



Submission from Seaford Housing Action Coalition (SHAC)

Frankston Housing Strategy 2017 Update

Shelter is one of the most basic and essential human requirements

SHAC is a community group formed in Seaford in 2014 to work with and stimulate community responses to homeless people (and those at risk of homelessness) in the local community and surrounding suburbs.

SHAC's interest in the draft Housing Strategy is the provision of housing opportunities for those who are homeless, on low incomes and vulnerable to living in unsafe circumstances. These are most often single people but also families or single parents with children. The housing services offered to these people are frequently Emergency or Crisis Accommodation, intended as short-term housing. However, these stays frequently extend to medium- or longer-term covering several months or much longer.

Collectively, SHAC's work has included:

- Engaging with and listening to the experiences and life issues of homeless people (and those at risk) to understand their situation. Some of these people are residents of the Seaford Beach Cabin Park (SBCP), whilst others have been sleeping in cars, living in rooming houses, or sleeping rough in parks & other places ¹
- Volunteering with the 12-month interim community meals program initiated by the State Govt and Frankston City Council (FCC) after City Life and the Breakfast Club closed
- Advocating for FCC to renew the lease to the SBCP to prevent its closure and loss of 70+ accommodation units that contribute toward the emergency housing needs in the local area

This Submission offers some solutions to the problems discussed in SHAC's Report: "Sleepless in Seaford" (referenced at the end of this document).

1. SHAC Recommends

- This Strategy be used as an opportunity for making policy changes to improve the situation with regard to emergency housing and that more discussion, detailed practical responses and better provision of emergency accommodation be incorporated into the Strategy, particularly for single people
- Less reliance on rooming houses as providers of emergency housing. Rooming houses are certainly not an appropriate option for many of the people seeking emergency accommodation and more suitable alternatives must be explored
- A strong case be put to the State Department of Health & Human Services (DHHS) to reconfigure some of its property portfolio to units for single people with multiple units per block
- The Strategy recognize the potential of small, well-managed cabin and caravan parks for emergency housing needs by including them in the mix of housing promoted for Frankston's future - parks with results as good as SBCP's should be encouraged
- FCC identifies potential sites for further cabin parks, including State and FCC owned land
- That the proposed Inclusionary Zoning threshold for public, social and community housing should be significantly increased: to at least 15%, as in South Australia

Coalition Members:

- St. Anne's Parish Social Justice Group

- Seaford Community Committee

- St Vincent de Paul Mt Eliza Conference Social Justice Group

- Residents of the Seaford Beach Cabin Park

2. Rooming Houses

The significant increase in numbers of rooming houses in Frankston and surrounding suburbs in recent years is symptomatic of a lack of practical, detailed and coordinated engagement regarding emergency accommodation.

SHAC acknowledges that the Strategy calls for more discussions to facilitate new social housing projects and for improved monitoring and awareness of rooming houses to either improve their services or close down. Whilst these are useful elements, SHAC believes the Strategy should go further, with recommendations for more substantial activity.

SHAC sees the current situation with many rooming houses as potentially dangerous and miserable. Frankston can aim higher to provide a better quality of emergency housing service. The Strategy needs to be a practical vision for change. If the Strategy does not bring attention to emergency housing, it risks promoting the situation where rooming house entrepreneurs open more houses. If increased regulation and monitoring is initiated, some rooming houses will close, offering little alternative emergency housing, leading to more people sleeping rough and in cars. These outcomes would be a mistake for Frankston.

Rooming houses are frequently the only emergency accommodation on offer in Frankston. SHAC agrees with the point made in 12.8 in the Strategy that occupancy rates in rooming houses reflect more on the lack of available alternatives, rather than being the accommodation of choice. Many residents do not choose rooming houses as their first preference, but simply because they have no alternative. SHAC has heard from some rooming house operators that all of their occupancy comes via emergency housing referrals from welfare agencies.

The growing number of rooming houses in the Frankston area is demonstrating a substantial and growing need for emergency housing, particularly for singles. According to Consumer Affairs Victoria², there are currently 44 rooming houses registered in Frankston (up from the 38 stated in the Strategy). If one adds to that, the estimated 40 or more rooming houses that operate without registration and then multiply that figure by between 5 and 9 beds per house, one gets a real feel for the a large number of emergency accommodation beds in Frankston. This means that between 300 to more than 700 people are living in Frankston's rooming houses each night. That demonstrates a very strong demand for emergency housing in the Frankston area.

Rooming houses are a private enterprise response to the need for emergency housing. There is a substantial cash flow available with room rent at or above \$200/wk. In addition to filling a need, a rooming house business can be financially attractive with significant potential profit.

They tend to be expensive, crowded and not always staffed. They put vulnerable people into needlessly exposed situations. SHAC believes that rooming houses do not always represent a "best practice" model for emergency housing and should not be as prominent in the list of services available for emergency accommodation and are not the emergency accommodation service that we should be aspiring to.

SHAC agrees with many of the concerns about rooming houses expressed in FCC's earlier paper "Building a Good Society: Housing Affordability and Homelessness, 2015"³.

