

20 October 2023

National Housing and Homelessness Plan  
Department of Social Services  
GPO Box 9820  
Canberra, ACT 2601

*By email: [Housingandhomelessnessplan@dss.gov.au](mailto:Housingandhomelessnessplan@dss.gov.au)*

Dear Colleague

### **National Housing and Homelessness Plan ('the Plan')**

Thank you for the opportunity to provide feedback in relation to the above.

### **About QCOSS**

Queensland Council of Social Service (QCOSS) is the peak body for the social service sector in Queensland. Our vision is to achieve equality, opportunity, and wellbeing for every person, in every community.

QCOSS leads the [Town of Nowhere](#) campaign advocating for change to end the housing crisis in Queensland, and is a partner of the national [Everybody's Home](#) campaign.

In March 2023, QCOSS, Tenants Queensland and The Services Union, along with the [Town of Nowhere](#) campaign partners commissioned the report '[A blueprint to tackle Queensland's housing crisis](#)' (The Pawson Report), which clearly outlines the unprecedented housing crisis in Queensland.<sup>1</sup>

### **QCOSS' position**

QCOSS welcomes the opportunity to provide input into the development of the Plan.

Queensland's current housing crisis has laid bare the vulnerabilities that exist in the housing system. Our frontline services are currently witnessing distressing levels of housing need and the human impacts of the same.<sup>2</sup> The Pawson Report found over 150,000 households in Queensland have an unmet need for social and affordable housing.<sup>3</sup>

QCOSS welcomes the federal government's commitment to developing the Plan to set a shared vision and to "set out short, medium and long-term reforms needed to address housing challenges."<sup>4</sup>

<sup>1</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service.

<sup>2</sup> Queensland Council of Social Service, (2022), [State of the Sector Report](#).

<sup>3</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 66-73.

<sup>4</sup> Australian Government, (October 2023), Housing Support: Developing the National Housing and Homelessness Plan, Department of Social Services, [Developing the National Housing and Homelessness Plan | Department of Social Services, Australian Government \(dss.gov.au\)](#)



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The Plan must be a whole of government plan that is interconnected with state and territory long-term housing plans, and it must use a mission-oriented approach that sets an ambitious goal of ending housing need in Australia within a decade.<sup>5</sup>

Details about initiatives and strategies that QCOSS supports are outlined below. These are discussed in alignment with each of the seven consultation focus areas.

### 1. **Homelessness:** *How can governments and community service providers reduce homelessness in Australia?*

#### A mission orientated approach

The Plan must start from the position that housing is a human right and that everyone must have access to adequate housing.<sup>6</sup> To achieve this, the Plan should use a mission-oriented approach that is characterised as:

- inspirational
- setting clear direction (targeted, measurable, time-bound)
- ambitious yet realistic
- cross-disciplinary, cross sectional, cross action innovation
- multiple bottom-up solutions.<sup>7</sup>

The Plan must include specific targets with associated detailed actions that are quantified and time specific, costed, resourced, and monitored, with outcomes reported frequently and transparently to enable adjustments to be made should initiatives prove not to be effective.<sup>8</sup> For example, specific supply targets for social and affordable housing must be included in the Plan.

The Queensland Government has announced that they are responding to the housing crisis through the development of a new Queensland Housing Plan. We encourage strong engagement with the Queensland Government to ensure the mission of the Plan is realised in Queensland in concert with the Queensland Government.<sup>9</sup>

#### **Recommendation 1: A mission-oriented approach**

The Plan must use a mission-oriented approach to ensure everyone has access to quality affordable housing, and to end homelessness in Australia.

The Plan should include specific targets with associated detailed actions that are quantified and time specific, costed, resourced, and monitored, with outcomes reported

<sup>5</sup> Martin, C., Lawson, J., Milligan, V., Hartley, C., Pawson, H. and Dodson, J. (2023) Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy, AHURI Final Report No. 401, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/401>. doi: 10.18408/ahuri7127901,20.

<sup>6</sup> Martin, C., Lawson, J., Milligan, V., Hartley, C., Pawson, H. and Dodson, J. (2023) AHURI Final Report No. 401 Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/401>, doi: 10.18408/ahuri7127901, 20.

<sup>7</sup> Mazzucato, M. (2018) Mission-Oriented Research & Innovation in the European Union: a Problem-solving Approach to Fuel Innovation-led Growth, European Commission, Brussels.

