

18 March 2022

Productivity Commission

RE: Review of the National Housing and Homelessness Agreement

The St Vincent de Paul Society National Council of Australia (the Society) welcomes the opportunity to provide a submission to the Productivity Commission's review of the National Housing and Homelessness Agreement (NHHA).

The Society is a lay Catholic charity that comprises over 60,000 members and volunteers and over 3,000 employees and has a long history of providing on-the-ground assistance in the form of emergency relief, supported accommodation, community housing and other support services across Australia.

Background

The Society's housing profile varies across the states and territories as it has developed over time, when opportunities arise and in response to local needs. It includes short-term crisis accommodation, transitional housing, medium to longer-term community housing, accessible housing for people living with disability and specialist homelessness services. Dwellings range from single bedrooms with shared facilities to four-bedroom homes.

Research shows that access to safe and affordable housing is a vital determinant of wellbeing and is associated with better outcomes in health, education and employment, as well as economic and social participation.¹ It helps reduce poverty and enhances equality of opportunity, social inclusion and mobility.²

For the people we assist, the lack of pathways out of temporary housing remains a barrier to them being able to get on with their lives, look for a job, study and/or take care of themselves or other family members.

We refer the Commission to a report from St Vincent de Paul Society NSW on the state of housing and homelessness in NSW - Attachment A.

Scope of NHHA

The first Commonwealth/State Housing Agreement signed in 1945 was meant to ensure that every person in Australia had access to secure, adequate and appropriate housing at a price within his or her capacity to pay. The aim was to alleviate housing poverty and ensure housing assistance was delivered equitably to people in different forms of housing tenure.³

We agree with National Shelter Australia's observations that the agreements between the Commonwealth and States and Territories have shifted from being a broad social housing agreement to a welfare housing agreement, particularly when homelessness was included in 2009.

The Society supports a return to a broader social housing agreement approach, operating across tenure types, appropriate to locations and within jurisdictional capability.

Housing shortfall

The current housing shortfall is well documented. Around 430,000 social housing dwellings⁴ and just over 210,000 affordable housing dwellings are needed immediately. By 2036, this will have blown out to an additional 728,000 social housing dwellings and 294,000 affordable housing dwellings.⁵

At least 115,000 people are homeless on any given night and this has increased 13.7 percent in five years.⁶ 148,500 households are already on waiting lists for social housing.⁷ The specialist homelessness service system is turning away 260 people each day.⁸ Upon first presentation, most clients seeking assistance were housed but at risk of homelessness (57 percent or 152,300); of these, most were living in private or other housing (61 percent or 92,900) or public or community housing at the time (24 percent or 36,000).⁹

Shared responsibility, matched funding.

Under the NHHA, Commonwealth and state and territory government funding is matched for homelessness but not housing. States' contributions towards social housing outweigh that of the Commonwealth,¹⁰ even more so after recent budget commitments were announced for the next five to 10 years. We note the Productivity Commission has reported all social housing and homelessness recurrent costs in 2021 to be \$4.5 billion, to which the Commonwealth contributed \$1.6 billion or around 35 per cent, leaving the states covering the remainder, or around 65 per cent.¹¹

Currently data on the number and type of housing and housing expenditure (including building, maintenance/repairs etc) is inaccessible or, at best, difficult to accurately attribute to the Commonwealth, states and territories.

The rate of affordable homes built or sold per 1,000 of low- and moderate-income households fluctuates widely within states across years and across states. From 2009-10 to 2017-18, NSW has dropped from 42 to 17, Victoria has been stable at around 40, Qld, WA and SA have improved from around 30 to 50, Tas has improved from 35 to 76 and the ACT has dropped from around 50 to 40.¹²

The revised NHHA funding allocation should be informed by a needs-based formula to identify where unmet needs are impossible to meet with current NHHA resource allocations.

We support National Shelter Australia's view that if no other changes are made to the NHHA, current Commonwealth funding commitments should be increased two to three-fold, to match state contributions. Further, a minimum net increase of 20,000 new social housing dwellings should be added to the total social housing dwelling supply each year.

What's needed

Many factors influence the supply, demand, costs and maintenance of housing across the country, ranging from Australia's growing and ageing population¹³ to fiscal policies covering subsidies and taxation (especially negative gearing and capital gains), through to planning laws and development approval processes at state and local government levels.¹⁴

The Society has advocated for increased social, community and affordable housing for many years, including through its 2016 paper, [Ache for Home](#) and in its [2021-22](#), [2020-21](#), [2020](#) and [2019 Pre-Budget submissions](#).

