

NSW Treasury

Shelter NSW submission on the *Performance and Wellbeing Consultation Paper* (“Housed” subcategory)

A secure home for all

31 July 2024



About Shelter NSW

Shelter NSW has been operating since 1975 as the State’s peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality. We have a diverse membership, ranging from community services organisations, other peak bodies such as Tenants Union NSW, and individual members who are generally academics, renters (public & private), or other people with lived experience in housing precarity.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

We consider a sustainable housing system one that delivers what we call Triple-A housing and Triple-P outcomes.

Affordable and diverse homes	Accessible, well-located housing	Appropriate, high-quality development
Housing supply and demand	Proximity to jobs and services	Amenity and aesthetics
Tenure forms and rights	Access to public transport	Energy and environment
Housing types and sizes	Accessibility and adaptability	Standards and maintenance
Productive cities and regions	Poverty-free communities	Protected neighbourhoods
Access to jobs and services	Housing stress and homelessness	Energy use and consumption
Housing costs and consumption	Physical and mental health	Urban heat
Financial and economic stability	Education access and attainment	Climate resilience and adaptation

At Shelter NSW, we believe that all people deserve to live in housing that delivers these priorities and objectives. We believe the housing system should deliver safe, secure, and affordable living outcomes for all, regardless of tenure type.

Our key alliances reflecting diversity of concerns



About our submission

Governments have always relied on important indicators of economic activity, such as production, employment, and income to measure performance. The unemployment rate for example, is not just a critical economic indicator but a stark tracker and predictor of poverty and community stress. We agree with the statement, that while these indicators are important, they are not sufficient. We commend the NSW Government for its efforts to develop a framework of indicators that moves beyond the usual used to assess the state's performance and progress.

These types of non-traditional metrics of course, are familiar to advocacy groups like Shelter NSW. Attracting the policy and budget-making focus of Government to issues related to equity, inclusion and fairness is our core business. A quick review of our [2024-25 Pre-Budget Submission](#) for example, demonstrates the usual metrics that we use to judge the health (or in the case of the housing system, sickness) of the housing system.

Along with the NSW Government, we recognise that the approach to develop a broader performance and well-being type framework is not new, but it is difficult. We are encouraged by the efforts to build on existing approaches and collaborate with the Commonwealth on the overall framework (especially noting the shared policy and investment agendas related to housing and homelessness in our federated system). In this submission we will take this approach further – noting that the measurement of the housing system is also not new with many existing models and, in the case of Australia, long-standing measurement frameworks and reporting processes in place to support it.

As stated in our introduction, Shelter NSW advocates for low-income people and households, that is the lowest 40% of households. We recognise that the NSW Government wants a framework that applies to the greatest number of people however, we encourage it to see the concerns of low-income people as an effective proxy for the concerns of the many. A better and fairer housing system for low-income people will be better and fairer for all.

For the obvious reasons, in this submission we will focus on the 'housed' section though, as our articulation of a sustainable housing system in the introduction (what we call Triple-A housing and Triple-P outcomes) suggests there are housing-related issues across all themes.

From the outset though, we will challenge the oft-repeated mantra noted in the consultation document, underpinning this proposed framework.... *that what gets measured, gets done.*

This mantra, now an accepted wisdom has been challenged for decades, as far back as 1956¹. The more accurate description should be this: *'what gets measured gets managed -*

¹ Ridgway, V. F. "Dysfunctional Consequences of Performance Measurements." *Administrative Science Quarterly* 1, no. 2 (1956): 240–47. <https://doi.org/10.2307/2390989>.

even when it's pointless to measure and manage it, and even if it harms the purpose of the organisation to do so.²

While we accept at Shelter NSW, *that a broader range of performance and wellbeing indicators...can improve our understanding of the impacts of policy and resourcing decisions* we do not accept the proposition that this will necessarily and reliably lead to *more effective allocation of our collective resources, allowing us to achieve more with less, thereby improving our collective wellbeing.*³

The challenge for the NSW Government is to select the right measures and assign targets and accountabilities for action and improvement, that is to *get things done*. Without that, we risk becoming busier and potentially distracted with the practice of measurement itself or as Rose Jackson, MLC Minister for Housing and Homelessness sometimes describes it, *admiring the problem*.

General Observations

We note that at the time of this submission the new [NSW Housing and Homelessness Strategy \(2024-2034\)](#) has not been released. We trust that its release will directly inform the development of the Performance and Well-being Framework.