<sup>8</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 86.

<sup>9</sup> Conversation with Director-General of Queensland Department of Housing Mark Cridland, (Queensland Council of Social Service, Brisbane Queensland, 17 October 2023), <https://youtu.be/hR9ip7rvROU>

frequently and transparently to enable adjustments to be made should initiatives prove not to be effective.

### Increase income support

It is well established that working-age income support payments are inadequate to keep people from living in poverty.

“Australia’s working-age income support payments are completely inadequate to cover the cost of essentials such as housing, food and energy... leaving many risking homelessness.”<sup>10</sup>

The inadequacy of the current income payment is resulting in people being unable to afford housing and puts people at risk of homelessness.<sup>11</sup>

QCROSS released the 2022 Living Affordability in Queensland report exploring cost-of-living pressures faced by low-income households.<sup>12</sup> This report found that among the modelled households, none “...have sufficient income to meet any unplanned expenses or emergencies. They cannot make meaningful savings and are highly vulnerable to increasing levels of debt, often from predatory ...”.<sup>13</sup>

Income support and rent assistance must be substantially increased to bring them into parity with other Commonwealth pensions, so that people who are reliant on government payments are lifted out of poverty and housing stress is reduced.

### **Recommendation 2: Increase working-aged income payments and rent assistance payments**

Immediately provide a substantial increase in working-aged income payments and rent assistance payments to lift people receiving government payments out of poverty and improve housing affordability.

## **2. Homelessness services: How can governments and community service providers support people who may be at risk of becoming homeless in Australia?**

### Permanent supportive housing framework

For some people our members work with, availability and affordability of housing alone will not solve homelessness. People with high support needs often require improved permanent access to healthcare, cultural, daily living support, and community services to sustain their wellbeing and housing.

<sup>10</sup> Australian Council of Social Service, (September 2023), It’s not enough: Why more is needed to lift people out of poverty, 2-4, [https://www.acoss.org.au/wp-content/uploads/2023/09/ACOSS\\_COL\\_Report\\_Sep\\_2023\\_Web.pdf](https://www.acoss.org.au/wp-content/uploads/2023/09/ACOSS_COL_Report_Sep_2023_Web.pdf)

<sup>11</sup> Australian Council of Social Service, September 2023, It’s not enough: Why more is needed to lift people out of poverty, 3-5, [https://www.acoss.org.au/wp-content/uploads/2023/09/ACOSS\\_COL\\_Report\\_Sep\\_2023\\_Web.pdf](https://www.acoss.org.au/wp-content/uploads/2023/09/ACOSS_COL_Report_Sep_2023_Web.pdf)

<sup>12</sup> Queensland Council of Social Service, Living Affordability in Queensland, (December, 2022),

[https://www.qcross.org.au/wp-content/uploads/2022/12/Living-Affordability-in-Queensland-2022\\_FINAL.pdf](https://www.qcross.org.au/wp-content/uploads/2022/12/Living-Affordability-in-Queensland-2022_FINAL.pdf)

<sup>13</sup> Queensland Council of Social Service, Living Affordability in Queensland, (December 2022), [https://www.qcross.org.au/wp-content/uploads/2022/12/Living-Affordability-in-Queensland-2022\\_FINAL.pdf](https://www.qcross.org.au/wp-content/uploads/2022/12/Living-Affordability-in-Queensland-2022_FINAL.pdf),19.

Permanent supportive housing is a proven solution for ending chronic homelessness by providing dignified and quality housing and support services for people with high support needs.<sup>14 15</sup>

The Plan must include initiatives that facilitate collaboration between state and federal governments to establish a permanent supportive housing framework using a housing first approach for people with high support needs. <sup>16 17</sup>

### **Recommendation 3: Implement permanent supportive housing frameworks**

The Plan must include initiatives that facilitate state, territory, and federal collaboration to implement permanent supportive housing frameworks.

