



12 December 2025

Affordable Housing Policy Coordination Team
Chief Minister, Treasury and Economic Development Directorate
220 London Circuit, ACT

By email: AffordableHousing@act.gov.au

Dear Affordable Housing Policy Coordination Team,

RE: Feedback on the Draft ACT Housing Strategy: Implementation Plan Update

ACT Shelter welcomes the opportunity to comment on the draft *ACT Housing Strategy: Implementation Plan Update* (the Draft Plan). We continue to support the vision and goals articulated in the original ACT Housing Strategy and acknowledge the considerable work undertaken across government to respond to housing need in a rapidly changing environment.

The ACT, however, remains in a prolonged housing crisis. Housing costs are placing intense pressure on many households, homelessness services are over-stretched, and social housing continues to decline as a share of total dwellings. The divide between those whose housing needs are met and those who are being left behind is widening. In this context, the Implementation Plan must offer a clear, ambitious and accountable pathway to long-term improvements in housing outcomes.

The Draft Plan does not yet meet this test. While it identifies important areas of work, it lacks a coherent and measurable framework for achieving the Strategy's goals. Many actions are high-level or unclear, key reform areas are omitted, and lessons from the first seven years of implementation are not fully reflected. The reframing of Strategy goals also represents a significant shift that has not been matched with the transparency or consultation required.

This submission outlines ACT Shelter's key concerns and recommendations for strengthening the final Implementation Plan, focusing on:

- (i) Risks of diluting Strategy goals and commitments;
- (ii) Responses to specific actions in the Draft Plan;
- (iii) Additional areas requiring attention; and
- (iv) Broader issues of evaluation, governance, data and system stewardship.

ACT Shelter urges the ACT Government to refine the Plan through clearer actions, stronger governance, meaningful engagement with affected communities, and robust monitoring and evaluation to ensure the Strategy delivers the homes and outcomes Canberra needs.

1. Weakening strategy goals and diluting existing commitments

The Draft Plan represents a substantial dilution of both the original ACT Housing Strategy and the current implementation plan published on the ACT Government website. The Draft Plan states that it “supersedes the actions listed within the ACT Housing Strategy” and will “form the basis of future report cards”. The Draft Plan, however, does not simply set out actions to operationalise the existing Strategy, but also changes – and, in several cases, weakens – the original goals of the Strategy. Key goals are broadened, timeframes are removed, responsibilities are less clear, and performance indicators are absent.

1.1. Loss of objectives and reduced strategic coherence

The original ACT Housing Strategy identified five overarching goals, each supported by a series of targeted objectives. Earlier iterations of the Implementation Plan built on this structure, with actions aligned to both goals and objectives, and with each action accompanied by a timeframe, responsible agency, and indicators.

The Draft Plan departs significantly from this approach. Objectives are omitted entirely. Actions are no longer grouped under specific objectives, nor even under the revised goals. Instead, each action appears in an ungrouped list with icons indicating which goal(s) each action purports to support. No timeframes are provided for actions; no responsible directorates are identified; and no indicators or benchmarks are assigned to each action.

This represents a dilution of the Strategy’s original structure, undermining the ability to understand how actions are linked to objectives and whether actions contribute to intended outcomes. Decoupling actions from objectives, indicators, timeframes and responsibility weakens accountability, removes the basis for monitoring, and makes it difficult to determine whether change is occurring or whether the Strategy is being effectively implemented.

ACT Shelter has previously raised concerns about the lack of effective benchmarking, monitoring and evaluation under the existing Strategy. Progress must be measured not simply by counting outputs or “ticking off” actions, but by assessing outcomes – particularly whether actions are reducing housing stress, increasing access to suitable housing, and improving the experiences of people who rely on the housing system.

The Draft Implementation Plan exacerbates these longstanding issues, rather than addressing them. Without objectives, indicators and explicit linkages between actions and outcomes, it misses the key elements required to ensure accountability and to effectively deliver a Strategy of this scale and importance.

