

## 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://rentalinsights.ahuri.edu.au/)

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