

**OPTIONS TO IMPROVE ACCESS TO EXISTING AND ALTERNATE
ACCOMMODATION TO ADDRESS THE SOCIAL HOUSING SHORTAGE**

Organisation: Women's Community Shelters

Date Received: 13 August 2021

Submission to the Legislative Assembly Committee on Community Services

Re: Inquiry into options to improve access to existing and alternate accommodation to address the social housing shortage

Women's Community Shelters (WCS) is an NSW based not-for-profit organisation working with communities to establish new crisis shelters that provide safety and support to women and children who are homeless or have experienced domestic and family violence (DFV). The organisation currently supports a network of seven shelters in NSW, with two additional shelters in development due to open before the end of the year.

The WCS Shelter Network accommodates 400 women and children in crisis each year and with the addition of two new shelters, will increase its capacity to support 500 women and children over the next 12 months. In addition to growing the WCS Shelter Network and delivering new crisis beds to the sector, WCS offers a range of complementary programs to support women and children impacted by homelessness and DFV. WCS shelters provide specialist DFV and casework support to women and children both in shelter and through community outreach. In addition, WCS has an expanding transitional housing program that offers medium term accommodation to clients who require a longer period of support.

WCS' innovative funding model brings together business and corporate sponsorship, philanthropic investment, Commonwealth and NSW Government funding and local community fundraising to support the WCS Hub and seven community-based shelters. A graphic communicating the WCS social franchise model can be found in Annexure A.

Homelessness and domestic and family violence (DFV)

DFV continues to be the leading cause of homelessness for women and children, with women and children escaping DFV making up 35% of all clients presenting to Specialist Homelessness Services in NSW.¹ However, only 3.2% of women and children escaping DFV are currently able to access long-term housing solutions when they need them.²

The long-term accommodation options for women leaving DFV are the private rental market, social housing or purchasing a home. Property purchase is not a realistic option for most women leaving DFV and while state government programs exist to facilitate access to the private rental market, affordability remains a significant obstacle.

The Anglicare Australian Rental Affordability Index examines the affordability of the private rental market for those on lower incomes, such as those relying on social security payments. The 2021 Rental Affordability Snapshot found that close to 0% of properties were affordable

¹ AIHW (2019) *Specialist homelessness services 2018–19: New South Wales*, <<https://www.aihw.gov.au/getmedia/c1ce917d-9812-459d-967d-0d2a027f70c0/aihw-hou-322-nsw-factsheet.pdf.aspx>>.

² Equity Economics (2021) *Nowhere to go: the benefits of providing long-term social housing to women that have experienced domestic and family violence*, <http://everybodyshome.com.au/wp-content/uploads/2021/07/EE_Women-Housing_Domestic-Violence_WEB_SINGLES.pdf>.

to people on low incomes across Australia.³ Of all the households featured in the Snapshot, families with two parents in full-time work stand the best chance of finding an affordable home, however, even they were locked out of 85 per cent of rentals surveyed, a drop of 8 percentage points from the year before.⁴

Where available, transitional housing is a good option for clients whose homelessness can be resolved with medium term subsidised accommodation and support. Traditionally available for a period of 12-18 months, transitional housing gives clients a period of stability after an experience of homelessness or DFV. While in transitional housing clients are supported to address barriers to permanent housing and long-term independence such as trauma, physical and mental health, financial insecurity, unemployment and family court and immigration matters.

In the situation where transitional housing is unavailable and rental prices are unaffordable, the only long-term housing solution for women leaving DFV is social housing. However, as the social housing waitlist continues to grow, with the priority list for housing increasing by over 800 in 2020, women face wait times of up to 10 years, with no interim solution.

Without feasible housing options, women are forced to choose between their safety and the safety of their children, and homelessness. We know that the risk of homelessness and financial vulnerability prevents women from leaving violence and increasingly, it is the reason that women return to the perpetrator. In Australia 7,690 women a year are returning to perpetrators due to the lack of affordable alternatives.⁵

Stable, affordable housing is critical for women to rebuild their lives after the experience of DFV as it supports safety and wellbeing. We urge the Commonwealth and NSW Governments to urgently address the lack of social and affordable housing, particularly for women and children experiencing homelessness and DFV.