1.2. Concerns About the Reformulated Goals

Alongside the concerns outlined above, ACT Shelter is troubled by changes to the Strategy’s goals. As indicated in the following table, the revised goals tend to be broader, less specific, less measurable and less aligned with equity outcomes than those in the original Strategy.

Goal number	Original goal in ACT Housing Strategy	Updated goal in Draft Plan	Comment
1	An equitable, diverse and sustainable supply of housing for the ACT community	Expanding housing choice	Removes specificity and dilutes the ambition of the original commitment. Without an explicit commitment to diversity, equity and sustainability, “choice” risks being operationalised as a market-driven concept that entrenches rather than addresses inequalities. Lack of specificity makes updated goal less measurable. Recommend reverting to original wording of goal.
2	Reducing homelessness	Reducing homelessness	While this goal remains unchanged it lacks ambition. The Strategy should be working toward the elimination of homelessness by making it rare, brief and non-recurring. Recommend goal commits to working toward eliminating homelessness by preventing homelessness and ensuring that, when it does occur, it is rare, brief and non-recurring.
3	Strengthening social housing	Boosting social housing	The reformulated goal, while positive in intent, is vague and ambiguous. “Boosting” could refer narrowly to increasing the number of dwellings, without recognising the vital need to improve housing quality, accessibility and tenant experience. To avoid ambiguity and support accountability, the goal should explicitly state that the ACT aims to both increase and improve social housing (i.e. to increase social housing supply and improve existing stock and tenant outcomes). Recommend “boosting social housing” be replaced with a commitment to “increasing and improving social housing”.
4	Increasing affordable rental housing	Improving rental housing	This reformulation dilutes the intent of the original goal. “Improving rental housing” is broader, less targeted, and less measurable, and removes the explicit and important commitment to increasing <i>affordable</i> rental supply. Improving protections for renters and tenancy law reform are important. Recommend “improving rental housing” be replaced with “increasing affordable rental housing and improving protections for renters”.
5	Increasing affordable home ownership	Supporting home ownership	Removing the explicit commitment to <i>increasing affordable</i> home ownership weakens the intent of this goal and renders it broad, less measurable and potentially counterproductive. Historically, policies designed to “support home ownership” (such as first homeowners grants, stamp duty concessions, and various demand-side subsidies) often serve to fuel demand rather than expand opportunity. ¹ These policies often bring forward the purchasing decisions of people who would have bought anyway, rather than meaningfully increasing the number of households able to achieve home ownership. Poorly targeted

¹ Troy, L., Wolifson, P., Buckley, A., Buckle, C., Adkins, L., Bryant, G. and Konings, M., (2023). *Pathways to home ownership in an age of uncertainty*, AHURI Final Report No. 395, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/395>

Goal number	Original goal in ACT Housing Strategy	Updated goal in Draft Plan	Comment
			<p>demand-side supports can inflate property prices, increase speculative investment, and exacerbate the wealth gap between homeowners and those locked out of the market. In this context, retaining “increasing” and “affordable” within the goal is essential to ensure government interventions are focused on increasing housing affordability and do not unintentionally reinforce market pressures or deepen inequalities across tenure types.</p> <p><i>Recommend retaining the original wording of goal.</i></p>

1.3. The need for wider engagement and further consultation

Collectively, the reformulated goals, removal of objectives, and absence of timeframes, responsibilities, and indicators significantly weaken the Strategy’s clarity, coherence and capacity for accountability. These changes also diverge from what stakeholders would reasonably expect from an ‘implementation plan update’, particularly given the extent to which the revised plan supersedes core elements of the Strategy itself.

Given the scale of the changes, clearer communication about the scope of the update and its implications would have better supported informed engagement. ACT Shelter believes that such significant shifts require more extensive consultation and engagement, and we recommend the Implementation Plan is not finalised until such engagement is undertaken.

We appreciate the responsiveness of the Affordable Housing Policy Coordination Team when we raised these concerns, including extending the deadline and reaching out to additional organisations that had not initially received the embargoed draft. Ensuring input from a wide range of stakeholders is essential given their insight into the needs of the communities most affected by housing policy.

