

HOMELESSNESS, SOCIAL HOUSING AND HOUSING AFFORDABILITY POLICY

Draft Policy Engagement Summary

April 2022

ACKNOWLEDGEMENT OF COUNTRY

The City of Adelaide acknowledges that we are located on the traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past, present and emerging.

We recognise and respect their cultural heritage, beliefs and relationship with the land. We also extend that respect to visitors of other Aboriginal Language Groups and other First Nations.

DOCUMENT PROPERTIES

Contact for enquiries and proposed changes

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1. SUMMARY

In response to the State Government's Homelessness and Housing Strategy – *Our Housing Future 2020-2040*, the City of Adelaide (CoA) prepared a draft Homelessness, Social and Affordable Housing Policy in order to clarify Council's role in relation to homelessness, social (public and community) and affordable housing. The draft Policy was approved by Council in April 2021 for engagement.

Between 24 January 2022 and 18 February 2022, CoA sought community feedback using a variety of online and social media channels on the Draft Homelessness, Social and Affordable Housing Policy as well as direct emails to key stakeholders. Hard copies of the consultation materials were also available at the customer centre, community centres and libraries.

Whilst informal consultation with key stakeholders had helped shape the drafting of the Policy the intention of the wider engagement was to:

- Inform key stakeholders of Council's proposed approach
- Seek feedback on the proposed policy and background paper to ensure the issues identified through the informal consultation process had been accurately portrayed
- Seek support for Council's proposed role in homelessness, social and affordable housing
- Seek input from stakeholders on how Council may best act as a facilitator and advocate for homelessness, social and affordable housing.

During the consultation 551 unique persons visited the Your Say Adelaide page, which resulted in 21 survey responses, 18 emailed responses and 29 social media responses. Analysis of the feedback produced the following key themes:

- Recommendations for changes to the Policy including:
 - Additional roles for Council to advocate or facilitate outcomes to improve homelessness, social and affordable services and housing, including through the utilisation of Council owned land.
 - Clarification/amendments to roles/actions identified in the policy.
 - Rename the Affordable Housing section to Housing Affordability to more accurately reflect the policy positions proposed.
- Recommendations for implementation of the Actions identified in the Policy including:
 - How and to whom CoA could advocate for greatest impact.
 - Leverage partnerships with the Local Government Association and other Councils, the homelessness and social housing sector and the community to advocate collectively for funding.
- Comments on Councils roles in the Homelessness, Social and Affordable Housing sectors
 - General support for the roles identified in the Policy.
 - Some requests for Council to deliver services and housing.
 - Some comments that it is the responsibility of State and Federal Governments.

2. BACKGROUND

The draft Homelessness, Social and Affordable Housing Policy was written after the delivery of the State Government's Homelessness and Housing Strategy - *Our Housing Future 2020-2040* in December 2019.

The scope of the draft policy has been aligned with the approach taken by the State Government to include the whole housing spectrum, acknowledging that homelessness is inter-connected with the housing spectrum.

The purpose of the draft policy is to clarify CoA's role in relation to homelessness, social housing (public and community) and affordable housing.

For completeness, it also outlines CoA's role in relation to private housing as CoA can influence this sector through rate rebates.

In reviewing the policy after engagement, it was apparent that the policy positions under the Affordable Housing and Private Housing sections were more appropriately combined and identified as Housing Affordability matters.

The policy seeks to provide a clear framework for decision making for this complex and important area of public policy, particularly in light of the impacts arising from the Covid-19 pandemic.

The policy supports CoA's vision of becoming the most liveable city in the world. Housing Affordability is a key component of liveability. It also supports CoA's aspirations to achieve well planned and inclusive residential population growth, functional zero homelessness and improved health and housing outcomes for vulnerable people and young people.

3. CONSULTATION – WHAT WE DID

Between 24 January and 18 February 2022, CoA consulted with key stakeholders using a variety of engagement methods. These methods included online via Your Say Adelaide, social media and targeted emails to key stakeholders, as well as hard copies at the customer centre, community centres and libraries.

The target for the campaign was to receive 40 responses to the survey on the Draft Policy.

The public were informed of the consultation through providing notice via:

- The Your Say Adelaide page
- The City's libraries, Community Centres and Customer Centre with supporting consultation information for public display
- A direct email campaign, including emails to:
 - Resident groups
 - Frontline service provider organisations
 - Key stakeholder organisations
- Social media.

Consultation was facilitated by:

- An online survey
- A dedicated email address
- A hard copy feedback form

- Offering online meetings (during Covid-19 restrictions).

4. RESPONSES

Feedback on the Draft Homelessness, Social and Affordable Housing Policy was received by direct email, through the Your Say Adelaide surveys and in comments made on social media.

Email responses were largely from key stakeholders across the sector, with survey responses via the Your Say Adelaide online platform generally from residents and the general public.

Your Say Adelaide

The Your Say Adelaide page received 551 visits of which:

- 439 were 'aware' visitors, unique visitors who visited the page as individuals or as individuals visiting on behalf of organisations
- 182 were 'informed' visitors, who explored the available consultation materials
- 24 were 'engaged' visitors, who submitted feedback through the online engagement tools available (submission form, guestbook etc)
- 2 individuals submitted feedback by email.

Targeted emails to Stakeholder Organisations

Targeted emails were sent to 77 key stakeholder organisations (State Government, Community Housing Providers, Not for Profit Organisations, Homelessness Service Providers, Peak Bodies, Private Sector, Community Groups and Precinct Groups), with reminder emails sent two weeks before and two days before the end of the engagement period.

In response, CoA received:

- 14 emails and letters (an 18% response rate)
- one meeting request (meeting held mid-March 2022).

Social Media

Social media posts received 29 responses. The majority were 'likes' and short comments, although one person gave an extended response across multiple posts.

5. KEY FINDINGS

The consultation produced reasonable feedback (see Appendix 4). Analysis of the feedback produced the following key themes:

- Recommendations for changes to the Policy including:
 - Additional roles for Council to advocate or facilitate outcomes to improve homelessness, social and affordable services and housing, including through the use of Council owned land or partnerships.

- Clarification/amendments to roles/actions identified in the policy.
- Recommendations for implementation of the Actions identified in the Policy including:
 - How and to whom CoA could advocate for greatest impact
 - Leveraging Council's partnerships with the Local Government Association and other Councils, the sector and the community to advocate collectively for funding.
- Comments on Councils roles in the Homelessness, Social and Affordable Housing sectors:
 - General support for the roles identified in the Policy
 - Some requests for Council to deliver services and housing
 - Some comments that it is the responsibility of State and Federal Governments

6. WHAT CHANGED?

In response to the submissions received the following changes have been made to the Policy, including renaming it the Homelessness, Social Housing and Housing Affordability Policy.

Homelessness:

Additional roles around advocacy of culturally appropriate accommodation and services for Aboriginal People.

Advocacy for whole of government responses to address systemic barriers to access to services and supports.

Ensuring advocacy for increased funding for the homelessness sector includes specific funding for prevention and early intervention programs based on quality data and evidence.

Social Housing

Additional facilitation role to reflect legislative obligations for rate rebates for community housing providers.

Facilitation of networks between social and community housing providers and private developers.

Housing Affordability

Amend references to National Rental Affordability Scheme (NRAS) to more generically seek to advocate for subsidised rental housing programs, given NRAS is not continuing.

Facilitate 'key city worker' and affordable housing as part of residential and mixed-use development on Council land, where demand and opportunity exists.

Amend the title of this section of the policy to Housing Affordability to more accurately reflect the policy statements and areas covered.

7. EMAIL AND LETTER SUBMISSIONS RECEIVED

The following is a summary of the 16 written submissions received.

Submissions were received from 14 stakeholder organisations and 2 individuals.

The stakeholder responses were in response to targeted emails sent to 77 key organisations (State Government, Community Housing Providers, Not for Profit Organisations, Homeless Service Providers, Peak Bodies, Private Sector, Community Groups and Precinct Groups) and the feedback received by email was from highly informed and knowledgeable experts in the areas being addressed in this policy.

Responses to the Draft Homelessness, Social and Affordable Housing Policy are summarised below:



Policy change/action








Will inform advocacy and implementation





Outside scope/ no change

SA Housing Authority




Comment	Response	
<ul style="list-style-type: none"> • Agree in principle with the proposed roles of CoA within the housing and homelessness sectors. • Consider CoA could partner with the sectors beyond facilitation and advocate to deliver appropriate solutions across the housing spectrum. • SA Housing Authority (SAHA) has developed an Affordable Housing Toolkit – available from April 2022. 	<p>Note support and suggested additional roles.</p> <p>The Policy has been updated to include that Council will have a role to facilitate ‘key city worker’ and affordable housing as part of residential and mixed-use developments on Council owned land where demand and opportunity exists.</p> <p>Council looks forward to utilising the Affordable Housing Toolkit once available.</p>	
<ul style="list-style-type: none"> • Recommend Council establish formal connections with Peak bodies, government and non-government organisations to determine an appropriate approach for identifying programs and initiatives that would benefit from CoA support. • Establish a Community of Practice forum with the LGA in relation to the development and implementation of Local Housing Plans. 	<p>Council has existing connections in relation to the homelessness sector, however as part of the development of a Local Housing Plan further connections can be considered, including linkages with the LGA.</p>	
<p>Suggest CoA develop informed proposals that demonstrate high levels of support from key stakeholders, and evidence-based data around successful project models and the</p>	<p>CoA already maintains relationships with a wide range of stakeholders and will continue to engage to develop advocacy positions in the future.</p>	

links between stable, secure housing and wellbeing.		
Link into work by the South Australian Aboriginal Community-Controlled Network.	Council has not previously been involved in working with the South Australian Aboriginal Community-Controlled Network, however will give consideration to appropriate linkages and liaise with SAHA as required.	
<ul style="list-style-type: none"> • Advocacy should not just be for funding for homelessness but also how CoA can connect interested parties with the Toward Home program. • Council has a key role in providing local knowledge and additional information for services and other levels of government – both in terms of data and observations (eg Street Connect Website). • Maintaining CoA connections with Housing SA regional office is vital. • SAHA interested in engaging with CoA to share information regarding the homelessness sector and can provide support and context as a subject matter expert. 	<p>The Policy has been updated to include Council as a facilitator of networks and participate in Communities of Practice, as well as expanding the advocacy role for increased funding for the homelessness sector to include specific funding for prevention and early intervention programs, based on quality data and evidence.</p> <p>Council provides local knowledge and will continue our relationship and engagement with SAHA through the Homelessness and Vulnerable People Project and general networks.</p>	
<p>CoA has key role in:</p> <ul style="list-style-type: none"> • The Inner-City Sub-Committee, • Supporting the governance of the Toward Home Alliance, • Continuing support for the next evolution of services after Puti on Kurna Yerta. 	Noted, Council will continue its role in these areas.	
<ul style="list-style-type: none"> • Advocacy should seek to connect interested parties in development initiatives to renew and modernise social housing (not just for increased funding). 	The Policy has been amended to include Council advocating to the State Government to create networks between social and community housing providers and private developers.	
<ul style="list-style-type: none"> • Work with the SAHA to understand resourcing constraints, opportunities and initiatives to modernise public housing. • Work with Community Housing providers to increase options, which could be delivered through rebates, grants etc. 	<p>Council will continue relationship and engagement with SAHA.</p> <p>The Policy has been updated to reflect Council's role in facilitating community housing through rate rebates.</p>	







Homelessness, Social Housing and Housing Affordability Policy

<ul style="list-style-type: none"> • Advocacy should seek to connect interested parties in development initiatives to develop affordable housing options (not just for increased funding and Mandatory Inclusionary Zoning (MIZ)). • Support MIZ to provide a level playing field. • Recommend proposed Policy response include a supporting role through adoption of a 15% affordable housing policy as part of CoA urban renewal and development planning. 	<p>The Policy has been updated to include a role for Council to facilitate key city worker and affordable housing as part of residential and mixed-use developments on Council owned land where demand and opportunity exists.</p>	
<p>Suggests CoA work in partnership with Consumer and Business services to understand constraints, challenges and opportunities for improvement to the <i>Residential Tenancies Act 1995 (SA)</i></p>	<p>Suggestion noted and will be taken into consideration through advocacy work.</p>	






SA Department of Human Services

Comment	Response	
<p>Broadly supportive of the Policy but would suggest including specific reference to vulnerable people that the Policy will support, including Aboriginal people, people experiencing domestic and family violence and people living with disability.</p>	<p>A definition of vulnerable people has been added to the Policy to clarify who the Policy will support.</p>	
<p>Include mechanisms for how Council will partner and advocate for improved housing outcomes.</p>	<p>How Council will partner/facilitate and advocate on issues will be determined on a case by case basis.</p> <p>Council's Residential Housing and Growth Action Plan includes actions for advocacy for improved housing outcomes.</p>	
<p>Clarify how CoA will engage with CoA residents to ensure a broad range of voices are heard to inform CoA's direction.</p>	<p>Engagement with CoA residents is undertaken in accordance with Council's Public Consultation Policy as required depending on the nature of projects or work proposed.</p> <p>Engagement on the draft Policy included opportunities for feedback from Council's residents.</p>	







Anglicare SA Housing Services

Comment	Response	
<ul style="list-style-type: none"> AnglicareSA has an active role in delivering the State Housing Strategy. Significant need to ensure people can access safe, affordable, secure housing in metropolitan areas. Sectors, stakeholders and services must collaborate and provide holistic accessible and consistent responses for people. Support Council as advocate and facilitator across the sectors. 	Noted.	
<ul style="list-style-type: none"> Increase the number of successful mixed tenure sites – such as UCity and UNO building. Council can use land holdings to support increase in social and affordable housing. 	The Policy has been updated to include a role for Council to facilitate 'key worker' and affordable housing as part of residential and mixed-use developments on Council owned land where demand and opportunity exists.	
<ul style="list-style-type: none"> Advocate for the release of land pockets or older buildings with the ask that the building sector invite the community housing sector to discussion early in the planning stage. Affordable long term rental requirements can also be included in developments with the stipulation developers work with community housing providers to purchase / manage these. 	<p>Advocacy information will be used to inform Council's advocacy work.</p> <p>The Policy has been updated to include Council advocating to the State Government to create networks between developers and community housing providers.</p>	 
<ul style="list-style-type: none"> AnglicareSA involved with Adelaide Zero Project (AZP) – support Council's continuation of both in-kind and financial support for this Function Zero approach. Anglicare Housing believes the Housing First approach must have support services attached and funding to assist delivery. 	Noted.	
<ul style="list-style-type: none"> Support rebates that assist South Australians to home ownership. If it proceeds AnglicareSA would promote the scheme to support customers take the step towards home ownership. AnglicareSA has piloted a Rent to Buy scheme in Bowden – happy to discuss further with CoA. 	<p>AnglicareSA's support for and promotion of any rate rebate schemes is welcomed.</p> <p>Council's Residential Housing and Growth Action Plan seeks to investigate alternative housing models. AnglicareSA's offer to discuss experience with a Rent to Buy Scheme is noted and will be considered as investigations progress.</p>	


Homelessness, Social Housing and Housing Affordability Policy

<ul style="list-style-type: none"> • Council could enter into development and management agreements with CHPs to develop sites around the city for long term social and affordable rent. 	<p>The Policy has been updated to include a role for Council to facilitate 'key worker' and affordable housing as part of residential and mixed use developments on Council owned land where demand and opportunity exists.</p>	
<ul style="list-style-type: none"> • Facilitate state and local govt sessions with private and NFP sector to consider how to increase social and affordable housing within the CBD and how we create and connect communities. Bring together state government departments whose portfolios span these areas. • The public housing transfer of homes to AnglicareSA will benefit CoA. Redevelopment Plan underway (more details in submission). 	<p>The Policy has been updated to include Council advocating to the State Government to create networks between developers and community housing providers.</p> <p>Noted.</p> <p>Council will consider these suggestions when undertaking advocacy work.</p>	 
<ul style="list-style-type: none"> • Advocacy should focus on a whole of government approach which leads to much greater impact. • All advocacy should be based on facts and use of research to articulate the evidence base and increase the individuals ability to contribute to the economy. 	<p>Noted. Council will consider these suggestions when undertaking advocacy work.</p>	
<ul style="list-style-type: none"> • Advocacy for community housing should seek to: <ul style="list-style-type: none"> o Unlock potential development sites at discounted rates o Introduce AnglicareSA Housing to current and future owners interested in philanthropic support o Introduction of a specialist gap funding solution as per the National Rental Affordability Scheme (NRAS) o Remove the NIMBY thinking that still exists by education program support o Fund support services with a prevention fund to assist sustainable tenancy and Housing First principles. 	<p>Noted. Council will consider these suggestions when undertaking advocacy work.</p>	

Anglicare SA Community Services

Comment	Response	
<ul style="list-style-type: none"> Facilitate and support culturally appropriate accommodation and services for Aboriginal people experiencing, or at risk of homelessness or housing insecurity: <ul style="list-style-type: none"> Learn from Puti on Kaurna Yerta Partner with other Councils, cultural authority, and services outside the city. 	<p>Noted.</p> <p>The Policy has been updated to include an action to advocate and support culturally appropriate accommodation and services for Aboriginal people experiencing or at risk of homelessness or housing insecurity.</p>	 
<ul style="list-style-type: none"> Fund/advocate for more investment in early intervention and prevention of homelessness/housing insecurity including: <ul style="list-style-type: none"> Private rental subsidies Early intervention and prevention – target grants program to services and initiatives that can effectively and immediately support people before they enter homelessness. Council consider its significant land holdings to support an increase in social and affordable housing within the City increasing the CBD population and activation. 	<p>Note support for Policy intent and additional points for advocacy.</p> <p>Council will consider these suggestions when undertaking advocacy work.</p> <p>The Policy has been updated to include a role for Council to facilitate key worker and affordable housing as part of residential and mixed use developments on Council owned land where demand and opportunity exists.</p>	 
<ul style="list-style-type: none"> Facilitate/collaborate with LGA and whole of Government efforts: <ul style="list-style-type: none"> Greater coordination across place-based efforts – advocate for coordinated approach through the LGA Advocating for whole of government responses across all tiers of government to address systemic barriers to access to services and supports 	<p>Note suggestions for using role to collaborate for stronger advocacy and address barriers to accessing services and support.</p> <p>The Policy has been updated to include advocacy for whole of government responses to address systemic barriers to access to services and supports.</p>	 





Shelter SA





Comment	Response	
<ul style="list-style-type: none"> Advocate to the State Government to increase the net supply of social housing. Like to see greater regulation of and licensing of boarding houses to ensure adequate standards are being met and residents have access to legal rights. 	<p>Council will consider these suggestions when undertaking advocacy work.</p>	

Homelessness, Social Housing and Housing Affordability Policy



<ul style="list-style-type: none"> • Support inclusionary zoning – with focus on social rather than affordable housing – encourage Council to explore this. • Develop empty homes program to activate vacant properties - incentives to tenant properties. • Advocacy around renting – information provided about changes they would like to see, including renters access to rights and issues of availability and affordability are addressed. 		
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Adelaide Day Centre for Homeless Persons Inc.



