

The National Urban Policy Consultation Draft

AHURI SUBMISSION

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About AHURI

AHURI – the Australian Housing and Urban Research Institute – is a national, independent research network with an expert not-for-profit research management company, AHURI Limited, at its centre. AHURI’s mission is to deliver high quality research that influences policy development and practice change to improve the housing and urban environments of all Australians.

Using high quality, independent evidence and through active, managed engagement, AHURI works to inform the policies and practices of governments and the housing and urban development industries and stimulate debate in the broader Australian community.

AHURI undertakes evidence-based policy development on a range of priority policy topics that are of interest to our audience groups. These policy topics include housing and labour markets, urban growth and renewal, planning and infrastructure development, housing supply and affordability, homelessness, economic productivity, and social cohesion and wellbeing, among others.

Our mission is to inform and impact better housing, homelessness, cities and related urban outcomes through the delivery and dissemination of relevant and authoritative research. To achieve this mission, we deliver four key programs.

National Housing Research Program

AHURI’s National Housing Research Program (NHRP) invests around \$4 million each year in high quality policy-oriented housing research and associated activities. We broker engagement between policy makers, key stakeholders, and researchers. This allows us to undertake research that is immediately relevant and actively contributes to national housing policy development. Our network of university research partners conducts research on key policy issues utilising a variety of research activities. This ensures the flexibility to undertake longer-term projects when fundamental research is needed, while also responding quickly to new strategic policy issues as they arise.

Australian Cities Research Program

AHURI launched a National Cities Research Program Strategic Agenda in 2020. We are enhancing our significant evidence base on housing and homelessness policy and solutions, and consolidating our role in delivering integrated and robust evidence to guide policy development. AHURI is working with governments and relevant stakeholders to expand our role in delivering research that informs urban policy and the shaping of cities in Australia. We are investing in, and developing partnerships for a National Cities Research Program.

Professional Services

AHURI Professional Services draws on our in-depth understanding of housing, homelessness, cities and urban policy and the expertise of AHURI’s national network of Research Centres. We deliver evidence reviews and synthesis, policy engagement and transfer, and are experts in research management and brokerage.

National conferences program

Our conferences, events and communications stimulate professional and public dialogue. We disseminate research in innovative ways and engage with government, private, not-for-profit sectors, and the community.

The National Network of AHURI Research Centres

There are currently nine AHURI Research Centres across Australia:

- AHURI Research Centre—Curtin University
- AHURI Research Centre—Monash University
- AHURI Research Centre—RMIT University
- AHURI Research Centre—Swinburne University of Technology
- AHURI Research Centre—The University of Adelaide
- AHURI Research Centre—The University of South Australia
- AHURI Research Centre—The University of New South Wales
- AHURI Research Centre—The University of Sydney
- AHURI Research Centre—University of Tasmania.

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Glossary

ABS	Australian Bureau of Statistics
AHURI	Australian Housing and Urban Research Institute
AIHW	Australian Institute of Health and Welfare
CRA	Commonwealth Rent Assistance
Draft NUP	National Urban Policy Consultation Draft
NCRP	National Cities Research Program
NHHA	National Housing and Homelessness Agreement
NHRP	National Housing Research Program
NUP	National Urban Policy
SDGs	Sustainable Development Goals
The Forum	Urban Policy Forum
UN	United Nations

Introduction to this submission

AHURI welcomes this opportunity to provide a submission to the National Urban Policy Consultation Draft (the Draft NUP). As indicated through our Managing Director's contributions to the Urban Policy Forum (the Forum) feedback on initial drafts of the consultation paper, AHURI strongly supports the Draft NUP's key principle — a 'commitment to evidence-based policy interventions based on fundamental drivers of change' and the focus on 'investment in high quality research' (p. 42).

AHURI is well positioned to coordinate and underpin efforts to develop a sound evidence base for the National Urban Policy (NUP), having delivered the National Housing Research Program (NHRP) in partnership with our university network for over twenty years.

Currently, AHURI is working with the Australian Government, state and territory governments and the councils of large cities to develop a model for the National Cities Research Program. This approach will substantially improve the evidence-based supporting urban policy decision making in Australia, and facilitate better policy coordination between tiers of government. The Draft NUP seeks to better integrate an urban lens across policy-making to ensure future policies, programs and investment support sustainable growth in urban places. Cross-portfolio engagement on urban policy matters, and intergovernmental coordination, are crucial to the future of our cities.

Through AHURI's network of University partners, we bring national capability experts in a wide range of disciplines relevant to the NUP's objectives, including housing supply, population and demographic change, transportation and social infrastructure, metropolitan governance, and sustainable building and development practices. AHURI conferences, events, publications and workshops ensure that research findings are widely accessible and advance knowledge transfer between the policy, research, not-for-profit and commercial sectors. AHURI's Professional Services team offers evidence review and synthesis, research management, program evaluation, brokerage, policy engagement, and information dissemination services to address pressing policy concerns.

The NUP will provide a platform to support coordinated policy for Australian cities and urban spaces; a National Cities Research Program (NCRP) facilitated by AHURI can similarly provide a platform for coordinated policy-focused Australian research into urban policy issues.

The following submission provides a brief account of recent evidence drawn from AHURI's National Housing Research Program to support an evidence-based NUP. The submission addresses selected aspects of the Draft NUP, demonstrating the potential contribution of a consolidated evidence base. While investment in housing policy evidence through the National Housing Research Program has substantially informed housing policy and practice over the past two decades, there has not been a parallel investment in urban policy evidence. There is a clear need for more evidence-based approaches to urban policy challenges, to underpin greater coordination and a shared vision. AHURI strongly supports the key principle of evidence-based policy and is well-positioned to deliver a NCRP consistent with the intent of the Draft NUP and its principles.

Part 1:

Introduction to the National Urban Policy

The Draft NUP is framed by an ambition for a shared vision, and agreed roles and responsibilities for different parts of government in shaping our urban places. The Draft NUP is then structured in relation to five goals (*Liveable, Equitable, Productive, Sustainable and Resilient*), then to six objectives (*No-one and no place left behind, All people belong and are welcome, Our urban areas are safe, Our urban areas are sustainable, Our urban environments and communities promote health and wellbeing, and Our urban areas promote productivity*), each articulated through a series of Key urban challenges. The Draft NUP is also underpinned by a set of principles, included as an appendix (*1. City planning and governance must be collaborative and adaptive, 2. Purposeful place making increases wellbeing and connection, 3. Urban development should actively improve social, environmental and economic outcomes, 4. Improving the evidence base will underpin urban innovation, 5. Fair and inclusive development builds equitable communities, and 6. Fostering innovation and creativity hubs enhance diversity and broadens opportunities*).

This structure is challenging, and the relationship between Goals, Objectives and Principles could be more fully articulated. In particular, the inclusion of the principles as an appendix to the Draft minimises their relevance — assimilation of these principles into the chapter dedicated to the goals would create a more coherent NUP. It appears that the Goals express the overall characteristics the NUP intends to achieve for Australian cities, and the principles describe the approaches required to deliver this.

The Objectives then, are more actionable, measurable expressions of the NUP's intent, and can be associated with a more coherent sense of purpose.

