



# NTCOSS

## Northern Territory Council of Social Service

**NTCOSS Submission to the National Housing and Homelessness Plan Issues Paper**  
20 October 2023

For more information, or to discuss this submission further, please contact:

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The Northern Territory Council of Social Service (NTCOSS) is the peak body for the Northern Territory (NT) community and social services sector and is a voice for people affected by social and economic disadvantage and inequality. NTCOSS membership is made up of community managed, non-government, not for profit organisations, which work in social and community service delivery, sector development and advocacy. We represent over 130 members across the NT, including Aboriginal community-controlled organisations (ACCOs), and organisations based in regional and remote areas. NTCOSS's vision is a fair, inclusive and sustainable NT.

NTCOSS welcomes the opportunity to provide feedback on the development of a National Housing and Homelessness Plan (the Plan). We recognise the relevant expertise of members and external stakeholders and as such endorse submissions from NT Shelter, Darwin Community Legal Service (DCLS), Aboriginal Medical Services Alliance NT (AMSANT), Jesuit Social Services (JSS), Aboriginal Housing NT (AHNT) and the Central Land Council (CLC). NTCOSS endorses and refers to the Australian Council of Social Service (ACOSS)'s submission for its expertise on a national level.

Acknowledging the broad range of topics covered in the issues paper, NTCOSS will provide a high-level submission addressing just a few of the focus areas as they are relevant to the NT. We will refer the Department to previous submissions that have covered specific content areas in more detail where relevant. This should not be read as indicating that other topic areas are of lesser importance. Housing and homelessness is a complex and multifaceted issue that requires a holistic approach.

While this document uses the term 'Aboriginal', we respectfully acknowledge that Torres Strait Islander peoples are First Nations people living in the Territory. Therefore, references to 'Aboriginal' Territorians should be read to include both Aboriginal and Torres Strait Islander Territorians.

### Summary of recommendations

- Centre the voices and experiences of priority groups and their needs in the development of the Plan.
- Ensure a strong focus in the development of the Plan on the drivers of homelessness, including poverty. The adequacy of income support is a key step to addressing poverty and immediate action should be taken to:
  - Raise the base rate of Job Seeker and other working age income support payments to at least \$78 a day, to support people to afford the basic costs of living;
  - Benchmark Commonwealth Rent Assistance (CRA) to rents paid and lift the maximum threshold for CRA by 50%.
- Adopt a needs-based funding allocation method for homelessness services in the NT, as per NT Shelter's supplementary submission.
- Follow the APONT Partnership Principles to guide how governments can best work with communities and the Aboriginal community-controlled sector to support better housing outcomes.
- Implement a harmonised national approach for rental reform to ensure renters across the country have the same minimum rights and protections under states and territories' respective residential tenancy acts.
- Prevent unnecessary further loss of existing affordable rental housing stock in the NT as National Rental Affordability Scheme (NRAS) entitlements expire.
- Ensure all states and territories act on agreed commitments to improving the thermal performance of residential dwellings.

NTCOSS looks forward to further opportunities for feedback as the Plan's drafting process progresses.

## Homelessness

While poverty is not the only factor relevant to homelessness, it is a core driver. To be effective, the Plan will need to address the root causes of homelessness, as well as direct housing and homelessness policy. Homelessness Australia reports that over half of people seeking homelessness services report issues with finances as the main reason for requiring support.<sup>1</sup> While the recent increase to the rate of some working age income support payments is an encouraging step, it is still deeply inadequate for recipients to cover basic necessities such as housing.

The impacts of poverty and inequity are particularly stark in the NT. Of the poverty rates in Australia, people living in Remote or Very Remote localities experience much higher levels of poverty than those living in urban centres.<sup>2</sup>

As recognised in the issues paper, Aboriginal people experience disproportionate housing inequality and are overrepresented in homelessness rates. This is true across Australia, but markedly worse in the NT.

The NT has the highest homelessness rates in Australia, at 563.6 per 10,000 population. This increases to a rate of 1,865 per 10,000 for Aboriginal people in the NT. The next highest homelessness rate is in Victoria at 47.1 per 10,000 population. Of the top ten regions with the highest homeless populations in the country, four are in regional and remote areas of the NT.<sup>3</sup>

Young people are also significantly affected by homelessness. In the NT 16.5% of people under the age of 18 are experiencing homelessness.<sup>4</sup>

NTCOSS refers the Department to a report produced by NT Shelter and the Office of the Children's Commissioner NT earlier this year centred on the housing and shelter experiences and opinions of young people living in Mparntwe.<sup>5</sup> The young people consulted as a part of this project identified that youth-specific accommodation and increased housing investment as key to solving the issue of youth homelessness. NTCOSS urges the department to implement the recommendations in this report, and more broadly to learn from this approach of deep consultation with the priority cohorts that are affected by homelessness.

