

12 January 2023

RE: Response to proposed amendments to the State Environmental Planning Policy (Housing 2021) (Housing SEPP)

To the NSW Department of Planning and Environment,

Homelessness NSW is a not-for-profit Peak body working to end homelessness in NSW. We exist to build the capability of people and capacity of systems to end homelessness. We have a vision for a future where everyone has a safe place to call home and connection to their community. Our 190 members include specialist homelessness services, allied organisations and services. We work with our members, people with lived experience and a broad network of partners to understand drivers of homelessness, advocate for solutions, build skills and knowledge, and scale innovation.

Last year, more than 68,000 people were assisted with homelessness, but the true extent of the problem is much worse. More than 50% of people who sought support could not have their needs met because services do not have the staffing and asset capacity to meet demand. This capacity is significantly hindered by a lack of social and affordable rental housing causing a backlog in the crisis system. As the cost of living continues to spiral, rents rise and wages stagnate, the pressure on those vulnerable to homelessness – ordinary Australians – grows. Homelessness NSW has a vision for a future where homelessness should never be more than rare, brief and non-recurring. We cannot achieve this without adequate and sustained investment in social and affordable housing.

Homelessness NSW welcomes the opportunity to contribute ideas for the Department of Planning and Environment's (DPE) Explanation of Intended Effect (EIE) for the proposed amendments to the in-fill affordable housing, group homes, supportive accommodation and social housing provisions of the State Environmental Planning Policy (Housing 2021) (November 2022). Homelessness NSW supports the vision for future growth that is well planned, sustainable and meets the changing needs of our community in the current iteration of the EIE. Homelessness NSW acknowledges the efforts to fast track and cut red tape for the planning and delivery of housing for people on lower incomes who require support.

Our submission makes recommendations based on our experience of working with specialist homelessness services, people with lived experience of homelessness, first nations communities and government partners. Our recommendations call upon the NSW Government to:

1. Introduce a legislative requirement for Councils to adopt an Affordable Housing Contribution Scheme and provide support to assist local government to achieve this.
2. Department of Planning & Environment ('DPE') to set the "maximum applicable affordable housing contribution rate" at the higher target of 10-15% to apply to residential rezonings and development.
3. Amend the Housing SEPP and standard LEP instrument to provide greater clarity on the product differences of social and affordable housing.

4. Maintain and publish data on Affordable Rental Housing granted approval and created under the provisions of the Housing SEPP (and former SEPP versions such as ARHSEPP 2009 and SEPP 70)
5. Amend the Housing SEPP and standard LEP instrument so that affordable rental dwelling clauses within the amended SEPP and standard LEP instrument are for dwellings in perpetuity (registered on title).
6. The Housing SEPP should provide expedited approvals for all social or affordable projects, as well as mixed income schemes where the share of affordable housing is significant.
7. Increase the stay to 24 months for High support accommodation (new housing type).
8. Amend the Housing SEPP to explicitly indicate that high support accommodation premises would be premises that have self-contained units with private kitchen, bathroom facilities and individual entrances where possible.
9. Amend the definition of high support accommodation in the Housing SEPP and standard LEP instrument to retain the existing 75% site coverage and height standard in Appendix 1 of the Housing SEPP. This will enable flexibility in the design of high support accommodation to ensure adequate fit for purpose accommodation where there are varying site constraints in metropolitan locations.
10. Expand the development consent pathway availability for development delivered by a government agency and providers of homelessness services.
11. Expand the supportive accommodation provisions of the Housing SEPP to include support services, in a dedicated room or area to people who are being supported by the service, not just existing tenants.
12. Remove the 5-year limit on the complying development pathway and make it subject to review at 5 years.
13. Ensure all new social housing aligns with the basic requirements of the Livable Housing Design Guidelines to ensure people with mobility issues have access and all people can successfully remain in their housing into old age.
14. Mandate and resource Local Governments to maintain a regular inspection schedule of boarding houses to ensure a safe standard of living for low-income tenants.

If you wish to discuss this submission further, please contact Dean Hart, Industry Capacity Manager, Homelessness NSW Dean@homelessnessnsw.org.au

Thank you for considering our submission.

