CENTRAL LAND COUNCIL

Submission to the Housing Strategy Consultation Draft

Department of Housing

Northern Territory Government

5 February 2016

Terms of Reference

SECTION ONE

1: Summary of issues
- Has the Consultation Draft Housing Strategy identified the key issues for the NT?
- If not, what else needs to be considered? What is the evidence to support this issue?
- Are there any other needs that are specific to individual communities that should be included?

2: Summary of key findings
- Are the key findings that have been identified the main areas that need to be improved?
- If not, what else should be included?

3: Summary of strategic directions
- Does the vision for the future address the main issues that need to be addressed by the final Housing strategy?
- If not, what else should be included

4: Housing Strategy Consultation Draft on a page
- Are the strategies identified sufficient to improve housing in the Territory?
- Of the strategies presented, which would you prioritise? Why?
- Are there any other solutions you think the Government needs to consider? If so, what are they

SECTION TWO

5: Homelessness
- Are these the key issues for homeless people in the NT? If not, what else should be considered?
- Is there other relevant information/evidence that should be included?
- Are the ideas for possible solutions the right ones? If not, what else should be considered?

6: Supported accommodation
- Are these the key issues for people needing supported accommodation in the NT? If not, what else should be considered?
- Is there other relevant information/evidence that should be included?
- Are the ideas for possible solutions the right ones? If not, what else should be considered?

7: Social housing
- Are these the key issues for social housing in the NT? If not, what else should be considered?

- Is there other relevant information/evidence that should be included?
- Are the ideas for possible solutions the right ones? If not, what else should be considered?

8: Rental

- Are these the key issues for people who rent in the NT? If not, what else should be considered?
- Is there other relevant information/evidence that should be included?
- Are the ideas for possible solutions the right ones? If not, what else should be considered?

Question 9: Home ownership

- Are these the key issues for people buying a home in the NT? If not, what else should be considered?
- Is there other relevant information/evidence that should be included?
- Are the ideas for possible solutions the right ones? If not, what else should be considered?

Executive summary

Australian governments of all persuasions have failed in recent years to meet the basic human right to safe and adequate shelter by providing low-cost housing. According to Knight[1] (2010) the single most reliable predictor of homelessness is poverty and States and Territories have clear responsibilities that include "tackling structural and systemic causes of homelessness and human rights violations." The Central Land Council (CLC) is keenly aware of the critical housing shortage and overcrowding problems that plague remote Aboriginal communities and outstations. Demographic projections suggest a dramatic increase in the NT's Aboriginal population over the next 20-30 years. In this context the CLC is keen to ensure that the maximum amount of housing is delivered, diverse housing options are available to remote communities, strategies for progressing the development and growth of the remote community housing sector are implemented and that mechanisms and processes are put in place to ensure there is a systemic way of dealing with community aspirations and needs. The Central Land Council (CLC) holds the delivery of a fair, effective and efficient housing system to remote communities as a very high priority. The CLC welcomes the fact that the Draft Strategy explicitly acknowledges that housing issues in remote communities are different and therefore require different solutions.

However, given the urgent and ongoing need to secure Commonwealth funds to underpin both housing supply and management in the NT, it is deeply concerning that greater attention has not been paid to outlining the financial arrangements that currently apply to remote housing, nor what is required in the future. Given these fundamental flaws, 'reforming housing in the Territory' is a misnomer to put it bluntly. The strategy does not identify sufficient reform for remote housing, but provides a framework for a continuity of present services and service delivery.

These flaws can be rectified, and the CLC has made a number of recommendations aimed at filling the gaps in the strategy, emphasising the need to provide a greater focus on remote issues specifically. Further, the CLC is seeking a greater commitment, and articulated actions, to ensure that there is a radical shift away from monopoly public housing to a diverse housing sector encompassing capable, local community housing providers. The NT Government must commit to developing and implementing a community housing sector similar to what has happened in the rest of Australia but with an emphasis on Indigenous participation and ownership of the community housing providers.

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[1] Knight, J. (2010) 'Hot House: market morality and the right to adequate housing', in Dissent No. 31, Summer 2009/2010.

Recommendations

Recommendation 1. That the principles underpinning the Draft Strategy be amended to incorporate two additional points:
- the right to housing which is premised on the centrality of appropriate, secure and affordable housing to the health and well-being of individuals and families as well as the social and economic sustainability of communities.
- that to ensure affordability in situations of market failure it is necessary to allocate housing subsidies.

Recommendation 2. That the Draft Housing Strategy explicitly detail how the housing continuum concept applies in the circumstance where there is no housing market to provide a range of housing options.

Recommendation 3. That the Draft Strategy be amended to clarify whether it is intended to be a whole of government strategy or a strategy for social and affordable housing specifically aimed at shaping future directions for the Department of Housing.

Recommendation 4. It is of great concern that a remote housing strategy with an action plan, policies and resourcing/investment strategy has not been articulated. The CLC recommends that the Draft Strategy be amended to provide a specific section detailing the strategies, actions and investment required to reform remote housing arrangements, incorporating the CLC's comments in relation to remote housing contained in this submission.

Recommendation 5. Specifically, the Draft Strategy needs to set out how a remote community housing sector will be established and supported, given the lack of current possible providers.

Recommendation 6. That the final strategy explicitly commit to the implementation of a community housing model for social and affordable housing based on:

- A regulatory system which is consistent with the national Regulatory Framework for Community Housing but relevant to the cultural and geographical uniqueness of the NT.

- Investment in building the capacity of a limited number of Aboriginal owned community housing organisations to achieve registration and both financial and professional capability to manage the risks of the community housing business.