The economic case for social housing

According to new research undertaken by Equity Economics⁶, there is an immediate need for 16,810 social housing units in Australia to support women leaving DFV. While provision of 16,810 social housing units is estimated to cost up to \$7.6 billion (with costs to Government potentially lower through use of community housing providers and innovative financing models), the immediate economic benefits are projected at \$15.3 billion, with 47,000 jobs created.⁷ In addition to the immediate economic and social benefits, governments can avoid \$122.5 million in a year in costs associated with women returning to a violent partner and save \$257 million in a year by reducing the number of women and children entering into homelessness.⁸

³ Anglicare (2021) *Rental Affordability Snapshot 2021*, <<https://www.anglicare.asn.au/wp-content/uploads/2021/05/rental-affordability-snapshot-national-report.pdf>>.

⁴ Anglicare (2021)

⁵ Equity Economics (2021)

⁶ Equity Economics (2021)

⁷ Equity Economics (2021)

⁸ Equity Economics (2021)

Options to better support meanwhile use (temporary supportive accommodation), and the current major planning barriers to meanwhile use.

In 2017 WCS established a temporary supportive accommodation program called Pathways Home. Through Pathways Home, WCS partners with community housing providers, property developers and other landholders to identify vacant or underutilised property that can be temporarily repurposed to create social value. This model, now known as meanwhile use, has provided significant benefit to WCS and our network of shelters, delivering over 35,000 nights of safe accommodation to more than 200 women and children.

WCS defines meanwhile use as the temporary utilisation of vacant or underoccupied buildings to meet a social or community need, until they can be brought back into commercial operation or demolished. Meanwhile use can be applied to residential premises, aged care facilities, hospitals, church owned buildings, office spaces and government assets. It makes use of empty spaces in advance of development or repurposing, instead of hiding spaces away behind hoardings.

Meanwhile use ensures that redundant buildings or vacant development sites are occupied for the time it takes for development approval, providing benefits to the local community in a variety of ways. As well as making the best use of vacant building stock, meanwhile use can support local government housing strategies and stimulate local economies. There is also an opportunity to plan for meanwhile use where significant infrastructure projects involve property acquisition to accommodate development.

WCS established its meanwhile use housing program in response to a lack of affordable housing options for WCS clients exiting crisis shelters. This is often the result of the inability of clients to access public or community housing due to shortages and long waiting lists, or ineligibility for public housing.

Unlike fully funded Specialist Homelessness Services, Government contributes only 10 - 50% of operational funding for each of the existing shelters in the WCS' Network. The remaining operational funds are sourced through philanthropy and community fundraising. WCS shelters have sourced their own transitional housing supply, through local partners and donor arrangements. Given the absence of a transitional housing allocation through Government, our meanwhile use approach provides a critical safety net for women and children who require a longer period of supported accommodation to prevent re-entry into homelessness and break cycles of disadvantage. WCS has diverse experience in delivering meanwhile use projects, working flexibly with partners to maximise housing outcomes. WCS has built a network of meanwhile use partners and properties over the last 3 years and now provides 94 crisis and transitional accommodation places to women and children across 19 properties located throughout Sydney.

Case Study: WCS x PAYCE Foundation x Bridge Housing

Our first [Pathways Home](#) project was a partnership with the PAYCE Foundation and Bridge Housing. Pathways Home was one of the first meanwhile use programs in NSW. The PAYCE Foundation provided 5 properties earmarked for redevelopment in the Parramatta LGA as an in-kind contribution and undertook the modifications required to ensure that they were fit for purpose. The PAYCE Foundation also provided seed funding to the project to support responsive maintenance costs.

The project, now in its fourth year, supports women and children leaving violence with access to transitional housing. Women are offered housing and support services for up to 18 months, including assistance to find appropriate permanent housing at the end of the period. WCS Shelters provides case management, with a focus on the development of skills required to independently sustain housing. Bridge Housing delivers tenancy management and responsive maintenance.

