



YWCA CANBERRA

**Submission to the National Housing and Homelessness Plan**



## **Acknowledgement of Country**

YWCA Canberra proudly recognises the rights of Aboriginal and Torres Strait Islander peoples to own and control their cultures and pays our respect to these rights. YWCA Canberra acknowledges the need to respect and encourage the diversity of Indigenous cultures and to respect Indigenous worldviews, lifestyles, and customary laws. We extend our respect to the Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and will continue to always be Aboriginal land.

## **About YWCA Canberra**

YWCA Canberra is a feminist not-for-profit organisation that has provided community services and represented women's issues in Canberra since 1929.

Our mission is 'Gender equity by strengthening communities and empowering girls and women through our services and advocacy' and our vision is 'Girls and women thriving'.

We provide essential, quality services for women, girls and families in the ACT and surrounding regions. We work in the areas of children's services, community development, homelessness and affordable housing, youth services, personal and professional training, women's leadership and advocacy.

We are externally accredited against the [Quality Improvement Council \(QIC\) Health and Community Service Standards \(7th Edition\)](#). Accreditation against the QIC standards support us to improve client and community engagement, diversity and cultural appropriateness, management systems, governance and service delivery, while committing to a cycle of continuous quality improvement. In addition to the QIC standards, we are accredited against the following external client related service standards for our key areas of work:

- [Australian Charities and Not for Profit Commission](#)
- [National Quality Standard for Early Childhood Education and Care and School Aged Care](#)
- [National Regulatory System for Community Housing](#)
- [Registered Training Organisations Standards](#)

Through our national Affiliate Association with YWCA Australia, we are part of the World YWCA network, which connects 120 countries across the globe.

## Introduction

YWCA Canberra welcomes the opportunity to provide a submission to the proposal for a National Housing and Homelessness Plan. As the plan outlines, the current crisis in housing in Australia is a confluence of factors around supply, demographic pressures, affordability, and zoning progress. As a provider of community welfare services, including tenancy support, brokerage funding and community housing, we are witnessing firsthand the increasing demand on housing and homeless services. Our frontline experience is also borne out in data that reflects how growing numbers of people in regular employment are struggling to afford housing<sup>1</sup>, how transitional housing has become *de-facto* long-term housing and how people languish for years on public housing waiting lists.

It was estimated that around 1700 people in the ACT were homeless on Census night 2021<sup>2</sup> which included around 700 women, 80 of whom were aged 55 and over. Concerningly there was also a 42 per cent increase, between 2016 and 2021, in the number of children aged 12 and under who were homeless. This is a deeply troubling shift in the representation of children among Canberra's homeless which is off trend with the decrease in homelessness as a proportion of population.<sup>3</sup> For women with children who are escaping violence, the intersection between poverty, crisis, and the sheer unavailability of housing can be understood in the context of this data trend.

Our submission draws attention to the following as core features to be included in the future National Plan:

- 1) The Plan, in responding to homelessness, must incorporate the principles of 'Housing First'.
- 2) Consideration must be given to increasing the supply of larger family homes within supported housing portfolios.
- 3) The role of specialist women's services in the delivery of homelessness services must be recognised and preserved.
- 4) Zoning reforms that preclude appeals against otherwise approved social and community housing proposals must be progressed nationally.

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<sup>1</sup> [state of the nations housing report 2022-23.pdf](#)

<sup>2</sup> Census of Population and Housing: Estimating Homelessness 2021, state and territory of residence all persons, table 2.9 <https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/latest-release#state-and-territories>

<sup>3</sup> While the number of people experiencing homelessness has increased as an overall number, the overall rate of homelessness as a proportion of population has slightly decreased.

- 5) Barriers to accessing Housing Australia finance be explored with a view to address blockages at the local level without penalising CHOs.

### **Housing First Principles**

Housing First is built upon the principle that housing is a human right and that a stable home is the foundation from which all other individual needs can be addressed. Addressing personal wellbeing issues such as alcohol and drug dependency, physical and/or mental health problems or therapeutic counselling needs are not a precondition of entry to housing. Rather 'housing first' acknowledges that only when housing is in place, can these significant welfare issues begin to be addressed. Central to the concept of housing first is that permanent housing is provided without a test of having to be 'housing ready'.

As a provider of diverse housing services including brokerage, transitional housing, and community housing we also provide housing support services, which draw upon Housing First principles, where the funding envelope allows. As one of the tenant support providers at [ACT Common Ground](#), we provide on-site services and support to clients in a housing first model and witness better long-term outcomes for individuals. In the drafting of a proposed National Plan, we urge housing first to be a critical component.