- A strategy and timeframe for implementing a community housing approach to regional and remote housing across the NT.

- Allocation of budgets for the implementation of the community housing approach to regional and remote housing across the NT.
- A "business case" approach to the implementation of a community housing model on a community by community basis involving each community in the development of key priorities in the respective business plans.

Recommendation 7. That the Draft Strategy be extended to include an analysis of the financial arrangements underpinning public housing, identifying remote, urban and town camps. This financial analysis should include both current arrangements and future projections.

Recommendation 8. The CLC calls for the recognition of Aboriginal Housing NT (AHNT) as the peak Indigenous housing body representing Aboriginal people in the NT.

Introduction

The Central Land Council (CLC) welcomes this opportunity to comment on the NT Government's Consultation Draft Housing Strategy.

The CLC is a Commonwealth statutory authority established under the *Aboriginal Land Rights (Northern Territory) Act 1976* ('ALRA'). Amongst other functions, it has statutory responsibilities for Aboriginal land acquisition and land management in the southern half of the Northern Territory. The CLC is also a Native Title Representative Body established under the *Native Title Act 1993* ('NTA'). Pursuant to the ALRA more than 50% of the NT and more than 85% of the NT coastline is now held by Aboriginal Land Trusts on behalf of traditional owners. The CLC region covers approximately 780,000 km² of land, and 417,318 km2 is Aboriginal land under the ALRA. Given existing pastoral land was not able to be claimed this Aboriginal land tends to be very arid and remote. In addition, rights have been asserted and won under the *Native Title Act 1993*, and traditional owners unable to claim land under the ALRA have succeeded in obtaining rights to small areas known as Community Living Areas, under NT legislation.

Through its elected representative Council of 90 community delegates the CLC continues to represent the aspirations and interests of approximately 17,500 traditional landowners and other Aboriginal people resident in its region, on a wide range of land-based and socio-political issues.

The CLC aims to improve the lives and futures of its Aboriginal constituents through sustainable development and change. The CLC's development approach is based on an integrated and strengths-based strategy of building economic, social and cultural capital. Significant work is being done under the various functions of the CLC in each of these related areas through initiatives in: natural and cultural resource management; the development of remote enterprise and employment pathways; innovative community development work, ensuring land owners use income generated from land use agreements for broad community benefit; and land administration and land use agreements for third parties and traditional owners.

Background

The Central Land Council (CLC) holds the delivery of a fair, effective and efficient housing system to remote communities as a very high priority. The objectives of the CLC in relation to housing in remote Aboriginal communities throughout our region are to:
• Address the social determinants of health including by reducing overcrowding and ensuring houses are well designed and maintained;
• Support the development of an innovative housing sector combining Aboriginal control and specialist advice within a strong governance framework;

- Ensure local control over housing decisions;
- Increase local Aboriginal repairs and maintenance capacity so as to maximise local employment and improve response times;
- Ensure remote housing tenancy management is culturally appropriate and fair;
- Ensure compliance with national housing standards and benchmarks;
- Access all possible Commonwealth and Territory subsidies;
- Structure tenure arrangements to provide for innovation, diversity and choice while protecting the fundamental property rights of Aboriginal land owners;
- Increase pride in and responsibility for homes; and
- Increase the options for affordable housing, including private home ownership, within a financially sustainable model.

To achieve these objectives, the CLC believes that the principles of diversity, partnership, community building, sound management and accountability must be embraced and embedded in the social housing system. To this end, the CLC has worked closely with the Aboriginal Peak Organisations NT (APO NT) and more recently the new Aboriginal Housing NT committee, to progress systemic reform of public housing in the NT.

At present Aboriginal housing in remote communities in the CLC region is almost exclusively managed under a public housing model rather than a social or community model, or owned privately. This is only a recent development. Until 2008, all remote Aboriginal community housing funded by Commonwealth and Northern Territory governments was managed by Indigenous Community Housing Organisations (ICHOs).[2] Around 75% of ICHOs were run through local community councils. In such cases the local community council was vested with authority over allocations for new houses and other management issues. ICHOs used to manage accommodation for almost all Aboriginal community residents irrespective of income. Decisions were made within the community. Tenancy agreements over a dwelling were rare. Eviction was also rare to non-existent. Maintenance was generally done on a request basis as the budget allowed rather than on a cyclical or inspection basis.

The system was acknowledged to be fraught with problems. A report by Spiller Gibbins Swan (1998)[3] identified inadequate recurrent funding as the critical impediment to

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[2] As Porter notes, '[i]n effect there were two distinct housing administrations: IHANT for Aboriginal community rental in remote areas, and Territory Housing for public housing in the main centres.' Broadly speaking all funds e.g ATSIC,CHIP; Commonwealth–State Housing Agreement, Aboriginal Rental Housing Program and NT Government contributions were channelled through the Indigenous Housing Authority of the Northern Territory (IHANT) to the ICHOs. See Porter R. (2009), *From community housing to public housing in Northern Territory remote Aboriginal communities: the policy context. DKCRC Working Paper 44.* Desert Knowledge CRC, Alice Springs

[3] Spiller, Gibbins & Swan Pty Ltd. (1998). *Financial viability of Aboriginal and Torres Strait Islander housing organisations.* Report for the CSWGIH, July.

effective housing management by ICHOs. The report found that even where ICHOs were best practice, there were significant shortfalls of available funding to meet recurrent funding needs. Additionally, studies by the Australian Housing and Urban Research Institute (AHURI) and Price Waterhouse Coopers highlighted financial viability of small scale operations, the lack of a prudential regime, a paucity of funds, under-maintenance and overcrowding as critical issues affecting the performance of ICHOs.[4]