Part 2:

Share government vision and roles

The Draft NUP articulates the need for a shared vision, and stronger alignment and partnerships across and with governments. The Draft NUP correctly notes that ‘the three levels of government, as well as communities and businesses, all have a vital role to play in urban planning and development, with each supporting Australia’s cities, towns and suburbs to thrive’ (p 13).

Similarly, the explicit intent of the National Housing Accord is a partnership approach to address housing challenges. As recommended in AHURI’s submission to the Productivity Commission review of the National Housing and Homelessness Agreement, this approach “AHURI suggests provides a better foundation for a coherent, coordinated (and strategic) approach to respond to housing needs” (AHURI 2022, p. 3).

The recent history of changing roles and responsibilities of the three tiers of government in housing issues presents a clear demonstration of the need for improved partnership and coordination. Beyond the negotiation of the Commonwealth-State housing agreements, there have been various reviews of the roles of government in relation to housing and homelessness. Perhaps the most ambitious of these (since the post World War 2 period) was the 2010-2014 Reform of the Federation process, culminating in a White Paper on the Reform of the Federation in 2014. In its terms of reference, this White Paper positioned a major part of the problem was that over time, the Commonwealth has become increasingly involved in matters which have traditionally been the responsibility of the states and territories. The White Paper included a number of Issues Paper, the second of which focused on Roles and Responsibilities in Housing and Homelessness (Commonwealth of Australia, 2014).

The Issues Paper contained a useful illustration of the roles, responsibilities and overlaps in housing policy between the Commonwealth and state and territory governments (Figure 1).

Notably, though proposing an ambitious reform agenda, the White Paper did not propose a change to the responsibility for regulation of rental housing, which were recognised as state responsibility, and noted that this is an area of minimal overlap between levels of government:

Housing is primarily regulated by the States and Territories (through, for example, urban planning and residential tenancy legislation and regulations). The States and Territories also have responsibility for regulating building and construction activity, and house purchases and sales. In line with Housing Ministers’ decision to develop a large-scale community housing sector in Australia, a National Regulatory System for Community Housing was introduced on 1 January 2014, supported by State and Territory legislation.

Commonwealth of Australia (2014) p. 21

Figure 1: Summary of Commonwealth and State and Territory roles and overlaps

Area	State and Territory role	Commonwealth role	Overlaps
Policy	<i>Shared lead</i>	<i>Shared lead</i>	<i>High</i>
	Oversee policies that directly affect the housing market (land release, zoning, land taxes). Social housing and homelessness policy.	Oversees policies that indirectly affect the housing market (migration, tax settings, financial services regulation). Commonwealth Rent Assistance (CRA) policy. Influences national social housing, homelessness and Indigenous housing policy.	Both levels of government share responsibility for policy to address housing affordability pressures.
Funding	<i>Shared lead</i>	<i>Shared lead</i>	<i>High</i>
	Fund social housing and specialist homelessness services. Funds grants and concessions for first home buyers.	Provides funding to States and Territories for social housing and homelessness services. Funds the National Rental Affordability Scheme (NRAS). Funds CRA. Funds Commonwealth homelessness programmes.	Both levels of government jointly and separately fund housing assistance and homelessness programmes.
Delivery	<i>Lead</i>	<i>Secondary</i>	<i>Low</i>
	Oversee delivery of housing and homelessness services (often provided by non-government organisations).	Typically not involved in delivery of housing services. Delivers CRA payments to individuals. Limited direct involvement in homelessness services.	Limited overlap in delivery of individual programmes.
Regulation	<i>Lead</i>	<i>Secondary</i>	<i>Low</i>
	Regulate housing (community housing, tenancy management, planning, land release and zoning). Local governments also regulate residential planning and construction.	Regulates NRAS.	Little regulatory overlap.



Source: Commonwealth of Australia (2014)

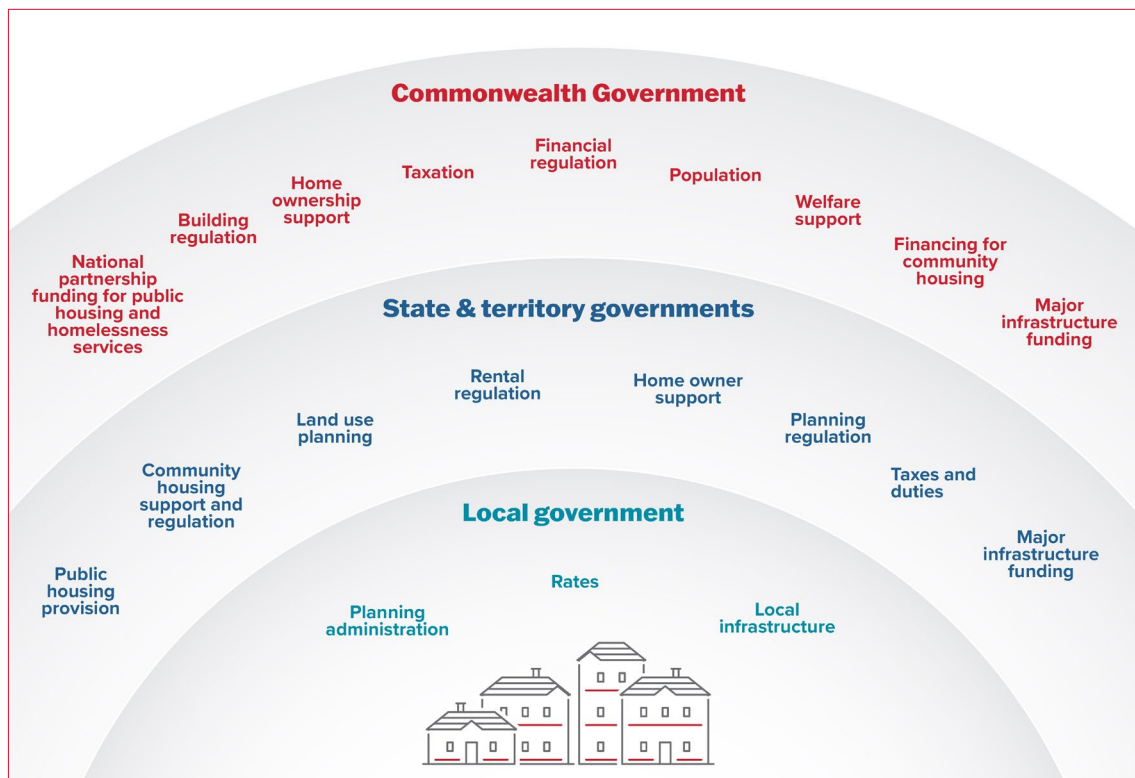
More recently, AHURI has examined the contemporary context for housing policy amongst the three tiers of government (AHURI 2023). Rental regulation is a clear responsibility of state and territory governments (Figure 2). The private rental system is overseen by rental laws, known as the Residential Tenancies Regulations in each state and territory. Rental laws are different

in each state and territory, though most include provisions regarding rights and responsibilities of renters (tenants) and rental providers (landlords), management of bond payments, and regulation around minimum standards.

Recently published AHURI research investigated the rationale for an Australian Housing and Homelessness Strategy (Martin et al., 2023). Applying contemporary thinking about the role of governments in complex problem-solving, and lessons from other ‘national approaches’ here and internationally, it sets out options for achieving cohesive, co-ordinated action on housing and homelessness in the Australian federation.