Shelter NSW has over many years called for a clear set of metrics and targets to bolster the implementation of the state's housing and homelessness strategy. We noted in [our submission \(July 2020\)](#) regarding the *NSW Housing Strategy 2041* for example, that while there many sound initiatives (and indeed) metrics, it lacked clear targets that would reliably enable the assessment of impact; drive tangible improvement; investment prioritisation and the policy reform agenda of Government.

As a reminder, there are a number of frameworks already in place within Australia that describe the dynamics of the housing system with identified key metrics and outcomes. The [Productivity Commission's Report on Government Services \(ROGs\)](#) for example, is one such framework (refer image below).

In 2021 and then in 2023 Shelter NSW produced with the Regional Australia Institute our [Regional Housing Needs Report](#). It also offers a set of metrics that enable an assessment of the health of the housing system especially as it impacts low-income households in regional NSW.

In addition, we commend to NSW Treasury the watershed report by Dr Chris Martin et al. for AHURI [Towards an Australian Housing and Homelessness Strategy](#), a true guidance document on measuring (and planning for) what matters in the realm of housing justice

² The Observer Business (2008). [The rule is simple: be careful what you measure | Simon Caulkin, management editor | The Guardian](#)

³ NSW Government (2024) *Performance and Wellbeing Framework Consultation Paper* at p9

for all Australians. Note that pages 58 and 59 are particularly instructive on what metrics need to improve (and *how*) to meet the vision of a fair housing system.

There is no shortage of data and metrics when it comes to housing and homelessness. The rest of this submission will provide specific feedback we have about the structure and presentation of the overall framework; queries as to why some metrics have been included and not others and more generally strong recommendations that wherever possible, targets be identified to articulate the depth and breadth of action and investment required to make real progress.

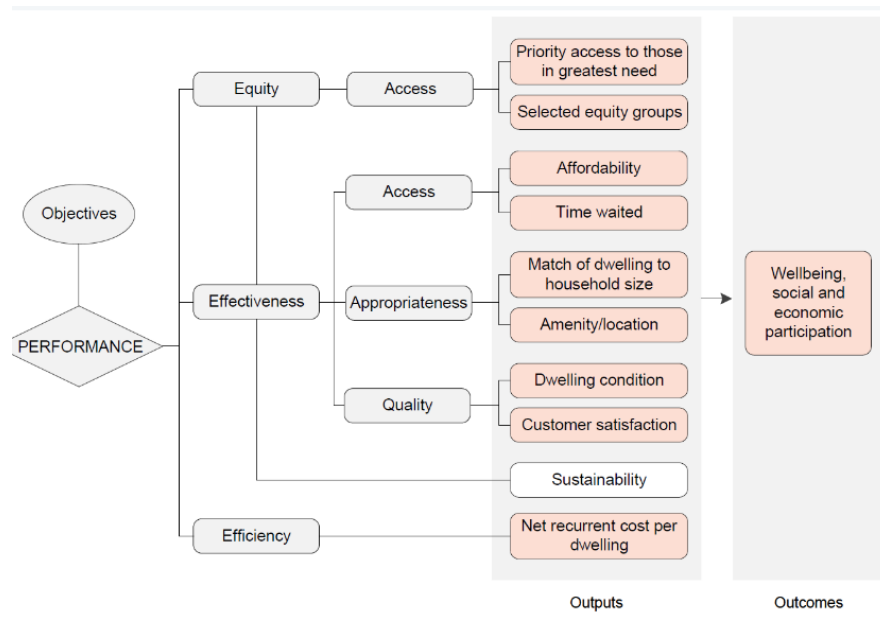


Image: Productivity Commission – Report on Government Services – Housing System

Indicator	A
Proportion of single-parent households	H
Proportion of households with a mortgage	H
Proportion of rental households	H
Proportion of low-income households in mortgage stress	H
Proportion of low-income households in rental stress	H
Proportion of social housing stock	L
Number of households on the social housing waitlist	H