Comment	Response	
<p>Suggest that Council buy empty warehouses and commercial buildings and re-purpose them for accommodation.</p>	<p>Direct provision of housing by Council is outside the scope of the Policy.</p> <p>Through Council's Residential Housing and Growth Action Plan investigations will be undertaken into ways to remove or address barriers to adaptive reuse.</p>	<p></p> <p></p>
<p>Suggestions for issues for Council to advocate to State Government about –</p> <ul style="list-style-type: none"> • To stop destruction and sale of current public housing dwellings in the CoA area, unless in a state beyond repair. It would be cheaper to repair and renovate than completely rebuild. • To stop any private/public housing schemes and handing over public housing to community housing providers. • Allocate enough money to keep public housing in good condition. • Employ permanent tradespeople with an emphasis on quality work. • Consult with not-for-profits, such as Adelaide Day Centre for Homeless Persons Inc, when developing housing plans as they are authoritative sources of information. • Rents should be charged as a percentage of income – and no more than 25-30% of total income to avoid rental stress. 	<p>Council's Residential Housing and Growth Action Plan seeks to investigate alternative housing models that deliver affordable living opportunities and advocate to the State Government to establish a new partnership entity between agencies of government, Council, community housing providers, industry and development groups that can oversee and/or be vested with a key responsibility to deliver significant affordable, social and specialised housing in the city and activating and/or expanding existing joint project arrangements for the same.</p> <p>To align the Policy with the action above, the Policy has been updated to include Council advocating to the State Government to create networks between developers and community housing providers.</p> <p>Council will consider these suggestions when undertaking advocacy work.</p>	<p></p> <p></p>

<ul style="list-style-type: none"> • Environmental considerations in building development/demolition. • Reuse of commercial buildings for accommodation. • Providing community areas in new and existing projects to encourage social interaction, minimise social isolation and provide play areas for children. • Research and utilisation of efficient dwelling construction using latest technology techniques, as well as the potential to use uncommon, innovative and environmentally friendly materials – eg Christie Walk. <p>Key contacts for Council to consult with who are valuable sources of information</p>		
<p>Comments provided through the survey:</p> <ul style="list-style-type: none"> • Mandatory Inclusionary Zoning should be a focus for advocacy – push for residential growth will increase property and rental prices. • Advocacy for replacement for National Rental Affordability Scheme (NRAS) should seek permanent program unrelated to Covid. 	<ul style="list-style-type: none"> • The Policy includes Council advocating for Mandatory Inclusionary Zoning. • The Policy has been updated to advocate for new subsidised rental accommodation program(s) in light of the cessation of NRAS (and remove reference to Covid 19). 	
<ul style="list-style-type: none"> • Support community grants, public realm and rate rebates elements of Policy. 	<p>Note support.</p>	
<ul style="list-style-type: none"> • Look for opportunities for CoA to employ homeless at events etc. 	<p>Opportunities are available for relevant organisations who support employment through the Community Impact Grants program.</p>	
<ul style="list-style-type: none"> • Consider the Adelaide Zero Project (AZP) a failure – use an Australian based initiative rather than US model. 	<p>Note views on the AZP, Council is a lead partner in the program and will continue this role.</p>	




Australian Alliance to End Homelessness

Comment	Response	
Support for Policy and roles identified for Council.	Noted.	
Add action under Social Housing: <ul style="list-style-type: none"> CoA will advocate to the State and Fed Govt for increased funding for the supportive housing identified by the Adelaide Zero Project (AZP) By-Name List to end chronic rough sleeping homelessness in the CoA. 	Council's involvement as a lead partner in the AZP and the advocacy proposed for increased funding for social and community housing is considered to sufficiently address this without the need to amend the Policy.	





Community Housing Ltd.

Comment	Response	
General support for the policy in terms of roles and in house support/funding for program deliver.	Note support.	
Strongly urge CoA to consider utilisation of land assets to facilitate the development of social/community/affordable housing for greatest impact.	The Policy has been updated to include a role for Council to facilitate 'key worker' and affordable housing as part of residential and mixed-use developments on Council owned land where demand and opportunity exists.	



The Big Issue and Homes for Homes

Comment	Response	
Integrating Homes for Homes across residential developments provide sustainable and long-term source of new funding to support the creation of social and affordable housing.	Note the background about Homes for Homes provided in the submission	
Include Homes for Homes into the Policy: <ul style="list-style-type: none"> Regulate planning rules to reward applicants for participating in Homes for Homes, eg by providing uplift or application fast track benefits; and Requiring Homes for Homes into tender processes or joint venture projects apply to new land release or surplus land sales undertaken by CoA. 	<p>Note suggested changes to the Policy. There are a number of housing programs available, so it is not appropriate to identify just one in the Policy.</p> <p>The Policy has been updated to include Council advocating to the State Government to create networks between developers and community housing providers.</p>	 






Purple Orange

Comment	Response	
<p>People living with disability are overrepresented in social and community housing – not always fit for purpose.</p> <p>Confirm in alignment with Council's Disability Access and Inclusion Plan.</p>	<p>Comments noted.</p> <p>There is a DAIP action to advocate for delivery of housing outcomes for people living with disability.</p>	
<ul style="list-style-type: none"> • Policy should include specific reference to the housing needs of people living with disability. • Include definition of vulnerable people in Policy. • Policy should include details of how CoA will use planning instruments to support people living with disability to fully participate in community life – including affordable housing and liveability goals. 	<p>A definition of vulnerable people has been added to the Policy, which includes people living with a disability.</p> <p>The DAIP addresses how Council will use planning instruments to support people living with disability.</p>	 
<p>Advocate for inclusion of universal design in NCC and P&D Code.</p>	<p>Council has previously raised this through the development of the Planning and Design Code.</p> <p>Advocacy for inclusion in the NCC and the Code will continue through the Residential Housing and Growth Action Plan.</p>	








ACH Group




Comment	Response	
<p>Support for Policy and roles identified for Council, including:</p> <ul style="list-style-type: none"> • Advocacy in the social housing sector • Advocacy on a replacement/s to National Rental Affordability Scheme (NRAS) • Advocacy for national approach to Mandatory Inclusionary Zoning. 	<p>Note support.</p>	
<p>Need the involvement of Council and industry groups to get building designs right (ie universal design) for older people.</p>	<p>Council has previously raised this through the development of the Planning and Design Code.</p> <p>Advocacy for inclusion in the NCC and the Code will continue through the Residential Housing and Growth Action Plan.</p>	

Homelessness, Social Housing and Housing Affordability Policy



Housing Stress – clarify whether median income of \$65,000 is gross or net.	The definition of housing stress in the Policy has been updated to clarify this is gross income.	
Clarify what is meant by Council's role as facilitator - and what is the commitment for in-kind/financial support.	Definition of facilitator added to the Policy. Commitments are managed between individual agreements and annual priorities on a case-by-case basis.	 
<ul style="list-style-type: none"> Council should seek to bring together various housing providers and other stakeholders to build momentum and strategic alignment. Envisage an opportunity to co-design policies with those who are impacted. 	<p>The Policy has been updated to include Council advocating to the State Government to create networks between developers and community housing providers.</p> <p>Council will consider these suggestions when undertaking advocacy work.</p>	 

Australian Institute of Architects


Comment	Response	
<ul style="list-style-type: none"> Create more active policies with a focus on addressing homelessness such as City of Perth Safe Night Space and City of Melbourne Make Room (AIA note services are not directly provided by CoA). Rate rebates or rate premiums for long term unoccupied sites to be allowed to use for housing. Identify sites for temporary modular homes and co-ordinate land owners with service providers. Puti on Kaurna Yerta type programs. Need accurate data. Include measurable targets. 	<p>Comments and suggested changes noted.</p> <p>Policy updated to include that Council will advocate for culturally appropriate accommodation and services for Aboriginal people.</p> <p>The Policy's role is to provide clarity on Council's position on any upcoming opportunities.</p> <p>Targets are considered outside the scope of the Policy as there are not specific deliverables by the Policy.</p>	   
<p><u>Homelessness:</u></p> <ul style="list-style-type: none"> Actively support temporary housing initiatives – examples given. Co-ordinating different providers, assessing current services, analysing gaps and establishing a network that is easily accessible – this work done as part of partnership with Adelaide Zero Project (AZP) but should be more prominent in Policy. 	<p>Comments and suggested changes noted.</p> <p>Policy updated to include that Council will facilitate networks of providers in the homelessness sector and participate in Communities of Practice.</p> <p>Council will consider these suggestions when undertaking advocacy work.</p>	  

<ul style="list-style-type: none"> Physical and emotional wellbeing of rough sleepers should be prioritised. Residential growth should not be at the expense of pushing rough sleepers out. 		
<p><u>Social Housing</u></p> <ul style="list-style-type: none"> Lack of detail about what advocacy for funding for Community Housing would entail – ie mandates for inclusion in private developments, though a Code Amendment etc? Advocacy to remove requirements for social housing to meet open market standards should be included in the Policy. 	<p>Advocacy work will be undertaken on a case by case basis so may vary in what it entails.</p> <p>Information provided will be considered when Council undertakes advocacy work.</p>	
<p><u>Affordable Housing</u></p> <ul style="list-style-type: none"> Lack of suitable supply is a key issue. Advocate for additional incentives in the Code to make affordable housing more viable for developers. Adaptive reuse too much red tape and complex issues – AIA supports Council's Heritage Incentives Scheme. AIA support further opportunities for adaptive reuse to provide diversity of housing – include in the Policy as an initiative for Council. 	<p>Noted.</p> <p>Council is investigating opportunities for adaptive reuse through the concurrent Residential Housing and Growth Action Plan – however Council is aware that adaptive reuse is not always a form of development that can be delivered in the affordable price range.</p>	
<p><u>Private Housing</u></p> <ul style="list-style-type: none"> Lack of diversity of supply is a challenge. Advocating for demonstration projects should be included in the Policy (ie Nightingale etc). Commit to inclusion of alternative housing models when partnering with private developers (ie Central Market Development). Policy should include how Council can facilitate rent to own development opportunities. Concern with the waiving of foreign buyer's surcharge as may exacerbate existing affordability issues. 	<p>Comments noted.</p> <p>Council supports a greater diversity of housing to cater for all households in an affordable manner.</p> <p>Council is investigating a number of alternative housing models through the Residential Housing and Growth Action Plan.</p>	



Urban Development Institute of Australia

Comment	Response	
<ul style="list-style-type: none"> Local government fees and charges can provide a barrier and contribute to increased costs, impacting both affordable and social housing. Other costs, ie temporary works permits, infrastructure contributions are significant barrier to Community Housing Providers. Acknowledge rate rebates and are grateful. 	Note comments.	
Do not support Mandatory Inclusionary Zoning (MIZ).	<p>Note UDIA's position on MIZ, as outlined in its response to the State Government's 'Housing, Homelessness and Support Strategy'.</p> <p>Remaining feedback received through the engagement showed support for Council's position to advocate for MIZ.</p>	

South-East City Residents Association Inc.




Comment	Response	
<ul style="list-style-type: none"> Support Council as advocate to State and Federal Government. Council may partner with other levels of government but should not direct or be major source of funding for such programs. Push for residential growth should not be at the expense of preserving amenity for existing residents / visitors / workers in the city. Recognition of role of residents, particularly in South East who donate time and money to assist and support existing homelessness and crisis accommodation. 	<p>Support and comments noted.</p> <p>Residential growth is one part of Council's key strategic goal to make Adelaide the most liveable city in the world. As such, growth must be supported by complementary amenity, lifestyle, economic and environmental benefits.</p> <p>Council acknowledges the role of residents in supporting existing homelessness and crisis accommodation.</p>	

Individual Response – 1

Comment	Response	
<p>General comments – particularly around what makes for a liveable city – need to define what a liveable city is.</p> <p>Key issues are:</p> <ul style="list-style-type: none"> Amenity and plantings 	<p>Comments noted, this feedback is also useful towards City Plan that is in development now.</p> <p>In light of the cessation of the NRAS program the Policy has been amended to include advocacy to the State and Federal</p>	 

<ul style="list-style-type: none"> • Less traffic. • Good public transport. • Housing designed for purpose and with appropriate facilities/infrastructure/amenities to support residents. • Who should provide housing – not just private developers – include residents in design stage. • What will happen now the National Rental Affordability Scheme (NRAS) finished? 	Governments for new subsidised rental program(s).	
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Individual Response – 2

Comment	Response	
<ul style="list-style-type: none"> • Hidden issue in housing is artists and dissidents. • Housing SA has powers to evict – so probationary tenancies should be provided. • Housing for entrepreneurs. • Lack of urban renewal - now relies on government or social housing. • More diversity of housing required. 	<p>Comments noted.</p> <p>Council supports a greater diversity of housing to cater for all households in an affordable manner.</p>	
<ul style="list-style-type: none"> • Supports CoA advocating for increased funding for subsidised rental accommodation. 	<p>Comments, links to further information and support noted.</p> <p>In light of the cessation of the National Rental Affordability Scheme the Policy has been amended to include advocacy to the State and Federal Governments for new subsidised rental program(s).</p>	 

All verbatim feedback is provided at the end of this report (Appendix A)

8. YOUR SAY ADELAIDE SUBMISSIONS RECEIVED

The Your Say Adelaide online engagement ran from 24 January to Friday 18 February 2022.

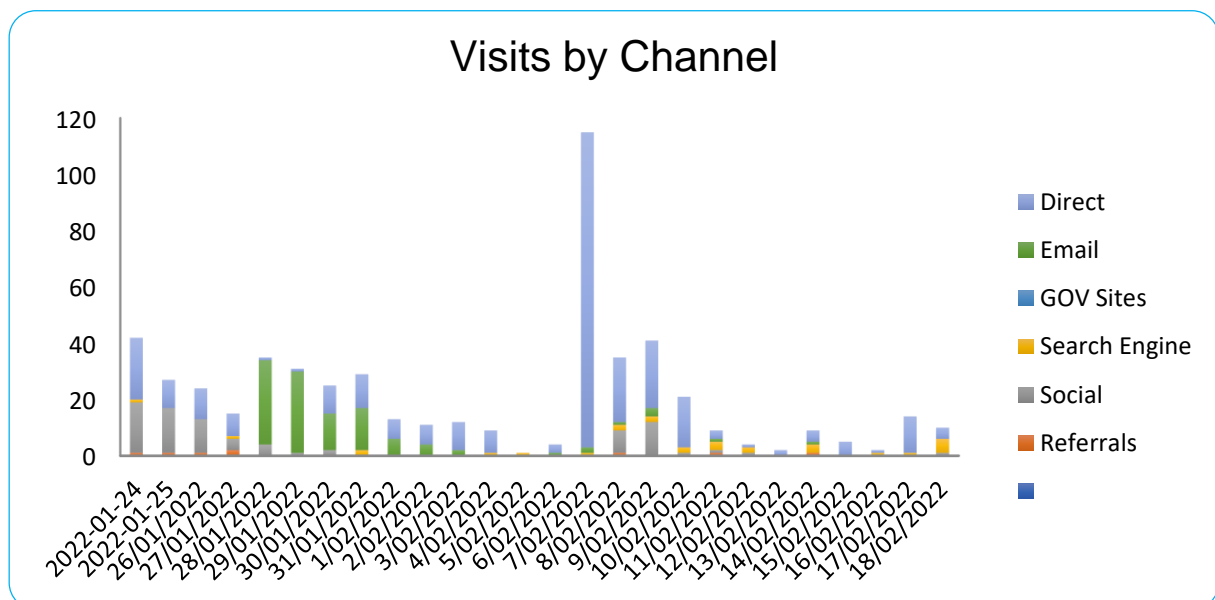
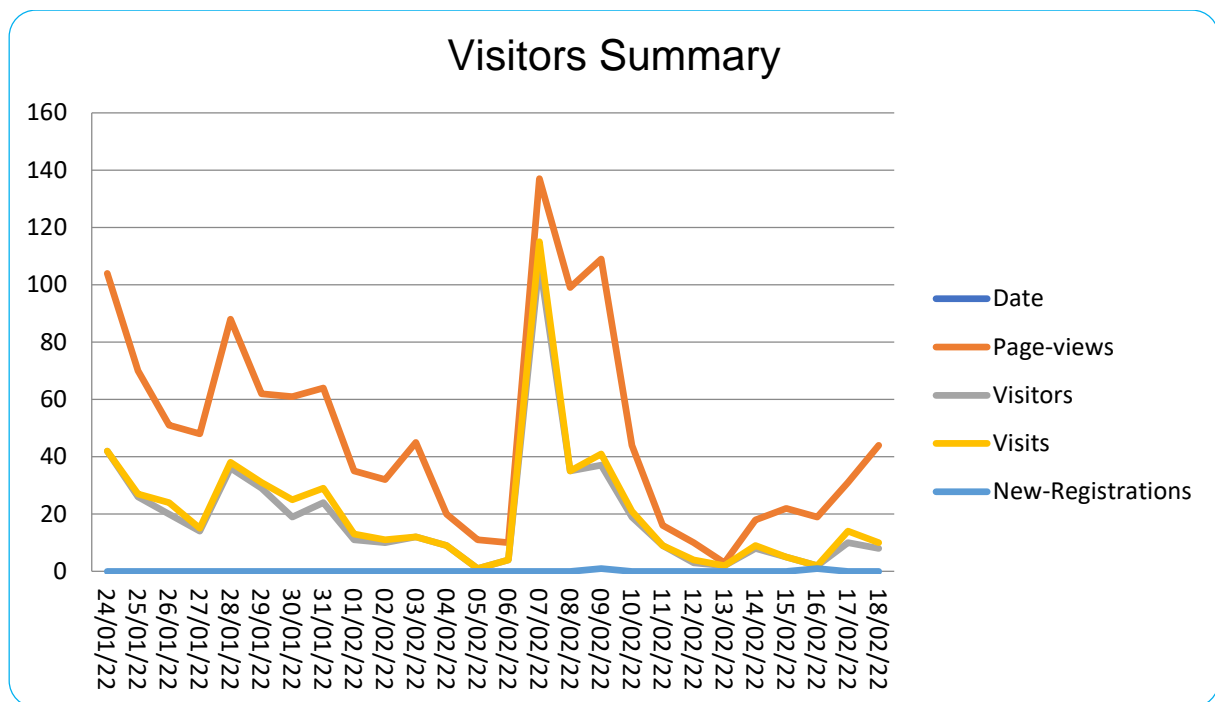
The Draft Homelessness, Social and Affordable Housing Policy engagement page attracted 551 visits by 439 individual visitors. 182 informed participants visited multiple project pages, and 112 visitors downloaded the consultation documents.

In total there were 202 downloads/views of the consultation documents: 100 downloads of the Draft policy, 49 of the consultation pack, 43 of the background paper, 6 of the accessible version of the draft policy and 4 of the accessible version of the background paper. There were 14 visits to the frequently asked questions page.

Homelessness, Social Housing and Housing Affordability Policy

In total 21 people provided feedback via the Your Say Adelaide online surveys. 12 were registered participants and 7 were unverified participants.

At the start of the engagement, interest in the new consultation was high, however the response rate was relatively low. A reminder email was sent to organisations and community groups on 7 February 2022, and reminder social media posts in the two days following, which resulted in a jump of interest and responses (emails and surveys).



Feedback responses received via the Your Say Adelaide online surveys was as follows:

Survey 1: General

There were 39 visitors to the General online survey, of which 9 became contributors. 7 were registered respondents and 2 were unverified respondents.