There were, however, positive as well as negative aspects to the delivery of housing services by ICHOs which are relevant to a broader discussion of the current public housing model. The positives included:

- Community engagement, participation, control and ownership of decisions
- Localised management of the service which, at its best, was very responsive
- Local skill development and employment opportunities in both tenancy management and property repairs and maintenance
- Housing decisions made in the interests of a harmonious community

The negatives included:

- Poor governance in many instances, which included self-interested decision making and poor financial control
- The lack of a legal framework surrounding tenancies (tenancy agreements)
- Inadequate attention paid to long term asset management planning
- Those most in need of housing were sometimes not housed

It was the negative aspects of prior arrangements, delivered in the Northern Territory by ICHOs, which prompted the Commonwealth and Territory Governments to devise changes to remote housing management from 2006 onwards.[5] From 1 July 2008, most ICHOs ceased to exist when the community councils under whom they operated were dissolved and amalgamated into eight shire councils. The major policy shift to a public housing model was made possible by the demise of most ICHOs and the compulsory acquisition of 5 year leases over many remote communities as part of the Northern Territory National Emergency Response.

In the Northern Territory, the new approach to remote housing involved the roll out of the Northern Territory Government's public housing model to remote communities. This became the joint Commonwealth and NT Government approach following an MOU in 2007 which provided that:

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[4] AHURI Final Report No. 125. Available at http://www.ahuri.edu.au/publications/projects/p80316; Price Waterhouse Coopers (2007). *Living in the sunburnt country: Indigenous housing – findings of the review of the community housing and infrastructure program*. Final report to the Department of Families, Community Services and Indigenous Affairs, Canberra.
[5] The review of the Community Housing and Infrastructure Programme by Price Waterhouse Cooper was particularly influential in shaping this change.

> [f]or all communities, access to…funds for repairs and upgrades will be dependent on those communities agreeing to the transfer of their housing to publicly owned Territory Housing on the completion of the repairs and upgrades.[6]

This shift was further reflected in the National Partnership Agreement on Remote Indigenous Housing (NPARIH) in 2008 (which was supposed to apply until 2018 but is currently being re-negotiated).[7] Agreement to the transfer of community housing to Territory Housing was not, in fact, sought up front as Territory Housing was granted permission by the Commonwealth to take over community housing stock by power of the compulsory 5 year leases acquired by them. It was only as 5 year leases were coming to an end (they expired in August 2012) that a commitment to 'regularisation of tenure arrangements' by agreement of community landowners became a major focus. Despite the evident problems with many ICHOs, the wholesale shift to a public housing model was one of many recent examples of community governance over a significant aspect of community life having been lost. The transition to Territory Housing was far from smooth given their lack of experience in remote settings and due to the haste with which it occurred. The problematic transition compounded the problems associated with loss of community control over housing. The Report from the Aboriginal Remote Housing Forum (APO NT 2015) and APO NT's submission to this draft strategy detail the dissatisfaction with the current housing management system.

This submission does not reiterate those concerns, but seeks to provide positive recommendations for improving the Draft Strategy to ensure that the concerns and aspirations of Aboriginal people are adequately reflected, and real progress can be made towards a better housing system and housing supply. Before embarking on this undertaking, a review of the draft's statistics on the circumstances of Indigenous household crowding and the interrelated problem of homelessness is included.

Statistics – current estimates under-represent the unmet housing need

While the NT is not alone in terms of the problems and challenges faced in housing Indigenous people, they stand alone in the excessively high rate of Indigenous homelessness caused by high levels of household crowding. Some of the Indigenous homelessness statistics are questionable (see p.17, *Homelessness*). The picture is in fact more dire than presented in the Draft Strategy. Essentially, remote Indigenous people are

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[6] *Memorandum of Understanding between the Commonwealth and the Northern Territory Governments in respect of Indigenous Housing, Accommodation and Related Services* (September 2007). Paragraph 19 reads '[f]or all communities, access to …funds for repairs and upgrades will be dependent on those communities agreeing to the transfer of their housing to publicly owned Territory Housing on the completion of the repairs and upgrades.

[7] Paragraph 16 of NPARIH provides that the Northern Territory will have responsibility for 'provision of housing in Indigenous communities and through State and Territory housing authorities be the major deliverer of housing for Indigenous people in remote areas of Australia'

under enumerated in the 2011 ABS Census by 17%. So the current estimates under-represent the unmet housing need in the NT. According to the *Homelessness among Indigenous Australians* report by the Australian Institute of Health and Welfare (AIHW) the NT homelessness proportion is 52.3 percent of the Australian total. While the actual number of Indigenous homeless in the Draft Strategy is correct – 15,476: 1 in 4 Indigenous persons in the NT are homeless or the rate of 2,462 per 10,000. The average rate for non-Indigenous Australia is 35.2 per 10,000. Ninety-two per cent of Indigenous homeless in the NT are living in severely crowded dwellings. The NT homelessness rate is approximately 70 times higher than the non-Indigenous average per 10,000 in Australia. (2014:13).[8] While the Strategy identifies that homelessness is complex and more than an under supply of housing, in actual fact in the NT it appears highly related to housing undersupply as well as poor housing and repair maintenance regimes. The NT Department of Housing funding of $500,000 i.e. $32.31 per capita investment for the homelessness and housing sector that services 15,475 people does not match this chronic need.