#### Solutions for families, children, youth homelessness, and people who are Aboriginal and Torres Strait Islander

People who have experienced family and domestic violence, young people, and people who are Aboriginal and Torres Strait Islander continue to be at a higher risk of homelessness than other people in Queensland.<sup>18</sup>

A percentage of new social and affordable homes should be allocated to support the specific needs of families with children, young people, and people who are Aboriginal and Torres Strait Islander experiencing homelessness. This could be achieved through initiatives to increase funding to new housing and support services, for:

- specialised supportive housing for youth, such as Youth Foyers<sup>19</sup>
- supportive housing for families experiencing family and domestic violence
- community-controlled Aboriginal and Torres Strait Islander housing.<sup>20</sup>

### **Recommendation 4: Increase funding for specialised housing solutions**

The Plan must include initiatives that facilitate state, territory, and federal collaboration to increase:

- specialised supportive housing for youth, such as Youth Foyers<sup>17</sup>
- supportive housing for families experiencing family and domestic violence
- community-controlled Aboriginal and Torres Strait Islander housing.

<sup>14</sup> Padgett, D., Henwood, B. F., & Tsemberis, S. J. (2016). *Housing First: Ending homelessness, transforming systems, and changing lives*. Oxford University Press, USA

<sup>15</sup> Roggenbuck, C. (2022) *Housing First: An evidence review of implementation, effectiveness and outcomes*, report prepared by AHURI, Australian Housing and Urban Research Institute Limited, Melbourne.

<sup>16</sup> Homelessness Australia, (8 October 2023), [About Housing First – Homelessness Australia](https://homelessnessaustralia.org.au/homelessness-resources/housing-first/about-housing-first/), <https://homelessnessaustralia.org.au/homelessness-resources/housing-first/about-housing-first/>

<sup>17</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), *A blueprint to tackle Queensland's housing crisis*, Queensland Council of Social Service, 92.

<sup>18</sup> Australian Institute of Health and Welfare, (7 September 2023), *Homelessness and Homelessness Services*, <https://www.aihw.gov.au/reports/australias-welfare/homelessness-and-homelessness-services>

<sup>19</sup> The Youth Foyer Foundation (2022) *Under One Roof: The social and economic impact of youth foyers*, Accenture.

<sup>20</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), *A blueprint to tackle Queensland's housing crisis*, Queensland Council of Social Service, 92.

In addition, financial incentives must be provided by government to ensure that housing young people in community housing does not result in a financial disadvantage for housing providers. This incentive could be delivered as an increased rental subsidy.

**Recommendation 5: Introduce additional subsidies for housing for young people**

The Plan must include initiatives to provide financial incentives to ensure housing young people in community housing does not result in a financial disadvantage for housing providers.

Invest in crisis and outreach housing services

To ensure all Queenslanders and Australians have a roof over their head, integrated service delivery and investment in services is required, particularly when people and families experience a housing crisis or are seeking to stabilise their lives immediately following a housing crisis. To meet the current high demand for services, funding for crises and outreach services must be increased.

**Recommendation 6: Increase funding for Specialist Homelessness Services**

Funding for Specialist Homelessness Services must be increased to ensure the service system is adequately resourced to connect people into permanent housing options as quickly as possible.

**3. Aboriginal and Torres Strait Islander housing: How can government best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander people?**

Aboriginal and Torres Strait Islander people are over-represented among people experiencing homelessness in Queensland. In 2021-22, people of Aboriginal or Torres Strait Island background accounted for 35 per cent of persons assisted by Supportive Housing Service agencies. This is partly associated with disproportionately large numbers of Aboriginal and Torres Strait Islander people experiencing serious overcrowding. According to the 2021 Census, no less than 38 per cent of Aboriginal and Torres Strait Islander households in Queensland were occupying homes with insufficient bedrooms, as compared with only 16 per cent of non-Indigenous households.<sup>21</sup>

QCOSS supports strategies to increase access to safe, secure, and affordable housing choices for people who are Aboriginal and Torres Strait Islander, including partnering with Aboriginal and Torres Strait Islander organisations, communities and peoples.

QCOSS supports strategies that aim to increase the capacity of community controlled Aboriginal and Torres Strait Islander Community Housing Providers in Queensland. This should include transferring housing assets to community-controlled Aboriginal and Torres Strait Islander Community Housing Providers and increasing investment in these organisations to respond to local housing challenges.<sup>22</sup>

**Recommendation 7: Invest in Aboriginal and Torres Strait Islander community-controlled housing.**

<sup>21</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 64.

<sup>22</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 92.

The Plan must include strategies that aim to increase the capacity of community controlled Aboriginal and Torres Strait Islander Community Housing Providers. This should include strategies to:

- transfer housing assets to community-controlled Aboriginal and Torres Strait Islander Community Housing Providers, and
- increase investment in community-controlled Aboriginal and Torres Strait Islander Community Housing Providers to respond to local housing challenges.