Yours sincerely,



Trina Jones,

Chief Executive Officer

Introduction

As of June 2022, there were over 57,550 households on the social housing waiting list in NSW including 6,519 on the priority list.¹ Wait times for social housing is now up to ten years or up to two years for those deemed priority. With the current rate of growth of social housing in NSW (averaging 700 new social housing dwellings per year), it would take 70 years to provide housing to everyone on the waiting list.²

At a time where rates of homelessness are increasing, it's never been harder to find or sustain a rental property. Access to housing that people can afford to live in has significantly reduced across the state with regional areas reporting extreme shortages and research showing less than 1% of rentals available for people on low income.³ Private renters experience tenure that is perpetually precarious and uncertain. NSW currently has approximately 154,000 social housing properties, representing 4.7% of all occupied residential dwellings. Setting a social housing target of 10% of occupied residential dwellings by 2050 is needed to provide a significant increase in social housing levels in NSW to both prevent further crisis and eliminate the current backlog on the social housing waiting list. The planning controls must be more flexible to respond to the changing needs of communities and commit to affordable housing in perpetuity.

Supporting more Affordable Housing

Recommendation 1: Introduce a legislative requirement for Councils to adopt an Affordable Housing Contribution Scheme and provide support to assist local government to achieve this.

To respond to the lack of available social and affordable housing Local Government must be supported and empowered to leverage all available mechanisms of delivery for low-income housing options. The EIE outlines the administrative and procedural barriers for Local Governments in developing Affordable Housing Contributions Schemes ('AHCS'). Specific guidance on how developers are to calculate and propose a "reasonable" Affordable Housing contribution rate will need to be created and circulated widely. Training of local government planning staff in interrogating developer-proposed contribution rates will also be required. This training and guidance requirement is even more pressing in regional contexts.

Recommendation 2: Department of Planning & Environment ('DPE') to set the "maximum applicable affordable housing contribution rate" at the higher target of 10-15% to apply to residential rezonings and development.

Homelessness NSW proposes the NSW Government mandate that 10% of all new developments and sub-divisions of land with 15 or more dwellings be social housing. This rate should be at least 30% (social and affordable) when the development is on government owned

¹ New South Wales Department of Communities and Justice, Expected Waiting Times Dashboard, Sydney, <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>

² Barnes, E, Writer, T & Hartley, C 2021, Social Housing in New South Wales: Report 1 Contemporary analysis, Centre for Social Impact, Sydney, ONLINE https://www.csi.edu.au/media/uploads/social_housing_in_nsw_contemporary_analysis.pdf

³ Anglicare 2019, Sydney Rental Affordability Snapshot, ONLINE <https://www.anglicare.org.au/about-us/media-releases/still-less-than1-affordable-for-people-on-low-incomesdespite-increase-in-rental-properties/>

land.

Inclusionary zoning is already used in Australia and internationally. In 2005, South Australia mandated that 15% of new dwellings in significant development projects be affordable housing.⁴ Internationally, London has had a 50% social and affordable target for developments with 15 or more units in place since 2004. Both of these examples have implementation issues that should be studied, with any learnings applied to a NSW model to ensure success.

A base rate of 10-15% aligns with many national and international practices of mandatory inclusionary zoning for affordable housing. Setting the affordable housing contributions range (10-15%) at the State Government level for regions/cities would eliminate the need for local government to undertake cumbersome feasibility testing at the local level.

Recommendation 3: Amend the Housing SEPP and standard LEP instrument to provide greater clarity on the product differences of social and affordable housing.

Affordable housing is a broad term used to characterise many types of public or private housing made available for rent or purchase at specified or qualifying income levels. One common way of defining 'housing affordability' is that a household spends no more than 30% of its gross household income on rent, excluding utilities. Social housing is a subset of affordable housing and refers specifically to rental housing provided by the government or by a not-for-profit organisation operating on behalf of government and includes public housing, community housing and Aboriginal housing.

An explicit amendment is sought to the Housing SEPP and Standard LEP instrument so that the definition of affordable housing defined by Clause 1.4 of the EP&Act 1979 reflects the term affordable "rental" housing. This will distinguish affordable rental housing from subjective terms of affordability defined by the private market.

Recommendation 4: Maintain and publish data on Affordable Rental Housing granted approval and created under the provisions of the Housing SEPP (and former SEPP versions such as ARHSEPP 2009 and SEPP 70)

At present, there is no publicly available or inter-departmental register of Affordable Rental Housing granted consent and created as a result of provisions in the *Housing SEPP 2021 (or repealed Affordable Rental Housing SEPP 2009 and SEPP No. 70)*. Given the compliance role often required of Department and Communities & Justice ('DCJ') in ensuring Community Housing Providers are meeting Affordable Housing obligations homelessness NSW calls for this information to be collected and made publicly available.