The level of crowding in NT Indigenous households is 65.5% of total households, i.e. the total number of Indigenous people living in crowded households is 30,581 (AIHW 2014: 29).[9] The latter statistic excludes visitors and is based on household usual residents. The statistics on p. 18 of the Draft Strategy show that Alice Springs and Tennant Creek are both localities with high levels of severe crowding. The summary of issues identified in urban regions (p. 9) show that 468 people live with severe household crowding in Tennant Creek. A recent housing survey by the Aboriginal Environments Research Centre (AERC) at the University of Queensland surveyed 80 households in Tennant Creek (with an average of 10 people per household). The AIHW Indigenous household tenure and overcrowding report (ibid.) averaged Indigenous households in Tennant Creek at 3.3 persons per household based on ABS 2012 Census community profiles, Australia: Indigenous profiles. The ABS uses a different sample method to the one used in the AERC survey. The ABS only counts usual residents and excludes visitors. The AERC survey included permanent visitors and usual residents, which is a more accurate estimate of household size and day-to-day realities of Indigenous household crowding.

In the following pages, we address our comments to Section One and Section Two of the set of questions guiding feedback to the draft. A report to the CLC from Hal Bisset[10] informs the content of this submission along with additional comments provided by Carroll Go-Sam[11].

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[8] AIHW (2014). Homelessness among Indigenous Australians. Cat.no. IHW 133. Canberra: AIHW.
[9] AIHW(2014). Housing circumstances of Indigenous households: Tenure and Overcrowding. Cat. no. IHW 132. Canberra: AIHW.
[10] Former CEO of Central Australian Affordable Housing Company and now consultant to the national community housing sector.
[11] ARC Indigenous Discovery Award Researcher, Aboriginal Environments Research Centre, University of Queensland.

SECTION ONE

Comments on Call to Action

Chief Minister Giles and Minister Price make two acknowledgements in the foreword of the draft consultation housing strategy that should give hope to Aboriginal people in remote communities:

> ....we recognise that housing aspirations in urban, regional and remote settings are different and our strategy seeks to identify new and innovative ways in which we can support Territorians in their housing choice at the appropriate time.
> ....some people need more help and support to improve their housing circumstances and assistance in being able to live independently and that remote communities are experiencing overcrowding and houses need repair and work on a number of levels.[12]

Both of these statements explicitly acknowledge that housing issues in remote communities are different and therefore require different solutions. One could therefore expect that the Draft Strategy would provide a clear path forward for remote housing or, if such a path is lacking, there would be an articulated desire to develop such a path. Unfortunately a clear plan for remote housing is not present and this is a major downfall of the strategy. Remote housing issues are described and summarised but there is no corresponding action plan detailing the strategies, actions or investment required to respond to those issues. Given the urgent and ongoing need to secure Commonwealth funds to underpin both housing supply and management it is deeply concerning that greater attention has not been paid to outlining the financial arrangements that currently apply to remote housing, nor what is required in the future. Given these fundamental flaws, 'reforming housing in the Territory'[13] is a misnomer to put it bluntly. The strategy does not identify sufficient reform for remote housing, but provides a framework for a continuity of present services and service delivery.

Comments on 'The principles of a good housing system'

The report begins by listing the 'principles of a good housing system'.[14] Two comments are in order:

1. The mention of a 'housing system' is a positive step forward. Historically housing has tended to be seen as a product or service. This limits the capacity of government to address all of the factors that impact upon the demand and supply of housing. Unfortunately while the draft strategy asserts a 'systems' approach it struggles to deal adequately with all of the elements, some of which are critical to the health of the housing market such as demand caused by population growth or supply constrained by access to housing finance. The CLC acknowledges that many of these matters are beyond the control of the NT government and belong with the

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[12] See p.2 of the Housing Strategy – Consultation Draft, n.d.
[13] See p.35 of the Housing Strategy - Consultation Draft, n.d.
[14] See p.5, Housing Strategy Consultation Draft, n.d.

Commonwealth. However, the NT Government's failure to adequately deal with these issues will result in a housing strategy that is potentially inadequate and unable to meet the many challenges currently facing remote communities, outstations and town camps.

2. The principles underpinning the strategy are sound housing principles[15]. They are:

- *Housing should offer a 'continuum' of options appropriate for the different needs of people at different times, and support people to transition between them as their needs and aspirations change.*
- *Strategies focus on early intervention with effective supports to prevent homelessness.*
- *People who are homeless or at risk of homelessness should have access to tailored client-centred housing and non-housing supports.*
- *Place-based approaches that marshal local resources to address local housing needs.*
- *Government applies influence across the housing system to support affordable housing in a cost effective manner.*

These principles are consistent with what is generally found in various housing department strategies across Australia. These principles can provide a basis for Aboriginal people to argue for a culturally and geographically relevant approach to housing supply and management in remote and regional communities. However, the CLC asserts that the principles fall short in two crucial areas.

1. They do not acknowledge the right to housing which is premised on the centrality of appropriate, secure and affordable housing to the health and well-being of individuals and families as well as the social and economic sustainability of communities.

2. They do not specifically recognise the failure of markets to provide appropriate, secure and affordable housing consistent with broader policies for regional and urban development. In particular while noting that governments 'apply influence' the principles do not make explicit that to ensure affordability in situations of market failure it is necessary to allocate housing subsidies.

Recommendation 1. That the principles underpinning the Draft Strategy be amended to incorporate two additional points:

- the right to housing which is premised on the centrality of appropriate, secure and affordable housing to the health and well-being of individuals and families as well as the social and economic sustainability of communities.
- that to ensure affordability in situations of market failure it is necessary to allocate housing subsidies

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[15] See p.6, Housing Strategy Consultation Draft, n.d.