The project has delivered transitional housing and wrap around support services to 27 women and 30 children since November 2017. This includes 5% Aboriginal clients and 50% clients of culturally and linguistically diverse backgrounds.

Planning barriers

While meanwhile use has the potential to add great value, WCS has encountered barriers in its practical application. Examples of the barriers experienced by WCS in activating meanwhile use opportunities are tabled in Table 1 – Barriers to activating meanwhile use opportunities.

In some situations, the proposed meanwhile use is different to the current development approval. For example, using an approved aged care facility temporarily as general residential, or general residential as a group home. Unfortunately, there is no mechanism within the current planning system that recognises or enables temporary or meanwhile use outside of pre-existing development approval.

In these situations, a more flexible, collaborative approach is required from the local council to ensure success. At times this has proven difficult to achieve. When local councils are not supportive of the change and require lengthy planning approval processes to take place, the cost to meanwhile use provision can be very costly and self-defeating – both financially and in 'time lost' to realise the maximum social benefit.

WCS has previously written to the Hon. Rob Stokes, Minister for Planning, Industry and Environment, proposing a way in which these barriers can be reduced (within the context of the current reviews of the *State Environmental Planning Policy (Affordable Rental Housing) 2009* and the proposed new *Housing Diversity SEPP*). Our proposal advocated for the inclusion of meanwhile use as complying development in the *State Environmental Planning Policy (Affordable Rental Housing) 2009* and the proposed new *Housing Diversity SEPP*. This inclusion would help to reduce barriers in the planning system and support easy

activation of meanwhile use opportunities that provide safe and affordable housing to women and children.

Suggested wording for inclusion in planning legislation related to the *State Environmental Planning Policy (Affordable Rental Housing) 2009* and the proposed new *Housing Diversity SEPP* can be found attached as Appendix A. This is aimed at making the controls regarding a temporary change of use of building for meanwhile use easier to navigate.

Table 1: Barriers to activating meanwhile use opportunities

	Opportunity	Proposed Meanwhile Use	Challenges	Outcome
Parramatta Women's Shelter	2 x vacant residential properties land banked by developer and available for 3 years at no cost.	Interim location of Parramatta Women's Shelter with capacity to accommodate up to 6 families across the two properties.	Permitted use is as general residential and as such, development consent is required for a change of use to permit a group home.	The costs and time associated with pursuing development consent were considered prohibitive in this case. The decision was made to occupy the properties at a reduced capacity to comply with the permitted use.
Beecroft House	Redundant aged care facility available for 2 years at no cost.	Transitional housing for single women exiting crisis accommodation and affordable housing for single women at risk of homelessness.	The permitted use is an Aged Care Facility and restricts use to accommodate people under the age of 55 without development consent.	The property is occupied according to the permitted use as there is sufficient demand for accommodation by women over 55.
Mosman House	Redundant private hospital available for 2 years at no cost.	Transitional housing for single women exiting crisis accommodation and affordable housing for single women at risk of homelessness.	The permitted use is a Health Services Facility and requires that health services be delivered on site. Aged persons accommodation is permissible but only with development consent.	Ultimately development consent was not required as WCS was able to demonstrate compliance with permitted use as a hospital through coordination of health care services to be delivered on site. However, the overall time the property will be available has halved due to these challenges in navigating the planning system.