This research notes that the landmark UN project Housing2030 conceives of good housing policy governance deriving from clear strategic frameworks, mission-focused institutions, capable stakeholders, long-term leadership and commitment. It typically requires multi-level governance, based on long-term agreements. The research identifies ways in which a national housing strategy can be market-shaping and transformative, addressing causes of well understood challenges, designing relevant policies and programs to ensure adequate housing for all.

Figure 2: Housing policy levers of Commonwealth, state and territory, and local governments



Source: AHURI (2023)

The research also notes that Australia’s system of concurrent federalism requires intergovernmental cooperation, and suggests that a mission-oriented Housing and Homelessness Strategy could revitalise inter-governmental cooperation (Martin et al 2023).

There has been a long trend towards the expansion of the Commonwealth’s powers, though it must interact with the states to implement policies. The current peak forum for intergovernmental relations, the National Cabinet, replaced the Council of Australian Governments (COAG) at a time when principles for intergovernmental cooperation remained

unresolved (Martin et al 2023). In this context, the AHURI research outlines a range of activities for the Federal Government to undertake in collaboration with the states and territories, local government, and private not-for-profit and for-profit partners (Table 1).

Table 1: Activities for each level of government

Stage	Level of government	Activity
Housing strategy	Australian, state and territory, and local	Understand future demand across housing market segments, current supply and gap analysis of housing need, which type, where
Housing targets	Australian, state and territory, and local	Quantify and set targets of new homes by market segment, including crisis, social and affordable housing, to meet forecast demand, by housing type, location and timeframe
Gap subsidy program	Australian, state and territory	Quantify finance required and design efficient allocation of ongoing gap subsidy program to leverage private participation by market segment e.g. crisis, social and affordable housing. Gap finance could be formulated as capital grant, tax concession, or recurrent subsidy
Outcomes	Australian, state and territory	Define social, economical, environmental, and other benefits sought, define measures, targets and reporting frameworks e.g. local employment, climate resilient design
Budgets	Australian, state and territory, and local	Commit funding to ongoing gap subsidy supplemented by annual targeted budgets to engage private sector in contributing to delivery of housing targets across market segments
Policies and programs	Australian, state and territory, and local	Implement clear, consistent policies and programs to engage private sector in contributing to delivery of housing targets across market segments
Procurement	Australian, state and territory	Implement clear, consistent procurement to competitively and efficiently award resources to the private and CHO sectors
Regulatory systems	Australian, state and territory	Implement principles-based regulatory system to monitor and control quality of providers and housing
Risk and performance	Australian, state and territory, and local	Gather and analyse data through regular reporting to manage risks, inform continual improvement and evidence based models

Source: Benedict et al., 2022

The roles and responsibilities for broader urban policy are similarly shared and inconsistent, and can similarly be impeded by poor coordination. The importance and impact of the NUP will in large part be determined by its success in defining agreed roles and responsibilities for different tiers of government, and different portfolios within government, and the ways in which this drives coordinated investment and activity.

Part 3:

Australian Government Goals

The Draft NUP's five goals for Australia's urban places identify fundamental characteristics of our urban places. The goals are interdependent, and specific Objectives (and key urban challenges) presented in the subsequent chapter frequently relate to more than one goal. As a broad framework for policy ambition, the goals are sensible and forward-facing.

As noted earlier in this submission, the Principles presented in the appendix to the Draft NUP provide an important guide to decision making. The Draft NUP acknowledges that these principles help the Draft NUP to align with the UN-Habitat New Urban Agenda, which provide guidance for achieving the Sustainable Development Goals (SDGs).

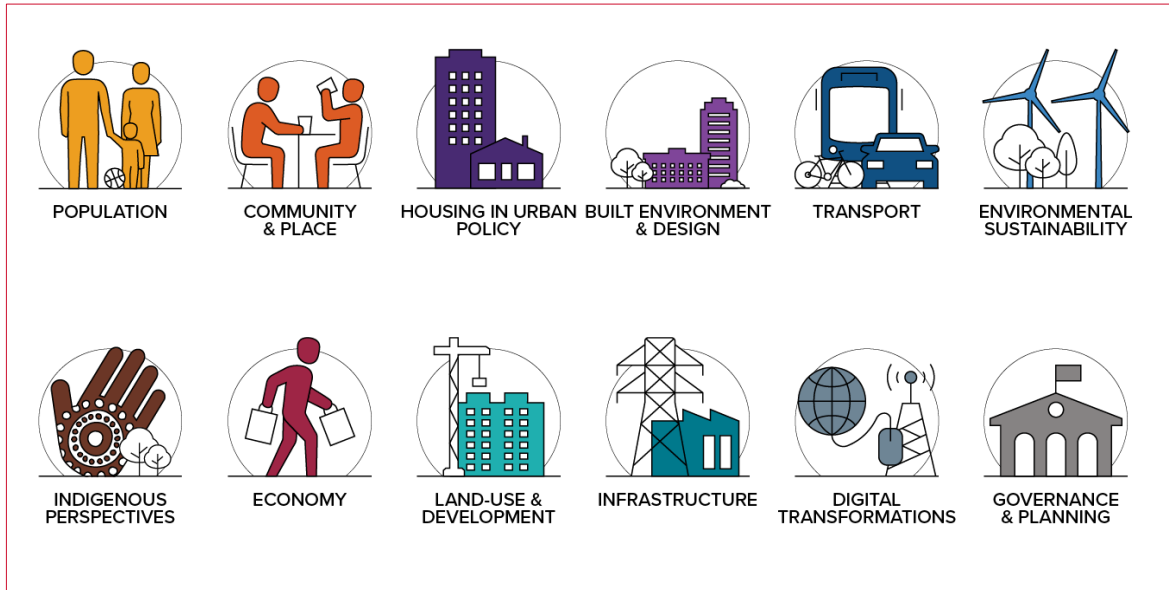
A matrix approach to presentation of the goals and principles could assist in articulating the scope and intent of the NUP, the prioritisation of actions and the areas in need of future development. It may be noted that the alignment of UN SDGs with the Draft NUP (and Australian urban policy more generally) is under-developed, and this approach would improve the alignment of the NUP to the SDGs, as well as bringing greater coherence to the NUP.

AHURI undertook a similar exercise in developing a Strategic Agenda for the NCRP. To develop a strongly grounded and appropriately targeted research agenda that can support leading urban policy in Australia, AHURI began with a detailed stocktake of current policy and the policy context. From this we identified nine broad themes that are addressed in jurisdictions across the nation — essentially those which have defined urban policy in Australia to-date.

Next, we systematically analysed the existing field of international and local urban research, to understand what the current leading edge of knowledge is and where policy gaps might be emerging. We also conducted an international survey of policy and research organisations with similar or related roles to AHURI. From this we found additional emerging themes that are relevant to a future urban policy agenda in Australia.

The resulting 12 themes are detailed in the National Cities Research Program Strategic Agenda (AHURI 2021; Figure 3). The NCRP Strategic Agenda details the scope of a national research program on urban policy — essentially mapping the work required for the Draft NUP's Principle 4 – improving the evidence base will underpin urban innovation. The twelve cities and urban research themes provide a framework to explore a broad range of emerging urban policy issues. Future research directions are identified under each of these themes to provoke discussion and collaboration in the development of a high quality evidence base.

