommodation and Liveable Housing Design Guidelines.

Consideration should also be given to reforms to the National Construction Code that aid the provision of housing at the scale necessary to address the issues we face nationally.

### **Mandatory inclusionary zoning**

State and Commonwealth Governments should consider a national approach to mandatory inclusionary zoning for affordable housing, including a change in state-based planning legislation to enable its staged implementation. The State Government should explore financial incentives for developers who include affordable housing and partner with Community Housing Providers to do so.

Research has identified that planning system tools, such as mandatory inclusionary zoning for affordable housing supply, work best when part of a wider whole-of-government strategy to address the continuum of housing needs. In addition, this approach can reduce the impacts of inflation on residential property values.<sup>19</sup>

## **5. How could governments work better with industry, community services and other organisations to improve housing outcomes for all Australians?**

The CoA is currently reviewing its Homelessness, Social Housing and Housing Affordability Policy (Attachment 1). To inform the review, Council is consulting stakeholders and completing a housing audit and need analysis that will inform the development of a Housing Strategy and Homelessness Policy. This work incorporates housing affordability (rent and purchase), adaptive re-use, housing and population diversity, student populations, residential development, First Nations housing needs and gender equality.

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<sup>18</sup> [Rental Insights: A COVID-19 Collection \(ahuri.edu.au\)](https://www.ahuri.edu.au/publications/rental-insights-a-covid-19-collection)

<sup>19</sup> [Supporting affordable housing supply: inclusionary planning in new and renewing communities | AHURI](https://www.ahuri.edu.au/publications/supporting-affordable-housing-supply-inclusionary-planning-in-new-and-renewing-communities)



With the current focus by all levels of government on the housing crisis, investigations undertaken to date have identified that it is imperative that these efforts are co-ordinated, to minimise duplication or gaps in delivery of outcomes.

The CoA will continue to advocate to State and Federal Government and seek partnerships with industry and community services and organisations to assist in improved housing outcomes. This includes recognition of the need to deliver the critical infrastructure that supports the liveability of housing.

Local government is often limited by the data available. Increased housing data sharing across levels of government could improve the understanding of the problem and assist with addressing the issues.<sup>20</sup>

## **6. How can governments and the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change?**

Housing must be affordable beyond rent or mortgage repayments. The environmental performance of buildings must be considered to ensure long-term housing costs do not increase for those who can least afford it. With rising power costs and rising temperatures, the costs of keeping housing cool and liveable in Australia is increasing. Opportunities for addressing the impacts of climate change on the liveability of housing such as, urban greening, electrification and renewable energy, should be considered where possible in statutory planning legislation nationwide.

CoA's Climate Change Risk Adaptation Action Plan<sup>21</sup> identifies a range of key outcomes and actions that Council will take, including investigations, advocacy and partnerships to ensure more sustainable and resilient housing.

Research by the Centre for Healthy Housing has found that before sustainability is considered social housing tenants want to be comfortable in their homes, they want to be able to keep their homes cool when it is hot and warm when it is cold.<sup>22</sup> Many homes in SA, particularly homes in the long-term rental market and social housing are not constructed and maintained for this. These homes are often lacking appropriate insulation, orientation or high performing appliances to be able to be kept comfortable efficiently. This translates to higher living costs, placing additional financial pressure on renters.

The CoA supports the recent announcement of the Households Energy Upgrade Fund,<sup>23</sup> allocating \$1 billion to discounted consumer finance to increase sustainability across the housing sector.

The Commonwealth Government is encouraged to provide and promote incentives that target owner investors to consider sustainability measures such as solar, adequate insulation or rainwater which benefit the tenant in terms of liveability and cost of living beyond rents. It is estimated full home electrification would save households between \$164 to \$1,390 per year (taking into account upfront costs). However, renters and apartment dwellers face the biggest barriers to gaining the benefits of electrification.<sup>24</sup>

Mandatory disclosure of the energy rating of housing for sale or lease would help to give prospective occupants a way to understand how much a house will cost to run. This can

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<sup>20</sup> [Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy | AHURI](#)

<sup>21</sup> CoA Climate Change Risk Adaptation Action Plan 2021-2026

<sup>22</sup> [Sustainable social housing retrofit? Circular economy and tenant trade-offs | AHURI](#)

<sup>23</sup> [Household Energy Upgrades Fund - Clean Energy Finance Corporation - Clean Energy Finance Corporation \(cefc.com.au\)](#)

<sup>24</sup> [Getting off gas: why, how, and who should pay? \(grattan.edu.au\)](#)



be coupled with minimum standards for example, mandating ceiling insulation for a rental property across Australia.

All levels of government should consider their role in electrification of homes.<sup>25</sup> The Commonwealth Government could lead through design policies that make all-electric homes the norm, for health, financial and climate benefits, combined. For private landlords, a short-term asset write-off for purchasing new electric appliances to replace gas could assist in uptake in this difficult housing sector. For social housing, States should time their electrification with refurbishment cycles and appliance end-of-life, to minimise disruption to tenants and costs.

The CoA is aware of the following approaches being trialled around Australia:

- The adoption of a minimum NatHERS 7-star rating in the National Construction Code for new homes. This needs to be supported by widespread training of the construction industry, compliance measures, and openness to processes of continuous improvement.
- Adoption of mandatory disclosure of the energy rating of residential property on sale or lease, occurring in the ACT via the Sale of Residential Property Act<sup>26</sup>.
- Adopting stronger mechanisms through State-based Planning and Design Codes to support rapid reduction of carbon emissions through the built form, in particular for multi-unit development.
- Support for homeowners to adopt 'all-electric' homes as their current appliances need replacing, including access to finance, expertise and subsidised products. In South Australia, incentives are currently offered by the City of Adelaide, City of Port Adelaide Enfield and City of Holdfast Bay, as part of their local efforts towards emission reduction targets

## 7. Is there anything else you would like to tell us?

There are significant bodies of existing research on housing and homelessness in Australia. These include the publicly funded Australian Housing and Urban Research Institute which has produced a report speaking specifically to the National Plan, *Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy*.<sup>27</sup> The Commonwealth Government should be looking to this existing research and experts to inform the development of the National Housing and Homelessness Plan.

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<sup>25</sup> [Getting off gas: why, how, and who should pay? \(grattan.edu.au\)](http://grattan.edu.au)

<sup>26</sup> [Civil Law \(Sale of Residential Property\) Act 2003 | Acts](#)

<sup>27</sup> [Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy | AHURI](#)