### Recommendations:

- **Centre the voices and experiences of priority groups and their needs in the development of the Plan.**
- **Ensure a strong focus in the development of the Plan on the drivers of homelessness, including poverty. The adequacy of income support is a key step to addressing poverty and immediate action should be taken to:**
  - **Raise the base rate of Job Seeker and other working age income support payments to at least \$78 a day, to support people to afford the basic costs of living;**
  - **Benchmark Commonwealth Rent Assistance (CRA) to rents paid and lift the maximum threshold for CRA by 50%.**

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<sup>1</sup> Homelessness Australia, 2023, *Homelessness Facts 2023*. Available at:

<https://homelessnessaustralia.org.au/wp-content/uploads/2023/07/Homelessness-fact-sheet-2023-1.pdf>

<sup>2</sup> NTCOSS, 2023, *Submission into the inquiry into the extent and nature of poverty in Australia*. Available at:

<https://ntcoss.org.au/ntcoss-submissions/re-inquiry-into-the-extent-and-nature-of-poverty-in-australia/>

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> NT Shelter and the Office of the Children's Commissioner Northern Territory, 2023, *"They can't go back home" Young People and Homelessness in Mparntwe (Alice Springs)*. Available at:

[https://occ.nt.gov.au/\\_data/assets/pdf\\_file/0020/1264043/74698\\_NT\\_Shelter-TCGBH\\_Report\\_Booklets\\_Digital.pdf](https://occ.nt.gov.au/_data/assets/pdf_file/0020/1264043/74698_NT_Shelter-TCGBH_Report_Booklets_Digital.pdf)

### Homelessness services

As demonstrated above, the NT has the highest homelessness rates in Australia. Despite this significant need, the NT receives the lowest level of funding from the National Housing and Homelessness Agreement (NHHA) allocations. This equates to the NT receiving just \$1,486 per person, the next lowest state allocation is SA at \$12,371 per person.<sup>6</sup> Without sufficient resources, homelessness services are unable to provide effective support.

#### Recommendation:

- **Adopt a needs-based funding allocation method for homelessness services in the NT, as per NT Shelter's supplementary submission.**

### Aboriginal and Torres Strait Islander Housing

Aboriginal Territorians bear a disproportionate burden of poor housing conditions.

The impacts of overcrowding on health and wellbeing are well documented. While there have been various commitments to reducing overcrowding in remote Aboriginal communities over the years, the problem remains with more than half of the houses in remote Aboriginal communities considered overcrowded.<sup>7</sup> Overcrowding accounts for over 80% of homelessness statistics.

While increased housing supply is needed, care needs to be taken to ensure new housing is appropriate to the needs and conditions of the community. There also needs to be commitment to an enduring and appropriately funded schedule of ongoing maintenance and repairs, that ensures housing meets the rights of inhabitants to have an adequate standard of living.<sup>8</sup>

NTCOSS refers to the expertise of Aboriginal organisations, such as AHNT, CLC and AMSANT and their submissions to this process. As recommended earlier in this submission, NTCOSS urges the Department to centre the voices and experiences of priority groups and therefore a considered process of consultation and engagement with Aboriginal Community-Controlled Organisations and Aboriginal communities should be integral to the development of the Plan.

#### Recommendations:

- **Follow the APONT Partnership Principles<sup>9</sup> to guide how governments can best work with communities and the Aboriginal community-controlled sector to support better housing outcomes.**

### Housing costs, home ownership and the private rental market in Australia

The private rental market is of significant concern when discussing the housing needs of Territorians. The NT has a particularly high proportion of the population living in rental housing, 47.6%, compared

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<sup>6</sup> NT Shelter, 2023, *Supplementary Submission on the National Housing and Homelessness Plan*. Available at: <https://ntshelter.org.au/wp-content/uploads/2023/10/National-Housing-and-Homelessness-Plan-Supplementary-Submission.pdf>

<sup>7</sup> Australian National Audit Office, 2022, *Remote Housing in the Northern Territory*. Available at: [https://www.anao.gov.au/sites/default/files/Auditor-General\\_Report\\_2021-22\\_18.pdf](https://www.anao.gov.au/sites/default/files/Auditor-General_Report_2021-22_18.pdf)