Homelessness NSW supports Shelter NSW calls for published data on affordable rental data. This register should track information on approval status, development status, timeframe status (i.e. housing being "affordable" in perpetuity from x date, or time-limited), and locations (LGAs, suburbs) of Affordable Housing made possible by the Housing SEPP. This includes housing built in accordance with Affordable Housing Contributions Schemes as well as Affordable Rental Housing reliant on provisions from Chapter 2 of the Housing SEPP. In time, this register should be expanded to include data on affordable housing made possible by Voluntary Planning Agreements. The data should be publicly available and published annually at a minimum.

⁴ RenewalSA 2014, Delivering an inspiring urban future, Adelaide, https://renewalsa.sa.gov.au/wp-content/uploads/2020/05/Delivering-an-inspiring-urban-future-AnnualReport-2013-14-30-September-2014-withFinancial-Statements_links-fixed.pdf

Planning pathways for social and affordable housing

Homelessness NSW supports the efforts to reduce red tape for accelerating the development of social and affordable housing. The standards and quality measures should be retained with an emphasis on expediting the process.

Recommendation 5: Amend the Housing SEPP and standard LEP instrument so that affordable rental dwelling clauses within the amended SEPP and standard LEP instrument are for dwellings in perpetuity (registered on title).

Homelessness NSW support Shelter NSW calls for an explicit amendment to the Housing SEPP and Standard LEP instrument for an affordable rental dwelling definition for dwellings in perpetuity (registered on title) and not a fixed 15-year term.

The Planning Institute of Australia's previous submission to the Housing Diversity SEPP Explanation of Intended Effect in September 2020 states '*Affordable housing development that has received a concession under the proposed SEPP should remain affordable in perpetuity*'. The definition of affordable rental housing in perpetuity must be reportable as such and can be monitored (operate as intended). This will best support both unmet, current, and future demand for affordable rental housing enabling people to age in place in their respective communities.⁵

Recommendation 6: The Housing SEPP should provide expedited approvals for all social or affordable projects, as well as mixed income schemes where the share of affordable housing is significant.

Homelessness NSW supports the Committee for Sydney recommendations for the Housing SEPP to provide expedited approvals for all social or affordable projects, as well as mixed income schemes where the share of affordable housing is significant.

The Committee states the current NSW planning system does not recognise the difference between affordable housing and market rate housing (one minor exception is the Housing SEPP's attempt to facilitate floor space bonuses). Outlining that, permanently affordable housing should be compliant with planning and design guidance, but not subject to lengthy and costly design competitions and assessment processes. The not-for-profit community housing sector should be supported to spend its resources on housing more people in need, not navigating an overly onerous planning process.

Victoria Planning Provisions - A Case Study

Victorian Planning Provisions Clauses 52.20 and 53.20 of the Victorian Planning Provisions provide for projects that are wholly or partly funded under the Big Housing Build program, carried out by or on behalf of the Director of Housing. Projects seeking the agency's funding are required to allow for council, referral authority and community consultation; a review by the Victorian Government Architect, where projects are over three storeys or 100 dwellings; meetings with the Department of Planning; revised documentation; and an eight-week assessment process. This is indicatively an eight-to-10-month process from the time of being advised of success in seeking funding, through to construction commencing. By contrast, the Committee for Sydney estimates most equivalent projects in Sydney area would take

⁵ Planning Institute Australia. Submission to the Housing SEPP 2021. Online. <https://www.planning.org.au/documents/item/10881>

approximately two years.⁶

Crisis and transitional support (Group homes and hostels)

Despite specialist homelessness services operating on average beyond their funded client numbers by 30%, in 21/2022, 50% of people who sought support could not have their accommodation needs met. The need for crisis services continues. Homelessness NSW welcomes the Housing SEPP amendment to introduce high support accommodation, to enable delivery of short-term housing for the purposes of refuge or crisis accommodation and drug and alcohol rehabilitation via a without consent pathway.

Crisis and Transitional Accommodation options need to be flexible for providers to amend the use to meet the client needs. Increasingly people experiencing homelessness are spending longer in crisis and transitional accommodation. This is due to a lack of safe and affordable rental or social housing options to support people to exit to. The shortages of social and affordable rental housing causing a “bed block” in crisis and transitional homelessness services.