Figure 3: NCRP Strategic Agenda themes



Source: AHURI (2021)

Part 4:

Australian Government Objectives

The most substantial and fully developed segment of the Draft NUP is the Australian Government Objectives. These objectives are supported by a wide array of programs and initiatives detailed in the appendix.

This submission will reflect on select Objectives and identified Key urban challenges, drawing on evidence from the NHRP. The Key urban challenges articulate significant issues for policy consideration, and AHURI recognises the importance of developing and maintaining a consolidated evidence base on these issues, through a dedicated national research mechanism.

Objective 1: No-one and no place is left behind

Key urban challenge 1.1:

Housing availability: Demand for housing is outpacing supply, leading to shortages that negatively impact affordability, rental vacancy rates, and housing ownership rates, especially for younger households

In addition to personal safety and security, the Draft NUP acknowledges the wider social and economic benefits of well-located and well-connected housing, including people's ability to access employment opportunities and to achieve work-life balance (Objective 5, p. 36-37).

Policy measures are needed to minimise the trade-offs that low-income workers face between housing affordability and work opportunities.

Urban agglomeration is widely understood to generate productivity gains by reducing the impact of distance on the exchange of goods, services, skills, information, and ideas. AHURI research estimates that productivity gains (measured by higher wages) arise at the small city scale (100,000 population with weaker statistical significance for smaller threshold) and increase with city size and density (Leishman et al., 2021). A doubling of employment density increases labour productivity by 1 to 4 per cent (Nygaard et al., 2021).

Concentration of firms and workers allows for greater levels of industry specialisation through better matching of skills to jobs, shared input markets, and knowledge and technological spillovers. A doubling of economic specialisation in local (SA2) and regional (SA4) areas, relative to the state economy, is associated with a 4 to 10 per cent increase in hourly wages (Nygaard et al., 2021). Spatial concentration is particularly apparent in 'Information, Media and Telecommunication', 'Financial and Insurance Services', and 'Art and Recreation Services' where knowledge exchange, face-to-face interactions and proximity to other industries and headquarters is important (Nygaard et al., 2021).

However, employment density is often accompanied by congestion and higher housing costs that may widen inequalities. AHURI research shows that higher-wage workers benefit more from employment agglomeration than middle and low-wage workers, before and after adjusting for basic housing costs (Nygaard et al., 2021). For the lowest 20 per cent of the wage

distribution, the wage differential from agglomeration is almost offset by higher housing costs (Nygaard et al., 2021).

High housing costs can also adversely affect urban productivity by reducing the availability of affordable housing options for essential workers. Low-to-middle income households are a critical sector of the workforce, including key workers such as teachers, nurses, emergency service workers, aged care providers, delivery drivers and cleaners (Gilbert et al., 2021). However, people working in these occupations – particularly those in the second lowest quintile of the income distribution (Q2) but increasingly those in the Q3 range – are unable to access affordable rental housing near employment centres (Gurran et al., 2021; Gilbert et al., 2021). Consequently, Q2 renters sacrifice housing affordability for access to employment opportunities or endure longer commute times, which impacts labour productivity and workforce participation.

AHURI research finds lower overall employment participation by lower-income households living in outer suburban locations in Sydney and Melbourne (Gurran et al., 2021). One fifth of key workers in Sydney and 17 per cent in Melbourne experience housing stress, with significantly higher rates in inner subregions (Gilbert et al., 2021). Approximately 44,000 key workers in Sydney and 38,000 in Melbourne commute over 30km to work (Gilbert et al., 2021). Left unaddressed, this may threaten Australian cities' capacity to sustain critical urban functions across the public and private sector (Gilbert et al., 2021).

AHURI research has identified that a lack of housing diversity also impacts the success of innovation districts in supporting the growth of technology- and knowledge-based service industries (Dowling et al., 2020). Innovation districts rely on a mix of firms (e.g., start-ups, large corporations, and public anchor institutions) and a diverse workforce, including students, postgraduates and young entrepreneurs. Innovation districts and high-tech clusters in urban centres are linked with gentrification in surrounding neighbourhoods, driven in part by high-wage knowledge and tech workers bidding up housing costs and stimulating demand for new consumption amenities. Without early planning for affordable housing and workspace, this ultimately harms the long-run mix of firms and workers in innovation districts and their economic competitiveness (Dowling et al., 2020).

To mitigate the adverse effects of agglomeration and employment density, urban policy is needed that balances economic productivity gains with broader social equity objectives. AHURI analysis suggests that market-based housing delivery is unlikely to create sufficient affordable housing for Q2 workers in central urban subregions, given land availability and current rental prices (Gurran et al., 2021). Policymakers could use well located public land for affordable rental housing development and legislate mandatory inclusion of affordable homes for all major residential projects with requirements that are “matched to market” (i.e., mechanisms to maintain affordable home ownership or rental with priority access for Q2 households) (Gurran et al., 2021, p. 4).

To retain key workers, supply and demand-side policies may be needed. Key workers usually work in population-serving industries, meaning they can work in most population centres and have little incentive to live in areas with unaffordable housing costs (Gilbert et al., 2021). Between 2011 and 2016, Sydney and Melbourne's inner subregions experienced a net loss of key worker residents, while more affordable outer suburbs and satellite cities experienced a net gain (Gilbert et al., 2021, p. 4).

An AHURI review of international programs revealed examples that mixed supply and demand-side programs, with home ownership assistance seen as particularly important for longer-term retention of key workers (e.g., “Next Door” grants and down-payment assistance in the U.S.; the Key Worker Living Program in England) (Gilbert et al., 2021). The study indicated that there have been no federal or state housing programs or policies specifically designed to support key workers (Gilbert et al., 2021).

Another policy option to the spatial mismatch between jobs and housing is “concentrated decentralisation”, where employment is clustered in designated nodes through strategic planning and targeted investment (Gurran et al., 2021, p. 1). AHURI research pointed to the “City Deals” framework in the UK as a potential model for place-based planning and policy coordination across the three tiers of government. The researchers note that these inter-governmental contracts hold potential to bring together separate powers, responsibilities, funding streams, and expertise in a way that reflects local priorities, but stress the need to consider the impact of transport and other major infrastructure investments on housing markets (Gurran et al., 2021, p. 49). While City Deals in the UK and Australia (e.g., Western Sydney City Deal) refer to housing affordability, the emphasis is often on increasing overall housing supply rather than specific targets and transparent monitoring frameworks to deliver affordable housing for low-income households.

For innovation districts and smart city initiatives, AHURI research argues that it critical to consider housing foundations at the formulation stage to maintain affordable dwellings and workspace over the long-term (Dowling et al., 2020). The authors highlight successful examples linking smart city initiatives to affordable housing overseas (e.g., Barcelona, Cleveland, and Chattanooga), but note that this link is yet to be embedded in Australian metropolitan planning (Dowling et al., 2020).

Overall, “in contexts where new infrastructure or other investment may inflate local house prices or rents, it is critical to ensure that existing affordable rental housing supply is preserved, and new opportunities created.” (Gurran et al., 2021, p. 54).

Key Urban Challenge 1.2:

Housing affordability: A lack of well-located, diverse housing options is causing stress for an increasing number of households.

