

Housing Policy Unit Manager  
Social Policy Division  
The Treasury  
Langton Crescent  
**PARKES ACT 2600**

By email: [housingconsultation@treasury.gov.au](mailto:housingconsultation@treasury.gov.au)

Dear Sir/Madam,

**RE: National Housing Finance and Investment Corporation – Liverpool City Council response**

I write in response to the consultation paper seeking feedback on the potential structure and governance of the National Housing Finance & Investment Corporation (NHFIC) and the operation of the National Housing Infrastructure Facility (NHIF).

The Liverpool local government area forms part of the Sydney South West Growth Area and is projected to accommodate a considerable proportion of Sydney's future population and economic growth. The population of Liverpool has grown from 188,100 people at the 2011 census to an estimated resident population of 204,594 at June 2015. Population projections by the NSW Department of Planning and Environment indicate that Liverpool's population will increase by 76% between 2011 and 2036, reaching 331,000.

This significant population growth will need to be supported by significant additional housing and supporting urban infrastructure including roads, water, sewer, electricity, parks, community facilities and quality public transport.

According to projections from the NSW Department of Planning and Environment a total of 116,150 new dwellings will need to be provided in the Liverpool LGA by 2036. The initiative from the Commonwealth Government in facilitating funding to accelerate housing provision to meet the anticipated growth and address housing affordability is commendable.

While further coordination is required between the Commonwealth, State and Local governments, the following comments are provided in relation to the proposed NHFIC and NHIF.

- It is suggested that the proposed NHFIC be an independent body. It is further suggested that there should be a fair representation from local government.
- The NHIF is proposed to consist of \$600 million in lending, \$225 million in equity investments and \$175 million in grants. It is recommended that the share of grants be increased.

- The timeframe of loans is indicated to be five years. This timeframe is considered inadequate and inflexible. To ensure the objective of the financial scheme is fully achieved, the timeframe needs to be flexible and reflective of the financial capabilities of the recipient organisation.
- It is proposed that NHIF payments to local government be made through State and Territory governments. This needs further clarification particularly around the assessment process, disbursement of funding and the repayment of loans.
- Clarification is required on the eligibility criteria for grants and loans. Further detail is needed on the type of information that will be required to support an application.
- The eligible projects for NHIF are stated to be new or upgraded infrastructure for services such as water, sewerage, electricity or transportation. The majority of these services in Sydney are provided by State agencies (e.g. Sydney Water, Endeavour Energy, and Transport for NSW). Additional infrastructure should be eligible including local roads, stormwater networks, and community and recreation facilities as these are critical for balanced residential growth.
- Growth area councils like Liverpool should be given priority in the eligibility criteria as Council is required to provide new infrastructure to support the substantial housing development in its designated growth areas. Growth area councils experience difficulty with funding the required infrastructure to support development resulting from the cap imposed on section 94 development contributions by the NSW State Government.

Should you require any further information on this matter, please do not hesitate to contact Masud Hasan, A/Executive Planner on (02) 9821 7232.

Yours faithfully



**Tim Moore**  
Director City Economy & Growth