Question 1: Do you support Council's proposed roles for each sector identified in the draft Policy?

- a. Facilitator and Advocate in the area of Homelessness
- b. Advocate in the area of Social and Community Housing
- c. Facilitator and Advocate in the area of Affordable Housing

Yes
<i>Advocate is appropriate, not a facilitator or to fund or co fund affordable housing</i>
Yes
Yes
<i>As a Facilitator perhaps Homelessness should be addressed at the State government level with Council assisting but not taking responsibility for</i>
Yes
Yes
<i>As a ratepayer I don't think council funds should be spent 'facilitating' but support the role of advocate. Homelessness is a state matter even though many camp out in the city.</i>
Yes

Response to Question 1 answers
<p>Note that Council's role as advocate across all sectors was unanimously supported.</p> <p>Concern with Council's role as a facilitator was raised by some respondents, with the belief that facilitation of homelessness services, in particular, should be a State Government role using State Government funding.</p> <p>Council will continue with facilitator roles given broad support from other submissions.</p>

Question 2: A key role for Council, as proposed in the draft Policy, is Advocate.

What are your suggestions for how Council might achieve the most benefit as an advocate for these sectors?

<i>A dedicated homelessness police service.</i>
<i>Lobbying state and federal government</i>
<i>Advocate to the parties that can assist in combining their efforts to provide affordable housing which includes housing for Indigenous with room for 'mobs' to live together. Sounds simple yet is very difficult.</i>
<i>We recommend City of Adelaide continue to play an active role in facilitating and advocating for whole-of-government responses across local, state and federal levels. This is critical in addressing systemic barriers to ensure we can provide a range of simultaneous supports for homelessness and housing - including mental health, physical health, financial assistance and youth, family and cultural services.</i>
<i>Surveys, facilitation of suitable properties, rate relief</i>
<i>Advocacy is most required to help raise community awareness, understanding and ownership. The actions of the Hutt Street Traders has shown poor form.</i>
<i>The advocate will need to address the extreme difference in power and access to politicians between the homeless / low income earners and large developers.</i>
<i>Clearly there is a need to address homelessness and social affordable housing. Council should be involved in formulating solutions but not directly in the provision of these. State and Federal governments should be responsible for the overarching solutions which affect all regions but are predominantly a central city issue.</i>
<i>Seek potential funding/organizations able to plan/execute the policy implementation. Making sure all related stakeholders are considered before the plan is approved/executed.</i>

Homelessness, Social Housing and Housing Affordability Policy

Response to Question 2 answers
Suggestions for how Council can achieve the most benefit as an advocate in these sectors are appreciated and will be used to inform Council’s advocacy work. Advocacy will largely be undertaken through the Disability Access and Inclusion Plan and the Residential Housing and Growth Action Plan.

Question 3: In response to issues across the whole housing spectrum, Council's draft Policy position is that the CoA will: Facilitate improved health and housing outcomes for vulnerable people and young people by providing in-kind staff support and/or funding to key stakeholders (subject to eligibility), to deliver programs and initiatives and to assist in the investigation of new approaches to current and emerging issues.

What programs or initiatives are you aware of that Council could consider providing in-kind staff support and/or grant funding to?

SAPOL.
<i>This is assuming you should do this. Don't agree.</i>
<i>Indigenous groups, Hostel groups e.g - Carrington and Waymouth Hostels can be expanded, more hostel groups to be used as a stepping stone to educate the vulnerable population to budget.</i>
<i>We recommend that in-kind support or grant funding is directed towards early intervention and prevention of homelessness and housing insecurity</i>
<i>none</i>
<i>This stuff is token. A real program is required.</i>
<i>Co-ordination and referral service to those organisations that address the causes of homelessness such as addiction, domestic violence and mental health issues.</i>
<i>Public transport is a key issue for homeless people. The free connector but is one small step in the right direction but I would suggest that all suburban public transport should be free (or a token cost for the disadvantaged). Support for charities such as the Hutt St Centre which for some reason had a large hunk of its funding pulled by the state government despite a long and excellent record. Improved rubbish collection and general maintenance of public housing possibly by establishing volunteer KESAB-type groups.</i>
<i>None.</i>

Response to Question 3 answers
Note suggestions for programs and initiatives. The Policy has been updated to include advocacy for funding specifically for prevention and early intervention programs.
Other suggestions will be taken into consideration when reviewing grant funding opportunities.
Acknowledge that not all submissions support this policy position, however Council’s Strategic Plan 2020-2024 includes an action to improve health and housing outcomes for vulnerable people and young people, which this policy is seeking to contribute towards.

Question 4: Council is seeking to encourage and support financially sustainable private home ownership via means tested rate rebates, potentially paired with targeted concessions available through State Government.

What are your thoughts on this draft policy position?

<i>No, plenty of cheaper suburbs to buy into.</i>
<i>I think you need to throw this thought bubble in the bin.</i>
<i>Sounds positive, education is needed</i>
<i>A useful policy position, however to accompany this, there is a significant need for subsidies and supports to be prioritised for people who have the capacity to access private rental or social housing in order to avoid homelessness.</i>
<i>Council is not into private real estate and should leave it to those who are and more importantly have the expertise. Council does enough blundering now.</i>
<i>Great</i>

How would this work in practice? Will there be a rollover of stock or do you assist one group of people to own their homes and then, when they sell them, they sell to the highest bidder so there is no further affordable housing stock in the CBD?

I support statewide schemes such as this but wouldn't want the CBD becoming the prime location for low cost housing.

I believe the Adelaide Council should partner with other councils. It will be difficult that lower the value of properties in the CBD. Affordable housing is plausible but not at all levels and not in all areas of South Australia.

You will attract certain level of investors to the city but that will not mean that anyone will be able to afford a house in the city.

An increase of cheap housing in the city might be correlated to the reduction of value of surrounding properties, which (if correlated) will impact the appetite for investors to come to the CBD.

Suggest to perform further analysis of potential correlation between this initiative and other variables.

Response to Question 4 answers

Concerns and suggestions for alternative options are noted.

The potential for a means tested rate rebate would be an incentive scheme to assist potential home buyers to purchase a property on the open market within the City.

The scheme would apply to owner occupiers for a period up to 5 years.

Question 5: What are your thoughts on Council proceeding with a means tested rate rebate scheme should the State Government not provide complementary financial incentives?

No, everyone who lives in the city should contribute equally.

You shouldn't be doing this on rate payer funds.

Sounds realistic, what has been tried in the past has not benefited the homeless so yes I agree with the CoA trying this new approach.

Is there an opportunity to provide other kinds of subsidies for vulnerable people who are exceptions or do not directly pay rates but live in the city (eg couch-surfers to move into their own private rental, homeownership or social housing)

Given the inequity and inefficiency of the current system I can see a means tested criteria creating even larger nightmares for people who can ill afford it

Just do it.

If you want a mix of housing / owners / tenants in the city you may have to subsidize without State Government help.

This is a state issue not a CoA problem. My concern is that it would potentially lead to low socioeconomic ghettos.

This is a good initiative provided property value and quality of live of people working/living in the city is not impacted.

Response to Question 5 answers

It is noted that opinions on this question are evenly divided between support and not.

If Council were to proceed with a means tested rate rebate scheme, without complementary incentives from the State Government, the extent of Council's commitment is to providing rate rebates, for eligible means tested owner occupiers, for a period of 5 years.

The scheme does not require Council provision of accommodation nor prescribe where in the city the property is located.

Council will advocate for alternative subsidies towards private rental or social housing as part of the implementation of the Homelessness, Social Housing and Housing Affordability Policy.

Question 6: If you met this means tested rebate rate and did not have to pay rates for 5 years, would this be an incentive for you to purchase a home in the City?

I wouldn't have purchased one when I did if you were offering this. It's not fair.

Homelessness, Social Housing and Housing Affordability Policy

<i>It may be for the less fortunate but you will push others out of the city because it will become a less desirable place to live.</i>
<i>I believe it would assist and convince many people</i>
<i>Yes</i>
<i>No even though I have lived in the City for many years the continuing stupidity, in fighting and waste of rate payers money would not incentivise me to move to the city</i>
<i>Pay rates too. Everyone needs to contribute now.</i>
<i>I own a home in the inner suburbs but my early adult age children might consider it.</i>
<i>Yes but why would the city be encouraging this? The state and federal governments should be responsible for what is a national not city issue.</i>
<i>For sure.</i>

Response to Question 6 answers
It is noted that opinions on this question are evenly divided between support and not. The intent of a potential rate rebate scheme would be to incentivise eligible property purchasers to buy in the City, rather than elsewhere.

Question 7: Do you have any additional information, research or policy suggestions for Council to consider?

-
No
-
-
No
No
-
-
No

Response to Question 7 answers
No additional information suggested.

Question 8: Do you have any additional information, research or policy suggestions for Council to consider? (Other (please specify))

<i>Why not disperse the public housing you do have better. There are full unit blocks that seem to attract murders, arson and violence. Ie, Sturt/Norman streets, Morphett st. You've created ghettos. Change the policy to have one unit in every unit block in the city dedicated to social housing.</i>
-
<i>A realistic approach to homeless in the city of Adelaide could involve more free education and zero percent home loans from a financial institution. Provide the accommodation and then provide the assistance for mental/social/addictions to assist the homeless to stay secure, an idea is to look at Finland Homeless situation in a major City similar size to Adelaide. Also in Spain and Portugal they legalised drugs, therefor reducing crime, leaving more money to assist the homeless.</i>
<i>Research undertaken by Wilfred Laurier University (Canada) found that rent assistance programs are a necessary component of supported housing programs. This research indicated that, in comparison to a control group, people receiving rent assistance showed:</i>
<ul style="list-style-type: none"> • <i>Significantly greater improvements in housing stability and quality of life</i> • <i>Higher levels of perceived housing quality and</i> • <i>Significant improvements over time on measures of informal social support, community functioning, and food security.</i>
-
-
<i>Adopt a high rate for those that own housing but are not resident as they have done in Paris - if the owner doesn't live in the housing 50% of the year, double or more the rates - stop those that profit while making</i>

<i>housing less available for others (apply to all short term rental other than hotels / designated student accommodation).</i>
<i>I've travelled widely and been appalled by the homeless on the streets of most cities but especially in USA where social support is neglected by government. We are very fortunate in Australia that we have good social security provision, Medicare and public hospitals (although they could all be improved). The approach to homelessness and housing affordability must be a nationally coordinated one. Councils have a role in advocacy but provision should be providing by the state or federal government. As far as I am concerned my rates should be wisely used to research and advocate not provide the services or housing.</i>
-
Response to Question 8 answers
Additional suggestions noted. Direct provision of homelessness services and public and community housing are outside Council's scope, however Council will continue to advocate for funding and provision of these services, including through advocacy for financial incentives that assist in the delivery of more affordable housing outcomes. The Policy has been amended to ensure advocacy for increased funding for the homelessness sector includes specific funding for prevention and early intervention programs based on quality data and evidence.

Survey 2: Homelessness

There were 53 visitors to the Homelessness online survey, of which 13 became contributors. 7 were registered respondents and 6 were unverified respondents.

Question 1: Do you support Council's role as a Facilitator and Advocate in the area of homelessness? Do you have any suggestions on how Council might achieve the most benefit as Facilitator and Advocate for this sector?

<i>Yes, perhaps engage with Salvation Army and similar charity organisations.</i>
<i>No. its not a fit entity for those roles. For decades a mere symbol of entrenched local power and elitism, councillors and Mayors were exempt from harassment and inclusion workplace laws. Resultant Council culture is incapable of fairness and integrity.</i>
<i>Yes I support this role, Council may achieve the most benefit by assisting the different agencies in the CoA to work together, unfortunately it is similar to robbing Peter to pay Paul! The clientele (homeless) are s ...</i>
<i>The Council's goal of attracting more residents to the CoA will increase property and rental prices. Advocacy for funding will not lead to enough new supply to outstrip this, so mandatory inclusionary zoning should be the focus of advocacy activities</i>
Yes
<i>No-aboriginal engagement officer can facilitate and advocate.</i>
<i>I thoroughly support anything the council can do to support homeless people to live more safely and comfortably off the city streets.</i>
<i>As a Facilitator yes as the main Agency for remediation No.</i>
-
<i>I believe it is a role of the council but it is not their direct supervision. Firstly it is federal and then state. They should field 90% of costs and effort and council should advocate for them and hold higher levels of government accountable</i>
-
<i>Improved dissemination of information regarding access to services. Currently people trying to access "Toward Home" need a mobile phone to be able to receive a return call. Could there be a way created for these people to get help?</i>
<i>I support the role of advocate but limit 'facilitator' to provision of advice, cooperation and to some extent rate rebates and specific grants to providers but not to actual provision of services.</i>
<i>Yes. listening to NGO's in the homelessness about what is required.</i>
Response to Question 1 answers
General support for Council's role in this sector is noted.

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Definitions of Advocate and Facilitator have been added to the Policy to clarify how Council will undertake these roles.

The Policy has been amended to ensure advocacy for increased funding for the homelessness sector includes specific funding for prevention and early intervention programs based on quality data and evidence.

Question 2: Council's draft Policy position is that the CoA will facilitate improved governance of the homelessness sector with the aim of achieving functional zero homelessness, through participation in the Adelaide Zero Project and other initiatives, including in-kind staff support

What other initiatives could Council support and why?

<p><i>Help facilitate rehabilitation projects that focuses on mental health and domestic violence.</i></p>
<p><i>I fail to see how defunding St Vinnies Shelter for Homeless Men and Catherine House will decrease the number of people without a proper place to sleep in Adelaide. Was that the ACC's idea? Probably went for it with gusto. As a proportion of the homeless person population are in that position due to current and past government policies regarding the nature and availability of mental health services (when I worked at Vinnies roughly 30% were homeless primarily because of inadequate mental health treatment and treatment outcomes, (and that's a fact based on the observation that most people in that situation are actually highly compliant with medication regimes), and I imagine the ACC will not be able to "facilitate" a proper (as promised when de institutionalisation was implemented long years ago with a false promise of a vast increase in community which never occurred) establishment of a decent mental health diagnosis and treatment regime in Australia and South Australia. It is here that my answer to question 1 has bearing, because I know what the work culture of the ACC is - it is extremely ignorant and intolerant. You people make people ill. I am one of your ex employees. Shortly after leaving your hell hole, I gained qualifications in mental health, youth work, drug and alcohol rehabilitation and augmented my skills gained working for the Department of Social Security for 15 years. With that I gained work at the St Vinnies Shelter for Homeless Men, as it was known then. I know the ACC is the puppet of its bigger rate payers and I know a number of businesses have wanted the emergency shelter closed down for a number of years. They resisted the expansion of the shelter dining room, so scrooge like they and probably you lot are toward the need to provide a modern hygienic place for people to eat. I think you should earnestly try to explain how you think contracting the number of emergency beds available per night for the homeless in Adelaide will decrease the number of homeless in Adelaide to zero. I know some businesses suggested that the homeless men be moved out of the city by bus each night to a location in the hills.</i></p>
<p><i>Educating the homeless for free in cooking, budgeting, Indigenous Rights. Many homeless have given up searching for housing due to a number of reasons including mental health.</i></p>
<p><i>While the AZP's aim to end street homelessness were laudable it has been an abject failure. Rough sleeper numbers have remained steady (143 at the start of the project 132 at present) and total numbers of homeless people have grown immensely (from 143 to 238). While the coronavirus pandemic has led to increased disadvantage for many Adelaide residents, this does not explain the outcomes. Between the AZP's commencement and March 2020, just prior to COVID's first wave, both rough sleeping and total homeless numbers climbed by 10% and 40% respectively.</i></p> <p><i>The council should be evaluating initiatives it supports and looking at organisations and groups which have been effective, in Adelaide, not the US. Many of these organisations have been operating for many years and are highly effective, whereas the US functional zero model has achieved functional zero homelessness for the chronically homeless in just 4% of the communities in which it has been implemented.</i></p> <p><i>The City of Adelaide's grants programs have supported many existing, successful organisations to challenge homelessness with effective programs which have been demonstrated to work in Adelaide's unique landscape. The CoA strategic plan outlines the council's vision to make Adelaide the most liveable city in the world by "build[ing] on our strengths to embrace the opportunities around us".</i></p> <p><i>The City of Adelaide should identify those extant strengths within the city and support them.</i></p>
<p><i>We need more program that support the independent living skills building of homeless people in line with the transitional housing program. They will need to learn how to maintain a property to stop the cycle of homelessness.</i></p>
<p><i>Stop giving money to religious orgs.</i></p>
<p><i>I suspect there are many different reasons why people end up living on the streets. It's not simply a matter of access to housing. Many will need support in learning how to care for themselves and manage in a domestic setting after a long time on the streets.</i></p>
<p><i>none</i></p>

<i>Develop a program that has real housing and training support for those experiencing homelessness.</i>
<i>The dollars shouldn't be funded primarily by council</i>
-
-
<i>Not sure</i>
<i>have open grants for homelessness services in the city to access for programs and services they want to provide.</i>

Response to Question 2 answers
The range of advocacy suggestions and initiatives are noted and will be taken into consideration through Council's advocacy and program participation.
Council's involvement with the Adelaide Zero Project (AZP) will continue as a means of facilitating improved governance of the homelessness sector.
Council's Community Impact Grants Program provide an opportunity for eligible organisations to propose programs that support community capacity building and social inclusion. Council grants are not for funding core service delivery.

Question 3: Council's draft Policy position is that the CoA will facilitate capacity building of specialist homeless service providers through the provision of community development grants for programs and events that engage the community, promote social inclusion and increase independence. Are you aware of these community development grants that Council provides?

No
No
No
Yes
No
No
No
No
No
No
No
-
No
Yes
No

Response to Question 3 answers
Whilst only 2 of the 13 respondents were aware of Council's community development grants, given that most respondents are residents or members of the public, as opposed to stakeholders who may seek funding, this result is not unexpected.

Question 4: Have you accessed these community development grants?

-
-
-
<i>The Adelaide Day Centre for Homeless Persons has been a receipt of grants in one form or another from the ACC/CoA for over 35 years.</i>
-
-
-
-
-
-

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-
-
No
-
Response to Question 4 answers
None of the individual respondents had accessed CoA community development grants, however the Adelaide Day Centre for Homeless Persons has received grant funding in the past 35 years.

Question 5: Other than by community development grants, how else might Council increase the capacity of specialist homeless service providers?

