

TABLE SUMMARISING SUBMISSIONS ON DRAFT HOMELESSNESS POLICY

Name of Submitter & ECM Number	Main Comment/s	Amendment to Homelessness Policy documentation
<p>Menkit Prince ECM: 3726374</p>	<p>Aware of people living in sheds, caravans, back yards and tents – many without power or running water. Are these people counted in the state survey? Would be far more than officially counted if the count included unapproved substandard dwellings.</p> <p>Rentals are becoming scarcer and more expensive. Difficult to find rent for under \$300 pw unless it is a room. Particular issue for older people and more difficult, especially older women. Provided examples / cases.</p> <p>Comment: Substandard dwellings are recognised under the definition and the lack of affordable rental housing and the vulnerability of older people is acknowledged.</p> <p>In terms of any decision to increase the supply of affordable housing through Tweed Council’s planning controls and new developments, it is considered that there firstly needs to be a more detailed program of broader technical investigation, stakeholder consultation and advocacy in respect of the following: establishing a clear role for local government in affordable housing in the context of Council’s Fit for the Future service delivery preparations; an alignment of the relevant taxation, welfare, and planning legislation and controls of the Federal and State Governments; and a better understanding of the capacity of private and community building and development firms to deliver new affordable housing forms in the Tweed Shire, particularly in respect to the proximity with the demands of the Gold Coast housing market and economy. Any advancement of new development controls for the physical form of new affordable housing types, also needs to be formulated in parallel to supporting social services.</p> <p>In terms of more immediate action on homelessness in the Tweed, Council can still play a pro-active role of partnering and providing technical advice and support on crisis accommodation development projects with the Local Members, the State and Federal Government, community groups and businesses.</p>	<p>Y</p>

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	<p>The ideas presented in the Draft Policy are too generic and broad to make any meaningful difference.</p> <p>Comment: Noted and the policy recommendations have been made more specific (in line with other submission responses)</p>	Y
	<p>Council should relax the rules for developers wanting to build affordable housing and give more support to such a developer e.g., allowing a developer to subdivide 100 acres into 100 lots... allowing construction of one, two or three bedroom homes. Need to put a ceiling on rents so developers cannot be profiting at the expense of council's concessions.</p> <p>Comment: It is considered that Council should not be altering its current planning controls until there is a broader alignment with the policies of the State and Federal Government, and evidence that housing and building industry can deliver on any new subdivision and housing forms in a sustainable manner. However, the Homelessness policy commits to the preparation of an Affordable Housing Strategy for Tweed Shire LGA, to include the identification of opportunities, strategies, or assessment parameters aimed at increasing the stock of adaptable and affordable housing.</p>	N

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	<p>Council could waive rates for affordable housing or those struggling. Zone land for affordable / low-cost housing for perpetuity. Building Codes relaxed to allow underground dwellings or other alternative style dwellings. Be more lenient with multiple occupancies and reduce rates for MOs, especially those that are off the grid.</p> <p>Comment: Any proposal to reduce Council rates for affordable housing developments needs to be considered in the context of Council's Fit for the Future service delivery preparations. The main building controls are centrally regulated through Federal and State legislation. It would be more efficient for Council to seek a review of these controls through a broader program of advocacy with groups such as NOROC and LGov. Tweed Council is also currently reviewing affordable housing options for the hinterland and outlying areas through the Rural Lands Strategy.</p>	N
	<p>Investigate prefab relocatable cabins and granny flats in people's back yards e.g. Queensland. Make more of the existing developed areas rather than resorting to big housing estates that clear cut forests. Work with Aussie Build 3000 (Murray Spry) to encourage home owners to build granny flats to increase income and property value, and reduce the rate of homelessness.</p> <p>Comment: Developers and housing providers are identified for the consultative network forum (proposed in the Policy) for the open exchange of information sharing and gathering aimed at improving the awareness of all issues and opportunities regarding access and supply of affordable housing. In addition, the Policy identifies the need to promote secondary dwelling opportunities.</p>	Y