The Draft NUP recognises that “significant, strategic action is needed to alleviate Australia’s housing pressures so more people can access secure, affordable and accessible housing” (p.22).

To achieve this goal, sustained reinvestment in social housing is needed. AHURI research shows that the private rental sector is increasingly unable to provide affordable accommodation for low-income households.

Since the 1990s, housing assistance programs in Australia have overwhelmingly focused on demand-side measures to support people in housing need, including assistance to secure private tenancies (Pawson et al., 2020). Commonwealth Rent Assistance (CRA) is main form of private rental assistance, assisting approximately 1.3 million people and costing \$4.9 billion annually (Aminpour et al., 2024, p. 8). CRA aims to improve housing access and alleviate

housing-related stress by reducing the costs of tenancies. However, AHURI research raises questions over its efficacy in its current form:

- In 2017, 34% of low-income CRA recipients paid more than 30 per cent of their income even after CRA is deducted from rents (Ong et al., 2020) — the 2024 Report on Government Services (2024) indicates that by 2023 42.9% of CRA-receiving low income households still experienced rental stress (SCRGSP, 2024)
- 18% per cent of low-income private renter households that are ineligible for CRA paid more than 30 per cent of their income in rent (Ong et al., 2020)
- CRA is standardised rather than tailored to local housing markets or household needs (Ong et al., 2020)
- Demand-side subsidies do not impose conditions on landlords of recipient tenants — in the absence of stricter private rental market regulations and enforcement, CRA does not address concerns over tenure security and property quality (Rowley & James, 2018)
- A survey of 3,182 Australian private renters found that only 11 per cent had a lease of two years or longer, and that 31 per cent of moves are involuntary (Rowley & James, 2018)
- CRA can drive up rents, particularly in disadvantaged neighbourhoods with relatively inelastic rental housing supply — in the absence of an adequate supply response rents rise, and most new housing supply in Australia tends to be concentrated in mid-to-high price rather than low-price market segments (Ong et al., 2017).

Secure and affordable housing outcomes are difficult to achieve through private rental markets, even with government subsidies. This is likely to worsen given long-term structural shifts in the composition of households in the private rental sector. Recent AHURI research shows strong growth in mid-to-high income households (\$64,000 per annum and above, \$2021), comprising 64 per cent of all households in the private rental sector in 2021 compared to 40 per cent in 1996. Furthermore, households with very high incomes (around \$140,000 p.a. and above, \$2021), made up only 8 per cent of privately renting households in 1996 but nearly one-quarter in 2021 (Reynolds et al., 2024).

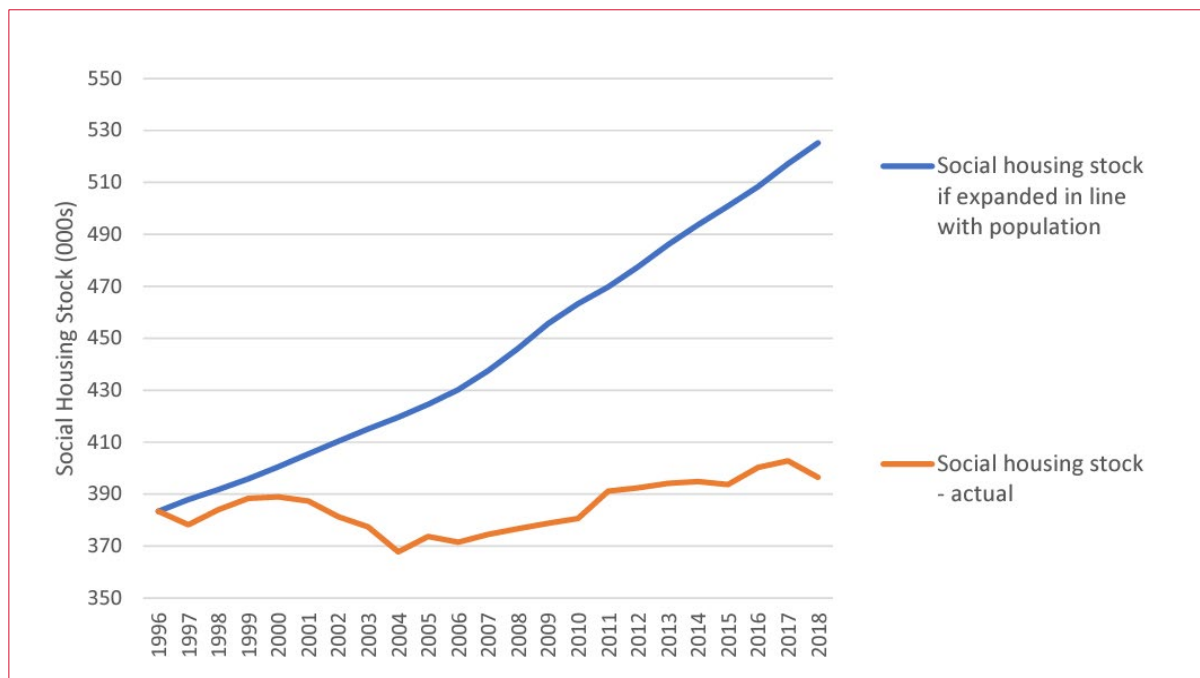
Increased competition from higher-income households is set against a shrinking stock of affordable private rental dwellings. Low-rent dwellings comprised just 13 per cent of the private rental stock in 2021, shrinking from 59 per cent of the private rental stock in 1996 (Reynolds et al., 2024). In 2021, 82 per cent of private rental households in the lowest income quintile paid unaffordable rents nationally and 90 per cent in capital cities (compared with 70% in nonmetropolitan regions).

For moderate income households, policymakers could build on current programs to improve the availability of affordable private rental options. For example, recent increases in the rates of CRA provides some relief to low-income provide renters but could be better targeted. AHURI modelling shows that reforms to CRA eligibility rules to target people experiencing housing stress (i.e., with housing costs more than 30% of income) would achieve the greatest housing affordability improvements at the lowest cost (Ong et al., 2020). Other measures might include new affordable housing models financed with funds raised through Housing Australia and build-to-rent properties specifically targeted at moderate income households (Reynolds et al., 2024).

AHURI research indicates that a comprehensive first home buyer strategy could also support moderate income earners secure stable housing, but only if policies are specifically targeted at cohorts that may not otherwise achieve homeownership (Whelan et al., 2023). To be effective, the research argues that policies need to facilitate (1) accessibility by alleviating downpayment constraints, and (2) affordability by addressing repayment constraints (E.g., shared equity schemes). Nonetheless, first home buyer strategies should be complemented with measures that develop other tenures as legitimate long-term housing outcomes (e.g., well-regulated affordable rental tenure or right of occupancy models) (Burke et al., 2020; Whelan et al., 2023).

For low-income households, however, the private market has consistently failed to supply enough stock of affordable and available housing while rising house prices preclude ownership. Consequently, sustained investment in social housing is needed, reversing long-run trends (Figure 4). In 2020-2021, nearly 30,000 applicants were granted a social housing tenancy nationally, compared with 52,000 in 1991. Adjusted for population growth, this represents a 61% reduction (Pawson & Lilley, 2022, p. 1; see Figure 4). Furthermore, across Australia, over 174,600 households had applied to live in social housing in 2021-22 but only 29,100 households were housed, usually those with complex or acute needs (Aminpour et al., 2024).