<i>Seek sponsorships, involve media outlets to spread and increase awareness.</i>
<i>By night shutting down emergency shelters that already exist. If you think the shelters create demand by existing, then you don't actually accept that homelessness in Australia really exists. You see it rather as an industry which is dependent upon its clientele. That is not the case. If you reduce the number of emergency beds, demand will go up not down. If you use the word capacity to mean the overall ability of a service provider to resolve homelessness in individual cases, then I say to you the more beds the service provider has and the more case management that can be done and the more skills and resource building, in house or by referral, the more likely individual cases of homelessness might be resolved so long as any long term impediment to the long term of goal of self determination and reintegration into full participation into society and economy is also overcome. And in my experience the primary barriers to that are the lack of success of modern mental health treatments and interventions (as noted earlier), dual diagnosis cases where a substance abuser with a mental health related illness remains inadequately diagnosed and is therefore even more unsuccessfully treated than usual in the shit mental health regime that exists in Australia. People can become homeless due to fire, natural disaster, a bad night at the casino, on prison release, on escaping an unsafe home, on business failure. No one is immune from homelessness. In fact, back in the days when one earner could pay the mortgage or rent, today it generally takes two. When one looks at the concept of "self reliance", it is a bit pointless to think and act as if the homeless person is incapable of it. In fact it takes more self reliance to survive homelessness than it does to go to work every day. Some people don't survive homelessness. They die young and are vulnerable. Yet some businesses see such people as threat. Weirdly. I dont expect council has the skills and talent to convince bigoted businesses to welcome the homeless on Adelaide's streets. Not all businesses. One morning after my graveyard shift at St Vinnies I met my wife in town and we had a coffee and popped into Bang and Olufsen. They make a lovely \$28,000 pair of omni directional speakers. (I'm not that self reliant yet, but they are technically interesting, so i wanted to look at them, to see if they could be copied for \$2.50 each (value is a funny thing. What's it's worth for the ACC to know 47 homeless men had a warm bed once)) and the B&O, much to my delight, was talking to a homeless man, plying him with coffee and cake and showing him the latest TV. It is tragic not all businesses are like that. It is a pity the Adelaide city council ordered me to lock the female toilet just inside the Halifax Street Depot when I worked there because "homeless women were using it", and that apparently was bad. If you lot cant accept the basic of needs of people, and you can't, I don't expect you to actually succeed in your own self sufficiency, let alone help anyone achieve theirs in the midst of homelessness.</i>
<i>The CoA could make there services knowledge more available to the clientele.</i>
<i>The CoA is involved in a host of events throughout the city. Homelessness is often a consequence of financial issues resulting from loss of employment or a reduction in available work. if the CoA would preferentially recruit some event staff through specialist homelessness providers, they could begin to address their financial concerns while also building self esteem, confidence and skills for future employment. The council could also go one step further and use this a test to determine which of these staff might be suited to an apprenticeship or traineeship with the COA in a role beyond the event.</i>
<i>Provide more independent housing options for people who are 16 to 17 years old, not just youth shelters. There are people who are not to live in that setting.</i>
-
<i>Ensure that there is an overall coordination of grants to service providers to eliminate duplication and increase effective use of human and financial services</i>
<i>Stay out of it and hand it to the State government, Council does not have the resources to spend</i>
<i>Take ownership of the issue.</i>
-
-
<i>Improved communication between the various services so they can work together rather than as individual silos. An annual meeting for representatives of all the services listed on your website for exchange of ideas?</i>

<i>I'm not aware of the red tape that service providers have to deal with but council should make sure it puts as little impediment in their way and actually help them comply with regulations, applications etc.</i>
<i>hold meetings with specialist homeless service providers to hear from them what could help. ask lived experience people for feedback.</i>
Response to Question 5 answers
The Policy has been amended to reflect a goal of improved health and housing outcomes for the whole community, irrespective of age, physical, social, cultural or economic status. The suggestions for how Council might assist increase capacity of service providers are noted and will be taken into consideration through Council's work with the Adelaide Zero Project (AZP) and future advocacy work.

Question 6: Council's draft Policy position is that the CoA will facilitate the delivery of specialist homelessness services by city based charitable organisations by providing up to 100% rate rebates (subject to eligibility).

Do you support the retention of rate rebates for specialist homelessness services by city based charitable organisations?

<i>Yes, include rehabilitation, education and job opportunity programs</i>
<i>Port Willunga</i>
<i>Yes I support the retention of rate rebates for specialist homelessness services.</i>
<i>All charitable organisations and not for profit businesses appreciate any financial support available to them. We would support this measure</i>
<i>Yes</i>
<i>-</i>
<i>Yes if this continues to be effective in keeping people off the streets and supporting them into long term solutions</i>
<i>Yes</i>
<i>-</i>
<i>This is more appropriate</i>
<i>-</i>
<i>Yes</i>
<i>Yes</i>
<i>yes</i>
Response to Question 6 answers
General support for Council's continued facilitation of these services through rate rebates.

Question 7: Council's draft Policy position is that the CoA will facilitate improved outcomes for both rough sleepers and city users by effectively managing the public realm and Park Lands to ensure safety, accessibility and amenity is maintained, in accordance with Council By-Laws, by assisting police and homelessness service providers in providing referrals to relevant services.

Do you have any comment on this draft policy position?

<i>Collaborate with charity organisations to run this successfully.</i>
<i>Some people refuse to sleep in shelters or any other alternate built structure. Not many but some. If there were sufficient emergency beds, a daily pattern of sleeping in public spaces and subsequent daily routine which sometimes worries, distresses and concerns people living flats, houses etc nearby, would greatly reduce. If there were no actual need to sleep in public spaces police and council would have a clear option of either directly ordering a person into an emergency bed, to move the person on, or to arrest them if some law, by law or regulation had been breached. Why haven't you figured out the obvious yet? This is an example of a lifestyle dictated to by habit which has created need which has closed off a person's reasonable options. And that can be resolved actually quite quickly. There may come a time when masses of Australians loose their jobs all at once. For young people in particular, life has been an increasing struggle to find work ever</i>

Homelessness, Social Housing and Housing Affordability Policy

<i>since the Post Vietnam War recession. When I was a teenager in 1969 the average time spent unemployed was two weeks or less. Today it is more than 6 months. How do you propose a service provider re orientate the values of the youth out of that fact?</i>
<i>I think this is a positive direction for the CoA to take</i>
<i>We would support this and also assist with it's delivery through our soup van which operates six nights a week, six months a year delivering hot food and basic material supports to Adelaide's rough sleepers while also engaging them with our own service or that of others.</i>
<i>Where can they go if the relevant services have no vacancies in the homeless shelters? Anything can be done about that?</i>
<i>Don't involve the church. Any church affiliated organisation.</i>
<i>Seems sound</i>
<i>A sound policy</i>
<i>Don't use safety and a guise to move people on. Unless Council/SAPOL is providing people with shelter, let them stay in parks.</i>
<i>K</i>
<i>-</i>
<i>Excellent. But how do you plan to provide the referrals? Via police? Via community workers?</i>
<i>Better lighting would be a big help so that the general public feel safe. I have had little problem with rough sleepers either in the city or the parklands but occasionally some with mental health or drug/alcohol problems can be intimidating especially to women. Late night workers (nurses, hospitality etc) should feel safe to walk in or around the city. I would like to see more on foot or bicycle police patrols especially in the parklands to develop a good relationship between rough sleepers and police - not to move them on but to ensure that they respect others right to safely use the parklands and to keep them tidy. Likewise for council workers, it would be good if they could encourage the homeless to help keep the place tidy. My observation is that it is not the homeless that make most of the mess but late night revelers or residents who are not houseproud.</i>
<i>as long as assisting police doesn't mean just moving them on without trying to link them with support</i>

Response to Question 7 answers
Note a positive response to this position, with caution raised on availability of services and emergency accommodation in ensuring this approach is workable. The Policy has been amended to include that Council will advocate and support culturally appropriate accommodation and services for Aboriginal people experiencing or at risk of homelessness or housing insecurity, as well as advocating for whole of government responses to address systemic barriers to access to services and supports.

Question 8: Council's draft Policy position is that the CoA will advocate to the State and Federal Governments for increased funding for the homelessness sector.

From your perspective, what are the most effective ways for Council to advocate for increased funding for the homelessness sector?

<i>Involve major companies via sponsorships, volunteering program of their staff, influencers to promote this project on an ongoing basis, collaborate with media outlets, run a yearly major event.</i>
<i>Grow bigger noses?</i>
<i>Providing Data is important from the different services showing that something works. The Council needs to gather positive and negative data from the agencies, have certain aims clear and realistic, not just changing titles.</i>
<i>The Background paper on Homelessness, Social and Affordable Housing speaks to the cessation of the NRAS scheme which we obviously, do not support. Your response also suggests advocacy to the government "in light of the impacts of of Covid-19" but we feel that this may be a misstep, as there would be an end date applied to any measure which came about as a result of this.</i>
<i>The end of the Federal government's jobseeker increase abruptly forced thousands into poverty and the cessation of Jobkeeper resulted in many losing their jobs. We feel that any potential replacement for the NRAS should be a permanent fixture, unrelated to COVID</i>
<i>Providing them figures on how long homeless shelter is able to move people experiencing homelessness into stable accommodation, while all transitional properties have long waiting list and shared housing and private rental have increased rents.</i>
<i>-</i>

<i>Find the Grace Tame of the homeless.</i>
<i>Lobby the State and Federal Governments</i>
<i>Leading by example</i>
<i>Mental health support</i> <i>The facilities may be already present but some individuals don't have the capacity to process it</i>
-
<i>I have no experience, but I suspect providing a cost benefit report, which would without doubt demonstrate the effectiveness, economically, in reducing homelessness - healthcare costs, increased employment, etc. - would be the most effective way to advocate.</i>
<i>It is a national problem not a council problem so all councils should be advocating for an overarching well funded approach. Addressing mental health is important as many (majority?) of the homeless have particular mental health problems which make it difficult for them to live in a stable housing environment (eg schizophrenia, drug induced psychosis or borderline personality disorder). These people struggle to access mental health services in an institutional setting so mobile less formal services would better serve them. I'm not sure this applies to the indigenous community who appear to move in and out of housing and the parklands as a chosen lifestyle. Maybe a nuanced solution to this that allows them to camp out but have access to some community facilities (toilets, bathrooms, cooking) with elders and workers encouraging them to interact respectfully with the general community.</i>
<i>use outcomes based evidence to show why it is required. the impact on the client as well at the CoA.</i>

Response to Question 8 answers
Note strong support of Advocacy role with particular focus for Council to co-ordinate and gather data with which to report and advocate to State and Federal Government.
The Policy has been amended to include advocacy for funding specifically for prevention and early intervention programs, based on quality data and evidence.
The Policy has been amended to reflect that Council will advocate to State and Federal Governments for new subsidised rental accommodation program(s) In light of the cessation of the National Rental Affordability Scheme.
The Policy has been amended to include advocacy for whole of government responses, across all tiers, to address system barriers to access to services and supports.

Survey 3: Social and Community Housing

There were 15 visitors to the Social and Community Housing online survey, of which 5 became contributors. 3 were registered respondents and 2 were unverified respondents.

Question 1: Council's draft Policy position is that the CoA will advocate to State and Federal governments for increased funding for public housing.

From your perspective, what are the most effective ways for Council to advocate for increased funding for public housing?

<i>Try talking to them</i>
<i>Affordable housing is a state or national issue not a CoA problem. People need to live where they can access employment, shops, schools, parks and services. The city is not necessarily that place for most people. As such the CoA should be promoting state and federal programs for widely distributed public housing, free public transport, healthcare etc etc.</i>
-
-
<i>demonstrate the need and outcomes when this occurs.</i>

Response to Question 1 answers
Note support for Advocacy role, using data and reports to demonstrate needs and outcomes, to State and Federal Government, to create a diverse liveable city inclusive of the metropolitan areas of the city.

Question 2: Council's draft Policy position is that the CoA will advocate to the State and Federal Governments for increased funding for community housing.

Homelessness, Social Housing and Housing Affordability Policy

From your perspective, what are the most effective ways for Council to advocate for increased funding for community housing?

As above
<i>Pretty much said it above - address the need for housing near to employment, transport, schools and healthcare.</i>
<i>'Submitted on behalf of: -, -, AAEH (emailed 26/1/2022) Congratulations on a great draft Homelessness, Social and Affordable Housing policy for the City of Adelaide. I think it both sets out a clear role for local government in housing and homelessness policy, that matches the responsibilities and capabilities of local government, but also has ambition for addressing the homelessness and housing crisis that we face in Adelaide, South Australia and Nationally. My only feedback is Re 3.0 SOCIAL HOUSING - I'd add a third dot point: - The CoA will: - Advocate to the State and Federal governments for increased funding for the supportive housing identified by the Adelaide Zero Project By-Name List that is needed to end chronic rough sleeping homelessness in the City of Adelaide. The attached fact sheet sets out what supportive housing is. But essentially, it's permanent and comes with both housing and support. Common Ground is one model. It is what we are missing to make progress with some of the most long term and unwell people experiencing homelessness on the streets of the City of Adelaide. The last time we had a significant reduction in rough sleeping in Adelaide, it came of the back of the building of a range of Common Ground facilities that the CoA was very supportive of. Happy to discuss further if you need any more information. Thanks for the consideration.</i>
<i>Submitted on behalf of: - (individual response, emailed 28/1/2022): One of the hidden issues in housing is struggling artists and dissidents. Part of the problem, is that there is no more urban renewal. In the 70s/80s, it was Mile End/Bowden/Brampton. Later it was Port Adelaide. Now increasingly it relies on government and social housing. With the scrapping of a lot of public housing stocks, the opportunities now are also diminished. That creates real issues, especially in eras of conservatism. If you have higher density housing, in eras arguably McCarthyist, then you set in train the potential for situations reminiscent of the Kristallnacht. I would argue that a democracy is seriously lessened, that refuses to support creative dissent. Further I believe there is no reason for that to happen. Housing SA is empowered to use SAPOL for evictions, there is therefore no reason that probationary tenancies for larger properties, couldn't be offered where the needs of creative non-violent dissent requires. Keep in mind this is also true of entrepreneurs. Where start up housing could be offered also. I think we need to take a much broader look at housing, in terms of encouraging the very diversity, that is vital for a healthy contemporary society. demonstrate the need and outcomes when this occurs.</i>
Response to Question 2 answers
Note support for Advocacy role to State and Federal Government, to create a diverse liveable city, inclusive of the metropolitan areas of the city. Acknowledge the role of supportive housing as one type of social housing that will be included in Council's advocacy work.

Survey 4: Affordable and Private Housing

There were 20 visitors to the Affordable and Private Housing online survey, of which 2 became contributors. Both were registered respondents.

Question 1: Council's draft Policy position is that the CoA will advocate to the State and Federal governments for increased funding to deliver more subsidised rental accommodation in light of the cessation of the National Rental Affordability Scheme (NRAS) program.

How might Council best advocate for increased funding for subsidised rental accommodation, following the end of the NRAS program.

<i>Lobby both State and Federal governments</i>
<i>I don't know how the NRAS operated so don't have a view on this.</i>

Response to Question 1 answers

The Policy has been amended to reflect that Council will advocate to State and Federal Governments for new subsidised rental accommodation program(s) in light of the cessation of the NRAS program.

Question 2: Council's draft Policy position is that the CoA will advocate to the State Government for changes to the Residential Tenancies Act 1995 to improve conditions for renters.

From your perspective, what are the most effective ways for Council to advocate for changes to the Residential Tenancies Act to improve conditions for renters?

Install some mechanism which prohibits exorbitant rate rise and forces property owners to have a maintenance schedule which must be adhered to this is particularly for retail premises, but talks to private residence as well. Owners appear to be able to completely ignore requests for normal maintenance from their tenements with impunity.

My limited experience with renting out properties is that good tenants had no problems with me as a landlord. I have heard many horror stories from others of tenants wrecking properties far in excess of any bond being held. I hear of very aggressive agents antagonising tenants too. I don't know how you could legislate 'respect'. Landlords should promptly and adequately maintain their property and tenants should keep properties tidy, clean and undamaged. Agents should behave professionally and respectfully. Try putting that into legislation - good luck!

Response to Question 2 answers

Advocacy role to provide data and case studies in support of changes at State Government level to the Residential Tenancies Act 1995 (SA).

Question 3: Council's draft Policy position is that the City of Adelaide will advocate to State and Federal Government for a national approach to mandatory inclusionary zoning for affordable housing, including a change in the state-based planning legislation to enable staged implementation.

How might Council best advocate for a national approach to mandatory inclusionary zoning?

Stay out of it. This is a State Government area of responsibility Council will only muddy the waters with incompetence, inconsistent messaging and the usual esoteric unworkable nonsense.

It's plainly a national issue even if housing costs are highest in CBDs. Many people who work in CBDs in retail, services and hospitality struggle to find affordable accommodation within easy reach. The cost and inefficiency of public transport aggravates this. Advocating for better cheaper public transport would be a big step.

Response to Question 3 answers

Feedback noted and will be included for consideration when Council undertakes advocacy work.

Guestbook

There were 7 visitors to the Guestbook section of the online survey. 2 became contributors. 1 was a registered user and 1 was an unverified user.

Hi,

I have read some of the details on the Draft Homelessness, Social & Affordable Housing Policy and have the following feedback:

I think any plan like this should be a long term vision of integrated housing that includes looking at diverse types of dwelling in style and size and also consider living near work and being able to get to work by walking or public transport. This is important for any city dwellings for homeless or otherwise. Often plans can be short term and expire quickly or be terminated by successive governments.

One example is NRAS and I read in your draft that:

NRAS has ended so what now?

Homelessness, Social Housing and Housing Affordability Policy

"There is no proposed replacement for this program that offers subsidised rentals through the private market, despite rental stress increasing, and Covid-19 creating further stress on low income households"
So I think what we need is long terms sensible visions that cater for the needs of all strata of our society and build a city that runs like a living organism and is both beautiful and efficient.
Also, consciously planned spaces and plantings should be implemented to enhance the lives of residents. The city has many spaces, but often they are not well designed for purpose to cater for the needs of people that inhabit or visit the city. We have many spaces that are perfect to be planted with various food plants and spaces should allow people to sit, play and interact and have functional areas including plant shade canopies for clean air and protection from sun.
For the poor or homeless there needs to be functional housing that is individually suited and affordable or subsidised and not just built to provide private developers with a way of using building incentives. Will the building be done by govt or by private developers? Who gets to input in overall design of dwellings spaces and plantings? It would be good if planning could be done to consider the real needs of the residents and give them a voice in the planning.
Also there needs to be consideration of existing infrastructure and amenities and shops for the intended residents. Often we build apartments with a cafe on the ground floor, but what other amenities do the residents need? I'm sure residents would have a long list.
Another thing that is important is the way the plans and details are presented for input and feedback. Sometimes these documents are very wordy and contain specialized terms. I think plans should be simple in overall detail and present the major principles in an easy to understand format with visual representations so that they are easy for all to understand and comment on.
It is easy to use terms like "liveable city", but you need to clearly define what that means and for who.
In my opinion a liveable city would be one that has convenient and cheap public transport that is quick and efficient. It should also have safe walking and biking tracks and less cars and trucks.
It should have public seating readily accessible for people walking to be able to sit and rest. The city should have a large set of plantings of tress and other plants to keep the city cool and clean the air. It should be a safe city with ample lighting and so on. I also think the planting of trees like plane trees contributes to the allergy problem so plant selection is vital and there should be community gardens and food plants all over. But I must admit I rarely see these things in draft plans and they just seem to be done ad lib after plan implementation.
The city should not have cars, just public transport and axis. The cars could be parked outside the city square and people could walk, ride or bus to the centre. Imagine how much cleaner the air would be in this liveable city.
I think planning a liveable city is not just about the housing, but what supports and goes around the housing and makes the city liveable of course.
I have many ideas about how I would expect our city to be more liveable and I'm sure others do too, but how do we get our ideas implemented? That is the key.
Cheers -

I urge CoA to ensure more social housing is prioritised. Council's role may be to be a strong advocate and create opportunities for that to be developed in the city. Affordable housing is too expensive for many and it appears no checks are consistently made to ensure that the affordable housing options are taken up in the city. The focus needs to ensure eligible people can access it rather than developers have a way to get some benefits from ostensibly including it as required.