Comments on the 'Housing Continuum' framework[16]

The Draft Strategy introduces the concept of a 'housing continuum' as a framework for reviewing the adequacy of existing approaches to housing policy and shaping the way forward.

The housing continuum concept is not new and has been used by every other State government at some point as a way of structuring new housing strategies. However, in the Draft Strategy 'housing continuum' is specifically limited to a 'product' or 'tenure' continuum; i.e. how does the level of need and the capacity to pay combine to provide both a social and an economic benefit. The continuum recognises six forms of 'housing product': crisis and emergency housing, transitional and supported housing, public and community housing, affordable housing, private rental and home ownership. There is an inherent assumption in the way in which the continuum is presented that the role of government is to assist people move through the continuum to greater independence. This is not inconsistent with the approach of many State governments around the country. Perhaps an enhancement of the approach would be to equally recognise the concept of 'housing career's; i.e. the different products/tenure that might suit a person as they transition through different life stages: e.g. student accommodation, singles housing, young family housing, single parenthood, blended families, extended families, disability, empty nesters, aged care etc. However, it should be recognised that Indigenous housing careers differ significantly from the pattern of non-Indigenous housing careers. In the Northern Territory, 72 per cent of Indigenous people rent their homes and 18.3 per cent are home owners or purchasing their homes. Indigenous housing careers are largely rental.

To this can be added another layer of impacts associated with cultural obligations such as sorry business or cultural strictures such as the need for gender separate household's i.e. single women's and single men's households. Together these life journeys create unique housing careers and a healthy housing system should include sufficient options on the housing continuum to respond to the particular housing needs of people and families as their life circumstances change.

A further comment on the concept of housing continuum: it is generally used in the context of what a healthy housing market will provide. This raises serious questions when it comes to remote communities as there is no housing market to provide such a range of options. It begs the question as to what might a remote community housing market look like if it were to provide a sufficient range of options to meet the diverse needs within that community. Given this context the CLC suggests that the Draft Strategy should outline how the housing continuum might be applied to a remote housing market to identify the range of options that might reasonably be expected to exist in that market.

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[16] See p.7, Housing Strategy Consultation Draft, n.d.

Recommendation 2. That the Draft Strategy explicitly detail how the housing continuum concept applies in the circumstance where there is no housing market to provide a range of housing options.

Comments on 'Strategic directions'[17]

Critically, the CLC has two fundamental issues of concern with the Draft Strategy:

1. Is this a whole of government housing strategy for the Northern Territory or a social and affordable housing strategy to shape the future directions for the Department of Housing?

2. While remote housing issues are characterised and described, there is nothing in the Draft Strategy which clearly articulates a pathway for progressing remote housing.

Is this a whole of government or Department of Housing strategy?

Firstly, the language employed gives the impression that the Draft Strategy is a whole of government strategy rather than a strategy for the Department of Housing – *the NT government is undertaking a review of the current housing system, to identify ideas for possible strategies that will improve the housing available to Territorians[18].*

The vision includes:

1. A sustainable housing system – to meet the needs of today and tomorrow

2. Sustainable communities – supports communities to grow and to prosper

3. Sustained well-being for people – delivers the right response to the right person at the right time

These all would seem to refer to the whole housing system – but the examples of what the future might look like are all limited to aspects of the system within the Department of Housing orbit of influence. It should be noted that a Housing Strategy for the NT and a Social and Affordable Housing Strategy for the Department of Housing are both important – but the two should not be confused and the latter should emerge from and be consistent with the former. It is our view that this tension needs clarification in the final Housing Strategy. The following table provides a comparison between what the Draft Strategy currently includes as compared to a possible whole of government housing strategy.

Vision	What we would see	What seems to be left out
A sustainable housing system	▪ Diversity of housing in response to diversity of needs ▪ Life cycle approach to asset investment and management	▪ An analysis of population growth and a forecast of housing demand ▪ Targets for housing supply across the housing continuum

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[17] See p.14 of the Housing Strategy – Consultation Draft, n.d.
[18] See p.5 of the Housing Strategy – Consultation Draft, n.d.

	▪ Good quality housing services at value for money ▪ NTG works with NGO's and private sector to sustain a supply of divers housing types	▪ Analysis of the cost of developing housing in various markets ▪ Estimates of the need for housing subsidies to ensure access to affordable housing for low income
Sustainable communities	▪ Remote and regional communities consulted on needs and solutions ▪ Community specific solutions reflect needs of local community ▪ Healthy houses support healthy people, children and families ▪ Opportunities for local employment, local economic development	▪ Linkage between housing supply and labour market opportunities through economic development ▪ Development of alternative community focused housing finance, development and management models to match local community needs and opportunities ▪ Procurement processes which are based on collaboration with communities rather than imposition of external contractors
Sustained well-being for people	▪ Housing for those most in need for duration of need ▪ People get help and support to live independently ▪ Innovative client focused service responses for the homeless and those at risk	▪ Regulation of standards in construction, maintenance and management which protect rights and the health of households ▪ Structures which link people to appropriate support services in appropriate housing

Recommendation 3. That the Draft Strategy be amended to clarify whether it is intended to be a whole of government strategy or a strategy for social and affordable housing specifically aimed at shaping future directions for the Department of Housing.