The Society continues to support calls made by National Shelter Australia,¹⁵ AHURI¹⁶ and recommendations made by relevant parliamentary inquiries for:

- a national housing strategy, developed in consultation with all levels of government and key industry and peak bodies with the aim of meeting the housing needs of low- and moderate-income households
 - National Shelter Australia recommends the national housing strategy includes targets for homeownership, rental housing and non-market (social, affordable/community and specialist) housing; and the national level of social housing be set at 10 per cent of all housing by 2036
 - National Shelter Australia calls for accurate information on dwelling numbers, condition, maintenance requirements, energy performance and long-term asset management, as part of a national regulatory system applied to all forms of subsidised housing (including state owned and managed social housing, community housing, Indigenous community housing, and private housing receiving forms of subsidy (such as capital gains discounts, negative gearing, or covered by other tax concessional arrangements).
- the establishment of an independent statutory authority to oversee the national housing strategy and manage the transparency, consistency and reporting of housing data against benchmarks
- increased funding for social and community housing and improvements to the Commonwealth Rent Assistance (CRA) program¹⁷
- matched Commonwealth and state and territory government funding for housing (not just for homelessness).

The independent statutory authority's remit would include the national housing strategy, the NHHA, the National Housing Finance and Investment Corporation (NHFIC), the National Regulatory System for Community Housing, conducting audits of housing stock and condition (to establish a reliable

benchmark), managing all data and reporting requirements and ensuring that all governments' contributions are commensurate to that required under the strategy.

The NHHA itself must identify all funding and data on social housing and homelessness programs by cohort. The current process for allocating funds (all on a per capita basis) disadvantages jurisdictions with relatively lower populations and population growth and higher provision of social housing, leading to negative consequences such as selling off social housing.

We support National Shelter Australia's call for a fairer process to allocate funds under the NHHA. This could be achieved through a new growth fund, which would be equivalent to the current imbalance in Commonwealth contributions, provided to States and Territories on a per capita basis and matched by them. The existing NHHA payments could be allocated on a per dwelling basis to providers (State and Territory housing authorities and community housing providers), with need to be identified and payments sufficient to cover maintenance and CRA (operational). This would support investment in social housing.

The Society's experience as a community housing provider

Through the Society's Amelie Housing Ltd (Tier 1) up to 1,200 social and community dwellings are provided in New South Wales, the ACT and South Australia. In NSW, Amelie Housing Ltd participates in the NSW Government's Social and Affordable Housing Fund, through which the company has contributed both land and capital to acquire, build and tenant 350 social housing properties and another 150 affordable homes, on time and under budget. Amelie Housing Ltd could seek to allocate additional land to deliver more affordable housing and is 'shovel-ready' to either build or renovate dwellings should funding become available.

The Society supports National Shelter Australia's call for community housing providers to own and manage 50 per cent of all social and affordable housing by 2036. Although we note that the Commonwealth has limited states to transfer no more than 30 per cent of social housing to community housing providers, to control CRA costs. This recommendation would only be supported if the increase in CRA costs did not adversely impact Australian Government investments in social housing stock.

Community housing providers need more options to address the existing funding gap, that is, the significant difference between the cost of designing, building, maintaining and managing housing and the income received from rent and CRA. These dynamics can bring additional pressures on any long-term, viable business models.

Given that rents must be set at levels affordable to low-income households, revenues can only support modest levels of debt financing. Funding gaps must therefore be met by the community housing provider and/or the private investor, necessitating co-investment.

The size of funding gap depends on whether community housing providers already own land that can be assigned to new housing; whether developments are in metropolitan or regional areas; the size and type of the dwellings to be built; whether wrap around support or tailored support coordination is included; the operational efficiency of community housing providers; and the funding model used to deliver the housing.

Government funding incentives and targeted forms of assistance are essential to incentivise private and community sector investment to meet funding gaps and operational costs. The proposed changes to funding allocated under the NHHA, as outlined above, would go some way towards addressing this issue.

The Society's supports AHURI's *Social Housing as Infrastructure*¹⁸ findings that an up-front 'capital grant' model, supplemented by efficient financing, provides the most cost-effective pathway for Government and is preferred to the 'no capital grant, commercial financing operating subsidy' model.