**4. Social housing:** *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?*

In the face of population growth, the chronic undersupply of housing is escalating the scale of housing stress in Queensland. In the four years to December 2021, Queensland’s total person count increased by 6.1 per cent, as compared with only 4.1 per cent for Australia.”<sup>23</sup>

Social housing in Queensland has seen a continuing decline in capacity, both in absolute terms and in relation to need.<sup>24</sup> Recent social housing figures confirmed there are more than 25,300 households in Queensland who are in need of social housing,<sup>25</sup> and the unmet need for social housing alone is greater than 100,000 households.<sup>26</sup> “Social housing dwelling commencements in Queensland averaged just over 500 during the ten years to 2020 – barely sufficient to keep pace with public housing demolitions and sales, let alone the significant expansion required to keep pace with the needs of Queensland’s growing towns and cities. While Queensland’s population grew by 17 per cent in the decade to 2021 social housing stock expanded by just 2 per cent.”<sup>27</sup>

Social housing targets

With the population expected to grow to 6 million by 2046 in South East Queensland alone, and the current average estimated representation of social housing across Queensland at just 3.4 per cent of all dwellings in Queensland, specific targets to provide social housing based on predicted levels of need are required to meet the housing needs of people living on low to moderate incomes.<sup>28</sup>

The specific target for social housing (public and community) must accommodate population growth and match the percentage of households who on average require social and affordable housing. As a minimum target, 7.5-8 per cent of all housing in Queensland must be social and affordable housing, with a specific separate target for ‘social (public and community) and ‘affordable’ housing to be determined based on further analysis of need.<sup>29</sup> This target must also be informed by the independent modelling currently being completed

<sup>23</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, [A blueprint to tackle Queensland’s housing crisis](#), (2023), Queensland Council of Social Service, 12.

<sup>24</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland’s housing crisis](#), Queensland Council of Social Service, 17.

<sup>25</sup> Queensland Government, Social Housing Register 30 June 2023, Department of Housing, <https://www.data.qld.gov.au/dataset/social-housing-register>

<sup>26</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, [A blueprint to tackle Queensland’s housing crisis](#), (2023), Queensland Council of Social Service, 79.

<sup>27</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, [A blueprint to tackle Queensland’s housing crisis](#), (2023), Queensland Council of Social Service, 12.

<sup>28</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland’s housing crisis](#), Queensland Council of Social Service, 20.

<sup>29</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland’s housing crisis](#), Queensland Council of Social Service, 17.

by the Australian Housing and Urban Research Institute (AHURI) on behalf of the Queensland Government.<sup>30</sup>

Determining an appropriate specific target for affordable housing is also dependent on confirmation of the definition of affordable housing. Clarity of this definition is fundamental to the effectiveness of the target. In principle, the definition of affordable housing must be focused on meeting the housing needs of people with low to moderate incomes. For example, the Australian Bureau of Statistics uses the definition “rent payments less than or equal to 30 per cent of household income.”<sup>31</sup>

Targets must be managed and administered as commitments that are supported by clear plans, funding, initiatives, and incentives to enable the targets to be delivered.

**Recommendation 8: Establish specific targets to deliver new social and affordable housing**

The Plan must include specific targets and initiatives for social (public and community) and affordable housing to be delivered based on the predicted level of need for people with low to moderate income.

Funding to supply social and affordable housing

While recent announcements by both the Queensland and federal governments to substantially increase funding for social and affordable housing are welcomed, there continues to be a significant gap between the announced funding and the current estimated need for social and affordable housing in Queensland. For instance, to stop things from going backwards in Queensland, net annual growth needs to be approximately 2,700 dwellings. Based on current estimates of demand, to end the crisis, social and affordable housing must expand in Queensland by 11,000 dwellings annually.<sup>32</sup> To achieve this, a significant increase in investment in social housing is required from both Queensland and Commonwealth governments.

The demand for new social and affordable housing is so great that governments cannot address the need without partnership. A combination of the federal and state governments, not-for-profit and for-profit organisations must finance, develop, and manage social and affordable rental housing.<sup>33</sup> Funding to accelerate housing supply should be made in a way that brings together investment from all levels of government and the private and community sectors.