2. Responses to specific actions in the Draft Plan

2.1 Overarching concerns

The Draft Plan lists 25 actions, some of which bundle together multiple activities. As outlined above, the list lacks key components of an effective implementation plan: clear links to objectives, defined outcomes, performance measures, timeframes, and the identification of responsible directorates or agencies. Several actions are expressed as broad aspirations, rather than concrete, well-defined actions, and are too vague to provide operational clarity. Other key actions and critical policy reforms are missing. Taken together, this risks producing a fragmented set of activities rather than a coherent, coordinated program of work capable of addressing the structural and interconnected drivers of housing outcomes. While it is beyond the scope of this submission to comment on every action, ACT Shelter provides targeted observations below on selected and significant actions or where gaps are most notable.

2.2 Housing supply, enabling infrastructure, and increases in public, community and affordable housing (actions 1-7)

Actions 1-7 reflect core government commitments on housing supply, infrastructure, and the growth of public, community and affordable housing. While these are central pillars of the

ACT Housing Strategy, the actions in the Draft Plan are generally framed at a high level and largely restate aspirational targets without providing the detail needed to understand *how* these targets will be achieved. The absence of clear implementation steps, timeframes, responsibilities, and performance indicators limits transparency and weakens accountability.

We are also disappointed that several actions included in previous versions of the Implementation Plan have been omitted, including commitments to model and publish ACT housing supply and demand projections and regularly report on key indicators influencing housing supply and construction. Such data is essential to guide implementation, support market and sector planning, and underpin a credible evidence base. We also note the removal of the commitment that at least 15% of dwellings in the Indicative Land Release Program will be affordable, community or public housing. We support the inclusion of targets for the Indicative Land Release Program, however maintain these should be more ambitious, disaggregated, and clearly articulated to ensure progress toward increasing social housing as a proportion of all dwellings in the ACT.

Further, the alignment between the Draft Plan and significant planning reforms – including changes to facilitate more ‘Missing Middle’ housing – is unclear. A clearer articulation of how planning, infrastructure, land release, and housing policy will work together would better support stakeholders to understand how increased supply will be delivered in practice and how this supply will advance housing equity, diversity, and sustainability.

The link between housing supply and the ACT’s net-zero objectives is also underdeveloped. Despite the well-established connections between energy performance, affordability, and sustainability, the Draft Plan pays limited attention to energy-efficiency measures or the need to ensure low-income households benefit from electrification and efficiency upgrades. We acknowledge the government’s strong progress on improving energy efficiency in social housing and introducing minimum energy standards for rentals; however, these initiatives should be explicitly incorporated into the Implementation Plan and extended to ensure low- and modest-income households who lack capital or agency are not left behind.

Critically, the actions articulated in the Draft Plan do not provide confidence that the Government will increase the proportion of social housing as a share of all dwellings. There appears to be slippage between the *number of public housing dwellings* and the *total number of all dwellings owned by Housing ACT* (the latter includes not only public housing, but also properties head-leased to community providers for crisis accommodation, supported housing, affordable housing and various occupancy-type arrangements, as well as over 500 properties that are vacant). This slippage obscures the true scale of public housing and social housing provision and undermines transparency.

Action 3 commits to delivering an additional **5,000** public, community and public housing dwellings between June 2024 and the end of 2030, while Action 4 commits to growing the public housing portfolio to **13,200** by 2030.

These targets, however, do not appear to reconcile. In the 2025-26 ACT Budget, the ACT Government indicated that of the 5,000 additional social and affordable homes to be delivered by 2030, at least **1,000** would be public housing dwellings. However, as at June 2024, the total number of public housing dwellings in the ACT was 10,952.² Reaching the

² Based on the [Productivity Commission’s Report on Government Services 2025](#), the [Housing Assistance in Australia data from AIHW](#), and the response from the Minister for Homes, Homelessness and New Suburbs [Response to a Question on Notice \(No. 123\) in December 2024](#).

target of 13,200 would require a net increase of **2,248** dwellings.³ The Draft Plan does not transparently explain how these numbers align.