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	<p>The current Affordable Housing SEPP and Council's LEP provides less stringent conditions for various forms of affordable housing. The encouragement of new housing forms needs to be balanced with other planning amenity, safety, accessibility and environmental sustainability controls. Consultation with industry groups and the community is also essential.</p>	
<p>Murray Spry, Aussie Build 3000 ECM: 3726391</p>	<p>Offers assistance to Council and provides personal and company background in the development of affordable housing noting: He has a factory in Murwillumbah where they build factory built housing modules from granny flats to three storey townhouses. The refinement of the domestic building methodology will enable us to house people at an affordable level and greatly assist our chronic low cost housing problem.</p> <p>Comment: Developers and housing providers are identified for the consultative network forum (proposed in the Policy) for the open exchange of information sharing and gathering aimed at improving the awareness of all issues and opportunities regarding access and supply of affordable housing. Please also refer to the comments for submission ECM: 3726374.</p>	<p>Y</p>
<p>Pastor Lynnette Borthistle (C/- Colin de Costa) ECM 3727450</p>	<p>Rent is far too high for women who are on their own. Women over 50 going through a marriage break up should be treated differently to someone younger who can better find suitable employment. Not all homeless people are people with addictions or mental health issues. Some live in cars because that's all they can afford.</p> <p>Tweed Community Open Arms Ministries has a mandate to provide a homeless 24/7 refuge where those who are found to be homeless can live, providing professional help for addictions and managing the mentally ill.</p> <p>Comment: The vulnerability of older people has been identified and expanded on within the policy. Challenges of homelessness and links to affordability have been made.</p>	<p>Y</p>

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Robyn Fitzpatrick ECM 3727843	<p>Suggest that there is a particular location for people to donate clothing specifically for homeless people.</p> <p>Comment: Included under Facilitation and Coordination to maintain up to date information on Council's website.</p>	Y
Pamela Chesher ECM 3728127	<p>Why do we not see housing commission homes being built by the government and rented out at a cost applicable to the tenant? If they are building them then they are not building enough.</p> <p>Comment: This is a matter for the NSW State Government to acknowledge and respond to. The need for more low-cost (social and affordable) housing is recognised within the Policy and there is a commitment to Lobby Government and advocate for sustainable resources for social housing options and homelessness support services, particularly case management, supported crisis accommodation, and transitional and affordable housing options.</p>	Y
Craig Buchan ECM 3728246	<p>Does Council consider people who are sleeping in cars in public reserves in Kingscliff in the homeless definition? (Usually in the same place for weeks and months). This issue needs addressing and Council should be enforcing move on notices in no camping areas and for rangers to offer these people emergency accommodation or a parking area in one of the Council caravan parks. Need a sustainable and long term accommodation option. They have Queensland number plates and complaints have been issued to the Council. Gold Coast enforces no camping areas and this is shifting the problem to Tweed Shire.</p> <p>Comment: Sleeping in cars is recognised in the definition. Enforcement of move on notices has been included as well the need to designate affordable and controlled camping and over-night parking sites for short term use.</p>	Y

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Christine Vannucci, Alzheimer's Australia ECM 3728459	<p>Details the population of seniors and highest prevalence of dementia in NSW, yet aged care or dementia services were not identified in the Tweed Shire Homelessness Issues paper. It is recommended that the Tweed Homelessness Policy should emphasise the service gap for the elderly population (people aged 55 and over) and outline Council's commitment to advocate for resources for housing and homelessness support services specific to vulnerable older people.</p> <p>Comment: The vulnerability of older people has been recognised and the high prevalence of dementia is now included in the background context of the policy. Council commits to advocating for housing and homelessness support services for all members of the community, including vulnerable older people.</p>	Y
Trish Evans, Northern Rivers Social Development Council ECM 3728951	<ul style="list-style-type: none"> • Add a definition for <i>first responders</i>. • Highlight housing stress is either mortgage or rental stress. • A report is mentioned that presumably provides data for Table 1 but is not sourced (referenced). • Remove the word 'social' from page 8, Facilitation and Coordination (last dot point) to read: 'Support housing providers to increase the availability of different forms of housing assistance'. • Add information in compliance section to identify training that council officers will cover (e.g., understanding homelessness issues and referral options, frequency of refresher training). <p>Comment: Definition of first responders and clarity on housing stress has been added. The data for Table 1 has been sourced, but this has been made clearer. The word Social has been removed and more detail on the training has been provided.</p>	Y