- Volatility exists within many rooming houses, which can be sites for chronic drug use, dangerously low standards of sanitation and criminal and violent behaviour to the point where many homeless people are fearful of staying in them. The health and safety of neighbours of these premises are also deleteriously impacted. Consequently, rooming houses are completely inappropriate for children, mixed gender and people highly vulnerable to sexual violence (item 2.3)
- Duty of care: Both State and Commonwealth Government fund local agencies across the country through contractual agreement, to provide housing referral services. The funded services appear not to be required to consider the compatibility or personal safety of tenants in regards to the behaviours of other tenants. Once a person is offered emergency accommodation, there is most often no ongoing support to ensure the placement is suitable (item 2.4)
- Further, one or more agencies may be involved with a referred client. The complexity of a client's needs together with the complexity of legislation and the lack of suitable provisions to ensure the best possible outcome for both the most vulnerable residents as well as the broader community is increasingly more challenging (item 2.4)

Importantly, SHAC is concerned that the work by local and state governments to improve the regulation and monitoring of rooming houses will not bring sufficient change in their general operation to transform all of them into a service suitable for promotion as emergency accommodation. These improvements have been discussed for a number of years but no significant change to the sector has occurred. As the Council's 2015 paper goes on to say:

- Many rooming house operators "navigate" the loopholes in the system, which relies on five separate pieces of legislation, to maximise their profit

3. Cabin Parks

The Strategy appears to indicate that caravan/cabin parks are unsuitable for emergency housing, saying on page 58 that residents need to be "transitioned to more suitable accommodation options". While SHAC understands the professional housing sector's reluctance to appreciate that such "secondary housing" could be as good as some ideal (the prospect of which we believe to be completely unrealistic in view of current public housing waiting lists), we believe that this view is not well-founded and we do not support it. This view is also not supported by the people SHAC engages with.

One cabin park providing emergency accommodation that SHAC has come to know in recent years is the SBCP. It is a real community, with residents enjoying each other's company and assisting each other in many ways.

SHAC has a strong belief that small, well-managed, self-contained caravan/cabin parks like SBCP - oriented toward long-stay residents to lessen the disruptive behaviour common to short-stay accommodation - with an on-site manager and out-of-hours security, offer an emergency accommodation option that is far superior to that offered by many rooming houses.

The SBCP is a relatively small facility operating on two hectares of land with a well-established tree canopy and shade protection for the residents between the Nepean Highway and Kananook Creek in Seaford. The cabins are not spacious but they offer a safe personal space and a family-friendly atmosphere for visitors and children. It is nearly always full. Importantly SBCP is much appreciated by its residents and supported by the majority of surrounding neighbours.

SHAC recommends that FCC invite potential providers of cabin parks to assist FCC in meeting its obligation to responding to the need for emergency housing. Subject to such discussions, we would support a proposal to establish a cabin park run as a community-based operation and would be pleased to participate in any discussions with FCC and others. There is considerable expertise amongst successful rooming house and cabin park operators to assist with such a development. SHAC recommends that FCC identify possible sites in the municipality, with a view to development into modern cabin parks suitable for struggling people. This could be government- or privately-owned land. We have identified several suitable sites within the city boundaries.

We believe an initiative of this nature by FCC would receive the support of all local Members of Parliament of all political persuasions. The development of very attractive, purpose-built small houses/Tiny Houses and cabins has recently become a growth industry and they can be purchased at very affordable cost.

4. Department of Health and Human Services Properties

Another option for improvements in emergency housing could come from a reconfiguration of the local portfolio of properties held by DHHS. The Strategy indicates there are over 1500 properties owned by DHHS in the Frankston municipal area. SHAC understands these properties are mostly family houses with multiple bedrooms and situated with one house per block. There could be capacity within this large quota of public housing properties to offer more housing for single people. Some properties should be reconfigured into smaller units to suit singles with multiple units per block. Many of these could be available for emergency housing, which would be a safer and more appreciated option than a room in a rooming house.

5. Inclusionary Zoning

This is a new and interesting idea, but at the proposed threshold of 5% of units in new developments, it is unlikely to produce many properties. It would need a development to have twenty or more units before one became available for this program. SHAC understands that developments of 20 or more units are relatively rare in Frankston. Given the number of people presenting in Frankston in need of emergency housing, we believe the inclusionary threshold should be significantly increased to at least 15%, as in South Australia.

¹ SHAC's Report: "Sleepless in Seaford": <http://www.seafordcc.org/forum/viewtopic.php?f=20&t=280>

² Consumer Affairs Victoria: <https://www.consumer.vic.gov.au/housing/renting/types-of-rental-agreements/sharing-in-a-rooming-house/public-register-of-rooming-houses?rs=3199&sz=20&pg=3&ct=2>

³ FCC Report: Building a Good Society: Housing Affordability and Homelessness, 2015: http://www.frankston.vic.gov.au/files/assets/public/your_council/council_and_committee_meetings/council_minutes_and_agendas/agendas_2015/om280_agenda_-_16_november_2015.pdf