In addition, bundled targets that include both social and affordable housing obscure the different and distinctive roles these different housing types play and risk over-reliance on affordable rentals, which are cheaper to deliver but are increasingly inaccessible to households in income quintile two given their rent-setting benchmarks (up to 74.9% of market rent). This exacerbates the growing gap between social housing income thresholds and entry incomes for affordable rental housing.

For these reasons, ACT Shelter strongly recommends that the Implementation Plan include clear disaggregated targets for:

- public housing (social housing dwellings owned and managed by ACT Housing)
- social housing delivered by community housing providers (CHPs)
- affordable rental housing.

In addition, to support transparency, accountability, monitoring and evaluation, the ACT Government should regularly publish disaggregated data on:

- ACT Government dwellings head-leased to CHPs, disaggregated by use (social, affordable, crisis/transitional, supported)
- the proportion of social housing relative to total dwelling stock in the ACT
- the profile of affordable rental housing, including:
 - number and type of dwellings
 - affordability levels (percentage below market rent)
 - duration of affordability commitments
 - tenant income profiles.

Improved data collection and public reporting would also support a review of discount-to-market rent-setting policies and enable more targeted responses to the widening gap between social housing and affordable rentals.

2.3 Reducing homelessness (including Action 8, 10-12, 14)

ACT Shelter is alarmed to see the substantial weakening and lack of detail for specific actions responding to homelessness, including early intervention, crisis responses, and prevention for those at risk of homelessness. The homelessness-related actions are fewer, vaguer, and disconnected from objectives, timeframes and indicators. Streams of work previously recognised as essential are now missing. We strongly recommend that these aspects of the Draft Plan be subject to further sector engagement before being finalised.

In the previous Implementation Plan, 14 specific homelessness actions were explicitly tied to six objectives, covering early intervention, crisis responses, exit pathways, Aboriginal and Torres Strait Islander housing needs, workforce capability, and cross-government service integration. Each action also included timeframes and indicators to track progress.

In the Draft Plan, this suite of work is condensed into fewer actions that omit entire areas of work that were previously prioritised, including co-design with people with lived experience of homelessness, workforce development and capability building, strengthening coordinated

³ The [CSD Annual Report 2024-25](#) indicated that, as at 30 June 2025, there were 11,078 public housing dwellings.

human services responses across government, support for long-term chronic homelessness through Housing First approaches, and expansion of diverse supportive housing models. Earlier plans recognised that homelessness cannot be addressed without coordinated systems across justice, corrections, education, family safety, health, mental health, and disability services. The Draft Plan includes only one generic reference to exit pathways (Action 11) and does not reinstate critical commitments to coordinated information sharing or joint planning arrangements across government. Strengthening cross-government and cross-sector coordination and integration remains vital to ensuring a strategic approach to homelessness, particularly for people with complex needs moving between service systems.

We also note the absence of any reference to the evaluation of the hotel brokerage and crisis accommodation trial. A dedicated focus on preventing and responding to youth homelessness is also warranted, including a system-wide mapping and planning process for the youth homelessness system.

In a context of high and persistent demand on homelessness services, high rates of chronic homelessness, growing complexity of need, insufficient crisis accommodation, and ongoing homelessness workforce pressures, the Draft Plan needs to be revised and strengthened to reflect the scale and scope of challenges facing the ACT's homelessness system.

2.4 Strengthening legal protections for tenants and occupants (Action 19)

ACT Shelter welcomes Action 19 but urges the inclusion of a clear timeline for progressing the next stage of tenancy law reform, together with strengthened enforcement mechanisms and improved communication and education to support tenants and landlords to understand their rights and responsibilities.