**Recommendation 9: Significantly increase supply of social and affordable housing**

The Plan must include a significant increase in funding in collaboration with state and territory contributions to provide sufficient funding to deliver housing to meet the predicted need for social and affordable housing for the next 10 years (current estimate for

<sup>30</sup> Minister for Communities and Housing, Minister for Digital Economy, and Minister for the Arts, (19 March 2023), Ministerial Media Statement Housing Queenslanders a priority for government, Queensland Government, <https://statements.qld.gov.au/statements/97405>

<sup>31</sup> Australian Government, (September 2023), Rent Affordability Indicator (RAID), <https://www.abs.gov.au/census/guide-census-data/census-dictionary/2021/variables-topic/housing/rent-affordability-indicator-raid>)

<sup>32</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, *A blueprint to tackle Queensland's housing crisis*, (2023), Queensland Council of Social Service.

<sup>33</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), *A blueprint to tackle Queensland's housing crisis*, Queensland Council of Social Service.

Queensland is 11,000 dwellings annually for the next ten years, which may require adjustment pending the completion of AHURI modelling of need).

**Housing costs, home ownership and the rental market in Australia:** *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?*

### Rental market

Just over 30 per cent of Queensland households are renters.<sup>34</sup> In addition to the unmet need for social housing, over several years, and preceding the pandemic, rental vacancy rates in Queensland have trended down to extraordinarily low levels.<sup>35</sup> Vacancy rates for rentals across Queensland as at July 2023 remain critically low at a rate of just 1 per cent.<sup>36</sup> The demand for affordable housing and low vacancy rates has resulted in significant increases in rental costs, creating high levels of housing stress and further increasing the unmet need for affordable housings. Rent in Queensland is continuing to rapidly rise and, as a result, housing is becoming unaffordable.<sup>37</sup> Rent in Queensland increased by 32 per cent from June 2021 to June 2023.<sup>38</sup>

The loss of affordable rental housing due to the expiry of the NRAS program has only compounded the more deeply embedded decline in the private rental market's ability to generate tenancies affordable to low-income renters.<sup>39</sup> While it is welcome that the Queensland Government is planning to acquire NRAS stock, it is disappointing that additional state government investment is required to maintain housing that was previously provided through subsidies paid by the Federal Government.<sup>40</sup> commonwealth.

QCROSS member organisations have also provided insight into the housing crisis from the perspective of Queenslanders working in the community service sector:<sup>41</sup>

- "I've been doing this sort of work for about 18 years now, and this is the hardest I've ever seen it... we used to get people walking out of here and we'd help them get a lease in place. That's really hard to do now."
- "The rental and accommodation crisis is hitting hard, with people now amongst the "lucky" if they are able to secure a tent or caravan."
- "The pressure on people to access or maintain affordable housing is impacting on all other areas of people's lives. Housing instability has increased mental health presentations, [DFV], financial distress, [and the] inability to afford basic needs such as medications, food, [and] transport."

<sup>34</sup> Australian Bureau of Statistics, (October 2023), 2021 Queensland, Census All persons QuickStats, <https://abs.gov.au/census/find-census-data/quickstats/2021/3>

<sup>35</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023) *A blueprint to tackle Queensland's housing crisis*, Queensland Council of Social Service.

<sup>36</sup> REIQ, (July 2023) Residential Vacancy Rate Report June Quarter 2023, <https://www.reiq.com/resources/media-releases/green-shoots-emerge-in-queenslands-rental-vacancy-rates>

<sup>37</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, *A blueprint to tackle Queensland's housing crisis*, (2023), Queensland Council of Social Service, 4.

<sup>38</sup> Residential Tenancy Authority (RTA), (2023), Queensland Government. Median rents quarterly data June 2023, <https://www.rta.qld.gov.au/forms-resources/median-rents-quick-finder/median-rents-quarterly-data>

<sup>39</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), *A blueprint to tackle Queensland's housing crisis*, Queensland Council of Social Service.

