

Appendix 2a

6.2 Draft Borough of Queenscliffe Social Housing Plan

Borough of Queenscliffe Social Housing Plan

Ordinary Meeting of Council

Wednesday 23 June 2021 at 7:000pm

Via videoconference (Zoom)



SOCIAL HOUSING PLAN

BOROUGH OF QUEENSCLIFFE

2021-2024



Shaping the Big Housing Build in the Borough of Queenscliffe



ACKNOWLEDGEMENTS

This project and plan would not have been possible without the timely involvement of **Sirovilla**, a community group which had the initiative to secure funds from the Percy Baxter Trust and the Anthony Costa Foundation to make this project possible.

Thank you to the Percy Baxter Trust and the Anthony Costa Foundation for ongoing engagement and generous support in the shared vision to generate additional housing options for people on modest incomes across the G21 region. Everyone has a right to safe, secure and affordable housing.

The Borough of Queenscliffe acknowledges G21 - Geelong Region Alliance which has assisted with the development of this plan via the G21 Region Social Housing Project.

1.0 Executive summary

Housing is big business.

Across the G21 region around 4,400 new dwellings, valued at around \$1.6 billion, were commenced in 2017/18. The number and value of houses has been growing, as the population of the region has expanded.

A small percentage of these dwellings are affordable for households on moderate incomes; either to rent or buy.

The Borough of Queenscliffe has a different profile than the region, minimal housing growth and no spatial expansion, but the value of properties has continued to increase. In 2020 the median house price in the Borough was \$936,875 (Victorian median is \$640,000).

None of the few, new properties that have been constructed in recent years in the Borough would fall into the category of affordable housing.

This social housing plan focusses on a group of households who are living on very modest incomes and are currently spending more than 30% of that income on unaffordable housing, usually private rental.

Spending more than 30% of available household income on housing is said to trigger 'housing stress' as all other living costs: food, bills, clothing, must be covered with the remaining household budget. In reality, for individuals and families in this situation, there is not enough money left each week to meet even basic needs. Choices are made between bills or food; between a new school uniform or tyres for the car. Housing stress, over time, directly affects the health and wellbeing of household members, through any combination of poor diet, limited social connections, anxiety or depression and reduced access to services, including health services. Poverty in our communities is real and the root cause is usually housing stress.

The solution to the problems of housing stress for households on very modest income is social housing.

There are many forms and models of social housing but the common factor is a subsidy, primarily from a government, that has been used to support the costs of building and maintenance so that rental can be capped, usually at 25% of household income.

Across the G21 region there are more than 3,600 subsidised social housing dwellings, where tenants pay no more than 25% of household income, even if that income is minimal. This system of housing is highly regulated, both for the tenants and also the government departments and community groups who own or manage these properties and support the clients.

In the Borough there are only 11 social housing properties and the data indicates an unmet demand for additional social housing - up to 47 additional properties.

This unmet demand has been recognised by the state government through an initiative called the Big Housing Build, where \$5.3 billion has been allocated over four years to build thousands of new dwellings and update existing social housing across our state, including the Borough.

This plan outlines the needs for many more subsidised social housing properties across the G21 region.

The plan also outlines positive working relationships between our council, other councils in the G21 region and the state government to work toward the shared goals of driving economic recovery, building jobs and addressing disadvantage.

2.0 Housing explained

The principles of social housing are very simple:

The private rental market and systems of home purchasing are geared towards capital growth and investment; not affordability

therefore

some form of subsidy is required to make housing affordable (<30% of household income) for households on very low incomes.

Government policies that encourage rising housing prices are great for owners, landlords and investors but continually drive up the cost of rental. Housing and rental costs in our region have increased significantly, particularly when compared with very low growth in income from salaries and benefits. So, the gap between rising costs and not-so-quickly rising income has widened over the past few decades.

Subsidised housing arrangements are used around the world to ensure that people on very modest incomes are not living in poverty because they are forced to spend more than 30% of income for the roof over their head.

In the Netherlands some 38% of all housing is subsidised social housing. Across many developed countries the percentage range of 15 to 20% of all housing is typical. In Australia, during the decades after the Second World War, 16% of all houses constructed were subsidised public housing. At present only 4.8% of all houses in Australia are social housing, some 3.8% in Victoria.

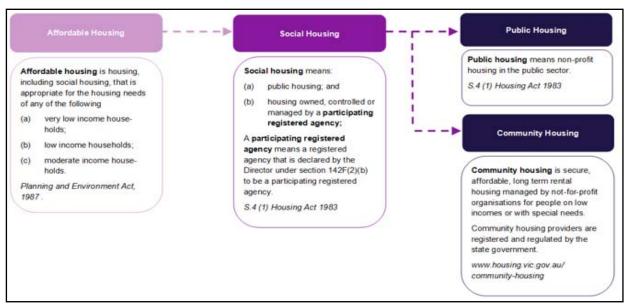
The current arrangements to govern 'social housing' have their roots in the Housing Act of 1983, which created a structure to enable community groups to receive grants and build subsidised housing. This approach was to supplement the long standing public housing stock, which is owned and managed directly by the state. So, by definition, social housing included any form of housing which was subsidised so that rent could be affordable for households on very modest income.