Importantly, the Draft Plan should also explicitly recognise the need to reform and enhance legal protections for occupants. While we acknowledge and commend the substantial progress already made in strengthening tenancy law in the ACT, current provisions remain too narrow to ensure the safety, dignity and security of occupants. At the same time, occupancy encompasses a wide range of housing arrangements, and we recognise that reform in this area requires a thoughtful and consultative approach. Significant groundwork toward this has already been undertaken in previous terms of government, with reforms left unimplemented. It is essential that this work is now carried forward and that long overdue occupancy reforms are finally enacted.

2.5 Strengthening social housing assistance (Action 15, 16)

The Draft Plan represents a significant narrowing of focus compared with previous Implementation Plans, which set out 15 actions under Goal 3 and linked each action to specific objectives. In contrast, the Draft Plan contains only two actions relating to social housing assistance and omits several critical areas. Notably, there is no reference to expanding the range of social housing options to meet the diverse needs of families, older people or people with disability, despite clear evidence of ongoing unmet need (and additional obligations now required under reforms to the ACT's Discrimination Act). Six previous actions aimed at strengthening tenancy services, improving responsiveness and enhancing tenant outcomes have not been carried forward or updated. As a result, the Draft Plan provides an incomplete and insufficient framework for improving the experience of social housing tenants.

Action 15 (to assess components of the Total Facilities Management Services Agreement for insourcing) is a welcome, necessary step, but it is only a starting point. Significant

improvements are needed in the quality, transparency and responsiveness of public housing repairs, maintenance and accessibility upgrades. The insourcing transition provides a crucial opportunity to co-design a more effective system with public housing tenants, peak bodies and organisations that support tenants to ensure maintenance practices are timely, accountable and better aligned with tenant needs.

Action 16 (to “continue to improve the experience of public housing tenants” and double Tenant Participation Grants) is positive but falls short of the scale of action required. The action lacks specificity, clear service benchmarks and measurable commitments. Declining levels of tenant engagement, reduced home visits, and ongoing concerns about service accessibility, cultural safety and responsiveness highlight the need for a much more substantive and structured approach.

ACT Shelter recommends a comprehensive set of actions to strengthen social housing services and tenancy management. Key priorities include:

- reviewing tenancy management ratios to ensure adequate support
- improving communication, engagement and complaints handling
- embedding person-centred, flexible, strengths-based, culturally appropriate and trauma-informed service standards (and ensuring these are consistently delivered)
- reforming allocation processes to ensure housing better matches tenants’ needs
- improving maintenance systems, transparency and accountability
- establishing benchmarks and indicators to enable meaningful monitoring of progress.

Without these elements, the Draft Plan does not provide a credible pathway to improving the experience and outcomes of social housing tenants.

2.6 Exit pathways from institutions (Action 11)

Exit pathways from institutional and supported settings remain a longstanding system challenge, with too many people continuing to fall into homelessness at the point of discharge. We welcome the inclusion of Action 11 and its intent to strengthen these pathways; however, the action is currently high-level and vague. Without clear multi-agency governance arrangements and explicit links to monitoring and performance measures, there is a risk that longstanding gaps will persist.

2.7 Affordable rental housing (including Actions 17,18,20)

To strengthen the Draft Plan’s focus on affordable rental housing, ACT Shelter recommends consideration be given to establishing a central intake or tenant-matching platform for affordable rentals in the ACT. At present, there is no coordinated system to help eligible households identify and access affordable housing, with people instead relying on real-estate listings or ad hoc avenues. Other jurisdictions, including NSW and Queensland, operate *WelcomeMat*, a dedicated portal that improves accessibility and equity for applicants while delivering efficiencies and cost savings for housing providers. A similar platform in the ACT has the potential to streamline access, support services to more easily direct people to suitable housing, and enhance the overall effectiveness of the affordable housing system.