Figure 4: Australia’s social housing stock: comparing actual provision with provision expanded in line with post-1996 population growth



Source: Pawson & Lilley, 2022, p. 19

The NUP, coordinated with the forthcoming National Housing and Homelessness Plan, can provide a framework that sets clear delivery targets, implementation levers, and performance measures for social housing and other forms of tenure across the continuum of housing needs (Gurran et al., 2018; Benedict et al., 2022; Martin et al., 2023).

This research indicates that a substantially larger and consistently regulated not-for-profit housing sector is needed with the scale and capacity to propel growth in the social and affordable housing stock and maintain continuity of development (Gurran et al., 2018;

Benedict et al., 2022). Secure and long-term debt finance enables affordable housing providers to operate counter cyclically, taking advantage of weaker market conditions and maximising public investment. Housing Australia provides an important source of lower cost and longer-term finance for registered community housing providers; however, government subsidy is still needed to deliver low-income rental housing (Gurran et al., 2018).

Government-facilitated access to land — either through government land organisations or inclusionary planning — generates development opportunities and can improve long-term project viability for social and affordable housing developments (Gurran et al., 2018). Moreover, government retention of land ownership as equity can support affordable housing development and achieve public return on equity as development improves land value.

Key Urban Challenge 1.3:

Homelessness and overcrowding: These persistent challenges in urban areas are particularly affecting marginalised communities, including First Nations people, people with disability, and low-income households

The NUP Policy aims to reduce homelessness, acknowledging it is as a persistent urban challenge that disproportionately impacts “marginalised communities, including First Nations people, people with disability, and low-income households” (Objective 1, p.22).

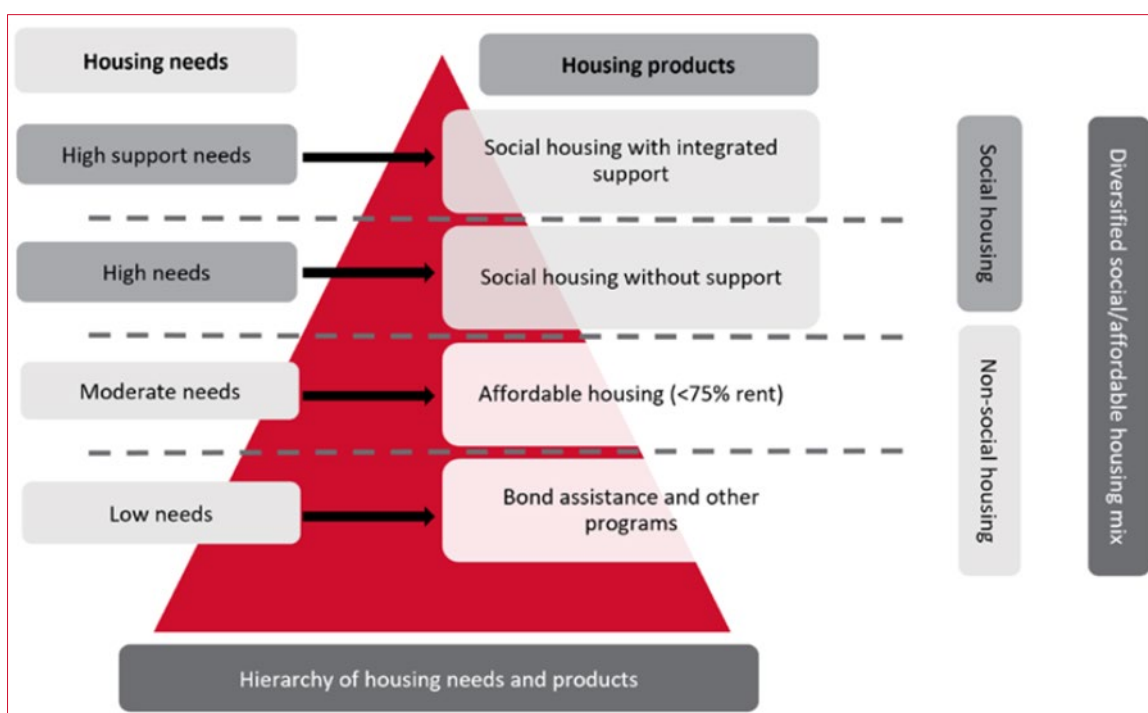
Policies geared toward early prevention are most effective at reducing homelessness.

Housing costs often represent that largest share of living costs. Excessive increases in housing costs, alongside insecure tenure and evictions, can lead to entrenched poverty and cycles of homelessness difficult to escape (Lui et al., 2023; Spinney et al., 2020).

Housing and related urban policies aimed at sustained tenancies in high-quality housing are most effective at alleviating poverty and reducing homelessness. To achieve this, recent AHURI research argues for a broader conceptualisation of the social housing system and the needs it addresses (Levin et al., 2023). Currently, the main function of Australia’s social housing system is to manage a scarce social housing stock by limiting it to people with the greatest need. This approach is financially unsustainable as high-need households generally have only poverty-level income, making it difficult for housing agencies to cover costs with rental streams. It can also lead to concentrations of disadvantage, a limited degree of housing choice for social housing tenants, and limited avenues to transition between housing products. Importantly, there are a range of cohorts experiencing different levels of housing need that are not serviced by the social housing system.

AHURI research calls for better integration of the social housing sector with the larger housing market (Levin et al., 2023; see Figure 5). This would provide a range of housing products to meet the changing needs of tenants and the wider population: ranging from bond assistance and headleasing from the PRS for people with low-to-moderate needs through to social housing with or without support services for those with higher needs. Such a system broadens eligibility criteria for assistance and offers more opportunities for people to change between housing products as their circumstances change, either with or without relocating.

Figure 5: Hierarchy of housing needs and products



Source: Levin et al., 2023

A broadened system of housing support will become more pressing over time. By 2031, an estimated 440,000 older households will be without suitable housing driven by declining rates of home ownership, carriage of mortgage debt into retirement, and restricted access to social housing (Faulker et al 2023). AHURI research suggests that a national shared equity scheme and land lease models (such as the Help to Buy program, currently before the Senate) could provide alternative housing security for low-income older Australians, potentially supported through tax concessions (e.g., GST and land tax relief for affordable retirement villages) or planning incentives (e.g., inclusionary zoning, accessory dwellings).

For low-income households in the private rental sector, AHURI research highlights the importance of stronger regulations to sustain tenancies and improve housing quality (Lui et al., 2023). This includes rental price regulations that reflect affordability considerations, stronger procedures around terminating tenancies, and building regulations that focus on improving the safety and quality of existing as well as new housing construction (similar to international models, such as the United Kingdom’s certification for improving energy efficiency in privately rented properties) (Lui et al., 2023). Collectively, these measures would improve renters’ quality of life, minimise their operating expenditures (e.g. utilities), and alleviate poverty and homelessness caused by precarious and poor-quality housing.

As another preventative measure, AHURI research recommends assertive outreach programs involving mainstream welfare agencies (e.g., Centrelink, medical services, schools) screening people to assess housing security and risk of homelessness (Spinney et al., 2020).