Response to Guestbook Comments

Feedback received through the engagement process will inform Council's advocacy program and has resulted in amendments to the Policy to provide for Council to advocate for new subsidised rental program(s) in light of the ending of the National Rental Affordability Scheme (NRAS).
 As identified in the Policy Council proposes to develop a Local Housing Plan to help identify the specific need of the local community in relation to both supply and demand of housing.

9. SOCIAL MEDIA FEEDBACK RECEIVED

Social media responses were received in response to CoA Facebook posts on 24 January 2022 and 9 February 2022, advising the public of the engagement and seeking feedback.

There were 21 'likes', 1 'love' and 1 'angry', and the following general comments:

Thank you for being proactive & transparent. Well done!

*Wasn't long ago that Councillor Hyde and Team Adelaide were making life difficult for the Hutt Street Centre.
(+ link to In Daily website and article)*

If you want more affordable housing we should start by incentivizing more density in the CBD. Why do we keep allowing these small developments? 11 stories in a CBD? No.

Is that building covered in ACP panels?

Don't build highrise Petri dishes

Leave it to the Authority

Response on Social Media comments

Comments noted. Council will continue to act as advocate and facilitator (where applicable) for improvements to housing and homelessness services across the housing spectrum within the City of Adelaide.

10. APPENDIX A – COPIES OF EMAILS AND LETTERS.

SA Housing Authority

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Draft Homelessness, Social & Affordable Housing Policy for Consultation SA Housing Authority submission

Thank you for the opportunity to provide feedback on the *City of Adelaide Draft Homelessness, Social & Affordable Housing Policy*. SA Housing Authority (the Authority) has provided general feedback, as well as specific responses to relevant survey questions.

The Authority agrees in principle with the proposed City of Adelaide (CoA) role within the housing and homelessness sectors; however, consider there may be opportunities for CoA to actively partner with the sectors in a role extending beyond advocate and facilitator, to deliver appropriate affordable housing, social housing and homelessness solutions.

CoA has the ability to foster and support affordable housing through a variety of means within its current control. As well as through governance of Council-owned land and buildings, CoA has planning authority to approve higher density developments, including affordable two-and three-bedroom family-oriented apartments in taller residential towers. Issues with development and construction costs means "affordable" housing products in the CoA are often one-bedroom dwellings, which have low appeal to affordable home buyers.

The Authority encourages industry to explore innovative ways to deliver affordable housing through new mechanisms such as joint ventures with community housing providers, build to rent, rent to buy and shared equity.

The Authority has developed an Affordable Housing Toolkit which will assist Councils with a framework for reviewing supply and demand for housing. We anticipate this will be provided to Councils in April 2022.

The Authority recommends CoA establish formal connections (if not already in place) with peak bodies, government and non-government organisations in which to determine an approach for identifying programs and initiatives that would benefit from CoA support. If not already in place, there may also be merit in establishing a community of practice or similar forum with other LGAs in which to share lessons learnt and ideas in relation to development and implementation of local housing plans.

It is also suggested CoA develop informed proposals that can demonstrate high levels of support from key stakeholders, rental data, cross-jurisdictional research and successful project models, and evidence-based research about the links between stable, secure housing and well-being.

For Aboriginal housing matters, CoA could link into the work being undertaken by the South Australian Aboriginal Community-Controlled Network to tap into ongoing implementation of the new Closing the Gap National Agreement priority reform, to strengthen Aboriginal Controlled Community Organisations. This includes following the current development of the Aboriginal Housing Sector Strengthening Plan by the Australian and State governments.

Homelessness

- The Authority suggests that the advocacy component isn't just focused on increased funding, but on how CoA can connect interested parties in working with the existing SA Homelessness Adelaide South Area Alliance (Toward Home).
- The CoA has a key role to play in providing local knowledge and additional information for services and other levels of government, both with regards to data and observations from frontline service staff regarding emerging trends in demand for services throughout

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the city. The Authority and specialist homelessness services (SHS) rely on the additional information that CoA is able to provide, including through tools such as the Street Connect website.

- Maintaining the Council's connections with the Housing SA Adelaide regional office and with inner-city services, including members of the Toward Home Alliance, is vital to ensuring people experiencing homelessness in the city can be well supported in a timely manner. Real-time information on people sleeping rough in the inner-city aids services in targeting outreach and offering support.
- The Authority is aware of the community development grants and welcomes the contribution to facilitating and enabling capacity building and resourcing for the SHS. The Authority would be interested in engaging with CoA to share information regarding the strategic direction of the homelessness sector and can provide support and context as a subject matter expert.

Council's draft Policy position is that the CoA will facilitate improved governance of the homelessness sector with the aim of achieving functional zero homelessness, through participation in the Adelaide Zero Project and other initiatives, including in-kind staff support and/or grant funding, as appropriate.

What other initiatives could Council support and why?

- CoA has a key role in providing leadership and support in a number of governance groups, including the Inner-City Sub-Committee (the Committee) that sits across the homelessness and domestic and family violence sector. The establishment of the Committee is being co-designed with key partners and will work with Alliances and other stakeholders across the specialist homelessness sector to support people experiencing homelessness in the inner-city. This will include developing connections with other areas of South Australia to support homelessness prevention and housing pathways outside the inner-city for people experiencing homelessness in the inner-city.
- CoA also has a role to play in supporting the governance of the Toward Home Alliance, which sits across the inner-city. This may include attending meetings of the Alliance Management Team to share information or collaborate on projects as appropriate.
- Continuing to provide support for the next evolution of services after Puti on Kaurna Yerta in the parklands will be beneficial for SHS and associated support services. CoA can play an integral role in supporting the mobile Aboriginal population and ensuring safety and service linkage. There is also a leadership and guidance role the CoA can play for other local councils considering moving to an Advance to Zero methodology, to share learnings and capacity build based on experience.

Social and Community Housing

- The Authority recommends that the advocacy component does not solely focus on increased funding, but on how CoA can connect interested parties in development initiatives to renew and modernise social housing.
- It is suggested CoA work in partnership with the Authority to understand resourcing constraints, opportunities and initiatives in place to modernise public housing.
- The Authority also asks CoA to consider how they can assist and work with community housing providers to increase options, which could be delivered through rebates, grants etc.

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Affordable Housing

- The Authority suggest that the advocacy component isn't just focused on funding and mandatory inclusionary zoning in planning legislation, but on how CoA can connect interested parties in development initiatives to develop affordable housing options.
- The Authority supports a strategic review of the delivery of affordable housing through inclusionary zoning, including mandatory application in the CoA, to create a level playing field for developers.
- It is recommended the proposed policy response include a supporting role through the adoption of a 15% affordable housing policy, as part of the CoA urban renewal and development planning.
- The Authority recommends CoA using their land to ensure achievement of a wide variety of affordable housing, including typology and price points.

Council's draft Policy position is that the CoA will advocate to the State Government for changes to the *Residential Tenancies Act 1995* to improve conditions for renters.

From your perspective, what are the most effective ways for Council to advocate for changes to the Residential Tenancies Act to improve conditions for renters?

- The Authority suggests CoA to work in partnership with Consumer and Business Services and other advocacy bodies and services (e.g. RentRight SA) to understand constraints, challenges and opportunities for improvement.

SA Department of Human Services

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Ref: 22TCEO/039

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Thank you for your email on 24 January 2022 inviting my department to provide feedback on the City of Adelaide (CoA) Draft Homelessness, Social and Affordable Housing Policy (draft policy).

It is pleasing to see the Council's commitment to supporting health and housing outcomes for vulnerable people and young people as part of the draft policy. I would also like to acknowledge the CoA as an active member of the Safety and Wellbeing Taskforce and a partner in the delivery of the Puti on Kaurna Yerta pilot program.

While I am broadly supportive of the draft policy, it would be of benefit to acknowledge specific vulnerable population groups that the policy will support. Of particular interest to my department are Aboriginal rough sleepers, people with disability, people experiencing domestic and family violence, and older women. It is widely accepted that these are priority cohorts, and as such, it is critical that housing and homelessness services and accommodation options are accessible, prioritise the immediate safety of women and children, and are culturally appropriate.

Aboriginal rough sleepers

Given the over-representation of Aboriginal rough sleepers in the Adelaide CBD, it is important to acknowledge within the draft policy the importance of identifying, partnering and investing in culturally appropriate responses for this cohort.

This includes responses to the multiple and complex issues experienced by this highly vulnerable cohort including drug and alcohol addictions, chronic and complex health needs, mental health issues, violence (including family violence), disability, housing, poverty and limited access to food and basic resources.

Domestic and family violence

A 'safety first' response is required for people experiencing domestic and family violence, placing the immediate safety needs and stability of women and their children at the centre of decision-making. It would also be of benefit to include older women as a priority cohort in the draft policy in relation to homelessness responses.

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Unless there are clear mental health or domestic and family violence issues, there are limited housing options for this cohort.

People with disability

You may be aware that work is occurring through the Disability Reform Ministers' meeting (DRMM) in 2022 to develop options to improve the supply of affordable and appropriate mainstream housing for people with disability. Engaging with respective Ministers for Housing is part of this work.

Given the role of the CoA in partnership and advocacy, you may also wish to include in the draft policy the mechanisms by which the CoA will partner and advocate for improved housing outcomes.

In addition, it is important to clarify how the CoA will engage with CoA residents and ensure a broad range of voices are heard to inform the direction of the CoA, reflecting community needs and emerging issues.

I look forward to our continued work together to support the safety and wellbeing of vulnerable South Australians.

Yours sincerely



Ruth Ambler
A/CHIEF EXECUTIVE

03 / 03 / 2022

Anglicare SA Housing Services



18th February 2022

City of Adelaide
Community Consultation
Draft Homelessness, Social and Affordable Housing policy 2021-2022
GPO Box 2252
Adelaide SA 5001

Via email:-HSAHPolicy@cityofadelaide.com.au

As a Community Housing Tier 1 provider in South Australia, we welcome and congratulate the City of Adelaide on creating the draft policy and seeking sector feedback on this very important societal issue.

AnglicareSA Housing is one of five Tier 1 South Australian based Community Housing Providers (CHP) in South Australia and we work closely and collaboratively with government, State and Local, to increase the number of social and affordable housing for the most vulnerable

The public housing transfer initiatives actioned in 2015 and 2017 has resulted in AnglicareSA Housing fast tracking a \$130M development and acquisition program in South Australia. We have invested heavily in asset redevelopment, new housing, maintenance services, community development and supporting infrastructure plus deliver a high quality service to our 2,100 plus tenancies.

As leaders in our field, we play an active part in delivering the state housing strategy for the long term benefit of South Australia's vulnerable and disadvantaged.

AnglicareSA Housing Ltd would like to provide the following feedback and recommendations regarding City of Adelaide's Draft Homelessness, Social & Affordable Housing Policy that is currently open for consultation.

As identified within your project information document, there is a significant need to ensure people can easily access safe, affordable, secure housing in metropolitan areas. This highlights the need for sectors, stakeholders and services to collaborate and provide holistic, accessible and consistent responses for people.

SURVEY RESPONSES

General

Do you support Council's proposed roles for each sector identified in the draft Policy?

- a. Facilitator and Advocate in the area of Homelessness
- b. Advocate in the area of Social and Community Housing
- c. Facilitator and Advocate in the area of Affordable Housing

AnglicareSA Housing see the City of Adelaide as both **Advocate** and **Facilitator**. Advocating to not only the State Government but to inner city Developers as the benefits of working with the community housing sector. Increasing the number of proven successful mixed tenure sites such as UCity and UNO building (102 Waymouth St).

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Council can also use its significant land holdings to support an increase in social and affordable housing within the City increasing the CBD population and activation.

A key role for Council, as proposed in the draft Policy, is Advocate.
What are your suggestions for how Council might achieve the most benefit as an advocate for these sectors?

CoA are able to advocate the release of land pockets, or older buildings, within the city that need rejuvenating or redevelopment with the ask that the building sector invite the community housing sector to discussions early in the development planning stage. Our sector is innovative and collaborative in its approach so we would bring another perspective to creating community in the city.

Affordable long term rental requirements can also be included in developments with the stipulation developers work with Community Housing Providers purchase / manage these.

In response to issues across the whole housing spectrum, Council's draft Policy position is that the CoA will:

- Facilitate improved health and housing outcomes for vulnerable people and young people by providing in-kind staff support and/or funding to key stakeholders (subject to eligibility), to deliver programs and initiatives and to assist in the investigation of new approaches to current and emerging issues

What programs or initiatives are you aware of that Council could consider providing in-kind staff support and/or grant funding to?

AnglicareSA Homelessness Services have had involvement with the Adelaide Zero Project since its commencement along with the City of Adelaide and many other collaborating partners. We believe that this project has had greatest impact within Inner City boundaries to assist rough sleepers into homes. AnglicareSA Housing supports the continuation of both in-kind and financial support for this Functional Zero approach.

AnglicareSA Housing believes the Housing First approach must have support services attached and funding to assist delivery of Housing First will directly increase tenant sustainability along with better health and wellbeing.

Council is seeking to encourage and support financially sustainable private home ownership via means tested rate rebates, potentially paired with targeted concessions available through State Government.

What are your thoughts on this draft policy position?

AnglicareSA Housing is focussed on assisting tenancies move through the housing continuum and ultimately into home ownership. We have already piloted a Rent to Buy program within Bowden and would be happy to discuss this further with the CoA. We support any rebates to assist south Australians move into home ownership.

What are your thoughts on Council proceeding with a means tested rate rebate scheme should the State Government not provide complementary financial incentives?

As above

If you met this means tested rebate rate and did not have to pay rates for 5 years, would this be an incentive for you to purchase a home in the City?

If this were the case, our dedicated Home Options Coordinator would certainly promote the incentive to tenancies and it would support some customers to take the step towards home ownership.

Do you have any additional information, research or policy suggestions for Council to consider?

One of the major prohibitive costs to social and affordable housing is land. Council could enter into development and management agreements with CHP's to develop sites around the city for long term social & affordable rent.

Facilitate state & local govt sessions with private and NFP sector to consider how to increase the amount of social and affordable housing within the CBD and how we create and connect communities. Bring together state government departments such as Health, Corrections and Housing to work through the issues. State government may have portfolios but issues span all these departments when supporting complex customers

In addition, building on the successful public housing transfer of homes will bring great benefit to the CoA. Since 2015, just over 1200 homes were transferred to AnglicareSA Housing and these transfers have generated more than \$86 million in Commonwealth rental assistance and council rate rebates to be reinvested in new housing supply, asset improvements and community development.

The redevelopment plan has commenced and is well progressed, with the aim of removing older poorer quality homes and replacing them with newly built properties for our customers. Our significant investment of \$130m in housing is not only social infrastructure for the benefit of our communities, but also stimulating the construction industry and jobs for our state. Our 20 year development plan will increase the number of safe affordable homes on offer to the community by over 200 homes.

Social and Community Housing

Council's draft Policy position is that the CoA will advocate to State and Federal governments for increased funding for public housing.

From your perspective, what are the most effective ways for Council to advocate for increased funding for public housing?

Public Housing is State housing. Advocacy would benefit from promoting be social and affordable housing which enables Community Housing Providers to be part of the mix and add value to various solutions.

Advocacy could focus on whole of government approach which leads to much greater impact as evidenced by Project Zero.

All advocacy should be grounded in facts and use of research to articulate the evidence base and also focus on increasing individuals' ability to contribute to the economy.

Council's draft Policy position is that the CoA will advocate to the State and Federal Governments for increased funding for community housing.

From your perspective, what are the most effective ways for Council to advocate for increased funding for community housing?

As a Community Housing Provider we have access to charitable concessions which other housing cannot obtain. We have access to Stamp Duty Concessions, Payroll Tax and Land Tax exemptions however this is not enough to bridge the gap between the low rental received as Community Housing Provider and the cost of long term asset management and renewal.

Programs such as the NRAS scheme is currently ending over the next 3-4 years time and does not have a Federal Govt initiative to replace it. As a CHP, we continually seek partnership, collaborative and innovative approaches to increase housing in SA.

CoA could act as advocate for the sector to:-

- Unlock potential development sites at discounted rates
- Introduce AnglicareSA Housing to current and future owners interested in philanthropic support
- Introduction of a specialist gap funding solution as per the NRAS program
- Remove the 'Not in My Back Yard' (NIMBY) thinking that still exists by education program support
- Fund support services with a prevention fund to assist sustainable tenancy and Housing First principles

Thank you for considering AnglicareSA Housing's feedback and of course we welcome a meeting to discuss any of these topics further

Yours sincerely



Michelle Gegenhuber
Executive General Manager, Housing Services

Anglicare SA Community Services



17 February 2022

Sarah Gilmour
Associate Director, Parklands, Policy & Sustainability
City Shaping
City of Adelaide

Dear Sarah,

AnglicareSA's Community Services portfolio would like to provide the following feedback and recommendations regarding City of Adelaide's Draft Homelessness, Social & Affordable Housing Policy that is currently open for consultation.

While AnglicareSA primarily supports people who are experiencing or at risk of homelessness and housing insecurity in Adelaide's metropolitan areas, we know that many of these people also travel into the city to access services, accommodation or sleep rough, including to our Gilbert Street site for emergency assistance and financial counselling. We also know that many people who initially present to services in the city are seeking accommodation, housing or other support in the metropolitan communities where AnglicareSA works.

There is a significant need to ensure these people can easily access support in the city if they choose or remain in secure housing and receive support in metropolitan areas without needing to navigate services and systems based in the city. This highlights the need for sectors, stakeholders and services to collaborate and provide holistic, accessible and consistent responses for people seeking this type of support across our communities.

AnglicareSA commends the City of Adelaide for its leadership and efforts to address homelessness and housing insecurity to date. AnglicareSA recommends the City of Adelaide consider a range of solutions, advocacy and partnerships to continue its vital role in addressing this issue.

Recommendations:

- 1. Facilitate and support culturally appropriate accommodation and services for Aboriginal people experiencing, or at risk of, homelessness or housing insecurity.**
 - **Learn from Puti on Kauma Yerta, and/or similar initiatives.**
Historically we have responded on a 'crisis' basis to what we consider a right of freedom of movement; a regular movement of Aboriginal people across Country. There remains a significant need to develop culturally appropriate responses that enable Aboriginal people to access, or return, to safe and appropriate accommodation.

Puti on Kauma Yerta was one of few dedicated, culturally appropriate responses available to Aboriginal people visiting, staying or living in Adelaide.

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ACN 169 715 762

159 Port Road Hindmarsh SA 5007
anglicaresa.com.au

While there are differing views regarding this approach, the provision of culturally safe, accessible services for both remote Aboriginal visitors and Aboriginal citizens must remain a high priority. This would enable culturally appropriate engagement by AnglicareSA and other services with our Aboriginal customers who move between the city, metropolitan and regional areas.

- **Partner with other Councils, cultural authority and services outside of the city to provide a more seamless response for Aboriginal people who are seeking support and move between the city, metropolitan and regional areas.**

2. Fund and/or advocate for greater investment into the early intervention and prevention of homelessness and housing insecurity, including:

- **Private rental subsidies** to be funded and supported across all levels of government. AnglicareSA welcomes and fully supports City of Adelaide's advocacy for rental subsidies.