2.8 Key missing actions

2.8.1 Integrating housing as a human right into policy, practice and evaluation

In September 2025, the ACT became the first jurisdiction in Australia to enshrine the human right to housing into law. The commencement of the right on 1 January 2027 provides the

ACT Government with a clear timeframe to ensure that policies, programs, systems and decision-making processes across all public authorities are capable of giving practical effect to this new right. As the Explanatory Statement accompanying the legislation emphasised, commencement was delayed to allow “*sufficient time for ACT Government directorates and other public authorities to assess where changes may be required to policies and procedures to incorporate the right, and to ensure that staff and members of the public understand the scope of the right.*”

It is therefore essential that the Draft Plan expressly incorporates the work required to operationalise the right to housing, and sets out a clear pathway to implementation. This includes developing a benchmarking and monitoring framework to support the Government’s obligations to progressively realise the right to adequate housing. While full realisation of the right will not be immediately achievable, progressive realisation obliges the government to demonstrate it is taking deliberate, concrete and effective steps to move towards it. As the UN Committee on Economic and Social Rights has stated, progressive realisation requires governments to use “all appropriate means” to realise the right to adequate housing:

In essence, the obligation is to demonstrate that, in aggregate, the measures being taken are sufficient to realize the right for every individual in the shortest possible time in accordance with the maximum of available resources.⁴

This obligation in turn requires establishing “clear goals and timelines for achieving specific outcomes and the right to adequate housing for all in the shortest possible time”, as well as “effective monitoring and accountability mechanisms”.⁵ Accordingly, progressive realisation will require the government to establish robust benchmarks and a more comprehensive, timely and transparent means of measuring progress on housing outcomes.

2.8.2 Strata reform

The Draft Plan contains no reference to strata reform or to establishing a Strata Commissioner. We recognise this is a complex area of policy and law, however the omission is notable given the growing concentration of multi-unit developments in Canberra’s town centres and new suburbs, and the increasing complexity these environments present for owners, tenants, developers and strata managers. Existing strata laws create significant and well-documented challenges, which are becoming more pronounced as density rises. Strata settings also directly influence the feasibility of incorporating affordable and social housing within new apartment projects. Given the implications for housing quality, equity, consumer protection, density outcomes and affordability, the Implementation Plan should explicitly acknowledge the importance of strata reform and include actions and timeframes for advancing this work.

3. Observations on other elements of the Draft Implementation Plan

3.1 Housing Continuum Diagram (p. 2)

The diagram on page 2 presents a simplified housing continuum that obscures the significant and widening income gaps between eligibility for social housing, entry thresholds for affordable rental housing, market rental, and affordable home ownership. While there is no

⁴ Committee on Economic, Social and Cultural Rights (CESCR), [General Comment No. 4: The right to adequate housing \(Art. 11 \(1\) of the Covenant\) \(13 December 1991\) E/1992/23](#), accessed 8/12/25

⁵ Special Rapporteur on adequate housing, [Guidelines for the implementation of the right to adequate housing A/HRC/43/43](#), accessed 9/12/2025

formal lower income limit for affordable rental, in practice community housing providers (CHPs) often apply minimum income requirements, and this nuance is not reflected.

Greater clarity is also needed regarding the meaning of “affordable rental.” The footnote (A) states that affordable rental may include private rental, which is confusing. It is unclear whether this refers to CHP-managed properties under the land tax exemption scheme, or whether it blurs the distinction between subsidised affordable housing and private rentals that are simply affordable relative to a household’s income.

In addition, eligibility for crisis, supported and transitional accommodation is not necessarily income-based and is not confined to the income band depicted in the diagram. Eligibility for crisis and transitional housing is usually based on a situational assessment relating to homelessness, risk of homelessness, or an acute crisis, with modest occupancy fees applied in some instances. Depending on the program, supported accommodation also has diverse eligibility requirements that do not map neatly onto fixed income thresholds.

To avoid oversimplification, the diagram should include qualification or explanatory notes to reflect the complexity of income eligibility, particularly for supported, transitional and crisis accommodation, and more clearly define the scope of affordable rental housing.

3.2 Housing income quintiles (p. 8)

The inclusion of income quintiles in the Draft Plan is a useful reference point for understanding housing need and how programs should be targeted. For clarity, it would be helpful to confirm whether the income ranges presented have been equalised.