<sup>40</sup> Queensland Government, (18 October 2023), *Government steps up to keep affordable rentals - Ministerial Media Statements*, Department of Housing, <https://statements.qld.gov.au/statements/98948>

<sup>41</sup> Queensland Council of Social Service, (November 2022), *The State of the Sector 2022*, <https://www.qcross.org.au/publication/report-state-of-the-sector-2022/>



- “The cost of housing plays a major part in young people moving forward, especially those who are on Centrelink. They don't get a look in when applying for private rentals.”
- “[the housing crisis] is impacting my staff. I've got staff that have struggled with homelessness. They've been in long term tenancies, had to leave, couldn't get accommodation, so they had to live with family or in temporary accommodation until they could find something. So that's continuing to impact on people who have secure jobs.”
- “[There's a] significant increase in young people sleeping rough with no hope for accommodation in 2022 or the foreseeable future.”
- “Service providers in the disability field are finding it increasingly difficult to find suitable housing for people with disability.”
- “We have an increased number of people who are over the age of 50, married, with retirement funds, that are facing homelessness. People who have gone into rent arrears because their rent has increased... Our demographic has changed to include a lot of people who should be well into their silver years and happily retiring.”

The current housing crisis demonstrates the vulnerability of renters in an insufficiently regulated rental market. As discussed in The Pawson Report, strengthening rental market regulation is one policy option to tackle the housing crisis.<sup>42</sup>

QCOSS welcomes the Better Deal for Renters announcement following the National Cabinet meeting in August 2023 as it recognised the need to improve renter rights in Australia.<sup>43</sup> However, detail about how each initiative identified in the announcement will be developed and implemented is yet to be forthcoming. Proposed initiatives also do not go far enough to improve renter rights and security, such as only limiting the frequency of rent increases without also limiting rent increase amounts and allowing many exceptions to no grounds evictions.

The federal, state and territory governments must work together to enhance renter rights, and progress initiatives that strengthen protections for renters, including:

- limiting rent increases by an amount calculated in reference to the Consumer Price Index and include mechanisms to effectively limit frequency of increases. We draw particular attention to the approach adopted in the Australian Capital Territory in relation to rent increases<sup>44</sup>
- ending ‘without grounds’ evictions, including no grounds evictions at the end of a fixed term agreement
- allowing for the installation of modifications and making minor personalisation changes, underpinned by a practical dispute resolution framework,
- implementing energy efficiency standards for renters.<sup>45</sup>

<sup>42</sup> H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 94.

<sup>43</sup> National Cabinet, (August 2023), Working together to provide better outcomes – Attachment 2: A Better Deal for Renters, <https://www.pm.gov.au/media/meeting-national-cabinet-working-together-deliver-better-housing-outcomes#a2>

<sup>44</sup> *Residential Tenancies Act 1997* (ACT) ss 64A – 70; *Residential Tenancies Regulation 1998* (ACT) s 5A.

<sup>45</sup> Queensland Council of Social service, (2023), Submission to the Inquiry into the worsening rental crisis in Australia.

### **Recommendation 10: Strengthen renter rights**

The Plan must incorporate initiatives for federal, states and territories to work together to strengthen renter rights and protections across Australia through rental reforms.

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

Enhanced housing system diversity and choice is required to deliver supply solutions that provide supply of safe, secure and affordable housing that meets the needs of the household and community.<sup>46</sup>

QCROSS supports housing diversity strategies such as that described in Strategy 3.5 of the Draft Shaping South East Queensland Plan 2023 Update to “unlock new models and diverse forms of homes (size and form) for housing delivery, including build-to-rent” solutions.<sup>47</sup> Encouraging build-to-rent construction through tax concession is one way to immediately encourage increased diversity of supply.<sup>48</sup> Supporting not-for-profit community housing organisations to develop build-to-rent properties is a mechanism that could be used to increase and diversify affordable housing using existing tax-advantaged and regulated status of community housing organisations.<sup>49</sup> Further, concessions could be introduced to incentivise delivery of social and affordable build-to-rent properties, including increased investment in the Housing Australia Future Fund.

### **Recommendation 11: Deliver diverse forms of housing, including not-for-profit build-to-rent**

The Plan must include initiatives to deliver diverse forms of affordable housing to meet the diverse needs of households and local communities, including initiatives that are designed to prioritise affordable build-to-rent accommodation delivered by not-for-profit housing providers.

#### Short-term rentals

Consideration must also be given to the potential impact of short-term rentals in key areas in Australia where short-term rentals are more prevalent. In Queensland, this includes areas such as the Sunshine Coast and Gold Coast. This could be achieved by incorporating a method to monitor and understand the impact of short-term rentals, and to respond if it demonstrates a significant impact on affordability and availability of housing.<sup>50</sup>

### **Recommendation 12: Monitor and respond to impacts of short-term rental**

The Plan must include initiatives to understand the impact of short-term rentals, and to respond collaboratively with states and territories when short-term rental adversely impact on affordable or availability of housing.