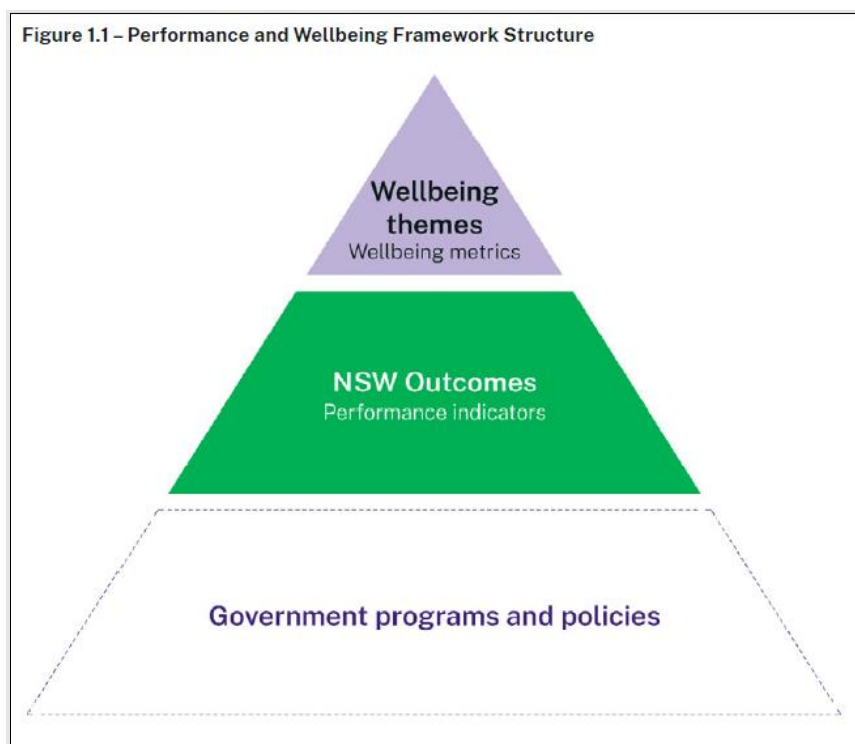


Image: Shelter NSW [Regional Housing Report \(2023\)](#)

The Consultation Paper

Our understanding of the purpose of the Consultation Paper is to gather feedback and test different wellbeing themes, indicators and metrics with the public for reporting at each State Budget. Similar to the national [Measuring What Matters Framework](#), the apparent intent of the NSW Performance and Wellbeing Framework is to provide a more complete picture of social wellbeing beyond generic economic indicators.

The Paper presents a tentative Performance and Wellbeing Framework for reporting and tracking several themes, one of which is the theme of “Housed”. The “Housed” theme is duplicated across overarching purple “wellbeing themes” with linked metrics, as well as “Housed” themes, indicators, and metrics being included in the second-tier of green “NSW outcomes” (p. 11):



Save for the above pyramid, the architecture of the Performance and Wellbeing Framework is not clearly articulated in the *Consultation Paper*. For instance, different housing metrics are proposed to be reported on within the purple and green tiers (Tables 1.10 and 1.4, pages 53 & 32 respectively):

Wellbeing theme	Indicator	Metric	Why this is important	Direction
Housed	Housing costs (mortgage, rent, maintenance, etc) against gross income	Percentage of household income spent on housing	Helps us understand how much households are spending on housing	↓
Housed	Home ownership	Percentage of an age cohort who own their own home	Home ownership is fundamental to secure housing	↑
Housed	Neighbourhood satisfaction	Percentage of Household, Income and Labour Dynamics (HILDA) survey respondents who are satisfied with their neighbourhood	Feelings about local communities and places	↑

NSW Outcome	Indicator	Metric	Why this is important	Direction
Quality housing solutions are sufficient and affordable	Rate of serious defects rectified in residential buildings	Measures serious defects in residential buildings rectified after action by the Building Commission NSW	Partial housing quality measure that reflects the Building Commission's regulatory functions	↑
Quality housing solutions are sufficient and affordable	New potential dwellings unlocked through rezonings	Number of dwellings approved through planning proposals and state-led rezonings	Measures planning system performance, to increase housing supply	↑
Quality housing solutions are sufficient and affordable	Proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing	Percentage of Aboriginal and Torres Strait Islander persons who live in dwellings where no extra bedrooms are required to adequately house the usual residents	Aligns to Closing the Gap measure; indicator of Aboriginal and Torres Strait Islander people securing appropriate, affordable housing that is aligned with their priorities and need	↑