To support more effective and responsive policy development and implementation, ACT Shelter recommends supplementing this information with analysis specifically focused on renter households, rather than just income quintiles for the population as a whole, together with a distributional analysis of rents. While this may be beyond the scope of the updated Implementation Plan, a commitment to undertaking such analysis in future would provide a meaningful way of monitoring pressure points and areas of unmet need. This includes tracking the growth of low-income renters who may be under-represented in household-level data because they are unable to form independent rental households and instead rely on informal renting or non-mainstream housing arrangements – a phenomenon which means the full extent of the affordability crisis experienced by the lowest-income renters is likely to be under-enumerated at the household level.^{6,7} This analysis would strengthen government’s ability to target, calibrate and monitor programs so they reach those most in need.

As noted, there is a growing cohort of households struggling in the private rental market who earn too much for social housing but do not meet the minimum income thresholds for affordable housing. While the income profile of renters has historically been more concentrated in the lower income quintiles of the wider population, nationally there has been a growth of private renters with household incomes at mid to high levels.⁸ At the same time, new rental supply has been concentrated at mid-market levels and the distribution of rents has narrowed. For households in income quintile two, the issue is therefore not only lack of

⁶ Reynolds, M., Parkinson, S., De Vries, J and Hulse, K., (2024). [Affordable private rental supply and demand: short-term disruption \(2016–2021\) and longer-term structural change \(1996–2021\)](#), AHURI Final Report No. 416, Australian Housing and Urban Research Institute Limited, Melbourne.

⁷ Parkinson, S., James, A., and Liu, E., (2018). [Navigating a changing private rental sector: opportunities and challenges for low-income renters](#), AHURI Final Report No. 302, Australian Housing and Urban Research Institute Limited, Melbourne.

⁸ Reynolds *et al.*, (2024).

supply but the limited availability of genuinely affordable stock – much of which is occupied by higher-income renters seeking to reduce housing costs or redirect household spending toward wealth building through other channels.⁹ Addressing the needs of private renters in the second income quintile will therefore require a broader suite of policy measures in addition to existing affordable housing programs.

3.3 Glossary

The glossary is helpful; however, further clarification is recommended regarding the term *supported accommodation*. In the Draft Plan, supported accommodation appears to be subsumed within the definition of crisis accommodation, whereas the term more commonly refers to transitional or longer-term housing that provides integrated support – such as daily living assistance, personal care, budgeting support, or health-related services – for people with disability, mental health needs or other complex and intensive needs. This includes NDIS-funded supports (such as Supported Independent Living and Specialist Disability Accommodation), as well as other forms of supported housing delivered by non-government organisations and [Housing ACT](#). Crisis supported accommodation can also be used to refer to short-term emergency accommodation with on-site support, however this is distinct from longer-term supported accommodation.¹⁰

It may also be useful to include a definition of *transitional housing* given it is offered as part of the continuum of housing supports in the ACT.

4. Broader issues relating to the ACT Housing Strategy

4.1 Governance, System Stewardship and Cross-Government Coordination

Effective housing policy requires more than a collection of discrete initiatives, and depends on whole-of-system stewardship and coordination. Current governance arrangements for housing in the ACT are fragmented, with responsibilities dispersed across multiple directorates and agencies operating within narrowly defined mandates. No single entity appears to hold overarching responsibility for system stewardship, driving system-wide housing outcomes, or maintaining a coordinated whole-of-government view.

This fragmentation makes it difficult to address the complexity and interdependence of the ACT's housing challenges. Housing outcomes are shaped simultaneously by planning, supply, infrastructure, taxation, social services, homelessness responses, regulatory frameworks and financial settings. Without effective coordination of these various elements, policy risks becoming siloed, reactive and inconsistent, undermining both the coherence of the ACT Housing Strategy and the ability to implement it effectively.

The location of housing and homelessness policy responsibilities under recent Machinery of Government changes is also unclear. Many aspects of housing policy are inherently cross-cutting, and without transparent articulation of roles, responsibilities and decision-making authority, external partners can struggle to meaningfully engage. Clarity is essential for accountability, but also for aligning strategic planning, service delivery, regulation and evaluation across government.