Lessons and opportunities

- Without an identified Government facilities pipeline, identifying and activating meanwhile use projects through private and community partnerships requires upfront resourcing. For example, WCS employs a full time Coordinator to oversee the operations of existing projects and identify new opportunities for meanwhile use. We suggest that there is an opportunity to build sector capacity through funding service capacity to identify vacant and underutilised assets.
- The suitability of a property for meanwhile use is dependent on the property location, length of time available and accommodation quality and amenity.
- WCS does not pursue meanwhile use opportunities where property is available for less than 12 months. This decision was made to guarantee WCS clients a 9–12-month tenancy period and allow sufficient time to identify suitable exit pathways. The 12-month minimum term also serves to balance the time and resourcing required to activate opportunities.
- The partnership between a CHP and service provider is critical to the success of meanwhile use projects. CHPs have responsibility for property maintenance and repairs, tenancy management and provide a critical support to access timely exit pathways.
- WCS shelters are responsible for providing casework support. While support needs will differ depending on client cohort and individual needs, WCS has developed a support model that averages 1-2 hours of casework support per client. In situations of shared living, where there may be shared kitchen and bathrooms, WCS provides part time onsite support to undertake casework and negotiate challenges relating to shared living. We note that to date these projects have been focused on older women, and the coordinator role has a strong focus on supporting women plan for the next steps relating to their housing and wellbeing.
- At the point of referral to meanwhile use an assessment is completed by an experienced homelessness/DFV practitioner to determine suitability. Meanwhile use housing is not suitable for people with multiple, complex and chronic needs experiencing homelessness. Tenants must be able to live and function with relative independence. People with complex needs are referred to programs that offer more intensive wrap around e.g., Together Home.
- Meanwhile use has the potential to self-fund, with rents charged to residents (25-30% income) sufficient to cover housing management and the majority of support costs. However, WCS projects to date have depended on significant in-kind support from corporate and community partners to make properties fit for purpose and some philanthropic funding to increase support hours available for properties of more than 15 residents. There is an opportunity to minimise up-front activation costs through better identification of suitable properties and matching of properties with specific cohorts. Where make good works are required, Government could match funding secured from the private sector to support activation costs and minimise the financial risk to CHP and support providers in delivery.

- Meanwhile use housing is not a systematic response to housing and homelessness and whilst useful, cannot offer the level of housing required to end homelessness. Having said that, it provides an immediate and pragmatic solution that reduces the cost borne by the individual (and by default other specialist services) as they wait for an allocation of public housing.

WCS recommends that the NSW and Federal Government:

- Commit to building the 16,810 social housing units needed in Australia to provide women and children escaping DFV with the long-term safety and security they need.⁹
- Conduct an audit across NSW to identify and purchase accommodation that may be appropriate for social housing, in consultation with community housing services, DFV services, and peak bodies.
- Conduct an audit of vacant and underutilised NSW Government assets to deliver meanwhile use projects and identify a preapproved pipeline of appropriate buildings.
- Develop a database of properties/assets available for meanwhile use to not for profit organisations.
- Convene a Community of Practice to refer properties for meanwhile use, match with suitable specialist services and share knowledge and resources.
- Implement minimum standards and guidelines for meanwhile use accommodation and consult with trauma-informed services when investigating properties for meanwhile use to ensure safety and appropriateness.
- Support CHPs to provide exits from meanwhile use housing into long-term housing.
- Provide funding and share the costs to facilitate meanwhile use opportunities, including start up, coordination and support costs.
- Include meanwhile use as complying development in the *State Environmental Planning Policy (Affordable Rental Housing) 2009* and the proposed new *Housing Diversity SEPP* to reduce barriers in the planning system and support easy activation of meanwhile use opportunities.
- Provide development and planning concessions on proposed Development Applications in recognition of the site being utilised and funded as a meanwhile use service for a period of time.
- Link developers and landholders to organisations achieving best practice in use of meanwhile properties. Organisations such as WCS can demonstrate the positive impact of meanwhile use on place-making, by seeing a building tenanted, thus improving safety, reducing risk of fires or squatters, and creating positive community connections.

WCS is committed to breaking cycles of homelessness and DFV, however, this is only possible with access to secure and affordable housing. We cannot stress enough the importance of building more social housing, and support in full, the recommendations of Homelessness NSW. However, while critical shortages of affordable housing options exist in NSW, meanwhile use

⁹ Equity Economics (2021)

projects offer an immediate alternative to meet the growing need and provide tangible benefits to vulnerable communities and specialist support services reducing the impacts for individual who face long wait periods for social housing.

WCS would welcome the opportunity to appear as a witness or to further support the Committee with its inquiry. We believe WCS can offer a unique perspective, based on our diverse experience in delivery of meanwhile use projects to support women with children and mature single women experiencing homelessness or DFV.

Thank you for the opportunity to provide a submission to the committee on this matter.