The need for flexibility is further compounded by the impacts of fire, flood and natural disasters contributing to an emerging group of people experiencing homelessness who are homeless for the first time. Some of whom are working, have mortgaged properties that have been destroyed without insurance or are not eligible for rent assistance or social housing. In some regional areas for those on low income there are no available rentals. This is causing people to be stuck in the crisis support system because there is no where for them to go. Many end up living in tents in caravan parks across the state.

Recommendation 7: Increase the stay to 24 months for High support accommodation (new housing type).

While the 18-month extended stay is welcome, a further extension to 24 months is preferred in line with feedback from services on minimum support time frames for people with complex needs experiencing homelessness. This is particularly the case for young people and families who require continuity of access to education, childcare and social networks to reduce trauma and aid in their support and sustained exit from homelessness. Service providers aim to limit time in crisis facilities to reduce impacts to clients. Extended stays are not generally preferred in crisis facilities however in recognition of the lack of available rentals the flexibility to service providers means they can make decisions based on the needs of the clients not the limitations of the planning controls.

Recommendation 8: Amend the Housing SEPP to explicitly indicate that High support accommodation premises would be premises that have self-contained units with private kitchen, bathroom facilities and individual entrances.

The NSW Core and Cluster or Hub and Home models being rolled out across the state and Australia provide the best practice model for emergency accommodation for people experiencing homelessness including women and children escaping DFV and young people. This is discussed in the DV Crisis Accommodation Functional Design Brief (2022), Design Guidelines (Housing Plus + Custance Architects) (2022) and other documents. The provision of independent living units creates privacy and space reducing conflict, and stress for individuals.

On page 20 of the proposed amendments, it states “– (point 1) have private rooms which **may**

⁶ Committee for Sydney. Bringing Affordable Housing to Scale. Online. <https://sydney.org.au/wp-content/uploads/2022/12/Committee-for-Sydney-Bringing-affordable-housing-to-scale-December-2022.pdf>

have private kitchen and bathroom facilities”. We recommend this is amended to Self-contained units with private kitchen, bathroom facilities and individual entrances where possible.

Recommended 9: Amend the definition of high support accommodation in the Housing SEPP and standard LEP instrument to retain the existing 75% site coverage and height standard in Appendix 1 of the Housing SEPP. This will enable flexibility in the design of high support accommodation to ensure adequate fit for purpose accommodation where there are varying site constraints in metropolitan locations.

The 25% reduction in site coverage and a 2 storey height limit may pose a challenge in metropolitan locations. This is highlighted by 5 of the 9 Domestic Violence crisis accommodation case studies provided in the Design Guide produced by Housing Plus + Custance Architects for group homes used as crisis accommodation. The examples referenced by the Design Guide were all recently built between 2018 and 2022, including Evolve Housing, Guildford Sydney, Women’s Housing Limited in Bayswater Melbourne, Blackwattle apartments in Metropolitan Sydney, Nightingale Fresh Hope, Sydney and Viv’s Place, Launch Housing, Outer Metropolitan Melbourne.

Successful supported housing models – Case Studies

Supported housing models for people experiencing homelessness provide an opportunity to break cycles of disadvantage as well as provide intensive support based on individual need.

Youth Foyers are integrated learning and accommodation settings for young people, typically aged 16 – 24 years, who are at risk of or experiencing homelessness. The Foyer model was developed in the United Kingdom more than 20 years ago and upholds that the only long term avenue out of homelessness for young people is through education and training, with a focus on nurturing an ‘aspirational community’ and securing sustainable employment and independent housing. Through this approach, Foyers are able to drive long term positive outcomes and impacts. The Foyer concept is considered international best practice in helping disadvantaged young people, aged 16-25 years who are homeless or in housing need, to achieve the transition to adult independence. Foyers have proven so successful that there are now more than 1,000 projects worldwide; including Australia, Ireland, the United States, Romania, Netherlands and Germany.⁷

Common Ground is a supportive housing model that accommodates people experiencing chronic homelessness. Common Ground models draw on Housing First principles, combining housing with wraparound support services. The target cohort of Common Ground projects are people with experience of chronic homelessness and with complex needs, including people with mental ill-health, experience of complex trauma, alcohol and drug use, chronic disease, and brain injury. The congregate setting of the building is designed to provide core support services on-site, create socially mixed communities, and strengthen neighbourhoods.⁸

Temporary supportive accommodation

Homelessness NSW support the proposed changes in the Housing SEPP in relation to Temporary supportive accommodation.