## The need for suitably sized family housing

A recurring issue encountered by our frontline staff relates to the suitability of existing supported housing stock for larger families. Data from the ACT Community Services Directorate shows a significant fall in the quantum of public housing stock between three- and four-bedroom dwellings (table 1). The shortage of larger dwellings has implications for potential over-crowding when children reach a certain age and should no longer be expected to share a bedroom with siblings. We urge that in developing the National Plan and in securing the buy-in from all state and territory governments, that consideration be given to lifting the supply of larger family homes across Australia's public and supported housing stock.

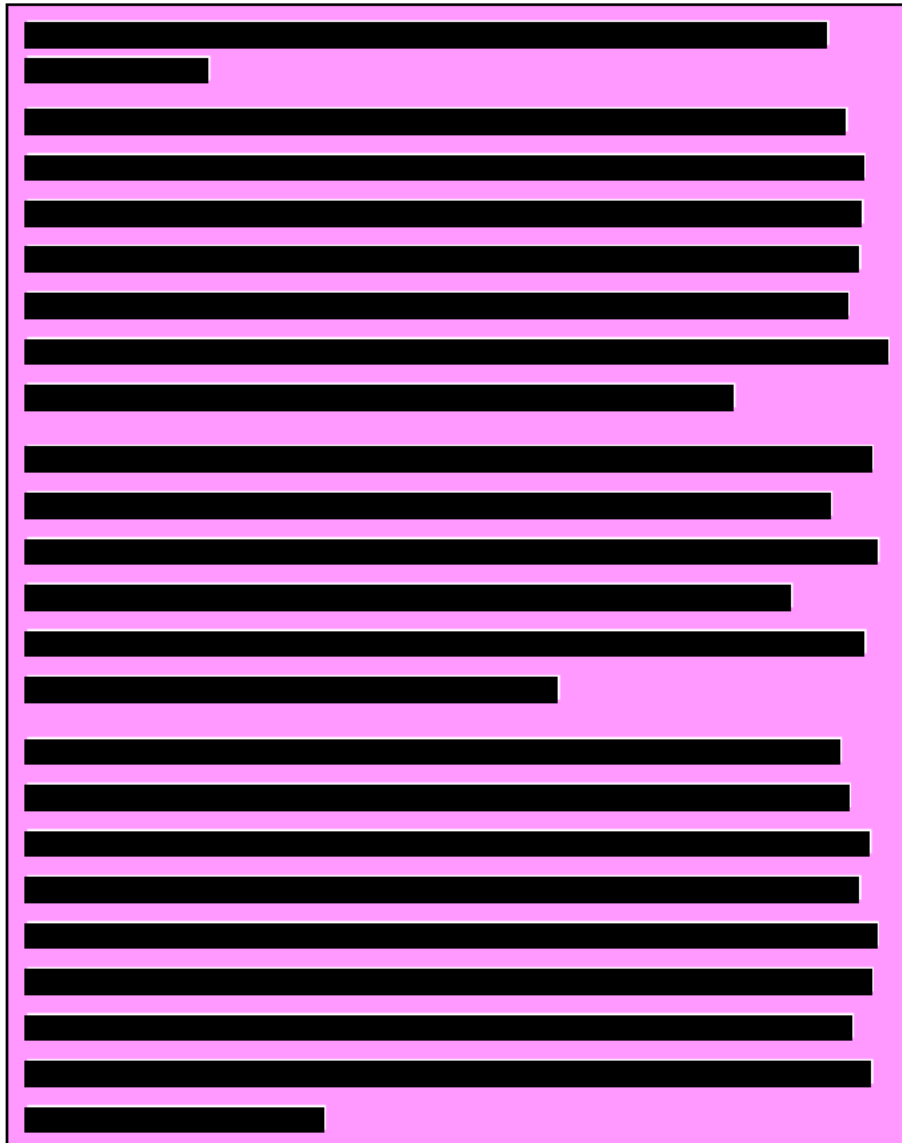
**Table 1: ACT Housing properties by size (number of bedrooms)<sup>4</sup>**

No. of bedrooms	Number	Percentage
1	1,974	17%
2	4,108	35.4%
3	4,274	36.8%
4	967	8.3%
5	224	1.9%
6+	65	0.6%



<sup>4</sup> [Community Services Directorate - Annual Report 2022-23 \(act.gov.au\)](#) (p. 102)

## The value of women's specialist homelessness services



Women's experiences of violence and inequality are complex and unique and intersectional identities such as race, ability, culture, gender identity and class can affect one's housing or homelessness journey and long-term recovery. Operating within a feminist framework means that our work recognizes that all violence and discrimination against women is the result of patriarchal power dynamics, rather than a collection of individual experiences.