<sup>46</sup> H Pawson, A Clarke, J Moore, R van den Nouweland, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 48.

<sup>47</sup> Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan 2023 Update](#), Department of State Development, Infrastructure, Local Government and Planning, 74.

<sup>48</sup> H Pawson, A Clarke, J Moore, R van den Nouweland, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 87.

<sup>49</sup> H Pawson, A Clarke, J Moore, R van den Nouweland, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 96.

<sup>50</sup> H Pawson, A Clarke, J Moore, R van den Nouweland, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 95.

**6. The Impact of Climate change and Disasters on Housing Security, Sustainability and Health:** *How can governments and the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change?*

Strengthen energy efficiency minimum standards

Energy efficiency measures help to assist tenants in managing their energy bills and make homes safer and healthier to live in. However, due to limited rental property choice and restrictions on making modifications to homes, tenants can experience increased energy costs and poor environments (too cold or hot).<sup>51</sup>

Energy efficiency minimum standards must be developed and implemented.

We draw particular attention to the *Community Sector Blueprint: A National Framework for Minimum Energy Efficiency Rental Requirements*.<sup>52</sup> This blueprint outlines key characteristics that should be present in the forthcoming National Framework for Minimum Energy Efficiency Rental Requirements. This presents an opportunity to develop a nationally coordinated and consistent approach to the energy efficiency needs of Australia's rental housing stock.

Energy efficiency incentives along with regulatory requirements will help to ensure that the transition to a cleaner energy future is a just transition, which does not leave anyone behind.

**Recommendation 13: Implement energy efficiency standards for rentals**

The Plan must include initiatives to work with state and territory jurisdictions to incorporate minimum energy efficiency standards for rentals.

Energy efficiency must also be considered more broadly in the housing system, and QCOSS supports strategies to incorporate “affordable renewable energy, low emissions technology, energy efficiency and zero waste/circular economy measures into the design, planning and development of communities and building...to facilitate the uptake of relevant certifications of ratings,”<sup>53</sup> such as those recently proposed in the Draft South East Queensland Plan 2023 Update.

**Recommendation 14: Implement energy efficient design**

The Plan must include initiatives to support energy efficient social and affordable housing design.

**Conclusion**

There are approximately 150,000 households in Queensland with an unmet need for affordable housing, and more than 100,000 of those households are eligible for social housing based on income.<sup>54</sup> As at 30 June 2023 just over 25,300 households were waiting

<sup>51</sup> Healthy Homes for Renters, *Community Sector Blueprint: A National Framework for Minimum Energy Efficiency Rental Requirements*, (November, 2022).

<sup>52</sup> Healthy Homes for Renters, [Community Sector Blueprint: a National Framework for Minimum Energy Efficiency Rental Requirements](#), (November, 2022).

<sup>53</sup> Queensland Government, (2023), [Draft Shaping South East Queensland Regional Plan Update](#), Department of State Development, Infrastructure, Local Government and Planning, 145.

<sup>54</sup> H Pawson, A Clarke, J Moore, R van den Nouweland, and M Ng, (2023), [A blueprint to tackle Queensland's housing crisis](#), Queensland Council of Social Service, 79.

for housing on the Queensland social housing register, the majority of these households have been assessed as high or very high need for housing.<sup>55</sup>

There is a need for immediate action and an ambitious and comprehensive long-term plan to end the housing crisis in Queensland and across Australia. Without long-term planning and government intervention, the housing crisis will continue to worsen, and many people in Queensland will not have access to affordable, safe and secure housing.

QCOSS welcomes the opportunity to provide input into the development of The Plan. The federal government must create a mission driven plan that takes a whole of government approach and sets ambitious targets to accelerate supply of housing and end housing need in Queensland and across Australia within 10 years.

We encourage meaningful engagement with the Queensland Government to ensure that, should it contain the required ambition, Queensland's forthcoming Queensland Housing Plan is adequately resourced to ensure that every Queenslanders has a roof over their head within the next decade.

Thank you again for the opportunity to provide the submission.

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<sup>55</sup> Queensland Government, (June 2023), Social Housing Register 30 June 2023, Department of Housing, <https://www.data.qld.gov.au/dataset/social-housing-register>