Quality housing solutions are sufficient and affordable	Social housing dwelling standard	Proportion of social housing tenants living in dwellings of an acceptable standard	Social and affordable housing, and rentals in general, should meet minimum quality standards	↑
Places are well-designed and sustainable	Government owned sites assessed as part of the Government Land Audit for potential housing use	The number of Government owned sites assessed as part of the Government Land Audit for potential housing use	Could contribute to improving housing supply	↑
Places are well-designed and sustainable	Number of visits across public spaces and events	Total number of visits	Measure of amenity and community enjoyment of public spaces	↑
Vulnerable people have access to suitable housing	Aboriginal and Torres Strait Islander households receiving essential services that meet or exceed standards	Percentage of communities with greater than 50 per cent Aboriginal and Torres Strait Islander residents that have appropriate access to essential services	Aligns to Closing the Gap measure; indicator of Aboriginal and Torres Strait Islander people securing appropriate, affordable housing that is aligned with their priorities and need	↑
Vulnerable people have access to suitable housing	Priority social housing applicants and wait time	Measures average wait time for priority approved applicants by Sydney, regional and rural NSW	Measure of whether social housing applicants can access housing in a timely manner	↓
Vulnerable people have access to suitable housing	Social housing dwellings	Number of dwellings, by social housing type	Measure of social housing supply	↑
Vulnerable people have access to suitable housing	Proportion of people experiencing homelessness who are assisted by Specialist Homelessness Services	Percentage of people experiencing homelessness who are assisted by Specialist Homelessness Services to achieve housing	Effectiveness measure for homelessness services	↑


The logic for inclusion of certain housing metrics as “top tier” Wellbeing purple metrics or as “second tier” green NSW outcomes/performance indicators is uncertain. Presumably, the purple wellbeing metrics in Table 1.10 relate to data and high-level metrics also reported on at a national level (housing costs as a proportion of income; home ownership rates) while the green performance indicators in Table 1.4 relate to NSW-specific measurables influenced by State programs and policies. However, some “second tier” green performance indicators are reported on at the national level through data collected via ABS (e.g. severe overcrowding) and some “top tier” wellbeing themes *are* influenced by State programs and policy decisions (e.g. housing costs borne by renters is within the State’s jurisdiction to influence through rental regulation reform and rent-capping).

Therefore, the linkages and interconnectedness between the purple “top tier” themes and green “second tier” themes needs to be clearly detailed in the final framework. Moreover, any of the “top tier” wellbeing themes must be explicitly linked to a corresponding ‘NSW outcomes’ performance indicator in Table 1.4. For example, the overarching “top tier” wellbeing indicator to do with home ownership rates should drill down to a “second tier” NSW performance indicator on low-income home ownership rates (desired direction: increasing). We note for this particular example, the State *did* up until very recently run a [Shared Equity Home Buyer Helper pilot scheme](#) targeting the increase of home ownership rates for low to moderate income households, and so “home ownership” is an appropriate metric to be duplicated across national data reporting “top tier” wellbeing indicators and State-level programmatic reporting on performance indicators in the “second tier”.

“Housed” theme comments

The “Housed” theme is vitally important to understanding and improving upon the wellbeing of all NSW citizens. Housing that is well located, secure, and affordable is central to peoples’ ability to participate both socially and economically. Households can participate more readily in education, training, and employment opportunities as well as participate in their communities. Housing has the ability to bridge equity gaps. We also know that poor housing through overcrowding and marginal housing tenures are indicators of homelessness.


As referenced elsewhere in this submission, we are concerned with the lack of strategic oversight that should guide and populate the proposed Framework. **Relatedly, Shelter NSW is critical of the lack of targets or desired “directions” for each metric exhibited in the Consultation Paper.** We offer comments on some of the existing line items in the Paper:

Housed	Housing costs (mortgage, rent, maintenance, etc) against gross income	Percentage of household income spent on housing	Helps us understand how much households are spending on housing	
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As a high-level indicator, we agree this is an important line item. However, this wellbeing indicator must recognise the differential experience of low-income households in trying to meet housing costs. **A subset metric on “housing stress” for low-income households** (commonly regarded as the lowest two income quintile households paying more than 30% of gross income on rent or mortgage repayments, per [AIHW datasets](#)) is

therefore necessary to adequately capture the wellbeing of households of intense interest to government decision-makers.


Further, we would encourage the NSW Government to consider “housing costs” in their fullest sense. **Housing needs to be affordable not just in terms of rent and mortgage repayments**, but also with respect to energy bills (embedded networks!), commuting costs (for essential workers in particular), strata fees in increasingly complex residential arrangements, and runaway insurance costs in flood and bushfire prone locations. Another way of looking at this issue is – how much **actual** disposable income is left for low-to-moderate income households after accounting for all housing-related costs?

Housed	Home ownership	Percentage of an age cohort who own their own home	Home ownership is fundamental to secure housing	
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Further to the above point, this high-level wellbeing indicator is significant (and points to intergenerational fairness issues that we are concerned about) but suggest a focus on the rates of **low-income home ownership and First Nations home ownership** as stronger indicators for the health of the whole housing system.