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John Lee, You Have A Friend Inc ECM 3729687	<ol style="list-style-type: none"> 1. Has worthy suggestions but does not fully address the primary stated issue to prevent and reduce homelessness, but suggest setting up internal working groups, committees and forums to be reviewed in April 2016. It needs to be acted upon without waiting years before solutions and support are put in place. 2. Utilise the Commissioned Report: Tweed Shire Homelessness Issue Paper Final Report” as the basis for actions to be taken, as per the implementation plan within that report (p58-59). For example the Rough Sleepers Initiative and Supportive Housing ventures, crisis and short term accommodation, appropriate and affordable long term accommodation, food services, services that do public space liaison and assertive outreach, better coordination of services, role of estate agents, Police and Council, education and community awareness. 3. Learn from the proactive Councils nearby – Brisbane City Council, Gold Coast, Clarence Valley. 4. The most important issue facing the Tweed is the lack of crisis, short and affordable long term housing, Council efforts should focus on this issue by considering land allocation for immediate crisis accommodation. 5. Allocate land upon which people can camp and park overnight on a temporary basis. A location closer to Tweed Heads than Stott’s Creek. 6. Prioritise the need to lobby State Government for more housing support. <p>Comment: Point 1 has been noted and the policy aims to provide clear actions. On point 2, the policy was developed from the Issues Paper and in partnership with the TSHHN. A table has been added as an Appendix to the policy to clarify the most pertinent links. Most of the actions have been integrated into the policy where practicable. Point 3 was undertaken as part of developing the original draft policy and continues through the TSHHN. Point 4 is acknowledged throughout the policy and land allocation has been identified as a consideration. The commentary on the shorter term priority for crisis</p>	<p>Y</p>

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	<p>accommodation is consistent with the comments provided for submission ECM: 3726374. On point 5, the need to designate affordable and controlled camping and over-night parking sites for short term use has been identified. Point 6 is in the policy under Education and Advocacy.</p>	
<p>Dot Holdom ECM 3729857</p>	<ol style="list-style-type: none"> 1. The Shire needs to provide alternative accommodation such as drop in centres, crisis accommodation, youth accommodation, men's accommodation if we don't want homelessness in the parks. 2. Consolidate and refurbish public toilet facilities – these are places used every day by women with children who are sleeping in cars and/or living on the local beaches. These are facilities for the homeless to wash themselves, go to the toilet and wash clothing. 3. Discreet signage be installed in public toilets and shopping centres to provide contact details and information on homeless support services that are available. 4. Need local government initiatives, conferences, community summits, local area partnerships and resource sharing with non-government agencies. 5. Funding from the sale of the poles and wires should help provide buildings for crisis accommodation and/or short term accommodation for those who are homeless. More emergency and crisis housing options are needed. 6. Tweed Shire Council officers to create an education pack around homelessness (based on info provided via current domestic violence education program) to be provided to schools in the Shire. 7. Links need to be made to social reskilling, basic life skills, drug and alcohol education, counselling and re-employment. 8. The safety net and service support for the most vulnerable needs permanent funding, safe places and ongoing support needs to be there. 	<p>Y</p>

