



**Link  
Wentworth**

Providing homes, building futures.

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7<sup>th</sup> November, 2023

Director  
Housing Australia Future Fund Unit  
Housing Division  
Treasury  
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[housing@treasury.gov.au](mailto:housing@treasury.gov.au)

Dear Director,

**Link Wentworth - Response to Amendments to the Housing Australia  
Investment Mandate Direction**

Link Wentworth congratulates the Government on the establishment of the Housing Australia Future Fund, the National Housing Accord and the expansion of the National Housing Infrastructure Facility and Social Housing Accelerator. These are all very strong signals to the Community Housing Sector of the commitment by government to deliver social and affordable housing and address acute housing need.

The Charter of the National Regulatory System Community Housing provides for a “..... *well-managed, scalable and sustainable community housing sector that meets the housing needs of tenants and provides assurance for government and investors.*” The prioritisation of the Sector in the allocation of funding and support by government to facilitate the delivery of housing will enable the Sector to continue to mature and make lasting contributions to community housing in Australia as has been the case in the United Kingdom.

Link Wentworth provides a range of built form and wrap around services that specifically target social, affordable, and acute housing need. We deliver our own social and affordable housing, manage housing tenancies, and offer a full suite of housing services either directly or in partnership. Our development pipeline has been secured to expand and build on our current operations and comprises ‘shovel ready’ as well as medium and longer-term projects.

Availability payments, capital grants and access to financing are a welcomed contribution by Government and necessary to address the increasing cost of delivering housing and supporting services.



The establishment of the Housing Australia Future Fund, the National Housing Accord and the expansion of the National Housing Infrastructure Facility and Social Housing Accelerator is a strong commitment by Government that will produce a once in a generation opportunity. The Sector is well placed to compliment, leverage and support this Government investment in the delivery of these housing outcomes.

We look forward to joining with Government in the success of this commitment. Link Wentworth has also written to Housing Australia with some recommendations on how projects might be prioritised and assessed in terms of funding allocation. A copy of that letter is attached for your reference.

Link Wentworth again congratulates the Government on securing this much needed funding and looks forward to working together to deliver social and affordable housing and addressing acute housing need.

Yours faithfully,

Andrew McNulty

**Chief Executive Officer**

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Attached: Link Wentworth letter to Housing Australia



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7<sup>th</sup> November, 2023

Nathan Dal Bon  
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Housing Australia  
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Dear Nathan,

**Link Wentworth – matters for consideration in the implementation of the  
Australia Investment Mandate Direction.**

Link Wentworth congratulates the Government on the establishment of the Housing Australia Future Fund, the National Housing Accord and the expansion of the National Housing Infrastructure Facility and Social Housing Accelerator. These are all very strong signals to the Community Housing Sector of the commitment by Government to deliver social and affordable housing and address acute housing need.

What is not clear in the Housing Australia Investment Mandate Amendment (Social Housing, Affordable Housing and Acute Housing Needs) Direction 2023 (Mandate Amendment) and the Exposure Draft Explanatory Statement (Statement) is how the Community Housing Sector and those that provide social, affordable, and acute housing need will be; prioritised in the funding allocation and access to grants, and the criteria that will be used for project assessment and allocation.

Link Wentworth has a development pipeline ready to deliver these housing outcomes. Knowing that availability payments, capital grants and access to financing is prioritised for the Sector, coupled with certainty around project assessment criteria, would enable Link Wentworth to:

- facilitate the immediate delivery of several projects in our development pipeline,
- bring online several more projects that would be viable if able to access the HAFF, and
- provide more certainty to our current acquisition strategy and partnership opportunities.



This priority and certainty would enable Link Wentworth to grow our assets to be a scalable and sustainable community housing provider and to expand the delivery of supporting services to meet housing need. With the expectation that Government will announce further details on the deployment of these funds soon, Link Wentworth offers the following matters for consideration.

### **Prioritisation of the Community Housing Sector**

The Charter of the National Regulatory System Community Housing provides for a “..... *well-managed, scalable and sustainable community housing sector that meets the housing needs of tenants and provides assurance for government and investors.*” The prioritisation of the Sector in the allocation of funding and support by government to facilitate the delivery of housing will enable the Sector to continue to mature and make lasting contributions to community housing in Australia as has been the case in the United Kingdom.

The supply of social and affordable housing remains critical, but investment in that supply must recognise the support services required by many in social and affordable housing, and not just those with acute housing need. The Community Housing Sector is aware of this need and equipped to provide services and supporting social infrastructure.

### **Project assessment criteria**

Link Wentworth has a range of projects in its development pipeline, projects that are ‘shovel ready’, small scale projects, larger projects, and those targeting acute housing need, in a range of locations. As the Government moves from the establishment of the Mandate Amendment to the consideration of assessment criteria for eligible projects, Link Wentworth offers the following:

#### **1 Timing**

It would be beneficial for the sector if there was guidance on the timing of the first round of the funding, and the frequency and duration of future funding rounds. This would enable our development pipeline to be adjusted to align with those funding rounds.

The Mandate references the supply of ‘short term’ housing stock citing examples of ‘spot purchases’ of existing, ready for tenancy dwellings. It would be useful to have guidance on the assessment criteria of the selection of these ‘short term’ stock as Link Wentworth has identified several sites that could address housing need now.

#### **2 Scale**

Social and affordable housing is required in a range of housing forms and locations, each with different development risks and complexity. If the government chooses to focus on large scale development and renewal projects, some smaller and medium scale projects that are much needed, without access to funding, grants and finance will remain under-developed. A range of project scales will be required to address the range of housing needs.



3 **Housing Need**

The Statement references criteria for financing decisions, stating that consideration will be given to "...housing needs in areas which are in most need of assistance." Further details will be required to better understand how this need and assistance will be assessed.

4 **Location**

The Statement references addressing housing need in "...regional, rural and remote Australia on an equitable as needs basis.". It would be useful to understand the assessment criteria in relation to targets in terms of location, and how issues of equitable access will be determined.

5 **Mix**

Whilst there is a range of housing need in the community, it would be beneficial to understand how the assessment criteria will determine housing mix and if there is a desire to create an equal and balanced mix of social, affordable and acute housing need.

6 **Value for Money**

Reference is made in Section 28D and in the Statement to a projects eligibility in terms of loans and grants that "...deliver(s) value for money, in terms of the amount of housing delivered relative to the amount of government support provided" In the assessment criteria, it would be useful to have this clarified and clear guidance on how that would be assessed.

Value for Money should also take into account the longer-term nature of Social and Affordable Housing delivered by a Community Housing Provider, where our charitable objectives and constitutions are focussed on providing long term housing outcomes for those in housing need as opposed to delivery models which leverage private equity and require "sell down" of a proportion of the homes at the end of the subsidy period.

The establishment of the Housing Australia Future Fund, the National Housing Accord and the expansion of the National Housing Infrastructure Facility and Social Housing Accelerator are all very strong signals of the commitment by Government with this much needed investment.

The Sector is well placed to compliment, leverage and support Government investment in the delivery of these housing outcomes. We would welcome the opportunity to provide further comments and to work with Government on how best to deploy these funds.

Yours sincerely,

Andrew McAnulty

**Chief Executive Officer**

[andrew.mcanulty@linkwentworth.org.au](mailto:andrew.mcanulty@linkwentworth.org.au)

Attached: Link Wentworth letter to Treasury