Housed	Neighbourhood satisfaction	Percentage of Household, Income and Labour Dynamics (HILDA) survey respondents who are satisfied with their neighbourhood	Feelings about local communities and places	
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Is this really a core “Housed” theme or is it a “Community” theme?

Quality housing solutions are sufficient and affordable	New potential dwellings unlocked through rezonings	Number of dwellings approved through planning proposals and state-led rezonings	Measures planning system performance, to increase housing supply	
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The delivery of new, additional Social and Affordable Housing stock is needed to actually drive housing affordability outcomes for low-income households.


This line item must be enhanced with references to counting new Social and Affordable Housing stock added via planning proposals and State-led rezonings. The NSW Government is undertaking several planning reforms to incentivise builds of Social Housing, and inclusionary zoning in ‘transit-oriented’ precincts for delivery of Affordable Housing. State-led rezonings, such as those currently proposed for Broadmeadow in the Hunter region, have the potential to deliver thousands of new Social and Affordable Homes. Reporting successes against this indicator can then be analysed against gains in driving down “housing stress” and “unmet housing need” (see later discussion on “unmet housing need” in section [Additional indicators, metrics, and targets](#)).

Quality housing solutions are sufficient and affordable	Proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing	Percentage of Aboriginal and Torres Strait Islander persons who live in dwellings where no extra bedrooms are required to adequately house the usual residents	Aligns to Closing the Gap measure; indicator of Aboriginal and Torres Strait Islander people securing appropriate, affordable housing that is aligned with their priorities and need	
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We support inclusion of this indicator and we recommend additional metrics on severe overcrowding for other cohorts are reported on.

Shelter NSW has previously commissioned [research into severe overcrowding in south-western Sydney](#). Fairfield LGA is one of the most significantly affected geographies for severe overcrowding, indicating that it is not **only** First Nations households that struggle to find culturally appropriate dwellings. Severe overcrowding in migrant households in south-western Sydney is mostly a by-product of families wanting to stay within the same neighbourhood and/or domicile, maintain access to core community services and cultural ties, and the lack of housing diversity and affordability for this to be done in a way that enables dignity of choice.

Our research also highlighted the need for more dwelling diversity (e.g. 4+ bedroom households, secondary dwellings) in public housing estates, new Social and private housing builds, and in the private rental market to meet dwelling demand of migrant households and reduce severe overcrowding occurrences. **Including a reporting metric on the percentage of CALD households that are in severely overcrowded dwellings in the Framework is necessary**, with targets to decrease this percentage (through underpinning programs aimed at increasing dwelling diversity in culturally diverse suburbs in particular).

Quality housing solutions are sufficient and affordable	Social housing dwelling standard	Proportion of social housing tenants living in dwellings of an acceptable standard	Social and affordable housing, and rentals in general, should meet minimum quality standards	
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This indicator should include targets related to [Livable Housing Design Guidelines](#) for accessibility. For example, [this circular](#) (September 2020) by the formerly-named LAHC on “Dwelling Requirements” includes targets on Universal Design Principles with silver standard as a baseline on all new Social Housing dwellings, and gold standard as a subcategory target. **These metrics should be reflected in the Framework at a minimum, and targets built upon (e.g. moving towards all new Social Housing dwellings achieving gold standard accessibility).**

Places are well-designed and sustainable	Government owned sites assessed as part of the Government Land Audit for potential housing use	The number of Government owned sites assessed as part of the Government Land Audit for potential housing use	Could contribute to improving housing supply	
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As the Government Land Audit Program is a time-limited program, inclusion of this indicator as a core, ongoing indicator is peculiar. Shelter NSW recommends instead that this indicator be replaced with: **Government-owned sites that are developed for residential purposes delivering 30% Social and Affordable Housing.**

The [current NSW Government has acknowledged the need to provide at least 30% Social and Affordable Housing](#) on any of its own land as a routine measure for residential development. We view the Performance and Wellbeing Framework as one avenue to

report and improve upon this commitment, aligned with the intent of the “Housed” theme and the three NSW outcomes of *quality housing solutions being sufficient and affordable; places being well-designed and sustainable; vulnerable people having access to suitable housing.*

Places are well-designed and sustainable	Number of visits across public spaces and events	Total number of visits	Measure of amenity and community enjoyment of public spaces	
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Is this a core “Housed” indicator or is better suited to the “Community” and/or “Connected” theme? As an alternative, we would **recommend a metric on the provision of public spaces (actual land area dedicated) in new residential developments/precincts.**