The lack of a defined remote housing component within the strategy

The CLC is heartened that the Draft Strategy appears to recognise the urgent need to address remote housing issues. To recap, in the Draft Strategy, remote housing is:

- highlighted in the forward by the Chief Minister and the Minister as important and different

- reflected in the principle that affirms place based approaches to addressing housing needs

- recognised as a key issue with consultations undertaken in five remote communities, the two Central Australian communities represented were Alekareng (Ali Curung) and Santa Teresa

- highlighted as one of three key areas for improvement

- specifically acknowledged as a key issue by referencing the APONT Report and quoting criticisms of the current system

- seen as a matter that requires Aboriginal people to be consulted so local aspirations and solutions can be taken into account

- included in each of the 'products' on the housing continuum, i.e. the situation in remote communities

From this, it could be reasonable to conclude that the NT Government is serious about remote housing and views it as being at the centre of housing policy and practice.

It is therefore disappointing that the Draft Strategy fails to address the challenges of remote housing with specific solutions; rather remote housing issues are only *described* throughout the strategy. Such descriptions and characterisations have been previously well studied and documented. Unfortunately the detail (or lack thereof) of a remote housing policy with attached strategy and implementation plan reflects the absence of tangible ideas about how to go about addressing remote housing issues. The content of the Draft Strategy does not identify reform, but continuity of the present pace of services and service delivery using the same strategies some of which do not clearly address the problems identified by remote Indigenous communities.

New strategic directions for remote housing

The CLC recommends the following be incorporated into the final strategy.

Key areas for improvement	Comments	Additions
• Current DoH stock profiles indicate a limited investment in remote and very remote Indigenous towns and localities Age of housing stock: • NT housing stock assessments in five remote communities indicates housing stock age ranges between 20-40 years • 41 per cent of NT public housing is over 30 years old.	• set clear targets for remote housing stock replacement based on local knowledge of housing circumstances and population, not ABS data in targeted locations of high need • urgent changes to the ongoing inadequacies of remote housing repair and maintenance regimes • develop a remote housing strategy that includes a digital asset database and asset plan	• DoH needs to have a clear remote housing strategy that realistically meets on the ground circumstances where the private market is non-existent, homeownership is negligible and social housing remains the only option. • Land Councils can assist DoH in working with the Dept of Lands, Planning and Environment to identify ways in which communal lands can be released for private home ownership.
Establish alternative community housing models: • Implement a community housing model, that is allow NGOs to take over management of community housing with the freedom to design and apply management systems, not as contractors of DoH • NGOs can contribute to innovative on ground solutions that circumvent household crowding and homelessness • NGOs can contribute to the design of new houses • NGOs can create local employment in housing positions • NGOs can employ community	• NGOs can develop localised compliance processes that collaborate with Indigenous residents to achieve the best outcome • NGOs can contribute to design, management and maintenance and need support to combine these with clear employment strategies • NGOs can access Commonwealth housing subsidies • NGOs can coordinate tenant labour contribution to remove graffiti and tackle vandalism and improve housing longevity • NGOs can contribute to assessing local community capacities	• The draft Strategy needs to set out how a remote community housing sector will be established. It needs to detail how the transfer of management capacity to NGOs will be achieved, including by building their capacity and reach

based tradespersons for key trades such as electricians and plumbers		
Diversity of housing stock: • diversify housing options beyond social housing and homeownership to include transitional housing and transitional support • increase provision of Aged Care facilities • review Housing Reference Group (HRG) that exclude meaningful input • fast track relief options for remote household overcrowding	• NGOs are best placed to define housing options that meet local needs where three-bedroom standard model may not be preferred	• DoH has critically under invested in remote Indigenous housing and there appears to be no clear future strategy beyond the present. There needs to be a quantified amount to invest in remote social housing which is glaringly absent from "What's being done?" (see Social Housing, p. 25 Housing Strategy, n.d.)

Recommendation 4. It is of great concern that a remote housing strategy with an action plan, policies and resourcing/investment approach has not been articulated. The CLC recommends that the Draft Strategy be amended to provide a specific section detailing the strategies, actions and investment required to reform remote housing arrangements.

Recommendation 5. Specifically, the Draft Strategy needs to set out how a remote community housing sector will be established and supported, given the lack of current possible providers.

Recommendation 6. That the final strategy explicitly commit to the implementation of a community housing model for social and affordable housing based on:

- A regulatory system which is consistent with the national Regulatory Framework for Community Housing but relevant to the cultural and geographical uniqueness of the NT.

- Investment in building the capacity of a limited number of Aboriginal owned community housing organisations to achieve registration and both financial and professional capability to manage the risks of the community housing business.

- A strategy and timeframe for implementing a community housing approach to regional and remote housing across the NT.

- Allocation of budgets for the implementation of the community housing approach to regional and remote housing across the NT.

- A "business case" approach to the implementation of a community housing model on a community by community basis involving each community in the development of key priorities in the respective business plans.

In the summary of remote issues, the urgent need for new housing stock was identified. 'Build new housing stock' is pinpointed and mentioned twice in the draft strategy (p. 28

and p.34). Yet, there is no concurrent strategy for advocating that the Commonwealth continue investment in remote housing beyond 2018. With no Commonwealth funds committed beyond the life of the current National Partnership Agreement there is an urgent need to advance negotiations and a significant opportunity to reform current arrangements.

Furthermore, the regional or place-based approach to housing has no real detail. We make the following observations.

