



Homelessness NSW



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Anne Campbell  
Executive Director  
Housing and Homelessness  
Department of Family and Community Services  
Sent via email

21 September 2018

Dear Anne

### **Ministerial Forum on Overcrowding and Homelessness**

Please pass on our thanks to the Minister for organising the Roundtable. The 74% increase in severe overcrowding since the 2011 census clearly warrants the attention of and action from the NSW Government and the invited organisations.

We thought it positive there was general agreement in the room both that severe overcrowding should not be excluded from the definition of homelessness and also that the fundamental issue leading to rising homelessness (and thus overcrowding) is the State's severe shortfall in social and affordable housing.

This outcome from the open discussion you allowed was particularly reassuring as the background paper and the presentations had raised concerns both because they were limited in analysis and also because of some of the suggestions about the reality of severe overcrowding.

The paper and presentation failed to provide an extensive analysis of the census data on overcrowding, particularly in terms of identifying areas of Sydney and regions where significant increases had occurred and did not provide enough analysis regarding who is experiencing overcrowding and the potential impacts of this. For example, the data illustrates the large numbers of families and young people under 18 living in severely overcrowded homes. It would have been useful to have had this information provided in the context of broader impacts of overcrowding by providing some analysis of overcrowding in the context of child protection reports and domestic and family violence incidences.

It would also be useful to have had information from Housing Pathways about the numbers of applications from severely and other crowded households, their eligibility for housing and whether they are treated as homeless for prioritisation purposes.

Our second concern was the paper's suggestions that:

- Severe overcrowding might be inappropriately defined as homelessness
- Some groups are 'choosing' (rather than forced) to be severely overcrowded in order to reduce their housing costs
- Aboriginal and CALD households for cultural reasons are more accepting of overcrowding.

These assertions are problematic when the definition of severe overcrowding is considered in real terms – ie four or more bedrooms are otherwise required – and what this would mean not only for daily living but also in terms of supporting people to achieve educational, employment and other outcomes.

This approach meant that the Roundtable itself missed a valuable opportunity to harness the expert insights due to the focus of the facilitated and prescriptive questions on these issues. It might have been more useful to have considered overcrowding within the broader context of the Human Services Outcomes Framework and in better understanding how access to safe, affordable and appropriate housing provides broader individual and community social and economic outcomes.

Therefore, we think that the following three areas should be prioritised to help reduce and end overcrowding:

1. Investment at scale in social and affordable housing and the development of a Housing Strategy. While individuals might be helped via changes to allocation policies or through short term private rental assistance products, without more supply other individuals will replace them. This should include:
  - Commissioning of a comprehensive housing needs assessment on which to base a housing strategy and to argue for resources alongside other major infrastructure projects. In our group, the Scottish Government example was cited and both the strategy and its delivery reports are available from its website. <https://beta.gov.scot/housing/>
  - Other actions that would alleviate the demand pressure on cheaper private sector rental properties including addressing land tax barriers to build to rent; encouraging and supporting Councils to maximise the opportunities in the low rise medium density [guidelines](#), streamlining the process for Councils to mandate affordable housing via SEPP70 and providing guidance and positive support for well designed smaller dwellings.
  - Consideration of the type of available housing as well as the increase in social and affordable housing, that is, investing in dwellings that meet the needs of families rather than primarily focusing on 1-2 bedroom properties.
2. Investigating the relationship between (1) young people and child protection notifications and (2) people experiencing domestic and family violence and the incidence of both in severe overcrowding and marginal housing as well as better understanding how overcrowding is identified and assessed via Housing Pathways

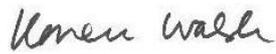
3. Strengthen the legislation and regulation of overcrowding in the private rental sector.

We hope this response is useful and look forward to working with you to make the changes to address housing and rental stress and ultimately to end homelessness in NSW.

Yours sincerely,



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