National policy frameworks are important mechanisms to ensure the clear transfer of information between relevant agencies. Urban policy can also encourage place-based responses, such as co-location of welfare and other services in accessible locations, which has

been shown to support collaboration and referrals across agencies (e.g., allowing staff to take clients from one agency to the next) (Spinney et al., 2020).

While policies aimed at preventing homelessness are best practice, there remains a need for short-term emergency and crisis accommodation for people in acute housing need. AHURI research highlights that effective crisis accommodation models provide certainty around length of stay, trauma-informed staff and building design, and support services that extend after exiting crisis accommodation (Batterham et al., 2023). However, the specialist homelessness services (SHS) sector suffers from a shortfall of crisis accommodation. Lack of capacity in the SHS sector means that SHS providers are increasingly reliant on purchased crisis accommodation, which often provides poor standards of accommodation and inadequate levels of support. AHURI analysis shows that “at least as many households are in purchased crisis accommodation, as are in SHS provided crisis accommodation” (Batterham et al., 2023, p. 4). This may require policy intervention to establish minimum quality standards and to coordinate access to purchased crisis accommodation, rather than leaving local service providers to broker access.

The SHS sector is also experiencing staffing constraints, driven in part by the competitive funding model and short-term funding cycle used to fund SHS organisations (James et al., 2023). This encourages short-term contracts and pay that is not commensurate to the nature and skill of the work performed, leading to high turnover and loss of critical skills. AHURI research has identified the benefit of an increase in Commonwealth funding using current data on growth in demand for SHS services and extension of funding cycles and lead times used by state and territory governments to distribute funds to SHS sector (James et al., 2023).

As recognised in the Draft NUP, First Nations Australians disproportionately experience homelessness. Despite making up less than four percent of the Australian population, they account for one in five people experiencing homelessness (ABS, 2023) and make up 27 per cent of clients receiving homelessness services (AIHW, 2023).

AHURI research shows that First Nations clients fare better when services are delivered by First Nations-controlled organisations, with First Nations frontline workers and a distinctive service philosophy emphasising flexible, client-directed practice (Tually et al., 2022; Moskos et al., 2022). The First Nations sector could be strengthened with funding to improve coordination of First Nations housing, homelessness and related services and to build local networks and partnerships within and between First Nations and mainstream providers (Tually et al. 2022; Moskos et al., 2022).

Objective 4: Our urban areas are sustainable

Key urban challenge 4.3

Building and construction emissions: Buildings contribute significantly to greenhouse gas emissions. Improved energy performance and sustainable materials can help decarbonise the built environment.

Key urban challenge 4.4

Circular economy and sustainability: Transitioning to a circular economy in urban areas is essential for reducing waste and repurposing materials, thus supporting sustainability and climate action.

The Draft NUP aims to support urban areas to improve sustainability and achieve net zero emissions by 2050, particularly through strategic planning, infrastructure and land use frameworks to improve climate mitigation and aid the transition to a circular economy (Objective 4, p. 31). The Policy also conceptualises sustainability objectives as important to the safety of urban areas, ensuring that they are resilient to climate hazards (Objective 3, p. 28).

Unsustainable development and construction practices are sustained by gaps in market settings and institutional capacities.

A recent AHURI inquiry found “no evidence that housing industries are wilfully adopting or prolonging unsustainable practices”; however, new policy frameworks and processes are required to support the implementation of circular economy (CE) housing (Horne et al., 2023, p. 3). Current barriers include low or unspecified building and development standards, a lack of professional awareness, adverse actor incentives and motivations, and high upfront costs to investors and consumers (despite long-term benefits). These barriers extend across different fields of housing in Australia.

At the neighbourhood scale, circular economy approaches are encumbered by fragmented policy and regulatory frameworks that extends across different jurisdictions (Dühr et al., 2023). Building regulations are set at the federal level, while urban and regional planning policies are the responsibility of states and territories. Statutory planners in local governments are also critical gatekeepers of sustainable development projects.

AHURI research shows that this fragmented governance and policy landscape creates challenges for built environment professionals, particularly when trying to identify relevant tools to plan, design, develop and evaluate sustainable housing at a neighbourhood scale (Dühr et al., 2023). The research surveyed 123 policymakers, planners, developers, and architects in the volume house building industry, finding that numerous neighbourhood-scale sustainability rating tools are available (e.g., OnePlanet Living and EnviroDevelopment), but all are voluntary and hence not widely used or understood (Dühr et al., 2023).

Moreover, compromises are often made during the implementation process that dilute initial ambitions, leading to a focus on selected aspects of sustainability in development projects rather than a comprehensive CE vision (Dühr et al., 2023, p. 55). The researchers recommend a review of the current fragmented landscape of neighbourhood-scale sustainability assessment tools and stronger mandatory targets to guide planning and development applications and to measure compliance (Dühr et al., 2023, p. 27).

In addition, housing developments are usually designed and realised at the scale of individual building sites, despite the neighbourhood scale offering greater sustainability potential and economies of scale for decentralised systems (e.g., water and energy), integrated land-use and transport planning, biodiversity planning and social sustainability. Projects such as eco-neighbourhood developments often involve lengthy negotiations and development processes with local governments due to non-standard development features that conflict with current policy guidance (e.g., parking requirements) and concerns over the costs of maintaining public assets after project completion. This contributes to difficulties securing finance as these projects are often perceived as higher risk (Dühr et al., 2023).

AHURI research recommends more support and training for local governments assessing applications, new public-private-partnership models that share the benefits and additional costs of neighbourhood-scale developments (e.g., infrastructure provision), and changes to the financing landscape (e.g., ethical or sustainability-focused financing arrangements that prioritise long-term returns) (Dühr et al., 2023).

At the building scale, apartment developments offer opportunities for improved sustainability due to their scale and shared infrastructure. However, AHURI analysis in New South Wales and Victoria shows that less than five per cent of building projects exceed minimum standards for sustainability and those that do are mostly delivered as luxury products in high value areas, which excludes low and middle-income buyers and renters (Easthope et al., 2023).

The lack of sustainable apartment development stems from the way apartment buildings are developed, owned and managed. Apartment buildings are usually delivered as speculative strata title developments. Under the build-to-sell model, property developers speculatively deliver apartments for individual strata-titled sale to multiple unknown owners, meaning there is little client oversight during design and construction. Since build-to-sell developments are also vulnerable to economic cycles, developers primarily focus on compliance with minimum standards in order to bring products to market quickly (Easthope et al., 2023).

In addition, strata titled ownership requires collective decision making over common property, creating challenges around upgrades and maintenance to prolong building life. Strata title committees tend to prioritise immediate repairs and maintenance with limited capacity to forward plan sustainable retrofits. Individual owners also lack knowledge about their building and utility costs and the practicalities of coordinating major works that affect shared infrastructure and building services (Easthope et al., 2023).

To achieve more sustainable apartment developments and retrofits, AHURI research recommends increasing minimum standards and expanding the scope of the Building Code of Australia (BCA) and National Construction Code (NCC) to include materials and environmental performance (Easthope et al., 2023). The research also indicates that a well-resourced planning assessment system and strengthened regulations for pre- and post-occupancy compliance auditing is needed to ensure that approved designs and performance standards are actually delivered.