⁹ Reynolds *et al.*, (2024).

¹⁰ In some jurisdictions the term '[supportive housing](#)' is a type of housing (usually funded by state and territory governments) that is a form of ongoing housing delivered in conjunction with coordinated, wrap-around supports for people with complex and intensive needs who would otherwise be unable to sustain a tenancy and community connection.

The Draft Plan further acknowledges numerous intersecting strategies and frameworks (including Closing the Gap, the Disability Inclusion Act, the National Housing Accord, etc.) yet provides no mechanism for coordinating them, ensuring joint governance, or measuring combined impacts. We also note the absence of any structured, ongoing advisory mechanism such as the former Ministerial Affordable Housing Consultative Group, which previously provided cross-sector advice and supported transparency and accountability.

To strengthen governance and coordination, ACT Shelter recommends:

- **Strengthening system stewardship and ensuring clear delineation of roles and responsibilities across government**, to support a coordinated, whole-of-system approach based on a recognition of interdependencies and shared objectives.
- **Transparent alignment between actions, objectives and measurable outcomes**, supported by a clear logic model or theory of change.
- **Structured avenues for regular input from community, industry, academic and lived-experience stakeholders**, to support effective implementation and ongoing refinement of the Strategy.

A governance framework with these elements would support a more cohesive, strategic and accountable system capable of driving meaningful housing reform.

4.2 Data, evidence and reporting

Robust data is essential to effective housing policy. High-quality, accessible and timely information enables government, industry, community organisations and researchers to understand housing needs, target investment, monitor outcomes and evaluate the impact of policy settings over time. Yet the current housing data environment in the ACT is fragmented, inconsistent, and difficult to navigate. Critical datasets are not reported publicly in a clear and timely way, undermining transparency, accountability and evidence-based decision making.

Existing gaps are significant. Statistics such as social and affordable housing starts, completions, demolitions, sales, tenancy exits, eviction data, and disaggregated information on rents and tenant income profiles are either not collected or published in a consistent and timely way. Important datasets held across government (including administrative data from community housing providers, rental bond data and specialist homelessness services) are not accessible and, as a result, stakeholders are often working from partial or inconsistent information.

Strengthening the quality, transparency and accessibility of housing data is fundamental to the success of the Housing Strategy and its Implementation Plan. To achieve this, ACT Shelter recommends:

- developing a whole-of-system housing data strategy, including actions to address data gaps, enhance data quality and consistency (underpinned by clear and consistent definitions), and enable digital access to datasets
- establishing a shared measurement and reporting framework aligned to the Housing Strategy's objectives, with clear indicators and regular public reporting
- enhancing transparency through routine publication of core housing statistics.

A more coherent, accessible and transparent evidence base will support better policy, strengthen accountability, and enable stakeholders to work from a shared understanding of the ACT's housing challenges and the progress being made to address them.

5. Conclusion

The Draft Implementation Plan presents an important opportunity to strengthen housing outcomes over the remaining three years of the current ACT Housing Strategy and to lay the foundations for longer-term and sustained improvement. However, as currently drafted, the Implementation Plan does not provide the clarity, coherence or accountability framework needed to drive the scale and direction of change required. We encourage the ACT Government to restore the linkages between goals, objectives and actions, include measurable indicators and outcomes, and undertake a deeper consultation process to ensure that the Implementation Plan is robust, transparent and fit for purpose.

ACT Shelter is committed to working constructively with the ACT Government to support better housing outcomes, and we would welcome the opportunity to assist with the finalisation of the Implementation Plan Update. With clearer commitments, strengthened governance arrangements, and further engagement with community stakeholders, we are optimistic that the Implementation Plan can realise its potential as a credible and effective roadmap for improving housing outcomes in the ACT.

Yours faithfully

A black rectangular box redacting the signature of Corinne Dobson.

Corinne Dobson

CEO, ACT Shelter