Other options include the National Shared Equity Scheme, through which low-income Australians currently locked out of the housing market would be able to co-purchase lower priced homes. The NHFIC would contribute 30 per cent toward the home value with profits shared when the home is sold.

A Housing Boost Aggregator could also be supported. This would provide community housing organisations with access to an annual refundable tax offset (boost), and an aggregator who would amass their capital requirements, create a fund and offer shares in that fund to institutional investors. The investors would provide upfront capital to the community housing organisation. This would help close the funding gap on new housing developments undertaken by community housing organisations.

National Housing Finance and Investment Corporation (NHFIC)

While the Society commends the Government for establishing the NHFIC, we have found little difference between it and a commercial bank. The Society considers that further incentives are still required to address the funding gap borne by community housing providers.

The Society's significant community housing projects have, to date, been funded through the Catholic Development Fund. Although interest rates are higher than the NHFIC, fees and charges are much lower, and funding is available over 25 years. The NHFIC offers only 10-year terms (with a 10-year rollover), with borrowers having to enter into General Service Agreements which apply to all operations, not just the project being funded.

With respect to the present situation in Victoria, state government lenders are not preferred because they have far more onerous obligations than external lenders.

We also understand most of the new loans issued by the NHFIC have been used to refinance existing stock and have therefore not substantially increased social or community housing stock. This is a matter that should be remedied if housing shortages are to be addressed.

Emergency Relief assistance

As a significant provider of emergency relief assistance, the Society is concerned about the inability to respond quickly and appropriately with housing assistance or accommodation during periods of natural disasters. A revised NHHA should contain contingency funds that can be called on in times of national emergency.

Finally, it is not possible to expect the NHHA, a single vehicle, to make significant inroads in terms of addressing housing and homelessness while it operates at arms' length with the many other factors that influence housing supply – they are not mutually exclusive and should not be treated as such. The piecemeal approach to housing and homelessness has led to significant housing shortfalls. Further, the growth of the community sector in the provision of housing solutions needs to be reflected in the NHHA, with appropriate peak body and industry representation.

A national housing strategy that brings together these complementary elements is essential if governments are to tackle the ongoing entrenched challenges of making secure and safe housing affordable for all Australians.

We thank you for the time you have given our submission. If you require any further information, please do not hesitate to contact me.

Yours sincerely

Mr P Toby oConnor
Chief Executive Officer

ATTACHMENT A

Review of National Housing and Homelessness Agreement

Feedback to National Council prepared by St Vincent de Paul Society NSW

Homelessness in NSW

- Across NSW, at least 37,715 people, including 2,278 Aboriginal people, were homeless at the time of the 2016 Census. This was 10,200 more people than at the 2011 Census; a significantly greater increase in NSW (37%) than across the nation (14%).¹⁹
- While data from the 2021 Census is yet to be released, modelling by Equity Economics has identified that the economic impacts of the COVID-19 pandemic may increase the number of people experiencing homelessness in NSW by up to a further 16,000 people.²⁰ If this forecast proves accurate, more than 50,000 people may now be experiencing homelessness in NSW alone.
- Equity Economics also report that an estimated 2,400 women have become homeless because they could not find secure and permanent housing after leaving violence. Another 2,400 returned to live with a violent partner because of a lack of an affordable alternative.²¹
- The most recent Productivity Commission Report on Government Services informs that 47,121 clients presented to homelessness services in need of accommodation across NSW in 2020-21. This is the largest number of people to express need for accommodation services in NSW since 2013-14.²²
- Of those who presented with need for accommodation, 22,709 people or 48.2% were **not** provided with this service. This is the highest number and percentage of people whose need went unmet since 2013-14.

Social housing in NSW

- The Productivity Commission reports that over 51,000 applicants—or more than 110,000 adults and children²³—were waiting for social housing in NSW as of 30 June 2021.²⁴ In parts of the state the wait time exceeds 10 years.²⁵
- The NSW Treasury 2021-22 Intergenerational Report reports that, if home ownership rates continue to decline, demand for social housing in NSW amongst retirees alone will increase by another 68,000 households by 2060-61.²⁶
- A 2021 report from the Centre for Social Impact, commissioned by Vinnies NSW, advised that the NSW Government had committed to deliver 9,386 additional social housing homes from 2016 to 2026, significantly below the demand for social housing.²⁷
- A follow up report from the Centre for Social Impact, also commissioned by Vinnies NSW, will estimate that if Government was to invest in 5,000 new social housing homes every year for 10 years, this level of investment would:
 - house 16,190 people experiencing homelessness;
 - reduce the social housing waiting list in NSW from 51,351 to 13,724 by 2031; and
 - house 33,808 people experiencing housing stress.
- Equity Economics has reported that, across NSW, investing in 5,000 additional social and affordable housing properties would support 16,200 construction jobs.²⁸
- Modelling commissioned by the Community Housing Industry Association and National Shelter found a four-year social housing building program of 30,000 homes would create up to 18,000 full-time equivalent jobs each year.²⁹