As a specialist women's service, we recognise the link between violence and homelessness and acknowledges the unique role of women (as the typically protective parent) when violence is evident in the family unit. These intersectional experiences require individual and holistic responses. Mainstream services, while providing important client outcomes, typically do not operate from a feminist lens and are not equipped to manage the dynamic experiences that women encounter when enduring homelessness or crisis. As specialist service providers responding to women's lived experiences, the trust between the client and the service provider is paramount to achieving outcomes. The specialist nature of this work cannot be replicated by generalist services of government. We call on the drafters of National Plan to recognise

women's specialist services as a core element in the response to homelessness by both preserving and distinctly recognising our important role.

## **Zoning and planning considerations**

YWCA Canberra contributed to the Productivity Commission's review of the National Housing and Homelessness Agreement in 2022<sup>5</sup>, and was active in contributing to the ACT Legislative Assembly inquiry into the planning system<sup>6</sup>.

As a community housing provider and a recent development proponent, we have seen firsthand how planning and development regulations, and the appeals process, can be significant barriers to building new housing, particularly social and supported housing. We understand that the role of the Australian Government in planning and land use is extremely restricted. Accordingly, a proposed National Plan will need to maximise state, territory, and local government buy-in so as to manage the role that zoning reforms can play in delivering supply.

For too long, 'planning' has been a loaded term considered inherently suspicious by community groups with disproportionate influence looking to delay or permanently scuttle housing development. If Australia's metropolitan centres and particularly inner-urban areas are to ever contribute to or meet the future housing demands, sensible planning reform must be allowed to proceed.

Third party appeal rights vary across Australia and while limitations exist in terms of who can lodge an appeal and what developments can be exempt from appeals, there is no nationally consistent approach. In the ACT, for example, challenging a development proposal has an initial low-cost application fee, and is a no-cost jurisdiction. This means it is easier for vexatious applicants to make disingenuous appeals as there is no financial consequence. Community and social housing providers, however, operate transparently and with limited budgets to deliver on their mission and meet local housing need. The reality of our ability to meet the legal costs to respond to spurious and vexatious claims is often overlooked, impacting our risk-appetite to engage in similar developments into the future.

While it would require significant collaboration and support from state and territory governments, limitations for third party appeals must be given consideration in developing the National Plan. We support reforms where third parties are precluded from appealing otherwise approved social

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<sup>5</sup> <https://ywca-canberra.org.au/wp-content/uploads/2022/02/NHHA-Submission-YWCA-Canberra.pdf>

<sup>6</sup> <https://ywca-canberra.org.au/wp-content/uploads/2022/06/YWCA-Canberra-Planning-Review.pdf>

and community housing development applications that have undergone requisite good-faith, consultation and met the requirements of local government approval process.

#### **YHomes: The need for zoning reforms**

'Yhomes' is YWCA Canberra's supported housing development that will provide well-located, safe, and fit-for-purpose housing for women on low incomes to live independently. The mixed-use project will deliver nine studio apartments funded through YWCA Canberra resources, philanthropy and from the Department of Social Services (DSS) 'Safer Places' program. This project demonstrates the role of supported housing and affordable housing in meeting local housing demand, but also highlights the significant barriers to progress encountered by organisations who take on new housing projects.

YWCA Canberra encountered extensive delays throughout the ACT development application process related to anti-development sentiment that misrepresented the proposal, misrepresented the heritage status of the site and demonised future tenants. An appeal to the ACT Administrative Appeals Tribunal imposed a significant financial burden on our community service organisation and, as litigation dragged on for more than 12 months, put at significant risk the Safer Places funding.

It is imperative that the future National Plan consider the impact of vexatious litigation on the risk appetite of providers of community and supported housing, and the tangible consequences for those on low or fixed incomes who need supported or social housing in the immediate future.

## **Housing Australia**

Housing Australia (formerly the National Housing Finance and Investment Corporation (NHIFIC)) supports individual home ownership and the development and investment of more social and affordable housing by lowering the cost of finance and facilitating access to affordable land packages.

In most states and territories these land packages are released to community housing providers at affordable rates which assist CHOs in managing the 'funding gap' between the operational costs and the tenant's rental payment. In Canberra however, the accessibility of the financing lever under the NHIFIC model was variable, given the sale of land has significant value to the ACT Government's revenue stream.

It is our view, that the relationship between land release and the Territory's bottom line creates strong reluctance on the part of the Territory Government to release packages at affordable rates to CHOs. This substantial barrier thwarts community housing investment across a growing Canberra meaning more people whose only need is affordable rent are subsisting in unaffordable private rentals or turning to other forms of housing assistance. We believe that



addressing this balance between the urgent need for affordable land release packages and the demands of the ACT Government's bottom line must be addressed in the National Plan. In particular, we urge the new Agreement accommodate space for the Australian Government and relevant jurisdictions to negotiate a means to address the funding gap without penalising CHOs.