Vulnerable people have access to suitable housing	Priority social housing applicants and wait time	Measures average wait time for priority approved applicants by Sydney, regional and rural NSW	Measure of whether social housing applicants can access housing in a timely manner	
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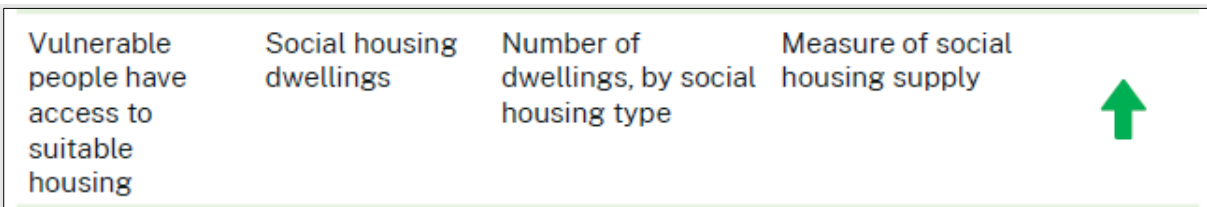
Social housing waitlist times is one (of many) crucial indicators of unmet housing need for vulnerable households. **This line item must be amended to reflect the general and priority waitlist waiting times.** The priority waitlist represents a sliver of all approved applicants as most approved applicants are on the general waiting list.

Access to social housing is highly rationed in contemporary Australia⁴; to be on any social housing waitlist is to be a vulnerable household, as demonstrated in Hal Pawson and David Lilley’s [Managing Access to Social Housing in Australia](#) “Waithood” Paper for UNSW City Futures Research Centre (2022). This Paper highlights that official waitlists do not fully capture actual unmet housing need for low-income households. Many are discouraged from even accessing the waitlist by way of its reputation for years-long wait times, cumbersome eligibility criteria, and the administrative pruning of applicants for example, that do not respond to government letters sent to old addresses (when applicants are usually homeless with no forwarding address). Only those with the most acute, complex, and life-threatening circumstances of housing precarity and homelessness are admitted to the priority waitlist. Chronic and life-limiting housing precarity persists for households on the general waitlist, who must wait for their

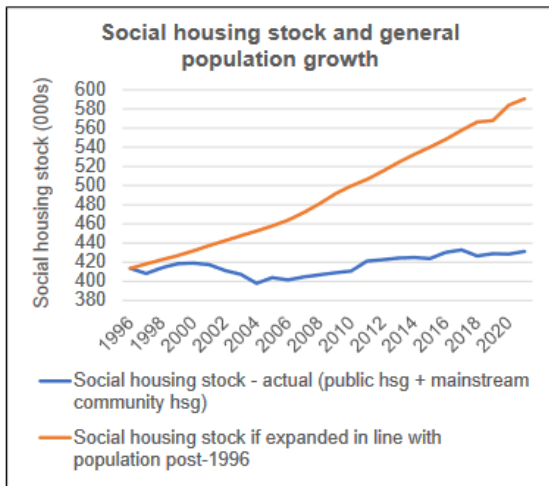
⁴ (Pawson, Milligan, & Yates, 2020)

circumstances to become ever more dire to be given access to a shorter, priority waitlist in their area.

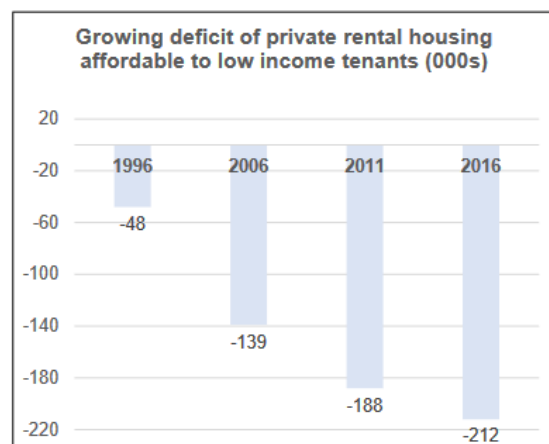
Measuring, reporting on, and driving down waitlist times must be thoughtfully pursued in order to prevent perverse policy outcomes. For instance, a laser-focus on reducing priority wait times might neglect the real and pressing needs of general waitlist applicants. This laser-focus may restrict further the eligibility criteria of what is considered a 'priority' applicant in order to keep the wait times in a desirable reporting range. Additionally, the scarcity mindset of only focussing on driving down priority wait times further stratifies social inequalities in our State and keeps the NSW Government in a 'crisis' mode of reactivity. **Shelter NSW welcomes more consultation on this particular indicator and associated metrics.**