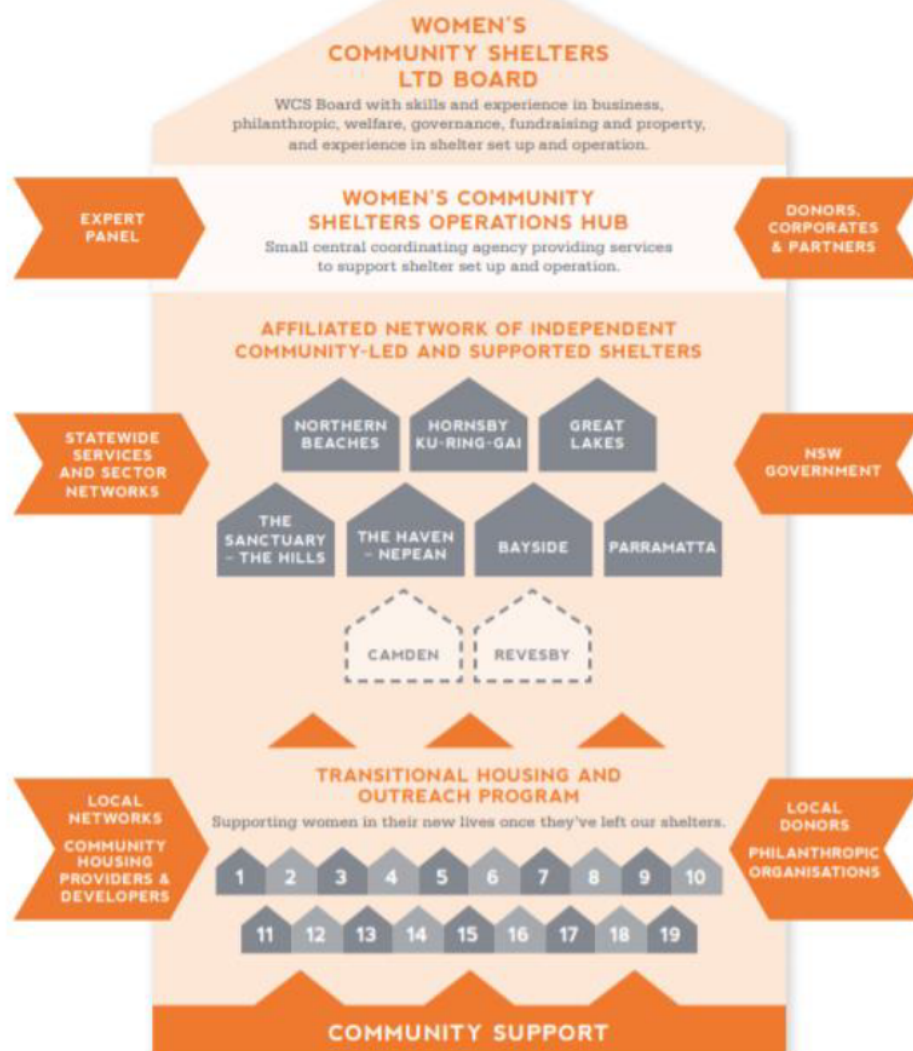
Appendix A: WCS Shelter Network

Social Franchise Model

Women's Community Shelters is a social franchise model.

The model is unique to Australia's homelessness and Domestic and Family Violence (DFV) sectors because it is supported by diversified funding from corporate and private philanthropy and community fundraising. It receives minimum Government funding for its shelters and its head office (Hub) is solely funded by philanthropy.

The diagram below illustrates our relationship with all stakeholders.



Appendix B: Proposed Draft legislative reforms

Meanwhile Use – short term supported accommodation.

We are proposing that the following draft Division 5 which sits under Division 4 Supported Accommodation in SEPP (Affordable Rental Housing) 2009. 'Meanwhile Use – short term supported accommodation' to be complying development.

Division 5 Supportive accommodation - Meanwhile Use

Development to which Division Applies

This Division applies only to existing residential, aged care or development, or Commercial Building to be used on a temporarily basis for up to 5 years for supportive accommodation.

Development Standards

The Division does not allow for the erection of any ancillary development facilities.