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	<p>Comment: Increased supply of accommodation (including crisis) is recognised throughout the policy. Recreation Services will be developing a Public Toilet Strategy that will include an assessment of supply and demand across the shire and the identification of issues relating to the use of public toilets, management and maintenance. As part of the assessment addressing social conditions which may contribute to increased demand in some locations will be considered (e.g. homelessness).</p> <p>Distribution and availability of information and education on homelessness services and issues of homelessness has been identified alongside events under the commitment to education and advocacy. Links to case management and the economic development strategy have been made within the policy as well as advocating for sustainable resources.</p>	
<p>William Arnold Everest ECM 3729803</p>	<p>Favours subdivision and multiple occupancies which seem to have fallen out of favour. Taxes and regulations associated with dwellings have put it out of the reach of a large percentage of the population.</p> <p>Shortage of land on which to build houses. In the early 70's you could subdivide any property zoned 1a.</p> <p>Council could create a zoning that would allow development of affordable housing on privately owned land that is already well serviced by roads, power, water and sewerage without creating a subdivision. Subdivision provides entitlement to the resident to make complaints about matters such as farming, whereas, altering the zoning could ensure housing is provided with the understanding that farming activities will be conducted. This is allowed with the Hare Krishna Farm, so why not for others, for fifth generation farmers who are trying to produce quality food and keep it as a family property and business.</p> <p>Council opposes rather than assists e.g. provision of a workers cottage got rejected as</p>	<p>N</p>

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	<p>the worker didn't need to be on the premises 24 hours a day. The controls need revisiting if you want supply of housing to increase. Need some entrepreneurship.</p> <p>Comment: Please refer to the comments for submission ECM: 3726374. The Homelessness policy commits to the preparation of an Affordable Housing Strategy for Tweed Shire LGA, to include the identification of opportunities, strategies, or assessment parameters aimed at increasing the stock of adaptable and affordable housing.</p>	
<p>David Boutkan, The Family Centre ECM 3729881</p>	<p>The policy looks suited for purpose. It covers all relevant areas and in the 'planning' section allows processes to inform the TSC affordable housing strategy, which is probably a more important and practical way Council can contribute to housing access and affordability in the future.</p> <p>It also maintains an appropriate role for Council in service coordination.</p> <p>Comment: The Homelessness policy commits to the preparation of an Affordable Housing Strategy for Tweed Shire LGA and sustained TSHHN support has been identified.</p>	<p>N</p>
<p>Leisa Gustafson, Department of Family & Community Services ECM 3730242</p>	<p>Include 'Residential Tenancies Act' under the 'Related Legislation' section. This Act covers tenancy rights and processes about termination of tenancies.</p> <p>Comment: Included.</p>	<p>Y</p>

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John McKenna, North Coast Community Housing Company Ltd ECM 104888056	<p>Dot point to be added to Planning section:</p> <ul style="list-style-type: none"> • Mandating minimum affordable housing inclusionary zoning requirements on all reasonable size property developments. (Between 10 and 20%.) • Congratulations to Council on a very good document. <p>Comment: Please refer to the comments for submission ECM: 3726374. The Homelessness policy commits to the preparation of an Affordable Housing Strategy for Tweed Shire LGA, to include the identification of opportunities, strategies, or assessment parameters aimed at increasing the stock of adaptable and affordable housing.</p>	N
Amanda Lindh, Nullum House Co- Ordinator ECM 3731476	<ul style="list-style-type: none"> • Continued involvement of Council as secretariat to Tweed Shire Housing and Homelessness network is essential. • Implementation of an Affordable Housing Action Plan could be considered whereby Council would work with the building industry and property investors to make affordable housing a viable option by relaxing the guidelines involved in property development on a contract basis that would allow the allocation of appropriate affordable housing to be delegated. This would reduce the number of homeless people. <p>Comment: Secretariat services and continued support for the TSHHN have been identified. The Homelessness policy commits to the preparation of an Affordable Housing Strategy for Tweed Shire LGA, to include the identification of opportunities, strategies, or assessment parameters aimed at increasing the stock of adaptable and affordable housing. The consultative network forum identifies building industry and property investors as a group of stakeholders to include in the exchange of information, aimed at improving the awareness of all issues and opportunities regarding access and supply of affordable housing. Please also refer to the comments for submission ECM: 3726374.</p>	Y