At Shelter NSW, we have long advocated for **Social Housing stock growth to be commensurate with population growth**. Social Housing stock growth has not kept pace with population growth for many decades and by extension has not kept pace with demonstrated housing need of low-income households:



Sources: ABS; Productivity Commission ROGS



Source: Hulse et al. (2019) – original data from ABS Census



Figures extracted from [UNSW City Futures Research Centre presentation](#) (Hal Pawson).

To remedy this, **Shelter NSW asserts that the total proportion of Social Housing stock must grow to be at least 1 in 10 homes across the State.** This is not a fantastical or unrealistic percentage to strive for; Shelter NSW advocacy in the 10% range would put NSW **below the average** of other OECD jurisdictions⁵.

Utilising data provided by the NSW Department of Planning on population projections and implied dwelling demand⁶, our 10% stock ask would materially result in **approximately 430,000 dwellings being Social Housing in NSW by 2041.** As there are approximately 155,000 Social Homes in existence across the State⁷, our 10% of stock ask requires **at least an additional 275,000 Social Housing dwellings to be delivered by 2041.**

Housing metrics and their associated targets are relatively easy to assemble and apply. The NSW Government for example, has just recently distributed housing targets across the state's many local councils. A logical extension would be for the NSW State Government to apply the same approach to the housing supply it is accountable for – social housing. Shelter NSW has called for this type of approach for many years, including in [our submission \(July 2020\)](#) on the *NSW Housing Strategy 2041*. There we called for (p. 8) ... *discrete targets and metrics regarding the appropriate 'mix' or diversity of dwellings required to meet the current and future diverse needs of the population in question. We suggest that at the very least, metrics measuring the current and **required** stock of social and affordable housing be established to the level of LGA across NSW. These metrics would sit within overall housing targets.*

Numerical Social Housing targets in the order of magnitude that we are calling for are essential to recognising the scale of investment needed in Social Housing (Public, Community and Aboriginal) at each State Budget.


Shelter NSW has recently [welcomed](#) the NSW Government's large commitment to more and better social housing. Given the size of the commitment we assume the Government does in fact have a clear trajectory for the growth of social housing in NSW. If that is the case, we are then calling for it to be made public.

We therefore **highly recommend the inclusion of a 10% Social Housing stock target by 2041 for this line item.**

⁵ OECD Affordable Housing Database. (2022). *PH4.1 Social Rental Housing Stock*. Retrieved from <https://www.oecd.org/els/family/PH4-2-Social-rental-housing-stock.pdf>

⁶ NSW Department of Planning & Environment. (2022). *GCC Six Cities 2022 CPA Population and Dwelling projections*. Retrieved from <https://www.planning.nsw.gov.au/Research-and-Demography/Population-Projections/Explore-the-data>

⁷ AIHW. (June 2023). *Data Tables: Social housing dwellings 2023*. Retrieved from <https://www.aihw.gov.au/getmedia/1af826ad-fcf3-43a0-93f9-87513a8c02d1/AIHW-HOU-334-Data-tables-Social-housing-dwellings.xlsx>

Vulnerable people have access to suitable housing	Proportion of people experiencing homelessness who are assisted by Specialist Homelessness Services	Percentage of people experiencing homelessness who are assisted by Specialist Homelessness Services to achieve housing	Effectiveness measure for homelessness services	
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This line item must be bolstered with a target to **reduce the number of people being turned away from Specialist Homelessness Services to zero**. In NSW, 50% of the 47,700 or more people seeking accommodation assistance from the Specialist Homelessness Sector were turned away during the reporting period of 2021-22⁸. No one presenting for assistance to a homelessness service should be turned away without a suitable resolution for accommodation, ever. This must be a core principle in the [pending NSW Homelessness Strategy](#), and reflected in the Performance and Wellbeing Framework.

Additional indicators, metrics, and targets

Unmet housing need

As mentioned elsewhere in this submission, the Framework lacks focus on “unmet housing need”, arguably one of the most insightful performance indicators for social wellbeing. Accounting for “unmet housing need” cuts across tenure types – it is a logical extension of the “so what?” of housing stress and homelessness that burdens low-income households in particular.