<sup>8</sup> Article 25 of the 1948 Universal Declaration of Human Rights and in article 11.1 of the 1966 International Covenant on Economic, Social and Cultural Rights. Retrieved from [The human right to adequate housing | OHCHR](#)

<sup>9</sup> Aboriginal Peak Organisations Northern Territory (NT), 2017, *APONT Partnership Principles for working with Aboriginal organisations and communities in the Northern Territory*. Available at: <http://www.amsant.org.au/apont/wp-content/uploads/2015/02/21070504-APONT-Partnership-Principles-Updated-version.pdf>

to an average of 30.6% across Australia.<sup>10</sup> NTCOSS refers the department to our submission to the recent Senate inquiry into the worsening rental crisis.<sup>11</sup>

NTCOSS' latest Cost of Living factsheets show that the private rental costs are increasingly unaffordable across the NT.<sup>12</sup> Price rises across most major centres over the past year (June 2022 – June 2023) have been above the general rate of inflation of 5.3% for Darwin for the same period, with some areas experiences private rental price increases of above 30%.

Low-income households are disproportionately impacted by high rental costs. The proportion of income required to rent privately in all major centres across the NT is well above the 30% housing stress level for those on income support payments and minimum wage. For example, a sole parent family with two children in Alice Springs receiving Job Seeker would be paying 76% of their income to rent a 3-bedroom house in the private market. For the same family on minimum wage, 49% of their income would be taken up by rent.<sup>13</sup>

While residential tenancy legislation is largely the purview of states and territories, there is a clear need for a harmonised national approach for rental reform. The commitment through National Cabinet in April 2023 was an important step to strengthening renters' rights, however these commitments are yet to be implemented. The Australian Government and this Plan have a key role in incentivising and resourcing appropriate rental protections and affordability initiatives are available across all states and territories.

#### Recommendations:

- **Implement a harmonised national approach for rental reform to ensure renters across the country have the same minimum rights and protections under states and territories' respective residential tenancy acts.**
- **Prevent unnecessary further loss of existing affordable rental housing stock in the NT as National Rental Affordability Scheme (NRAS) entitlements expire.**

#### The impact of climate change and disasters on housing security, sustainability and health

The NT is known for its harsh and diverse climate. In a 2023 study, it was found that indoor conditions for renters in the NT over the summer period rarely dropped below 25°C, with 5 hours a day recording temperatures above 30°C.<sup>14</sup> The World Health Organisation recommends a healthy temperature range inside homes of between 18°C and 22°C.<sup>15</sup>

As a result of climate change, the NT is predicted to experience more extreme weather events. Improving energy performance of residential dwellings is essential to build climate resilience.

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<sup>10</sup> Australian Bureau of Statistics, 2022, *Snapshot of the Northern Territory*. Available at: <https://www.abs.gov.au/articles/snapshot-nt-2021>; and Australian Bureau of Statistics, 2021, *Snapshot of Australia*. Available at: <https://www.abs.gov.au/statistics/people/people-and-communities/snapshot-australia/2021>.

<sup>11</sup> NTCOSS, 2023, *Submission to the inquiry into the worsening rental crisis in Australia*. Available at: <https://ntcoss.org.au/ntcoss-submissions/re-inquiry-into-the-worsening-rental-crisis-in-australia/>

<sup>12</sup> NTCOSS, 2023, *Factsheet: Cost of Housing in the Northern Territory*. Available at: <https://ntcoss.org.au/media-releases/ntcoss-urges-nt-and-commonwealth-provide-protections-for-territorians-amid-cost-of-living-crisis/>

<sup>13</sup> Ibid.

<sup>14</sup> Barrett, B., Catania, L., Dignam, J., 2023, *Sweaty and Stressed: Renting in an Australian Summer*. Available at: [https://www.betterrenting.org.au/renter\\_researchers\\_summer\\_23](https://www.betterrenting.org.au/renter_researchers_summer_23)

<sup>15</sup> . World Health Organization, 2023, *WHO housing and health guidelines*. Available at: <https://www.who.int/publications/i/item/9789241550376> (2018).

To address this component of the Plan, NTCOSS refers the Department to our previous submission to the National Energy Performance Strategy Consultation Paper.<sup>16</sup>

**Recommendations:**

- **Ensure all states and territories act on agreed commitments to improving the thermal performance of residential dwellings.**

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<sup>16</sup> NTCOSS, 2023, *NTCOSS response to National Energy Performance Strategy Consultation Paper*. Available at: <https://ntcoss.org.au/ntcoss-submissions/ntcoss-response-to-national-energy-performance-strategy-consultation-paper/>