- KPMG reported that, during the Global Financial Crisis, the Social Housing Initiative delivered approximately 9,000 full time equivalent jobs in the construction industry and an overall increase of approximately 14,000 FTE jobs. For every \$1 of construction activity, around \$1.30 in total turnover was generated in the economy.³⁰
- In 2019 the City Futures Research Centre estimated the funding gap for the delivery of new social housing, by region and funding model.
 - In Greater Sydney, the average annual funding gap per dwelling per year was \$14,400 if social housing were to be delivered using a capital grants funding model over 20 years
 - In Greater Sydney, the average annual funding gap per dwelling per year was \$17,100 if social housing were to be delivered using an operating subsidy funding model.
 - Across the rest of NSW, the gap was \$8,700 per dwelling per year using capital grants funding
 - Across the rest of NSW, the gap was \$10,300 per dwelling per year employing the operating subsidy model.

Vinnies' homelessness services in NSW

- The Vinnies NSW Homelessness and Housing Division works to give people access to long-term, safe, and stable accommodation that meets their individual needs. Services include:
 - Crisis accommodation for people experiencing domestic and/or family violence; families and single people; unaccompanied women who are experiencing homelessness or are at immediate risk of homelessness; family groups, with particular focus on supporting those who may be unable to access other services, such as single fathers with accompanying children, single mothers with a teenage son and any other accompanying children or couples with accompanying children; youth who are experiencing homelessness or at risk of becoming homeless; and men leaving the criminal justice system
 - Case management to assist clients achieve their short- and long-term goals
 - Drop-in and engagement centres for people who are homeless or who are at-risk of homelessness
 - Early intervention to support clients to remain safely in existing housing or assistance with securing and sustaining safe and stable housing
- During the 2020-21 financial year, our homelessness services assisted 7,475 people. This was a 19% increase on the previous year.
- Government funds Vinnies NSW to provide the bulk of these homelessness services. However, this funding is inadequate to meet need in the community.
- Of the clients who sought help from Vinnies NSW homelessness services in 2020-21, we are unable to provide assistance to 1,019 people. In almost half of these occasions (48%) this was because there was no available accommodation. Staff have advised that the lack of available accommodation was in part due to additional demand during the COVID-19 pandemic. So too, in some of our facilities we had to reduce capacity to accommodate the need for social distancing because the infrastructure at these facilities was not fit for purpose.
- To help meet the need for crisis accommodation, case management, drop-in and engagement centres, and early intervention, Vinnies NSW complements the funding provided by Government. In 2020-21, 18% of funding for housing and homelessness services came from Society funds, philanthropy, and other internally-generated sources.

Western Sydney

Our Lady of the Way is a supported crisis accommodation service for single women aged over 50 who are escaping family and domestic violence or experiencing homelessness. Support staff are onsite 24 hours a day, seven days a week.

Across Western Sydney there is a lack of affordable housing for single- and low-income households. At the same time, the inadequate number of places in domestic and family violence refuges means that more single women are experiencing prolonged homelessness.

Our Lady of the Way is experiencing an increase in the number of domestic and family violence cases requiring more intensive support including financial brokerage, court support, police support and advocacy.

This additional and intensive demand is impacting the time that support staff can spend with other crisis clients.

They have also seen an increase in the number of women and children on temporary visas with no income. The complexities and severity of the domestic and family violence experienced means there is an urgent need for additional funding.

The need for emergency food relief increased during the COVID-19 pandemic and is expected to continue to increase as grocery prices increase following the current floods.

Wagga Wagga

Edel Quinn provides crisis accommodation and case management services primarily for men experiencing homelessness in the Wagga Wagga region.

There has been an unprecedented increase in the number of people seeking access to the Specialist Homelessness Service accommodation at Edel Quinn. There has also been a dramatic increase in community members attending throughout the day for meals which the Society has been fulfilling using leftovers and donations sourced from the local community.