- Strategic remote housing programs with attainable and realistic targets are required to tackle the urban and remote housing divide.
- Regional and place-based approaches can value-add multiple Aboriginal social and economic capitals, rather than the prevailing approach of building maximum numbers of houses on the ground as fast as possible.
- Tenancy management costs in Indigenous communities' post-NPARIH were identified as a matter of concern as rental income is insufficient to meet the needs of maintenance and replacement costs. This perpetual problem has beset Indigenous housing for multiple decades. The Draft Strategy needs to identify clear strategies on how vital services will be maintained in the context of projected population growth in remote Indigenous communities.[19]
- Place-based approaches marshalling local resources to address local housing needs would feature the Central Australian Affordable Housing Company, as an experienced Indigenous community housing sector provider, which was recently unsuccessful in re-tendering contracts. The NT Department of Housing appear to favour price and inexperience in the Indigenous housing sector, over proven service experience and delivery. Is this decision supporting the department's place-based approaches or counteracting them?

Financial Analysis

The Draft Strategy fails to provide a financial analysis of the current housing management system, including investments from both levels of government and rental streams, nor a projection of future needs. Without some transparency and analysis of both current costs and future investment needs it is impossible to assess whether the directions proposed in the strategy are achievable. A social and affordable housing strategy for the future must address the where the money will come from to deliver on the goals.

Recommendation 7: That the Draft Strategy be extended to include an analysis of the financial arrangements underpinning public housing, identifying remote, urban and town camps. This financial analysis should include both current arrangements and future projections.

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[19] Habibis et al (2014) Progressing tenancy management reform on remote Indigenous communities, AHURI Final Report No. 223, AHURI.

SECTION TWO

The Draft Strategy presents 'ideas for possible responses' in relation to the identified gaps within each of the 'products' on the housing continuum. Before looking at each product the CLC notes that there is a glaring gap in relation to a peak representative Aboriginal housing body.

Recommendation 8: The CLC calls for the recognition of Aboriginal Housing NT (AHNT) as the peak Indigenous housing body representing Aboriginal people in the NT.

The CLC makes the following comments and recommendations.

Homelessness

Ideas for possible responses	Comments	Additions
More and greater diversity of temporary and supported accommodation options.	Strongly support – in particular there is need for visitor accommodation that is affordable and culturally appropriate in regional centres.	The biggest issue with homelessness is the overall lack of social housing – part of the response must be to develop a strategy to grow the supply in both remote communities and regional centres and therefore reduce the incidence of homelessness caused by overcrowding.
Create opportunities for NGO's to develop new approaches to service delivery that: • Improve the operation of the system • Intervene early to prevent homelessness	Agree but the best way to enable NGO's to assist in developing a more responsive system is to facilitate a community housing management model. This is not directly addressed – the paper reads as if they do not know what a real community housing model is.	Commit to developing alternative community housing models in remote & regional communities that work closely with tenants, their communities and relevant community service agencies to support sustainable tenancies.
Build on and expand existing tenancy support programs already in place to more proactively identify and address client needs at all stages in the housing continuum.	Agree but the current approach needs an overhaul with less emphasis on transitional housing and greater emphasis on transitional support.	Restructure the TSP program to recognise (i) induction and capacity building programs designed to assist people unfamiliar with western housing to manage their homes and get the best out of them and (ii) case management to ensure early intervention in tenancies at risk, assessment and referral to support agencies and ongoing coordination of those supports essential for stable tenancies. Perhaps the best value would be to integrate these into the tenancy management service as it will ensure a strong relationship built from an early stage between tenant and manager.

Supported accommodation

Ideas for possible responses	Comments	Additions
Increase the flexibility and responsiveness of public housing quickly and cost effectively through models such as leasing existing	Head leasing works well in markets where private demand is weak – it is a useful complementary strategy to social housing supply. However	Consider a variation on the Real Housing for Growth Program to provide "Secure Housing for Health". Such properties might be secured

housing on the private market (head leasing).	without an NRAS type program that secures dwellings for a long period the tenants remain at the mercy of landlords' decision over continuing tenure – and tenants who need supported accommodation generally need long term secure tenure.	through the private market or preferably through NGO's who hold land.
Create opportunities for NGO's to develop new approaches to service delivery that: • Improve the operation of the system • Intervene early to prevent homelessness	This is the same response as for Homelessness and the CLC's comments are the same.	Create a program in regional centres where vacant public housing properties are transferred to NGO's to develop for supported accommodation with the support of a NRAS type subsidy as described above ("Secure Housing for Health").
Build on and expand existing tenancy support programs already in place to more proactively identify and address client needs at all stages in the housing continuum.	This is the same response as for Homelessness and the CLC's comments are the same.	There is a great need for other service systems such as mental health, aged care, disability, family support, drug and alcohol to work more collaboratively with housing providers. Improvement in the housing service system will forever be constrained by inadequate collaboration between service providers and housing managers.

Social housing

Ideas for possible responses	Comments	Additions
Increase the flexibility and responsiveness of public housing quickly and cost effectively through models such as leasing existing housing on the private market (head leasing).	Note comment above re limitations of head leasing.	Head leasing for general social housing stock requires a long term operational subsidy to ensure client stability – need careful consideration of the term required which may be 5 years for single parent to 20 years for mental health patient.
Invest in stock renewal strategy to align stock to needs, supported by a clear asset management plan that: ▪ Identifies and sells low quality stock ▪ Upgrades existing stock in key locations ▪ Builds new stock in targeted locations	Agree strongly but must be undertaken in the context of a rational housing finance program which might be capital funding, operational funding or a combination of both. A clear and coherent Asset Plan based on an evidence base of housing need and a strategy to meet the diversity of need through community partnerships is essential to win any further funding from the Commonwealth through either NAHA or NPARIH.	Develop regional housing needs plans and a corresponding asset management strategy in the context of a housing finance strategy that addresses both mainstream public housing and remote housing.
Work with the DLPE to look at innovative approaches to support government and private developers to deliver diverse housing options across the system that support transitions from social housing	Agreed – however the major opportunities will be in Darwin where land value is such as to be able to negotiate social policy outcomes in new land releases. However need to be aware that implementation will inevitably require some capital investment.	Review and assess the outcomes from the Ilpye Ilpye development in Alice Springs.
Identify DOH policies and procedures that could be improved to achieve better housing and non-housing outcomes for clients, potential clients and the community.	Strongly agreed – need to move from a punitive compliance based approach to a collaborative client focussed approach.	Specifically the development of a new Housing Policy and Procedures Manual for remote communities would be appropriate. This should be developed by community housing