Together, these reforms would incentivise development teams to embed sustainability in project feasibility. The researchers also put forward a case for supporting the built-to-rent and social housing sectors where developers have more incentives to improve building quality (e.g., reducing operating costs for tenants, maintaining asset value), enabled by access to green finance (i.e., impact investors seeking low-risk, long-term returns) and the National Housing Finance and Investment Corporation (now renamed Housing Australia).


Mainstreaming best practice in apartment development could support a broader shift in the housing system, given that apartment construction involves large-scale developers and major lenders.

The adoption of CE principles in building material supply chains offers significant potential to reduce Australia's carbon footprint. AHURI analysis shows that the embodied greenhouse gas emissions in residential building materials have almost doubled over the last fifty years (from 3.2 million tonnes CO₂ equivalent in 1970 to 5.7 million tonnes CO₂-eq in 2020) (Dalton et al., 2023). This was driven in part by the increasing size of houses and changes in construction materials (e.g., increased use of reinforced concrete aligned with the increasing proportion of multi-unit apartment housing; the embodied energy-intensities of apartments are 18 percent higher than houses). The researchers find that current construction models restrict choice of lower carbon materials; for example, timber in the multi-unit apartment industry. There are also institutional barriers to recycling waste and planning for end-of-life disassembly, including higher costs for repurposed relative to new materials, the lack of an established market for reusable construction and demolition waste materials, and the financial costs of disassembly relative disposing materials in landfill.

To address these barriers, the researchers call for stronger regulation, financial incentives (e.g. taxation) and strategic use of public procurement are important to support reuse, rethink, repurpose, remanufacture functions (Dalton et al., 2023). There are also significant data gaps that need to be addressed to better understand (1) the flow of materials used in the construction of housing, (2) materials already in the housing system, and (3) construction and disassembly waste and reuse. While the CSIRO's Australian Housing Data Portal has made significant progress in the development of a data system, their efforts could be supported by more robust builder reporting requirements. The lodgement of as-built documentation and materials passports would allow for a more accurate representation of stock in-use and 'track and trace' systems for construction materials (Dalton et al., 2023).

Overall, AHURI research recommends a multi-level governance approach with robust national leadership to provide a more comprehensive and less fragmented path towards a circular economy. The NUP has an important role to play in guiding CE-related programs, funding and regulations at the Federal level (Figure 6).

Figure 6: Summary of recommended CE-related actions for the Commonwealth Government



Commonwealth government

- Coordinate policy to support CE in building, planning and investment
- Increase minimum energy efficiency (EE) standards in National Construction Code (NCC)
- Support database and warehouses for reusable products and materials for procurement
- Establish clear measurable objectives, pre- and post-occupancy and incorporate into accountability frameworks, such as valuations and environmental, social and governance (ESG) investment standards
- Account for embodied carbon in housing materials in a trackable way in relation to emissions targets.
- Develop a long-term funding pathway to enable social housing providers to embed retrofit within their maintenance plans
- Robust ESG CE investment definitions, and compliance reporting
- Support tertiary education, TAFE and professional development to increase workforce capacity to reduce carbon intensity of new housing and retrofit

Source: Horne et al., 2023, p. 6.

Objective 5: Our urban environments and communities promote health and wellbeing

Key urban challenge 5.2

Housing quality: Poor-quality housing, particularly for lower-income households, can result in negative health impacts and hinder community liveability.

There is long-established evidence from Australia, and internationally, examining the ways in which housing impacts physical health. Intervention studies provide strong evidence for particular housing improvements and the health benefits that flow as a result. The housing setting needs to be supportive of healthy behaviours, such as physical activity, social interaction and access to nutritious foods, as part of everyday life (Phibbs and Thompson, 2011).

Key considerations include overcrowding, damp and mould, cold or poor thermal performance, and indoor pollutants, which are associated with a range of infectious, respiratory, cardiovascular and other health conditions (Phibbs and Thompson, 2011).

More recent research has sought a clearer understanding of the interaction between housing experiences and mental health. The research found that safe, secure, appropriate and affordable housing is critical for recovery from mental ill-health and for being able to access appropriate support services. Yet, there is a shortage of appropriate housing options for people with lived experience of mental ill-health. Quantitative analysis showed that poor and deteriorating mental health directly impact housing stability (as measured by forced moves and financial hardship). Mediating factors, such as social support, good general health, and accessing mental health and other health services, can reduce the likelihood of housing instability and shorten the length of time a person experiences mental ill-health (Brackertz et al., 2020).

There is evidence that environmental exposure to housing instability or homelessness, can lead to mental illness. AHURI research also reveals that people living in private rental or those experiencing housing unaffordability are generally most at risk of mental ill-health under adverse circumstances. Researchers have found that mental health and social functioning worsened for low-to-moderate income households whose housing became unaffordable. Australian private renters whose housing becomes unaffordable experience a small but significant decline in mental health, while the same change in affordability for home purchasers does not, on average, alter their mental health (Brackertz et al., 2020).

Research published by AHURI that was undertaken during the COVID-19 pandemic identified significant health concerns associated with private rental accommodation. In 2020, 23 per cent of renters were unable to keep warm in their home during cold weather, 27 per cent reported problems with mould, and 21 per cent reported problems of dampness (Daniel, 2020). High rates of cold, mould and damp in rented properties point to failures in Australia's standards for construction and regulation of the private rental sector (London, 2020). Notably, research conducted in this period showed that poor housing quality is not a trade-off for affordability — almost a quarter of households living in what they regard as poor quality housing also rate their housing as unaffordable (Rowley, 2020).

Concluding remarks

The Draft NUP provides a strong foundation for the development of nationally consistent approaches to urban policy challenges. The ambition and scope of the NUP as presented in the Draft NUP are sound, though the interpretability of the document could be enhanced by better integration of the Goals and Principles.

The Key urban challenges set out under each of the Australian Government Objectives are realistic, and present a concise summary of the issues faced by Australian cities.

Notably, the final pages of the Draft NUP are dedicated to cataloguing a wide range of government initiatives relevant to each objective. While the sheer volume of these lists of initiatives precludes their inclusion from Part 4 of the Draft NUP, where each Objective was discussed, monitoring their progress, and the implementation of new initiatives relevant to urban policy, will be important in facilitating coherent urban policy in Australia.

Urban policy is complex, involving multiple portfolios in all three levels of government, so clear understanding of the different activities which impact it is vital.

This submission has, in large part, been drawn from the evidence base developed through long-term investment of the Australian government and all state and territory governments in national housing and homelessness research – through AHURI's National Housing Research Partnership. Since the inception of the NHRP, many urban issues have been addressed through AHURI's evidence-building. This is understandable given the centrality of housing and its provision for cities and urban policy – as recognised in the Draft NUP through a number of the Key urban challenges.

Although state and territory governments continue to oversee the planning and growth of our major cities, the last several decades have witnessed an increasingly relevant national policy focus on cities. AHURI's partner universities also have expanded their expertise and capacity for urban policy research across a diverse range of fields. The NHRP has served to advance significantly our knowledge about housing and homelessness in Australia and informed policy and practice from federal, state and territory governments, service delivery sectors and industry. Our research has attracted international recognition and established a strong global reputation for Australian research and policy formation.

It is timely now to act on one of the key Principles of the NUP and build a consolidated evidence base on urban policy challenges, and the solutions for governments, communities and industries. AHURI welcomes the development of a NUP, and looks forward to supporting continued progress in this space.

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