Research undertaken by Wilfred Laurier University (Canada) found that rent assistance programs are a necessary component of supported housing programs. This research indicated that, in comparison to a control group, people receiving rent assistance showed:

- Significantly greater improvements in housing stability and quality of life
- Higher levels of perceived housing quality and
- Significant improvements over time on measures of informal social support, community functioning, and food security.

We would welcome a meeting with you regarding this, as we are also in discussion with the State Government about proposed solutions to this issue.

- **Early intervention and prevention of homelessness**
Up to 60% of AnglicareSA's customers experiencing homelessness are cycling through emergency accommodation with little to no stable or long-term housing pathway available. This is evident across the State's homelessness system and points to the need for strong investment into not only additional housing outcomes, but also early intervention and prevention to support people to remain housed.

We recommend City of Adelaide plays a role in addressing this issue by targeting its community grants program toward services and initiatives that can effectively and immediately support people before they enter homelessness. This could include options for flexible brokerage funding, which we would appreciate discussing further with you.

3. Facilitate and/or contribute to collaborative responses involving the Local Government Association and whole-of-government efforts

- **Greater coordination across place-based efforts**
AnglicareSA has been involved in several place-based efforts to address homelessness and housing insecurity, including the Padninthi Kumangka Wardli Homelessness Alliance, the Adelaide Zero Project and COVID-specific responses. These initiatives are crucial to meet the specific needs of communities. We recommend the City of Adelaide facilitates or advocates for a coordinated approach through the Local Government Association that enables Councils and services to leverage networks and resources to collectively address homelessness and housing insecurity across our communities.
- **Advocating for whole-of-government responses**
AnglicareSA's teams and customers are often required to navigate a range of complex, interrelated social systems in order to prevent and respond to homelessness and housing insecurity. We recommend City of Adelaide continue to play an active role in facilitating and advocating for whole-of-government responses across local, state and federal levels. This is critical in addressing systemic barriers to ensure we can provide a range of simultaneous supports that meet people's complex needs including mental health, physical health, financial assistance and youth, family and cultural services. There is also a continued need to ensure systemic issues and responses are equally informed by data and evidence beyond a city-focus, to include all metropolitan and regional areas.

Thank you for considering AnglicareSA's feedback. We welcome a meeting with you to discuss further opportunities regarding our recommendations including private rental subsidies and flexible brokerage funding for people at risk of homelessness and housing insecurity.

Kind Regards



Nancy Penna
Executive General Manager, Community Services
AnglicareSA

Shelter SA

From: [Alice Clark | Shelter SA](#)
To: [HSAHPolicy](#)
Subject: HPRM: RE: Consultation on Council's Draft Homelessness, Social and Affordable Housing Policy
Date: Monday, 7 February 2022 12:00:07 PM
Attachments: [image004.png](#)
[image011.png](#)
[201214 Shelter SA Empty Homes Project Report FINAL +designed.pdf](#)
[Shelter SA Election Platform 2022 Final.docx](#)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello there, we included the below article in our enews, which forms the basis of our response to the draft policy, to encourage our subscribers to participate in the consultation. Please contact me if you require further information or would like to discuss the points raised or require more information. Attached are two supporting documents. Thank you, Alice.

The City of Adelaide has released it's draft Homelessness, Social and Affordable Housing Policy for community feedback. We applaud the Council for developing this policy! We encourage you to read the draft and spend a few minutes providing your input. There are [several ways to contribute](#), one of them is via email so no registration or login are required! The closing date is 18 February. Some of our thoughts that may guide you include the following:

It is acknowledged in the policy that Federal and State Governments are responsible for housing and homelessness, however, local governments do have a role to play and we are pleased to see the City of Adelaide developing policy in this area.

It is stated in the policy that Council supports the State Government role in the provision of housing and homelessness services, we would add however, that there is also the possibility that Council could advocate for State Government investment to increase the net supply of social housing.

It is also stated in the policy that there is a role for local governments to regulate homelessness accommodation, but in accordance with our research on for-profit rooming houses (boarding houses) we would like to see greater regulation and licensing of them to ensure adequate standards are being met and residents have access to their legal rights.


Council supports inclusionary zoning in it's current form - our Election Platform provides information about strong structural reform of this policy to include social housing rather than 'affordable' sales and we would like to see Council explore this direction.

Shelter SA would also like to see the development of an empty homes program in the City, to explore the activation of vacant residential properties through engaging owners and incentives to tenant their properties.

Advocacy around renting is also welcome within the draft policy and we will supply Council with some information about the changes we would like to see to ensure that renters have access to their rights and issues of availability and affordability are addressed.

Dr Alice Clark
 Executive Director
 Shelter SA
 The South Australian Peak Body for Housing


Homelessness, Social Housing and Housing Affordability Policy



ShelterSA

0425 060 649
alice.clark@sheltersa.asn.au
PO Box 6207 Halifax Street Adelaide SA 5000

We acknowledge and respect the Kaurna people as the traditional custodians of the ancestral lands we live and work on and their deep feelings of attachment and relationship to country.



Adelaide Day Centre for Homeless Persons Inc.

From: [Adelaide Day Centre – Data](#)
To: [HSAHPolicy](#)
Cc: [Lachlan Barr](#); [Janda Munra](#)
Subject: HPRM: Feedback for Homelessness, Social and Affordable Housing Policy
Date: Friday, 18 February 2022 11:42:17 AM

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Whom It May Concern,

First off we appreciate the opportunity to comment on the draft for the Homelessness, Social and Affordable Housing Policy. The submission below represents some suggestions and thoughts from the Adelaide Day Centre for Homeless Persons Inc. regarding the Homelessness, Social and Affordable Housing Policy. We hope that some of these will be incorporated in future and current projects undertaken by the council.

We would like you to advocate for the following:

- The immediate cessation of the destruction and sale of any current housing trust dwellings in the ACC area unless the properties are in bad enough condition to be condemned as it would almost certainly be cheaper to repair and renovate than completely rebuild.
- The immediate cessation of any private / public housing schemes that may be in operation and no handing over of public housing to community housing providers.
- Allocate enough money to keep housing in good condition and avoid the use of contractors. Employ permanent tradespeople on a reasonable wage with an emphasis on quality work rather than employing contractors whose primary motivation is getting the job done as quickly as possible with quality a distant second.
- As well as working with the govt regarding the development of housing plans, consulting with not-for-profits such as the Adelaide Day Centre for Homeless Persons Inc, Brian Burdekin Health & Welfare Services, Westcare Centre etc is essential as these organisations work directly with homeless people and would be authoritative sources of information.
- Rents to be charged as a percentage of income so that those on various low paid benefits pay less and those working and earning average wages pay more. Rents to be no more than 25 – 30% of total income to avoid rental stress. It should be noted that low-income residents spend almost all of their income on living expenses and keeping their rents at a reasonable level would mean that any excess money left over would be likely to be spent at local businesses in the CBD.
- Investigate the option of purchasing empty or little used warehouses and factories, office buildings and repurposing these for accommodation.
- Use environmentally friendly practices such as recycling materials from buildings being demolished in Adelaide and possibly elsewhere and introducing water recycling systems to reuse laundry and shower water for garden use and toilet flushing etc.

Homelessness, Social Housing and Housing Affordability Policy

- Providing community areas in new and existing projects to encourage social interaction, minimise social isolation and provide play areas for children.
- Advocate for research and utilisation of efficient dwelling construction using latest technology techniques not widely used yet e.g. 3D printing which enables a variety of different shapes and material to be used to increase efficient use of space and materials, increase insulation properties both for winter and summer and massively reduce construction costs and time. There is also the potential to use uncommon, innovative and environmentally friendly materials. There are plenty of examples available on the internet. A good place to start would be the Christie Walk urban development at Sturt St in the CBD.

Lastly below is a link to successful housing projects in other countries:

<https://www.arch2o.com/successful-public-housing-projects/>

Regards,

Joyce van der Sman
Adelaide Day Centre for Homeless Persons Inc.
Postal Address - 32 Moore St
Delivery Address - 21 Queen St
Adelaide, 5000, South Australia
Phone: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED]
Email: [REDACTED]
ABN: 41 376 882 134

Australian Alliance to End Homelessness

From: David Pearson
Sent: Wednesday, 26 January 2022 9:03 PM
To: HSAHPolicy
Cc: Lauren Grant; Mihiret Richards; Caro Mader
Subject: Feedback on draft Homelessness, Social and Affordable Housing policy
Attachments: 2013 Supportive Housing factsheet.pdf

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,

Congratulations on a great draft Homelessness, Social and Affordable Housing policy for the City of Adelaide.

I think it both sets out a clear role for local government in housing and homelessness policy, that matches the responsibilities and capabilities of local government, but also has ambition for addressing the homelessness and housing crisis that we face in Adelaide, South Australia and Nationally.

My only feedback is Re 3.0 SOCIAL HOUSING - I'd add a third dot point:

- The CoA will: - Advocate to the State and Federal governments for increased funding for the supportive housing identified by the Adelaide Zero Project By-Name List that is needed to end chronic rough sleeping homelessness in the City of Adelaide.

The attached fact sheet sets out what supportive housing is. But essentially, it's permanent and comes with both housing and support. Common Ground is one model.

It is what we are missing to make progress with some of the most long term and unwell people experiencing homelessness on the streets of the City of Adelaide. The last time we had a significant reduction in rough sleeping in Adelaide, it came of the back of the building of a range of Common Ground facilities that the CoA was very supportive of.

Happy to discuss further if you need any more information. Thanks for the consideration.

Regards,

David Pearson

CEO - AAEH

Mobile: _____ **Email:** _____ **Office:** Social Sciences South Building, Bedford Park Campus, Flinders University, Sturt Road, Bedford Park, South Australia

Pronouns: He / Him / His | [Learn more](#) about pronouns.

The AAEH recognises, acknowledges and pays respect to Aboriginal and Torres Strait Islander peoples of the lands on which we live, learn and work. We pay our respect to Elders, past, present and future.

SUPPORTIVE HOUSING

Supportive Housing can provide an immediate solution for ending the homelessness of the most vulnerable and chronically homeless people in Queensland. People who are chronically homeless experience long term or repeated homelessness and/or have a co-occurring disability, including a mental illness or addiction.

Services provided to people who sleep rough or are chronically homeless are expensive emergency responses from the police, ambulance, hospital emergency rooms, prisons, city council, food vans and other outreach services. Emergency shelter is a costly alternative to permanent housing and while it is sometimes necessary for short-term crises, too often it serves as long-term housing. Supportive housing will fill a gap in housing options for these people, through the close integration of suitable housing and tailored support services.

There are supportive housing projects in communities across the United States and Europe, many that have similar characteristics and populations of homeless people as Brisbane.



Vivian and Adrian know all too well the debilitating experience of homelessness. Both are now enjoying the comforts of home as tenants of Brisbane Common Ground in Hope Street, South Brisbane.

Features of Supportive Housing

The Corporation for Supportive Housing (CSH) promotes and assists supportive housing projects in the USA. The CSH defines supportive housing as ‘a successful, cost-effective combination of affordable housing with services that helps people live more stable, productive lives’.

A supportive housing unit is defined by the following elements:

- The unit is available to, and intended for, a person or family whose head of household requires support to sustain a tenancy and to have quality of life and has multiple barriers to employment and housing stability, which might include mental illness, chemical dependency and/or other disabling or chronic health conditions

- The tenant household ideally pays no more than 30% of household income towards rent and utilities and never pays more than 50% of income toward such housing expenses
- The tenant household has a lease (or similar form of occupancy agreement) with no limits on length of tenancy, as long as the terms and conditions of the lease or agreement are met
- The unit's operations are managed through an effective partnership among representatives of the project owner and/or sponsor, the property management agent, the support services providers, the relevant public agencies and the tenants
- All members of the tenant household have easy, facilitated access to a flexible and comprehensive array of support services designed to assist the tenants to achieve and sustain housing stability
- Service providers proactively seek to engage tenants in onsite and community-based support services, but participation in such services is not a condition of ongoing tenancy
- Service and property management strategies include effective, coordinated approaches for addressing issues resulting from substance use, relapse and mental health crises, with a focus on fostering housing stability.

Onsite and Scattered Site

There are two basic types of supportive housing. **Onsite supportive housing** sees support services physically located within the housing. Developments can include single multi-storey buildings and sprawling housing estates for families. Support services usually have an office onsite and are accessible to tenants in business hours and in some cases, 24 hours a day. Onsite supportive housing is especially effective for people with high support needs. **Scattered Site supportive housing** is where support services outreach to people living in public or community managed or private rental homes. Services visit tenants as often as is needed to support them to maintain their tenancies. Micah Projects currently provides scattered site supportive housing.

Supportive Housing Works

There is a strong evidence base to show that tenancies are sustained and evictions avoided in supportive housing. CSH reports that approximately 75-85% of people who enter supportive housing remain housed and are supported to access the support and health services they need and deserve. Tenants do not become homeless again and often move onto more independent housing. Their homelessness is ended, permanently.

Sustainable Solution

Supportive housing improves housing stability, employment, mental and physical health, and school attendance and reduces active substance use. People in supportive housing are able to live more stable and productive lives.

Investment in Ending Homelessness

Supportive housing breaks the cycle of homelessness and crisis accommodation that is the typical experience of people who are chronically homeless. Supportive housing represents an investment into permanent solutions to end homelessness for individuals. In Brisbane, a group of people are sleeping rough with chronic health conditions such as liver disease, respiratory conditions, cancer and diabetes. These rough sleepers are very vulnerable, averaging 6.5 years homeless and 44.5 years old.

The 368 most vulnerable rough sleepers in Brisbane are very high users of acute health care – with 839 hospital admissions and 3,052 Emergency Department presentations every year costing \$11.31 million per annum.

Brisbane Common Ground demonstrates the cost benefits of supportive housing for the whole community. The building is home for 146 people, half who have been chronically homeless. Supportive Housing is a cost effective solution to break the cycle of homelessness for this population.

Supportive Housing is Cost Effective

Acute healthcare costs for vulnerable rough sleepers:	\$30,733 per person p.a.
Supportive Housing:	\$14,487 Support services per person p.a. \$1811 Security per unit p.a. \$4,110 housing subsidy per person p.a - \$20,408 per person p.a

Beneficial to Communities

Evaluations of supportive housing projects have shown that it helps to build strong, healthy communities by improving the safety of neighbourhoods, beautifying city blocks with new or rehabilitated properties and increasing or stabilising property values over time.

About Common Ground

Common Ground is a supportive housing provider that originated in New York City with the first development in Times Square in 1991. It has had great success linking up Street to Home outreach programs with supportive housing to end homelessness for individuals. Common Ground leads a nationwide campaign to secure 100,000 homes for 100,000 chronically homeless Americans (100k Homes) with 76 communities participating. In Brisbane, Common Ground has supported the 50 Lives 50 Homes campaign and lent its expertise to the development of the Brisbane Common Ground project.

Common Ground has been the inspiration for new supportive housing developments in most Australian capital cities. The Australian Common Ground Alliance is a network of the organisations working in partnership with government, corporate, philanthropic and community stakeholders to promote and deliver supportive housing solutions for chronically homeless Australians.

Principles of the Common Ground model of Supportive Housing

Design: Designing or renovating buildings thoughtfully to create a dignified and positive home environment and including in the design community spaces that can be utilised by tenants and the wider community.

Permanency and Affordability: Housing is permanent, affordable and self-contained with rent less than 30% of income.

Tenancy Mix: There is a mix of tenants with half being people who have experienced homelessness and half people who have never been homeless. This mix helps ensure a vibrant community and a diversity of tenants.

Safety: A concierge service is provided 24 hours, 7 days per week to ensure a welcoming but controlled access to the building at all times.

Support Services: Onsite supports including holistic case management, mental health, primary healthcare, recreation and other specialist services to prevent people becoming homeless again and to support people to achieve their goals and aspirations.

Social Inclusion: Each element of supportive housing from building to support service design aims to create the greatest degree of empowerment and independence for people, as well as a thriving community for tenants and neighbours.



.....
Brisbane Common Ground
building, July 2012.
Photography: Katie Bennett.

For more information:

micahprojects.org.au
commongroundqld.org.au
csh.org.au
commongroundaustralia.org.au
100khomes.org

Community Housing Ltd.

From: Wayne Gibbings
Sent: Thursday, 17 February 2022 1:45 PM
To: HSAHPolicy
Subject: Draft Homelessness, Social & Affordable Housing Policy

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for the opportunity to consider your draft policy. The policy is a broad statement of support/advocacy for important outcomes in housing which is to be welcomed. We note there are some specific actions contemplated to provide in-house support and/or funding for program delivery which is also welcome.

We would note that the CoA could have the most impact by giving consideration to utilisation of land assets to facilitate the development of social/community/affordable housing, and this could be done in a manner that does not disadvantage CoA economically, and would certainly assist the community by provision of more safe, affordable housing. We would urge CoA to give this more consideration.

Kind regards,



Wayne Gibbings | Senior Manager Property and Development
W: [Redacted] | E: [Redacted]
A: [Redacted]



~ Our Vision: A world without housing poverty ~

We acknowledge the traditional Aboriginal and Torres Strait Islanders owners of country throughout Australia and pay our respect

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The Big Issue and Homes for Home



16 February 2022

Community Consultation
Draft Homelessness, Social and Affordable Housing Policy 2021-2024
GPO Box 2252
Adelaide SA 5001

Homes for Homes submission on City of Adelaide's draft Homelessness, Social and Affordable Housing Policy 2021-2024

Homes for Homes applauds the City of Adelaide (CoA) for developing a clear framework for decision making in this important area of public policy. We appreciate the opportunity to make a submission on the draft Homelessness, Social and Affordable Housing Policy.

Executive Summary

Homes for Homes does not compete with any policy, rather augments the work being undertaken by local government to increase the supply of social and affordable housing.

Increasing housing affordability requires an innovative mix of leadership, strategy, partnerships and, most importantly, funding that can deliver an increase in housing supply, not just now but for future generations to come.

Without a new source of sustainable funding, the gap between housing supply and demand will continue to grow - Homes for Homes is that new source of sustainable funding.

The Homes for Homes model is simple – raise funds from voluntary tax-deductible donations as part of existing property transaction processes, then leverage both the money raised and existing expertise in the community to increase the supply of social and affordable housing. It is an initiative that draws on support from across the community, enabling individual homeowners, government and the property and finance sectors to each play a part. Homes for Homes is a proven, highly scalable, independent initiative that in only a few short years has granted over \$1 million to 10 social and affordable housing projects, housing 53 people.

Highly regarded and supported across the property industry, Homes for Homes has a number of influential developers already pre-registering properties with Homes for Homes before selling to homeowners.

Homes for Homes commends the CoA for supporting the inclusion of Homes for Homes on the Central Market Arcade Redevelopment incorporating 212 apartments. From this development, Homes for Homes estimates \$600,000 in donations can be raised over 30 years to increase the supply of social and affordable housing.

CoA can further amplify Homes for Homes impact by including Homes for Homes in section 2.0 of its Homelessness, Social and Affordable Housing Policy. This can be achieved by:

Page 1 of 7



Basement Level, 227 Collins Street
Melbourne VIC 3000
GPO Box 4971, Melbourne VIC 3001

OS 6065 4533
homesforhomes.org.au
ABN 58 143 181 644

1. Regulating planning rules to reward applicants on multi-dwelling developments who participate in Homes for Homes, for example providing uplift or application fast track benefits; and
2. Regulating Homes for Homes into any tender process or joint venture project applying to new land release or surplus land sales undertaken by the CoA.