This surge in demand has been caused by the dramatic increase in rent and reduction in rental vacancies to below 1% in Wagga Wagga. These lower vacancy rates and higher rents have led more people to seek access to social housing but there is nowhere near enough to meet community need.

Between 2020 and 2021, the number of applicants on the general waiting list for social housing in Wagga Wagga increased from 389 to 496 families; an increase of 28 percent in 12 months.

Many of these applicants now regularly depend upon Edel Quinn for brokerage to help with rent arrears, meal services, case management and accommodation. Without Edel Quinn, many would be sleeping rough and would otherwise struggle to access to meals.

Illawarra/Shoalhaven

The Illawarra Homeless Coordination Services provide specialist support to people who are experiencing homelessness or are at risk of experiencing homelessness. The service has a community centre where people can access showers, toilets and laundry facilities. It also hosts a learning centre and outreach services where people can access external agencies.

Since the advent of COVID-19, many local people have struggled to pay their rent. At the same time, a lot of people have moved to Wollongong and surrounds from Sydney because they were able to work from home, which reduced the number of rental properties available and placed upward pressure on the price of housing.

The Illawarra Homelessness Coordination Service has subsequently experienced an increased demand for their facilities, and referrals from new clients, including parents with children. Staff advise that there are very few housing options available, particularly for families. The waiting period for 2-, 3- and 4-bedroom homes in Wollongong, Kiama and Shellharbour is up to 10 years.

Deniliquin and surrounding areas

Vinnies Homelessness Service provides early intervention, crisis accommodation, and long-term support to assist people find safe and stable housing. Vinnies Reconnect offers support to young people and their families to prevent homelessness. And the Vinnies Youth Connections Program works with young people, their family, school, and employer to sustain education and training and prevent homelessness.

Staff have experienced increased demand for these services across the Berrigan Shire, Murray River Council, Edward River Council and Jerilderie Shire. So far this year, they have assisted 170 individuals and families: a 15 per cent increase in demand relative to the same period last year.

More people are presenting in need of housing. For example, an elderly man recently sought assistance after he was advised that his rent would increase by \$90 a week. Unfortunately, a lack of affordable housing in the private market together with waiting periods for social housing mean that case workers are spending significant time advocating to help keep people in their existing, often unaffordable, homes.

Recently, there has been an increase in the number of referrals for housing support from outlying towns because these areas are becoming unaffordable for the first time, especially for low-income earners. Staff are expecting this demand to continue and are concerned about a homelessness crisis across the region.

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- ⁷ AIHW. 2020. *Housing assistance in Australia 2020*. Accessed at: <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia-2020/contents/priority-groups-and-waiting-lists>
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- ¹⁰ NSW Independent Pricing and Regulatory Tribunal. July 2017. *Review of rent models for social and affordable housing*. Accessed at: <https://www.ipart.nsw.gov.au/sites/default/files/documents/final-report-review-of-rent-models-for-social-and-affordable-housing-july-2017-%5Bw172737%5D.pdf>
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- ¹² *ibid.*, Table GA.4.
- ¹³ AIHW. June 2021. *op. cit.*
- ¹⁴ AHURI. May 2018. *Inquiry into increasing affordable housing supply: Evidence-based principles and strategies for Australian policy and practice*. Accessed at: https://www.ahuri.edu.au/__data/assets/pdf_file/0016/20482/AHURI_Final_Report_300_Inquiry_into_increasing_affordable_housing_supply_Evidence_based_principles_and_strategies_for_Australian_policies_and_practice.pdf
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- ¹⁷ Parliament of Australia. 2004. *A hand up not a hand out: Renewing the fight against poverty - Report on poverty and financial hardship; 2008 Henry Tax review*, Parliament of Australia. 2019. *Living on the Edge: Inquiry into Intergenerational Welfare Dependency*. ACOSS. 2019 *Social Housing as Infrastructure*. 2019. Media Release. 2019. *Community Housing Industry Association congratulates the re-elected Coalition Government*.
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- ²⁴ Productivity Commission Report on Government Services, *op. cit.*
- ²⁵ NSW Department of Family & Community Services .2016. [Expected Waiting Times](#)
- ²⁶ NSW Treasury. 2021-22 NSW Intergenerational Report Accessed at: https://www.treasury.nsw.gov.au/sites/default/files/2021-06/2021-22_nsw_intergenerational_report.pdf
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