

11 September 2024

The Hon Claire O'Neil MP
Minister for Housing and Homelessness
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

By Email: jake.miller-randle@treasury.gov.au;

Dear Minister O'Neil,

ABS data collection and Land Lease Data

The Government's pledge to tackle the housing crisis and commitment to the National Housing Accord target, being 1.2 million new homes by 2029, is a welcome step in the right direction, and one that UDIA and industry applaud.

UDIA has been working with members of the Seniors Living and Land Lease sector to further enhance its role in helping Australia and states meet its National Housing Accord targets.

UDIA is seeking to clarify if Land Lease Community dwellings (Land Lease) are being counted by the State and Territory Governments towards the overall housing targets and appreciate any help the Minister can provide to confirm this with state and territory counterparts.

Equally, we see the need for resourcing consistent metrics with the Australian Bureau of Statistics (ABS) such as net completions (rather than gross) at a local government area level nationwide.

Given that future financial incentives for States and Territories will be tied to housing delivery, there is clear benefit in having a consistent national data set with which to measure housing completions – noting that currently the ABS only provides gross completion estimates at the national and State and Territory scale.

Without more granular and accurate completions data States and Territories will be left to deliver their own ad-hoc metrics for assessing performance, which have historically not been upkept in a contemporary or consistent fashion to inform evidence-based decision making, much less track performance against a target.

Land Lease Communities

Large landholdings and a motivated private sector, appropriately guided, can offer expertise and experience to help unlock vital housing supply and help Australia meet the National Housing Accord target.

The Land Lease sector presently has circa 530 residential parks registered across NSW for example, with 25,000 homes accommodating over 45,000 residents in NSW. Many established assets include

caravan parks, older manufactured home estates and mixed assets. Traditional parks can broadly be classified as 'Generation 1' and evolved predominantly from caravan parks however Generation 2 assets comprise lifestyle communities for over 55s that are more akin to traditional medium density housing estates.

UDIA is concerned that there is no consistent metric with which the National Housing Accord can be assessed against. Fundamentally, we've observed that this is a data issue, stemming from a lack of appropriate resourcing for this work.

Expanding ABS Resources for Nationwide metrics

Now is the most critical time to pick this work up again using the resources and capabilities within the Australian Bureau of Statistics (ABS).

Between 2018 and 2022, the ABS was funded out of the National Housing and Homelessness Agreement to enable delivery of the research dataset "Estimated Dwelling Stock." This allowed ABS to report on two fundamentally important factors:

1. Residential completions on an Statistical Area (SA)2 basis.
2. Capture Net residential completions (as opposed to gross completions).

The ABS provided a solitary release of this data on 31st of November 2022 which provided quarterly estimates of Australia's dwelling stock from the June 2016 quarter to the June 2022 quarter – based on the 2021 Census of Population and Housing. This ABS release did provide a breakdown of dwelling additions, removals (demolitions) and net change to total stock levels. Unfortunately the funding for this reporting ended in 2021/22 and the ABS advised "ongoing quarterly estimates of dwelling stock are not funded" and there have been no further releases.

With the ABS being the key source used to track performance of the dwelling stock delivery against the National Housing Accord, we think it is pivotal that Government understands the unintended consequences of reporting against gross completions as opposed to net completions (which without further funding is the limits of which ABS data currently reports on).

For example, a knock down rebuild of an existing dwelling will contribute to housing targets, despite not being an additional dwelling delivered to the housing stock. Another example is a single dwelling being replaced by a dual occupancy, which under current metrics will contribute two homes towards the housing target, despite creating only one new dwelling. These may seem immaterial, when rolled out across the country they present a problem. We have seen examples in previous years where demolitions have totalled tens of thousands nationwide. This runs the risk of contributing inappropriately to overall "new" housing stock, and we do not believe that this was the intention of the National Housing Accord.

As part of their commitment and role in delivering the National Housing Accord, UDIA would recommend that the Federal Government reinstate funding to the ABS to produce a completions **data** that enables the tracking of net residential completions at the Local Government Area level across the country.

Please do not hesitate to contact the UDIA National Head of Policy and Government Relations - Andrew Mihno on 0406 454 549 to discuss this further.

Yours sincerely



Col Dutton
UDIA National President