If Homes for Homes were registered on all new residential dwellings approved by the CoA every year for the next 30 years, using the average annual approval numbers over the past 5 years, there is the potential to raise \$22 million by 2052 through property donations to increase the supply of social and affordable housing.

In addition, a further \$1.9 million could be raised by 2052 if 5% of existing dwellings donated to Homes for Homes when sold within the CoA.

Examples are provided in this submission of where these outcomes are already in operation.

Addressing homelessness through increasing the supply of social and affordable housing in Australia

Tackling the shortage of social and affordable housing in Australia is a first order priority with over 116,000 people homeless each night, while another 1.5 million live in serious housing stress. The problem is too big for any one government or organisation to solve alone - a whole-of-community approach is needed.

Housing has the power to break the cycle of poverty. All people have a right to safe and secure housing, yet Australia has a shortage of >600,000 social and affordable homes, projected to exceed 1 million by 2036.

The flow on effects makes this shortage one of Australia's biggest social issues, and one which the COVID-19 pandemic will most likely exacerbate as more people face job insecurity and experience housing stress. The cost of doing nothing is significant.

At its most basic, housing satisfies people's fundamental need for shelter from the elements. However, a house serves many other needs that allow people to function effectively.

A recent University of Technology Sydney (UTS) study found that people experiencing homelessness rely more heavily on the health, justice, and welfare systems. Once an adult is housed, the cost saving to government is between \$23,000 to \$44,000+ per year which is more than \$1 million over a lifetime. With these costs increasing every year and the number of taxpayers decreasing due to our ageing population, the only sustainable solution is for Australia to increase its supply of safe and secure housing.

Ongoing donations raised through property transactions deliver an increase in housing supply, for now and for future generations. Without an innovative solution, the chronic shortage of social and affordable housing will continue to grow – demand simply cannot meet supply. Homes for Homes is that solution.



If just 3% of residential properties registered with Homes for Homes by 2050, our conservative economic modelling shows that Homes for Homes could realise over \$1 billion in donations. These funds are granted to create new social and affordable housing for the most vulnerable in our community.

Incorporating Homes for Homes into residential development projects creates a unique opportunity for a new funding stream to be realised in the social and affordable housing sector. This can be achieved at no cost to local government. Registering properties with Homes for Homes is also done at no cost to individuals or developers.

Homes for Homes is a sustainable funding stream designed to deliver an increase in social and affordable housing. Funds are raised via owners agreeing to register properties with Homes for Homes, enabling a tax-deductible donation of 0.1% of the sale price donated to Homes for Homes at the time of sale. Participation is recognised through a caveat registered on the property title which acts as a gentle reminder of the owners promise to donate at the time of sale. The donation flows seamlessly through the settlement disbursement process. Donations from each property sale will remain in that state or territory. Donations are pooled and funding is granted to housing providers to increase supply of social and affordable housing.



1. Homes registered



2. Properties sold



3. Funds donated



4. Money distributed



5. Homes built

Often individuals are unsure how they can make a difference to end homelessness - a seemingly insurmountable problem. Homes for Homes provides a simple and meaningful way to contribute.

Australia's housing crisis can only be resolved by the whole community working together. Innovative initiatives that encourage the entire community to come together and make a difference to support those on the margins are desperately needed.

If all new developments within the CoA were registered with Homes for Homes, this would have an enormous impact on Homes for Homes' ability to increase the supply of social and affordable housing.

Once a home or development is registered, it continues participating in Homes for Homes, encouraging all future homeowners to donate when they sell, until a property owner elects to withdraw.



The idea of using property sales to generate a new fundraising stream is based on a similar, successful initiative seen operating in the US, whereby a single property developer in California encouraged owners of 25,000 properties to make a small contribution at their time of sale. Twenty years later, this initiative has raised over \$9 million for local community initiatives.

The Homes for Homes initiative can apply to the entire housing system - from existing dwellings to new developments including government housing stock - as the core premise is simply to encourage small donations on property sales which accumulate into billions.

Homes for Homes provides additional value to the sector with no financial outlay required by local government and no associated risk.

Donations = increased supply of housing

Homes for Homes is a new source of funding, not a builder. When sufficient funds have been raised in a state or territory, housing providers are invited to apply via an open tender process.

Homes for Homes has established Investment and Housing Advisory Groups who review grant applications and provide recommendations to the Homes for Homes Board to maximise impact from funds granted.

Homes for Homes has already increased social and affordable housing supply, granting \$1.14 million to 10 social and affordable housing projects, housing 53 people, with a further \$140,000 approved for disbursement in 2022.

Our experience across four grant rounds has shown that funds granted by Homes for Homes had a multiplier effect of 1:8. For every \$1 granted, Homes for Homes unlocked \$8 for the community housing sector. Typically, we have funded the crucial 10-20% equity component of a community housing project, which has meant that Homes for Homes is the key to more projects securing additional finance and becoming a reality.

Leveraging the multiplier effect means Homes for Homes' grant funding can be spread across more social housing projects – creating more homes to help end homelessness.

Developer support

Homes for Homes has the support of many developers who operate across Australia including:

- ICD
- The Barnett Foundation
- Assemble
- Balcon
- Capital Estate Developments



- Development Victoria
- DevelopmentWA
- Grocon
- Lucent
- Mirvac
- Setia

Since launching in 2015, Homes for Homes has 36 developers who have committed projects nationally. The 30-year projection of donations flowing from these developments alone exceeds \$52 million.

Beyond our publicly recognised property partners, Homes for Homes is also in discussions with a further 60+ developers.

Governance

Homes for Homes is governed robustly.

Established by Australia's largest and most successful social enterprise, The Big Issue, Homes for Homes is a not-for-profit company, limited by guarantee and endorsed as a Deductible Gift Recipient. All donations are tax deductible. Homes for Homes benefits from the knowledge, expertise, and networks of industry leaders.

Homes for Homes is independent from the finance, property, and community housing industries.

The Homes for Homes Board is responsible for authorising funding allocations to social and affordable housing providers. To assist in making funding decisions, the Board leverages the knowledge and expertise of an industry-based Investment Advisory Group and Housing Advisory Group.

Homes for Homes Board

Sonya Clancy (Chair), Chief People Officer, Bank Australia
Adam Brooks, Partner, Thomson Geer
Carolyn Viney, Chief Development Officer, Vicinity Centres
Paul Kearney, CEO, Kearney Group
Steven Münchenberg, Managing Partner, Blackhall & Pearl
Wendy Fromhold, Director, WFConsulting

Homes for Homes Investment Advisory Group

Sonya Clancy (Chair), Chief People Officer, Bank Australia
Andrew Penn, CEO, Telstra
The Hon Anna Bligh AC, CEO, Australian Banking Association
Ian Smith AM, Joint Managing Director, Bespoke Approach



Peggy O'Neal AO, Consultant, Lander & Rogers
Sally Herman, Non-Executive Director
Simon McKeon AO, Chancellor, Monash University
Terry Campbell AO, Senior Chairman, Goldman Sachs

Homes for Homes Housing Advisory Group

Each state/territory Housing Advisory Group is made up of a panel of cross sector experts specific to their state/territory.

The role of government as an instrument of change

Homes for Homes is engaging state and local governments, statutory agencies, and industry associations across Australia to explore inclusion of its mechanism in the planning process.

Moreland City Council were the first council in Australia that formally endorsed Homes for Homes. Homes for Homes is embedded within their design excellence scorecard. Developers who commit to Homes for Homes via the scorecard are fast-tracked through the planning process.

Bayside City Council, in Melbourne's southeast, has since unanimously voted that all planning permits issued for multi-dwelling developments must include a condition requiring the implementation of Homes for Homes, via a Section 173 Agreement under the Planning and Environment Act 1987. Analysis shows over \$13 million every 30 years could be raised from donations from multi-dwelling applications in this local government area alone. Kingston City Council also recently voted to support Homes for Homes in a similar manner.

The Green Building Council of Australia have included Homes for Homes as an 'innovation challenge' in their Green Star rating system. Developers can apply for up to two Green Star points when they include Homes for Homes in their projects. This type of incentive is a win-win for both Homes for Homes and the developer.

LWP, a Western Australian developer are working in conjunction with state government to rollout Homes for Homes on all joint venture projects. This is a great example of the positive role that government can play in embedding Homes for Homes, and in turn, increase the state's supply of social and affordable housing.

DevelopmentWA are favourably weighting proponents who participate in Homes for Homes when tendering for a development located at Shenton Park, minutes from Perth's CBD.

Integrating Homes for Homes across residential developments provides a sustainable and long-term source of new funding to support the creation of social and affordable housing in Australia.



CoA can further amplify Homes for Homes impact by including Homes for Homes in section 2.0 of its Homelessness, Social and Affordable Housing Policy. This can be achieved by:

1. Regulating planning rules to reward applicants on multi-dwelling developments who participate in Homes for Homes, for example providing uplift or application fast track benefits; and
2. Regulating Homes for Homes into any tender process or joint venture project applying to new land release or surplus land sales undertaken by the CoA.

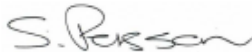
A path forward ...

Homes for Homes is an innovative model that has the capacity to raise substantial funding to increase the supply of social and affordable housing across Australia. With local government support to embed Homes for Homes across residential developments, Homes for Homes will gain rapid traction - becoming a part of everyday property transactions – truly becoming a whole-of-community led solution to increasing the supply of housing for society's most vulnerable.

After working in the industry for close to 30 years, the desire to resolve homelessness in Australia is certainly not the issue. Financial investment is what is needed to deliver on this desire and that is where the task of local government is so much greater. We believe with the support of initiatives such as Homes for Homes it can be done.

Again, we thank the CoA for providing the opportunity to make a formal submission on their draft Homelessness, Social and Affordable Housing Policy.

Yours sincerely



Steven Persson
CEO, Homes for Homes and The Big Issue



Purple Orange

17 February 2022

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Dear Sir/Madam,

Consultation on Homelessness, Social and Affordable Housing Policy

Thank you for the opportunity to comment on the Homelessness, Social and Affordable Housing Policy. Purple Orange recognises that the policy is well advanced and has been developed from the background paper released last year.

Therefore, Purple Orange puts forward the following recommendations for City of Adelaide's consideration in the spirit of seeking to include the perspective and needs of people living with disability.

It is our intention to provide some feedback within this letter which positions people living with disability as a major population group within the community. Currently, we feel that this significant cohort are not specifically mentioned in the draft policy and yet are representative of a large stakeholder group that should be able to benefit from the goals of improved liveability across the City of Adelaide.

Through our systemic advocacy work in South Australia on behalf of the disability community since 2006, Purple Orange has had a significant line of sight on the barriers people living with disability face in terms of accessing affordable housing options. For instance, we are aware that people living with disability are often overlooked as a population group within the housing market because of the history of segregated housing in congregate settings such as closed institutions or supported living or group home arrangements.

Additionally, people living with disability are overrepresented in social and community housing where the designs are not fit-for-purpose and are often not designed according to the principles of universal design. As a result, people living with disability often exist in housing that is inaccessible, unaffordable and/or unsafe, and this can occur whether the tenure is within social and community housing, private rental or homeownership.

Choice and inclusion for people living with disability

Furthermore, people living with disability are at increased risk of homelessness or are homeless due to a range of factors such as barriers to education, health and employment services and opportunities and this cohort often has limited formal and informal support networks available to them.

Therefore, we recommend that:

Recommendation 1: That the policy be strengthened to include a specific reference to people living with disability as a population group, noting the above constraints and limitations this group faces in the context of affordable housing.

Following on from this recommendation, we note that the policy may intend for people living with disability to be included within the references to 'vulnerable' people. However, if the policy were to reference people living with disability as a specific population group within the policy then we can see genuine benefits that may flow from its implementation. We note people living with disability are specifically referred to as a target group within the South Australian housing strategy. In terms of providing outcomes for people living with disability, we have several suggestions as to how this policy could be strengthened to ensure it is of service to this community. These include:

1. revision of the policy to include a clear statement about people living with disability as a population group, noting there is currently no definition in the policy about who is included within the term "vulnerable people". We note that this term is used throughout the document but is not defined;
2. introducing a stronger alignment between outcomes of the proposed policy with the *SA Housing Strategy 2020-2030* which specifically states people living with disability as a defined population group;
3. specifically stating support for the principles of universal housing design and support for amendments to the *National Construction Code*, including stating how the City of Adelaide will demonstrate this support through its own projects (as referenced in this draft policy);
4. ensuring that the policy refers to and is in alignment with the *City of Adelaide's Disability Access and Inclusion Plan*, as well as the *South Australia's State Disability Inclusion Plan: Inclusive-SA*; and
5. expressing support within the proposed policy for the goals outlined within *Australia's Disability Strategy 2021 – 2031*.

Recommendation 2: That the policy be strengthened to enhance the facilitation and advocacy priorities of the City of Adelaide through incorporating the above suggestions into the proposed policy.

We note that the proposed policy does not specifically outline how the City of Adelaide currently uses its planning instruments to enable people living with disability to fully participate in community life, including support for accessible housing and liveability goals. This seems significant considering that any hoped-for outcome of 'liveability' must include liveability for all people including people living with disability.

Choice and inclusion for people living with disability.

Recommendation 3: That the policy and its companion material clearly outline how the City of Adelaide proposes to utilise its planning instruments to support people living with disability to fully participate in community life across the City of Adelaide, including support for the stated affordable housing and liveability goals.

Thank you again for the opportunity to provide feedback on this important draft policy and we welcome the opportunity to meet with you to discuss this further.

Yours sincerely

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Robbi Williams
CEO, JFA Purple Orange

ACH Group

From: Ivy Diegmann
Sent: Friday, 25 February 2022 6:24 PM
To: HSAHPolicy
Cc: Mat Vine; Frank Weits
Subject: Homelessness, Social & Affordable Housing Policy Consultation

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

ACH Group appreciates the opportunity to contribute to the City Of Adelaide's Homelessness, Social & Affordable Housing policy consultation. The City of Adelaide's commitment and ambition to provide a clear framework to inform decision-making in this important public policy area is welcomed and has strong alignment with ACH Group's social purpose.

ACH Group was founded post World War Two in 1952 by Parliamentarian Sir Keith Wilson to support pensioners, post-war migrants, war veterans and their widows by pioneering a new housing model for older people, particularly those who were disadvantaged. From those beginnings – the building of three independent living units - we have grown to become one of South Australia's largest and most respected not-for-profit aged care organisations. Our 1900 strong workforce supports over 10,000 older Australians with an innovative and integrated range of accommodation and care, including more than 600 retirement living units across metropolitan Adelaide and the Fleurieu Peninsula.

Providing access to affordable housing is in keeping with ACH Group's 'Good Lives' philosophy and is central to our strategic vision. In the City of Adelaide we have partnered with Housing Choices and SA Housing Authority to continue to support older people at Spence on Light. A 75 accessible one and two bedroom apartment development in Light Square where ACH Group offers 16 secure and affordable apartments for older people who may require support as they age.

As a leading aged-care provider, we are aware and understand the housing challenges faced by people as they age. We know that rising living costs, including increasing rents, combined with under-employment and unemployment, are leading to an increase in homelessness and housing insecurity in South Australia. While public housing was once an option for older South Australians who did not achieve home ownership, the past two decades has seen this form of housing increasingly targeted towards more vulnerable populations. Many of the SA Housing Trust's Cottage Homes program sites have been redeveloped into more general social and affordable housing. Tenuous and insecure housing can have a serious impact that touches on all areas of a person's life, affecting health, self-confidence and wellbeing. We now know that people who experience homelessness also experience premature ageing are more likely to enter residential aged care earlier.

We know that we are set to face a huge growth in demand for affordable housing among older people. According to the Australian Housing and Urban Research Institute, mortgage stress among people aged 55 and older jumped by 600 per cent between 1987 and 2015.[1] There are predictions that eligibility for public housing among seniors will increase from 247,000 in 2016 to 440,000 in 2031.[2]

With declining levels of home ownership and declining options for low income renters, we need new partnerships and innovative solutions. The Light Square collaboration is a great example of what working together can achieve. ACH Group looks forward to working with new partners with Council and with new ideas to bridge the housing gap and explore a variety of funding options to suit particular financial circumstances and provide services for people who are living in social housing. ACH Group does not just want to build new accommodation as a sales transaction, but have an ongoing relationship with residents through tailored service provision so they age well.

One idea that we are exploring is whether we can soften the hard distinction between housing provided under the Retirement Village Act and housing developed under Community Housing arrangements.

It is clear that Commonwealth and State governments are strong supporters of an expanded community housing sector and ACH Group would like to see stronger connections between retirement villages and community housing to provide greater choice for all older South Australians.

We are also seeing rapid development in the availability of medium and high density housing for older people. As we see with Light Square, providers are exploring how medium and high density housing can lead to more variety in housing and lifestyle choices. Higher density buildings are naturally more complex to design, build and manage and often involve a mixture of different tenures and uses. We need the involvement of Council and industry groups such as the Property Council to help us to get these buildings right.

At ACH Group we believe older people deserve access to safe and independent living, and to stay connected with their community. We plan to grow our charitable purpose through property, with single older women who are most disadvantaged in our sight. We are committed to working with individuals and their families to develop roles and relationships that have been neglected or lost. Much of this work centres around the involvement of older people in activities such as fitness, being involved in community activities and clubs, renewing past interests, being able to maintain old relationships and develop new relationships, being able to continue lifelong interests and develop new interests. We believe that in future, aged care must be mindful of the whole context of people's lives well beyond meeting functional and clinical needs. For many older people isolation, loneliness and boredom, quite simply, make them sick.

Affordable housing must be available in areas where people have access to work, good public transport, shopping, services, recreation and social opportunities. People need access to these services, for their health, wellbeing, to enable them to have choices, rights and a sense of purpose. Housing must be designed to support people to age well. This could mean the inclusion of a range of age-specific design elements such as the installation of a lift, stepless thresholds and shower alcoves, nonslip floor tiles, wide external access paths, ramps and railings. And of course, digital solutions to make homes smart and safe.

Our Connected Communities Strategic Direction brings together older Australians, local community, government, business and researchers to support people to live good lives as they age. Connection with others is vital to a healthy community. By bringing together mixed tenure communities, older people are not always congregated, and we all benefit from a vibrant, diverse and representative society. We recognise that there is power in community partnerships and co-design with older people to allow them to have a voice and be in control, living a good life in a way that they choose and we can develop types of accommodation that they want to live in.

We provide the following specific comments to the draft policy paper:

HOUSING STRESS

When talking about rental affordability we were unclear as to whether the median household income of \$65,000 per year is gross or net income.

HOMELSSNESS

Our understanding of the 'facilitator' roles would be sharpened with increased clarity of the definition and measurable commitment. For example, it is not clear what the commitment may be for in-kind support and available grants as a proportion of a hypothetical sum required to reach the targets mentioned in the policy response. We see benefit in this aspect of the response to aim to address some of the key underlying determinants of homelessness, including education, poverty, mental health, trauma, home environments, experiences during childhood/adolescence, socio-economic equity, and lifestyle factors such as substance abuse. Perhaps there is an opportunity to articulate Council's contribute to addressing these factors. Council's advocacy role for increased funding with State and Federal Governments is highly valued.