While we recognise temporary accommodation does not guarantee a sustained exit from

⁷ Foyer Foundation, Foyers in Australia, ONLINE <https://foyer.org.au/foyers-in-australia/>

⁸ Alves, T, Brackertz, N, Roggenbuck, C, Hayes, L, McGauran, R, Sundermann, K & Kyneton, N 2021, Common Ground Housing Model Practice Manual, prepared with MGS Architects, Mind Australia, Australian Housing and Urban Research Institute Limited, Melbourne, ONLINE <https://www.ahuri.edu.au/sites/default/files/documents/2022-02/AHURICCommon-Ground-Housing-Model-PracticeManual.pdf>

homelessness it is critical infrastructure for the safety and stability of people experiencing homelessness. Temporary supportive accommodation can take the form of traditional purpose-built refuges and transitional accommodation, medium density modular housing communities, or retrofits for crisis responses e.g. meanwhile use.

Meanwhile use presents an opportunity to utilise existing assets to respond to homelessness across NSW. This means using what resources are available to respond to need at the local level. Providing additional pathways to support the delivery of temporary supportive accommodation in vacant buildings and on vacant land creates significant opportunity. Meanwhile use is a critical opportunity to provide transitional accommodation and wrap around support. For this to be successful the planning instruments must allow for innovation and immediate response. We also welcome the commitment to broaden the existing supportive accommodation provisions so that they apply to a wider range of residential accommodation, and to tourist and visitor accommodation.

Women's Community Shelters – A Case Study

A former aged care facility on the NSW Central Coast has been transformed into a 14-room transitional housing facility under an innovative partnership between Women's Community Shelters and Pacific Link Housing. The facility is for older women (over 55) escaping domestic and family violence or who are at risk of homelessness. Funding support to develop the shelter was provided by the NSW government. The project was initiated by a local developer who purchased the property but did not plan to use the site for a three-year period. The site is ideal for this purpose with ensuite studio apartments, communal lounges, kitchens, laundry facilities and gardens. Women's Community Shelters provide residents with case management support and coordinate community engagement and wellbeing activities as well on-site support services. The facility opened in September 2022 and is one of a number of meanwhile use projects implemented by Women's Community Shelters.⁹

Recommendation 10: For high support accommodation expand the availability of the without development consent pathway to include community housing providers, specialist homelessness services and other non-government housing organisations in addition to government agencies .

Providing the "without development consent" pathway to CHP's, SHS's and other non-government housing organisations who are building high support accommodation will enable expedited implementation of urgently needed accommodation for various disadvantaged groups. In the current NSW context the majority of high support accommodation is built by non-government agencies (CHP's, SHS's or non-government housing organisations) rather than government agencies. Expanding this consent pathway beyond government will result in greater impact.

Review wording to include the scope of providers as outlined in red text below.

This accommodation:

- must be managed by a government agency, a registered community housing provider or

⁹ Women's Community Shelters. Media Release. <https://www.nsw.gov.au/media-releases/new-safe-haven-for-vulnerable-older-women-east-gosford>

a specialist homelessness service.

- A “without development consent” pathway will be available for development delivered by a government agency, a registered community housing provider, specialist homelessness service or providers of homelessness services provided the agency carrying out the development has considered whether the development meets the standards set out in Appendix 1 for this accommodation type.

Recommendation 11: Expand the supportive accommodation provisions of the Housing SEPP to include support services, in a dedicated room or area to people who are being supported by the service not just exiting tenants.

The department proposes to amend the supportive accommodation provisions of the Housing SEPP (set out in Chapter 2, Part 2, Division 4) to make it easier to provide temporary and permanent supportive accommodation. The existing definition of supportive accommodation would be amended so that it refers to the use of an existing building or buildings to provide:

- accommodation to people experiencing, or at risk of, homelessness, and
- support services, in a dedicated room or area, only to people who live in that building or buildings.

Homelessness NSW recommends this is amended to include text in red below;

- support services, in a dedicated room or area, to people who are supported by the service.

Allowing services to offer support beyond existing tenants in a dedicated room or area within Temporary supportive accommodation. This enables more holistic responses particularly in regional communities where services have multipurpose facilities that may include a hub that can be utilised for post crisis support and case management or group support through recovery meetings, employment training etc.