For instance, the UNSW City Futures Research Centre *Housing Need Dashboard*⁹ identifies unmet housing need using methodology of:

- Housing stress
- Income quintiles or enumerated homeless
- Existing social and affordable housing stock
- Projected housing needs by 2041 based on household growth
- Estimated social and affordable housing stock required by 2041 to meet projected needs.

⁸ Productivity Commission (Cth). (20 January 2023). *Report on Government Services, Part G Housing and Homelessness*. Retrieved from <https://www.pc.gov.au/ongoing/report-on-government-services/2023/housing-and-homelessness>

⁹ Lead by Dr Ryan van den Nouwelant, Dr Laurence Troy, and Dr Balamurugan Soundararaj, date accessed 26 July 2024: <https://cityfutures.adfa.unsw.edu.au/social-and-affordable-housing-needs-costs-and-subsidy-gaps-by-region/>

We encourage NSW Treasury to consider incorporating a placeholder indicator in the Framework on “unmet housing need” in consultation with experts.

Private rental market

We are dismayed by the lack of explicit indicators and metrics centred on the performance of the private rental market and wellbeing of renters in NSW. Our State is home to the largest number of renters of any State or Territory in Australia¹⁰. The private rental market is not performing well for the households of NSW, as evidenced by extremely low rental vacancy rates, costly and unfair evictions, and huge rent increases among other things.

The NSW Government has recently reiterated its commitment to ending no-grounds evictions for all lease types. **We suggest an indicator in the Framework on the number of no-grounds evictions initiated by landlords against tenants (with a target to zero).**

We are also intensely interested in observing a **reduction in the number of Social Housing tenant-initiated NCAT proceedings against Social Housing Providers for maintenance and repairs** and recommend this being a performance indicator with linked reduction targets.

Climate-ready and universally accessible housing

Zero climate-ready housing indicators or targets are included in the proposed Performance and Wellbeing Framework.

NSW is part of the cross-jurisdictional process of developing a National Framework for Minimum Rental Requirements for energy efficiency and built-form standards, under the *Trajectory for low energy buildings*¹¹. The timeframe for implementing this Framework is severely lagging. Accountability in the Performance and Wellbeing Framework is needed primarily through **performance indicators on the number of new and existing rental properties that meet the national minimum agreed rental energy efficiency and built-form standards.**

Similarly, there must **be targets in the Performance and Wellbeing Framework on homes that exceed minimum NatHERS requirements** (e.g. 8+ stars), preferably with a **high target on the proportion of Social Homes that exceed 7 stars NatHERS.**

¹⁰ ABS. (2021). *New South Wales Quickstats*. Retrieved from <https://www.abs.gov.au/census/find-census-data/quickstats/2021/1>

¹¹ Australian Government – Department of Climate Change, Energy. (n.d.). *Trajectory for low energy buildings*. Retrieved from <https://www.energy.gov.au/government-priorities/buildings/trajectory-low-energy-buildings>

Universally accessible housing is also a neglected aspect of the Performance and Wellbeing Framework. Elsewhere in this submission we advocate for minimum silver and gold accessibility standards for Social Housing. More broadly, **we urge the NSW Government to finally sign up to the National Construction Code ('NCC') provisions for all new residential builds to meet minimum silver standards.** This standard, if adopted, would require all new residential dwellings to have minimum doorway widths, step-free ingress/egress areas into a home, and reinforced bathroom walls¹². In the Final Regulatory Impact Statement, the upfront cost of these design requirements was estimated to be less than \$6,000 per build¹³ compared to the retrofitting cost of up to \$50,000 per dwelling with accessible home modifications¹⁴.

The cost burden of **not** adopting the NCC silver standard accessibility changes will be disproportionately shouldered by people with disability, older Australians, and various levels of government through funding home modification programs. **Not adopting and then tracking NCC silver and gold standard accessibility changes in the Performance and Wellbeing Framework presents a significant weakness in measuring social wellbeing.**

¹² Croft, S for Housing Industry Association. (2021). *Sweeping changes to the NCC* [blog]. Retrieved from <https://hia.com.au/our-industry/housing/in-focus/2021/sweeping-changes>

¹³ Centre for International Economics. (February 2021, Table 6.1, p. 150). *Proposal to include minimum accessibility standards for housing in the National Construction Code: Decision Regulation Impact Statement prepared for The Australian Buildings Codes Board*. Retrieved from <https://ncc.abcb.gov.au/sites/default/files/resources/2022/Final-decision-RIS-accessible-housing.pdf>

¹⁴ Ibid, Table D.3, p. 307