SOCIAL HOUSING

The proposed Policy Response for Social Housing is based on an advocacy role with State and Federal governments for increased funding for public housing and community housing. This is understandable as it is not the Council's role to deliver social housing. We value the role Council plays in assisting community housing providers through the provision of up to 100% rate relief for properties that contain community housing and strongly advocate that this be reflected in the policy response. We also acknowledge the leadership role Council undertakes in driving a multi-

sectoral approach to bring together the various housing providers and other stakeholders (e.g., State Government, universities), to build momentum, strategic alignment and a better understanding of the strengths/needs of the sector and we strongly support this continuing. We envisage this could be an opportunity to co-design policies with those who are ultimately impacted.

AFFORDABLE RENTAL HOUSING

The end of NRAS is resulting in increased housing stress with properties returning to market rental rates. We are supportive of the proposed advocacy role Policy Response with State and Federal Governments for increased funding to deliver more subsidised rental accommodation in light of the cessation of the NRAS. We see an opportunity for Council's leadership role to be expanded to the forming a multi-sectoral partnership to increase the effectiveness of this advocacy, as well as to drive discussions on innovative rental housing models.

AFFORDABLE HOUSING (FIXED PRICE PURCHASE)

We acknowledge the non-mandatory inclusionary zoning whereby developers building private developments of greater than 20 dwellings should include 15% affordable housing has been unsuccessful and this has been a lost opportunity to alleviate the overall housing stress in the CBD. We are supportive of the proposed advocacy role for Council to the State and Federal Governments for a national approach to mandatory inclusionary zoning for affordable housing, including a change in state based planning legislation to enable its staged implementation.

THE WHOLE HOUSING SPECTRUM

We understand that Council has a role in the governance, leadership and policy coordination of the reforms of the Our Housing Future 2020-23 Strategy, including in the provision of housing insights and needs of its local community through the preparation of local or regional housing plans. ACH Group is supportive of Council's liaison with the State Government and the leadership opportunity to drive strategic partnership with the aim of amplifying action.

ACH Group welcomes the opportunity to continue to engage with Council in our aligned housing policy advocacy positions. For any clarification please do not hesitate to contact CEO Frank Weits.

Kind regards

"Please consider the environment before printing this email."

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¹⁴¹ *Mortgage Stress and Precarious Home Ownership: Implications for Older Australians*, Australian Housing and Urban Research Institute Limited, published 27/8/2019

Australian Institute of Architects



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18 February 2022

Homelessness, Social and Affordable Housing Project Team
City of Adelaide
25 Pirie St
Adelaide SA 5000

RE: DRAFT HOMELESSNESS, SOCIAL & AFFORDABLE HOUSING POLICY 2021-2024

The Australian Institute of Architects appreciates the opportunity to provide feedback on this Draft Policy. Housing is a fundamental human right, and the Institute recognises this in our [Affordable Housing Policy](#). The Institute has also recently entered into a [partnership with Housing All Australians](#) to strengthen architects' involvement in addressing Australia's growing social and affordable housing needs.

The Institute strongly supports the general messages presented in this Policy but feel that further development is needed to clearly establish the City of Adelaide's role in relation to homelessness, social and affordable housing. While we acknowledge that homelessness services, crisis accommodation, social housing and affordable housing are not directly provided by the CoA, we particularly recommend the creation of more active policies with a focus on addressing homelessness.

The Institute also notes that the Policy should clearly state the need for accurate data, and discuss collection, monitoring, targets and reporting. Data will enable the effectiveness of programs and changes over time to be measured and responded to in a targeted manner. Currently there is no specific mention of data in the Policy, although support by CoA for governance is referenced.

Finally, the Policy should include measurable targets to enable the effectiveness of the Policy to be determined and progress to be celebrated.

2.0 HOMELESSNESS

The *Ending homelessness in Australia: An evidence and policy deep dive* report recently published by the Centre for Social Impact establishes the ongoing importance of:

1. all levels of government investing in or facilitating the urgent development of more housing and accommodation
2. better data on homelessness to accurately understand what is needed
3. meaningful collaboration between service providers and all levels of government.

This confirms the importance of the CoA Policy and work being undertaken by the Council in relation to Homelessness and housing. However, as stated in the introduction, the Institute believes that there are opportunities for the CoA to address homelessness more actively.



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The CoA is in a unique position to actively support temporary housing initiatives in the following ways:

- In kind support to service providers with the use of City owned buildings. The City of Perth's Safe Night Space and The City of Melbourne's Make Room initiative are strong examples of this type of program.
- Incentives to encourage utilisation of underoccupied spaces for emergency housing. Through rates rebates or similar, owners with land or buildings that are long-term unoccupied or waiting for development could be incentivised to provide use of the property to temporary housing providers (such as Housing Choices).
- Introduction of a rates premium applied to properties that have been unoccupied for a significant period. This would incentivise occupation/development of vacant property, adding vibrancy to the city, as well as generating funding to support housing initiatives.
- Coordinate access to undeveloped land for use as fixed term sites for modular housing initiatives such as Forage Built, which provides modular individual accommodation units with associated social, health and employment support. Council could assist with identification of sites, advocacy to site owners, rates incentives and facilitate services connections.
- Establish campgrounds within the Park Lands in consultation with the Park Lands Authority and the Aboriginal community, who comprise a significant proportion of situational and long-term homeless people within the city. This would include identification of suitable sites and provision of amenities, targeted support services and staff could facilitate well-managed, safe and supportive temporary accommodation.

The Institute encourages the CoA to include active initiatives such as those listed above in the Policy.

The CoA can also play a vital role in working towards functional zero through coordinating the different providers: assessing the current services, analysing the gap, and establishing a network that is easily accessible by people experiencing homelessness.

There is reference to these tasks being carried out through the CoA's partnership with the Adelaide Zero Project, and this is commended by the Institute. We would like to see this stated more clearly in the Policy.

In reference to "improved outcomes for both rough sleepers and city users by effectively managing the public realm and Park Lands to ensure safety, accessibility and amenity is maintained", the Institute feels it is important that the physical and emotional wellbeing of rough sleepers is prioritised, particularly for Indigenous people, including those who are Traditional Owners of the area.

Likewise, it is vital that the goal of encouraging more people to live in the City of Adelaide does not come at the cost of pushing rough sleepers out of the city to the fringes or the suburbs, where they have lesser access to services and support.



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3.0 SOCIAL HOUSING

The Institute supports the CoA's Policy of advocating for increased funding for public social housing, which is primarily the responsibility of State and Federal governments in Australia. The Draft Policy also includes a statement regarding advocacy to State and Federal government for community social housing but provides no detail regarding what this would involve. For example, would the aim be to implement mandates for inclusion of social housing in private residential development, define minimum quality standards or initiate a Planning and Design Code Amendment to facilitate development of social housing? The work done by local government in Victoria to raise minimum standards for boarding and rooming houses is one existing program that the CoA could reference.

The Institute is also aware that private providers of social housing are often required by government funding bodies to deliver housing that can be sold on the open market at a later date. This reduces opportunities to design quality outcomes, restricts innovation and adds cost. Advocacy by the CoA to remove this restrictive requirement should be included in the Policy.

4.0 AFFORDABLE HOUSING

The absence of affordable housing in the city is a significant concern. Without suitable supply, it is impossible to address the issues identified in the Policy, or for the incentives and rebates included in the Policy to be effectively applied.

The Institute has identified financial viability as the key barrier to the development of affordable housing which may inform the CoA's Policy in this area. Modelling undertaken by organisations such as Shelter SA provides alternatives to current developer lead strategies for addressing this issue.

CoA could identify and advocate for additional incentives to those currently included in the SA Planning and Design Code to make inclusion of affordable housing more viable for developers. For example, this may include relaxing or removing the requirement for car parking associated with affordable housing developments and permitting smaller dwelling sizes where quality shared facilities such as laundries, social spaces and landscaped areas are provided.

The extensive regulations and application process for adaptive reuse makes it a less practical option, even when the preference is to retain existing buildings. Relaxing the regulatory requirements for adaptive reuse projects is a complex issue and requires buy-in from multiple regulatory and stakeholder bodies. There are also essential life safety provisions which must be maintained.

However, the Institute commends the Council for the work it is doing to promote and support adaptive reuse through information, demonstration projects and the Heritage Incentives Scheme. The Institute encourages the CoA to explore opportunities for further adaptive reuse projects that focus on provision of diverse housing and to include this as an initiative to be directly supported by the Council in the Policy.



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5.0 PRIVATE HOUSING

The Institute supports inclusion of private housing in the Policy, and notes that lack of diversity in supply is a challenge that needs to be addressed to better respond to changing demographics and affordability. Research shows that single person households are the largest growing demographic in Australia. However, the housing development sector continues to deliver a disproportionately high proportion of 3 bedroom homes.

Innovative, architect driven housing models such as Baugruppen at WGV, Perth and the Nightingale model in Victoria have been recognised for their ability to deliver more affordable housing and determine development objectives based on long-term occupation needs rather than profit.

Advocating for demonstration projects that provide buyers with the opportunity to see alternative housing models firsthand should be included in the Policy. The CoA can also commit to inclusion of alternative housing models where they partner with private developers. The Institute notes that this is already occurring in the Market Development, which includes one bed apartments that can be divided to provide two studios, which will provide compact, lower cost options for buyers and flexibility to be reconfigured over time.

The policy includes strategies by which the CoA can encourage the transition from renting to home ownership for key city workers. This is primarily through targeted rates rebates. In addition, ways in which the CoA can facilitate rent to own development should be considered as an alternative means to facilitate home ownership.

Finally, the Institute regards the waiving of the foreign buyers' surcharge as a concern. Without the inclusion of a benefits/risks analysis it is difficult to say that this initiative would not exacerbate existing affordability issues.

SUMMARY

The Institute supports the CoA in development of the Homelessness, Social & Affordable Housing Policy. We commend the CoA for the initiatives that they are already involved in and encourage development of active strategies that clarify social and cultural benefits, diversity and alternative modes of housing.

Yours sincerely,

Nicolette D Lerna FRAIA

EXECUTIVE DIRECTOR SOUTH AUSTRALIA

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25 February 2022

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Email: HSAHPolicy@cityofadelaide.com.au

RE: City of Adelaide's Draft Homelessness, Social and Affordable Housing Policy

Thank you for the opportunity to comment on the City of Adelaide's draught homelessness social an affordable housing policy.

Following consultation with some of our members we make the following high-level observations, mainly focused on the provision of social and affordable housing in the city of Adelaide.

Local government fees and charges can certainly provide a barrier and contribute to increased costs and ultimately affordable housing pricing, impacting both affordable and social housing (as well as private developers).

Other development costs such as temporary works permits, contributions toward civil infrastructure and the like are significant barriers to community housing providers (CHP) developing housing in Adelaide.

Notwithstanding the above, some of our community housing provider members have acknowledged that the Council already provides deep subsidies to their rates for them, which is extremely valuable and would be hard to operate without.

We also note that the City of Adelaide intends to encourage and support a national policy agreement on inclusionary zoning. The UDIA has some significant concerns with the introduction of mandatory inclusionary

Another matter that has been raised is the open space levy payment which could become a significant issue for all CHPs and retirement living providers in the future under recent changes to the P&D Code. The UDIA has consistently called for reform in this area which could include considering application of the levy to infrastructure improvements that support social and community housing developments.

Finally, we note that the City of Adelaide supports a national approach to mandatory inclusionary zoning.

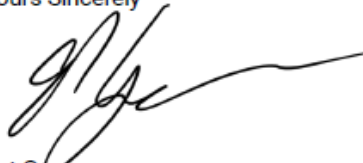
As part of the UDIA's response to the State Government's *Housing, Homelessness and Support Strategy* the UDIA stated:

We do not believe that these issues and broader housing affordability should be dealt with through the imposition of policies like inclusionary zoning, essentially across subsidisation by other homebuyers. A more horizontally equitable approach with government involvement would yield better outcomes, by being more economically efficient and ultimately more sustainable.

The UDIA's position is unchanged on this matter.

We trust that the above is of assistance.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Pat Gerace', with a long horizontal flourish extending to the right.

Pat Gerace
Chief Executive

South-East City Residents Association Inc.

**SOUTH-EAST CITY
RESIDENTS
ASSOCIATION INC.**

strengthening our community

Email: HSAHPolicy@cityofadelaide.com.au

Community Consultation

The Lord Mayor of Adelaide
Ms Sandy Vershoor
City of Adelaide
GPO Box 2252
ADELAIDE SA 5001

Dear Lord Mayor

Thank you for the opportunity to respond to the Draft Homelessness, Social & Affordable Housing Policy.

As you are aware the South East City Residents Association (SECRA) provides the residents of the south-east precinct of the City of Adelaide with a voice to achieve the following objectives:

- To promote the interests of the residents of the south-east precinct of the City of Adelaide and adjoining areas.
- To preserve and enhance the inherent character and heritage of the neighbourhood, including the adjacent area of the Park Lands, and in particular, Victoria Park.
- To support the provision of local retail and service facilities whilst retaining the "village atmosphere" of Hutt Street.
- To determine the policy of the Association to matters affecting the South East Precinct.

We write today in response to the Draft Homelessness, Social and Affordable Housing Policy.

SECRA agrees that local government and, in particular, the City of Adelaide does not have a role in providing (direct delivery) homelessness services, crisis accommodation, social housing or affordable housing.¹ It is the responsibility of the State and Federal governments to determine the policy and delivery of service to the homeless and address the lack of social and affordable housing. Local governments role is to **advocate** and hold the two levels of government to their respective roles and responsibilities.

The State and Federal governments should provide homelessness services, crisis accommodation, social housing and affordable housing in all local government areas—not just the City of Adelaide —allowing vulnerable people to remain in their neighbourhoods, close to friends and family.

The City of Adelaide should also advocate that State and Federal Governments facilitate programs that support the vulnerable in need of housing. An example of a program with such support is the Aspire program which is a collaboration between Hutt St Centre, South Australian Government, Social Ventures Australia and Housing Choices South Australia. The City of Adelaide may partner with the State and Federal government in these programs but should not be the driver (and a major source of finance) of such programs.

SECRA does not support 'accelerating the rate of population growth in the City of Adelaide'² at the expense of preserving the amenity for those living, working and visiting the City.

¹ See page 2.

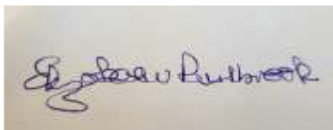
² See page 4.

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SECRA also notes that the contribution made by residents in this matter may have been overlooked. The SE corner has one of the highest urban densities in Adelaide; it has a significant proportion of social housing in our streets, and many of the services for the homeless are located here. In addition that many of our residents donate their time and money to assist and support the existing services for homelessness and crisis accommodation.

Thank you for the opportunity to comment on this critical social issue. Please do not hesitate to email secra.sa@gmail.com should you have any queries.

Yours sincerely

A rectangular image showing a handwritten signature in black ink on a light-colored background. The signature appears to read 'Elizabeth Rushbrook'.

Elizabeth Rushbrook
Chair
SECRA

Date: 17 February 2022.

Individual Response – 1

From: [REDACTED]
Sent: Thursday, 3 February 2022 1:57 AM
To: HSAHPolicy
Subject: Feedback

Hi,

I have read some of the details on the Draft Homelessness, Social & Affordable Housing Policy and have the following feedback:

I think any plan like this should be a long term vision of integrated housing that includes looking at diverse types of dwelling in style and size and also consider living near work and being able to get to work by walking or public transport. This is important for any city dwellings for homeless or otherwise. Often plans can be short term and expire quickly or be terminated by successive governments.

One example is NRAS and I read in your draft that:

NRAS has ended so what now?

"There is no proposed replacement for this program that offers subsidised rentals through the private market, despite rental stress increasing, and Covid-19 creating further stress on low income households"

So I think what we need is long terms sensible visions that cater for the needs of all strata of our society and build a city that runs like a living organism and is both beautiful and efficient.

Also, consciously planned spaces and plantings should be implemented to enhance the lives of residents. The city has many spaces, but often they are not well designed for purpose to cater for the needs of people that inhabit or visit the city. We have many spaces that are perfect to be planted with various food plants and spaces should allow people to sit, play and interact and have functional areas including plant shade canopies for clean air and protection from sun.

For the poor or homeless there needs to be functional housing that is individually suited and affordable or subsidised and not just built to provide private developers with a way of using building incentives. Will the building be done by govt or by private developers? Who gets to input in overall design of dwellings spaces and plantings? It would be good if planning could be done to consider the real needs of the residents and give them a voice in the planning.

Also there needs to be consideration of existing infrastructure and amenities and shops for the intended residents. Often we build apartments with a cafe on the ground floor, but what other amenities do the residents need? I'm sure residents would have a long list.

Another thing that is important is the way the plans and details are presented for input and feedback. Sometimes these documents are very wordy and contain specialized terms. I think plans should be simple in overall detail and present the major principles in an easy to understand format with visual representations so that they are easy for all to understand and comment on.

It is easy to use terms like "liveable city", but you need to clearly define what that means and for who.

In my opinion a liveable city would be one that has convenient and cheap public transport that is quick and efficient. It should also have safe walking and biking tracks and less cars and trucks.

It should have public seating readily accessible for people walking to be able to sit and rest. The city should have a large set of plantings of trees and other plants to keep the city cool and clean the air. It should be a safe city with ample lighting and so on. I also think the planting of trees like plane trees contributes to the allergy problem so plant selection is vital and there should be community gardens and food plants all over. But I must admit I rarely see these things in draft plans and they just seem to be done ad lib after plan implementation. The city should not have cars, just public transport and taxis. The cars could be parked outside the city square and people could walk, ride or bus to the centre. Imagine how much cleaner the air would be in this liveable city. I think planning a liveable city is not just about the housing, but what supports and goes around the housing and makes the city liveable of course.

I have many ideas about how I would expect our city to be more liveable and I'm sure others do too, but how do we get our ideas implemented? That is the key.

Cheers



Individual Response – 2

From: [REDACTED]
Sent: Friday, 28 January 2022 5:12 PM
To: HSAHPolicy
Subject: Dissident Housing

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

G'day,

One of the hidden issues in housing is struggling artists and dissidents. Part of the problem, is that there is no more urban renewal.

In the 70s/80s, it was Mile End/Bowden/Brampton. Later it was Port Adelaide. Now increasingly it relies on government and social housing.

With the scapping of a lot of public housing stocks, the opportunities now are also diminished.

That creates real issues, especially in eras of conservatism. If you have higher density housing, in eras arguably McCarthyist, then you set in train the potential for situations reminiscent of the Kristallnacht.

I would argue that a democracy is seriously lessened, that refuses to support creative dissent. Further I believe there is no reason for that to happen.

Housing SA is empowered to use SAPOL for evictions, there is therefore no reason that probationary tenancies for larger properties, couldn't be offered where the needs of creative non-violent dissent requires.

Keep in mind this is also true of entrepreneurs. Where start up housing could be offered also.

I think we need to take a much broader look at housing, in terms of encouraging the very diversity, that is vital for a healthy contemporary society.

Yours sincerely,
[REDACTED]