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<p>Peter Usher On Track Community Programs Ltd ECM 3748515</p>	<ul style="list-style-type: none"> • It is good. Similar to City of Sydney Policy which led to 'Homeless Persons Protocol'. Perhaps this policy could too? • Matters discussed relating to planning and affordable housing are a part of the 'Housing Policy'. They are good of course. • Comments relating to 'Council will....facilitate, advocate etc do not define who the target audience is. • Little reference to the private sector's responsibility to respond. • No great emphasis on the need to support and facilitate the services delivered by social housing and other service providers in the NFP sector. • Overall a strong effort but needs a little sharpening. <p>Comment: The Homelessness policy commits to the preparation of an Affordable Housing Strategy for Tweed Shire LGA, to include the identification of opportunities, strategies, or assessment parameters aimed at increasing the stock of adaptable and affordable housing. Have defined who the target audience is for Education and Advocacy and been more specific where practicable e.g. establish a bi-monthly internal coordination group. Reference has also been made to the private sector's responsibility and continued secretariat support for the TSHHN has been identified.</p>	<p>Y</p>
<p>Julie Murray Kingscliff Ratepayers and Progress Association Inc ECM 3729556</p>	<p>The community would like more information on who to contact, what organisation, when residents become concerned for the safety of a person who appears to be homeless. Perhaps information could be included on the Council Website.</p> <p>Comment: Included under Facilitation and Coordination to maintain up to date information on Council's website.</p>	<p>Y</p>

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Maria Baker ECM 3729791	<ul style="list-style-type: none"> • Provide somewhere for the homeless people to sleep – like a hall – that is out of the weather. A lot of people are sleeping in cars only to be told to move on. • The government needs to look after homeless people like they do in the Mediterranean, the government look after them and their needs. • Praises Fred’s Place and You have a Friend service providers. <p>Comment: Through the TSHHN and this policy, Council works to support housing and homelessness services. Please also refer to the comments for submission ECM: 3726374.</p>	Y
Stuart O’Neill ECM 3752493	<ol style="list-style-type: none"> 1. Preventing and reducing homelessness – currently Council is incongruent with this policy. 2. Improved communications are needed before issuing fines. 3. What is wrong with someone allowing people to park on their private land if they are homeless? (cars, vans, camper vans, tents) Can properties greater than a certain size deliver certain services and have permitted uses if construction is not required for limited emergency shelter or parking. Properties could be registered and monitored. Could Council assist residents who are interested in utilising their properties for these purposes? 4. Residents can help to collate and communicate data on those experiencing homelessness. 5. Business incubator with mentors could help homeless people to generate micro businesses and generate legal income. Council could waive fees to help start-ups. 6. Although unsightly to some, pushing a shopping trolley of items is not an offence. 7. Pet minding service for the homeless to attend appointments and/or work. 8. Have a target for 100+ safe locations per night throughout Tweed Shire. 9. A homeless working committee for five years. 10. Revisit planning regulations where someone can park their van for any length of 	Y

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	<p>time on my land if it is not slept in and can live in my house for any length of time, but if they sleep in their van they are breaking the law. Can be using facilities like showers/toilets in both instances.</p> <p>11. Using the flood policy is an abhorrent excuse.</p> <p>Comment: Points 1, 2, 6, 7 and 11 are noted. Point 3 has been responded to under the Planning and Development Control section by including items for consideration e.g. identify opportunities, strategies, or assessment parameters aimed at increasing the stock of adaptable and affordable housing. Point 4 is responded to under Research and Monitoring by including the community. Point 5 is incorporated under Council Services and Compliance, through identifying the links to the Economic Development Strategy which supports entrepreneurship and creation of local employment / procurement opportunities. For example, the implementation of policies such as local preference in procurement. Tweed Shire Council supports the principle of a Business Incubator noting it is a State Government project currently being delivered on behalf of the State by NORTEC covering the range of all business start-ups. Point 8 Council has committed to working with the Tweed Shire Housing and Homelessness Network, the community, and the Police, to collect and monitor data and emergent trends for homelessness on an annual basis, and to establish relative annual demand for the full range of social and affordable housing. Point 9, Council has the TSHHN for inter-agency and community sector collaboration; in addition a bi-monthly internal working group has been included. Point 10, there is a commitment to prepare an Affordable Housing Strategy for Tweed Shire LGA utilising the work undertaken to-date as part of the NOROC <i>draft Northern Rivers Regional Affordable Housing Strategy</i>. The need to designate affordable and controlled camping and over-night parking sites for short term use has also been identified.</p>	