		organisations in collaboration with local communities in which they manage housing. The bottom line is the Residential Tenancies Legislation and the need for the collection of rental revenues to meet outgoings.
Create opportunities for NGO's to develop new approaches to service delivery that: • Improve the operation of the system • Intervene early to prevent homelessness	As noted above and in the suggested additional table for remote housing, there is a need to move to a community housing model.	Implement a community housing model which is based on the nationally recognised approach where approved CHO's have effective control of title and take full responsibility for management of the assets and the tenancies and not the existing dysfunctional outsourcing of separate components of management.
Deliver housing services effectively and efficiently through: • Identifying optimal roles and responsibilities for public, private and NGO's across the system • Assessing local community capacities and aspirations with regard to housing • Identifying the terms under which any future transfer of responsibilities could occur	This is a very weak statement and indicates minimal bureaucratic support for genuine community housing model. There is 20 years of practice and evidence of good outcomes (financial and social) across Australia by moving to a community housing model.	Commit to the implementation of a community housing model for social and affordable housing based on: • Recognition of special purpose Community Housing Organisations with corporate governance and professional skills. • Investment in building capacity of CHO's through (i) training of Boards and Staff and (ii) investing in significant growth based on sustainable business plans. • Regulating the CHO's to ensure continuing governance standards, client service and asset management.

Recommendation 7. That the final strategy explicitly commit to the implementation of a community housing model for social and affordable housing based on:

• Recognition of special purpose Community Housing Organisations with corporate governance and professional skills.

• Investment in building capacity of CHO's through (i) training of Boards and Staff and (ii) investing in significant growth based on sustainable business plans.

• Regulating the CHO's to ensure continuing governance standards, client service and asset management.

Private renting

Ideas for possible responses	Comments	Additions
Identify DOH policies and procedures that could be improved to achieve better housing and non-housing outcomes for clients, potential clients and the community.	This response would appear to be premised on encouraging social housing tenants to move into affordable rental housing or private rental – however without a supply of both affordable and secure rental housing there is little incentive for	Expand the Real Housing for Growth program and prioritise allocation to social housing tenants and incentivise them by offering long term tenure (say 5-10 years) irrespective of income.

	long term social housing tenants to move.	
Work with the DLPE to look at innovative approaches to support government and private developers to deliver diverse housing options across the system that support transitions from social housing	See comment above.	Linked to a Real Housing for Growth program there is real potential to generate affordable rental housing in expensive markets like Darwin.

Home ownership

Ideas for possible responses	Comments	Additions
Work with the DLPE to look at innovative approaches to support government and private developers to deliver diverse housing options across the system that support transitions from social housing	See comment above. There is a dilemma in trying to use planning gains to assist homeownership as the benefit becomes a windfall gain to the individual purchaser – a bit like a lottery.	The general problem of declining affordability of home ownership is a national problem which is predominantly caused by a number of non-housing trends that are the purview of the Commonwealth government. There is little the DOH can do about the problem.
Continue to progress initiatives to widen opportunities for individual home ownership.	This would appear to be a reference to the initiatives to achieve home ownership in remote communities.	Perhaps the best outcome would be for Aboriginal people through their key groups to undertake a thorough investigation of the opportunities and constraints to achieving home ownership in remote communities and the costs and benefits to individual home owners. This might lead to a culturally relevant and "market" appropriate home ownership model. This might be a project that AHNT could take on.

Current Contracting Arrangements

It is deeply disappointing that recent allocation of the tenancy management contract for the Alice Springs town camps has resulted in the Central Australian Affordable Housing Company losing the contract in favour of Zodiac Services. A successful, small community housing provider that was established by a key Aboriginal organisation, with majority Aboriginal membership on the Board, has been overlooked in favour of a for-profit non-Aboriginal provider. It is of further concern that Zodiac Services appear to be struggling to perform the same role satisfactorily in remote communities in Central Australia. It is difficult to believe that the NT Government is serious about diversifying the housing sector and supporting a community housing sector when this decision directly undermines those objectives.

Conclusion

This submission provides many considered suggestions for extending, improving and amending the Draft Strategy. The CLC trusts this input will be reflected in the final Strategy. It is particularly critical that the final Strategy articulates not only the need for

change but the exact processes by which reform will occur. In the CLC's view the reform required for remote communities must be based on a move to an alternative community housing model which would result in: greater community control over housing matters, greater responsiveness to local issues, creation of a cooperative rather than a compliance-based approach, and, critically, a shift in the role of government to become the funder and regulator of the social and affordable housing system and away from being a provider.

With NPARIH funds ending in 2018, and many of the sub-leases to DoH in communities in central Australia also expiring in 2018, it is critical that a new direction for remote housing be agreed. The finalisation of a thorough Strategy is one important step, but the real challenge will be in the implementation and investment of those strategic directions. The CLC is committed to assisting all agencies and stakeholders to drive change in remote housing and implement positive strategies designed to increase community empowerment and deliver better outcomes for our constituents.