Recommendation 12: Remove the 5-year limit on the complying development pathway and make it subject to review at 5 years.

The new complying development pathway will be available in existing buildings where the existing land use is not residential accommodation or tourist and visitor accommodation. Under this pathway: Use of a building will be limited to 5 years from the date the occupation certificate for the use is issued. We recommend this is amended to be “reviewed’ at 5 years.

Seniors independent living units

Homelessness NSW supports the Housing SEPP commitment to update the accessibility and usability standards for seniors independent living units.

Recommendation 13: Ensure all new social housing aligns with the basic requirements of the Liveable Housing Design Guidelines to ensure people with mobility issues have access and all people can successfully remain in their housing into old age.

On 30 June 2021, there were 15,036 social housing applicants on the NSW Housing Register where the head of the household was aged 55 years or older. Universal housing design is a key concept within the Liveable Housing Design guidelines that enables living spaces to be more easily and cost-effectively adapted to meet the changing needs of home occupants across their lifetime. The guidelines recommend the inclusion of features that make homes

easier and safer for all occupants, particularly including people older people and people with a disability.¹⁰ All new social housing in NSW should be built to ensure access for people with mobility issues and tenants can retain their tenancy into old age.

First nations led responses must be supported and championed. Aboriginal and Torres Strait Islander people are disproportionately experiencing high rates of prolonged and sustained homelessness. Older Aboriginal people may seek to age on Country and within their own community and require a holistic, culturally appropriate, and culturally safe options. The Housing SEPP can facilitate the ability to include smaller independent living units adjacent to exiting properties to enable family networks to stay together.

Boarding houses

Recommendation 14: Mandate and resource Local Governments to maintain a regular inspection schedule of boarding houses to ensure a safe standard of living for low-income tenants.

Boarding Houses are for profit businesses and a type of private accommodation where a tenant rents the use of a single room, but other facilities such as kitchens, bathrooms and toilets are generally shared. They differ from shared house arrangements in that residents are not generally known to each other, and each individual occupant has their own agreement with the operator. Homelessness NSW recognises people living in traditional boarding houses as a subset of the homeless population. This is in line with the ABS definition of Homelessness.¹¹

The Department of Fair Trading (May 2019) recorded 1,062 Registered Boarding Houses in NSW. More than half of these are in the broader metropolitan Sydney and surrounds. A small percentage of these boarding houses are assisted. Assisted boarding houses have better regulation and oversight and generally require 75-100% of a person's income. Traditional Boarding Houses make up the majority of Boarding Houses.

The profile of people who live in "Traditional Boarding Houses" are more likely to be unemployed; people with disability, cognitive impairment, or mental health issues; people with a history of problematic drug and alcohol use; and people who are exiting the criminal justice system. This group is of high risk of experiencing homelessness and exploitation. People who live in traditional style boarding houses have very limited housing choices. For these people, boarding houses may present the most accessible, immediate and viable option. The NSW Ombudsman found most people who live in traditional boarding houses are unable to access alternative low-cost housing, have a history of housing insecurity, and are likely to experience multiple disadvantages.¹²

There is limited oversight of Traditional Boarding Houses with no agency having an up-to-date record of Boarding Houses; no records of the number of residents; and limited evidence of monitoring of standards of living environment. While NSW Fair Trading hosts the register of Boarding Houses, it has no function in relation to enforcing the Boarding House Act 2012; this is largely the responsibility of local government.¹³ Any levers to increase the number and scale of boarding houses should ensure they are safely developed and managed.

¹⁰ Livable Design Guidelines. Online. [SLLHA_GuidelinesJuly2017FINAL4.pdf \(livablehousingaustralia.org.au\)](https://www.livablehousingaustralia.org.au/SLLHA_GuidelinesJuly2017FINAL4.pdf)

¹¹ ABS Definition of Homelessness. 2012. Online. <https://www.aihw.gov.au/reports/australias-welfare/homelessness-and-homelessness-services>

¹² NSW Ombudsman. 2011. More than board and lodging: the need for boarding house reform [SR Boarding Houses.pdf \(nsw.gov.au\)](https://www.nsw.gov.au/SR_Boarding_Houses.pdf)

¹³ Drake. 2018. Evaluation of the Boarding House Act 2012. Online. <https://www.newtowncentre.org/uploads/5/1/5/0/51502997/evaluation-of-the-boarding-houses-act-2012-report-4-and-final-report-2018.pdf>