Development Standards

The Supportive accommodation - Meanwhile Use project must be managed by a registered Community Housing provider

Complying Development

Supportive accommodation - Meanwhile Use is defined as Complying development and may be undertaken without consent.

Subdivision Home businesses, home industries and home occupations

Development Standards

The standards specified for this development are that the development can involve a temporary change of building use for up to 5 years.

Note 1

The elements that must comprise this development are specified in the definition of **home business, home industry or home occupation** the Standard Instrument.

Note 2

Under the *Building Code of Australia*, a change of building use involving a floor area greater than 10% of the floor area of a building would cause the building to contravene the development standard.

Subdivision Minor Building Alterations (internal)

Specified Development

(1) minor internal building alteration for the replacement or renovation of -

(A) a doorway, wall, ceiling or floor lining, or

(B) a deteriorated frame member, including stairs and stairwells, or

- (C) a bathroom or kitchen, or
 - (D) a built-in fixture such as a vanity, a cupboard or a wardrobe, or
 - (E) an existing sanitary fixture, such as a grease trap or the like, or
 - (F) shelving or racking that is not higher than 2.7m, or
 - (G) a partition, work station or counter, is development specified for this code if it is not constructed or installed on or in a heritage item or a draft heritage item.
- (2) The installation of new or replacement insulation material in the ceiling, floor or wall of a building is development specified for this code.

Development Standards

The standards specified for that development are that the development must not

- (A) not cause reduced window arrangements for light and ventilation needs, reduce the size of a doorway or involve the enclosure of an open area, and
- (B) not affect the load bearing capacity (whether vertical or horizontal) of a building, and
- (C) not include a change to the fire resisting components of, or interfere with the entry to, or exit from, or the fire safety measures contained within, a building, and
- (D) if it is the installation of a partition, work station or counter—
 - (i) comply with the requirements set out in the *Building Code of Australia*, and
 - (ii) if located beneath a fire sprinkler—not be higher than 1.5m, and
- (E) if it is the installation of new or replacement insulation material in a dwelling, it must be in accordance with Part 3.12.1 of the *Building Code of Australia*, and
- (F) not affect an existing awning, or more than 25% of the gross floor area of an existing building to which an awning is attached, unless the awning complies with the requirements set out in BP1.1 and BP1.2 of Volume 1 of the *Building Code of Australia*.

Subdivision Minor Building Alterations (internal)

Specified Development

A minor internal non-structural building alteration, such as the following—

- (A) painting, plastering, cement rendering, cladding, attaching fittings or decorative work,
- (B) the replacement of an external window, glazing areas or a door (other than those on bush fire prone land),
- (C) the repair to or replacement of a non-structural wall or roof cladding,
- (D) the installation of a security screen or grill to a door or window or a security door,
- (E) the repair to or replacement of a balustrade,

(F) restumping or repairing structure foundations without increasing the height of the structure, is development specified for this code if it is not constructed or installed on or in a heritage item or a draft heritage item or in a heritage conservation area or a draft heritage conservation area.

Development Standards

The standards specified for that development are that the development must—

(A) not comprise the making of, or an alteration to the size of, any opening in a wall or roof, such as a doorway, window or skylight, and

(B) not reduce the existing fire resistance level of a wall or roof, and

(C) if located on bush fire prone land—

(i) be adequately sealed or protected to prevent the entry of embers, and

(ii) use equivalent or improved quality materials, and

(D) not affect any existing fire resisting components of the building, and

(D1) if the development involves cladding or is attaching fittings or decorative work—

(i) not be carried out on any building other than a 1 or 2 storey dwelling house, attached development or detached development, and

(ii) not involve the use of external combustible cladding, and

(E) not affect the means of egress from the building in an emergency, and

(f) if it is the installation of a security screen or grill to a door or window or a security door—

(i) be for the purposes of a dwelling, or

(ii) be for any other purpose so long as—

(A) the screen or grill is installed for a door or window that is situated at least 5m from the boundary of any road, or

(B) the security door is installed at least 5m from the boundary of any road, and

(C) not be under an awning, unless the awning complies with the requirements set out in BP1.1 and BP1.2 of Volume 1 of the *Building Code of Australia*.