Over the past decades the state system of social housing, based on the Housing Act 1993, has evolved into a highly regulated structure where people seeking subsidised housing apply to a central waiting list and the organisations receiving funding to build social housing are monitored to ensure probity and value to the tax payer.

The terms relating to housing such as affordable, public, community and social have well established definitions. The following diagram looks at all forms of housing and identifies housing on a continuum:

Crisis & transitional housing eg refuge	Public housing	Community housing	Cheaper private rental	Other private rental	Home ownership
Affordable housing					
Social housing options					
Lower income households increasing subsidy by govt				Higher income h	ouseholds

The state government uses the following definition to specify the relationship between social housing and its types: community housing and public housing.



Source: Victorian Government DHHS, Affordable Housing voluntary contributions: Public Housing as an Affordable Housing contribution, June 2018

In either case, public or community housing is regulated to ensure access to housing at less than 30% of income in a rental agreement that provides security of tenure.

All public housing is owned and managed by the state government and the tenants have a lease directly with the government.

All community housing is owned or managed by not-for-profit community groups who are regulated by the Housing Registrar and called Housing Agencies. They are registered under the Housing Act 1983 as either housing associations or housing providers.

To be eligible for registration as a Housing Agency, a not-for-profit organisation must be a company limited by shares or guarantee, an incorporated association, or a co-operative. As at 1 January 2020, there were 39 registered agencies consisting of ten housing associations and 29 housing providers.

Registered housing agencies:

- · may own, manage and develop affordable rental housing
- may provide a range of housing support and assistance to clients
- are viable businesses partnering with both government and the community
- have met registration criteria, and continue to meet ongoing compliance requirements as well as demonstrate continuous improvement

Housing managed by registered agencies is primarily long term and/or transitional (up to six months) but some agencies also provide crisis housing and other forms of housing such as disability shared accommodation.

Some agencies have now incorporated real estate agent business arms to enable them to manage private rental market housing.

For more details refer to the Housing Registrar's website: http://www.housingregistrar.vic.gov.au

The social housing system involves ensuring that those Victorians most in need of affordable housing have access. Prospective tenants are eligible to register on a waiting list if the household income fits within a set of three thresholds, calculated from time to time by the state government for both metropolitan and regional Victoria. At present those thresholds for Regional Victoria (including the G21 region) are defined as:

	Very low income range (annual)	Low income range (annual)	Moderate income range (annual)
Single Adult	Up to \$18,380	\$18,381 - \$29,400	\$29,401 - \$44,100
Couple, no dependents	Up to \$27,560	\$27,561 - \$44,100	\$44,101 - \$66,160
Family (one or two parents and dependent children)	Up to \$38,590	\$38,591 - \$61,750	\$61,751 - \$92,610

Source: Victorian Government Gazette, 29 May 2018.

Those eligible for the waiting list due to income levels are also assessed according to their circumstances, for example needs arising from domestic violence or mental ill health. An assessment is undertaken to determine priority on the list.

Those housing agencies fill vacancies by contacting tenants via the central register and must take a percentage of tenants who have been assessed as high and / or urgent need.

This system of social housing across Victoria has been designed to ensure access for those most in need within a structure to ensure: safety and security of tenure, quality of homes, access to support services and value for the taxpayer.

This social housing plan is built on a strong foundation of prudent management of social housing across the state. The challenge for Victoria has not been to manage and govern social housing; it has been to build enough social housing properties to meet the demand.

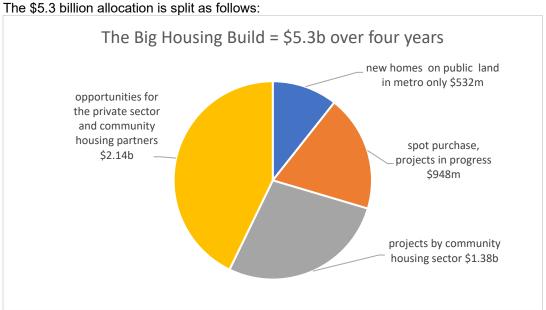
The state government has recognised the urgent need to build many more social housing properties and has allocated funds and deployed a new government department to deliver a program called the Victorian Big Housing Build.

3.0 Big Housing Build explained

The state government has developed a new department, Homes Victoria, to deliver the Big Housing Build, which has a budget of \$5.3 billion over the next four years.

Homes Victoria manages four streams of funding, which are described on their website as follows:

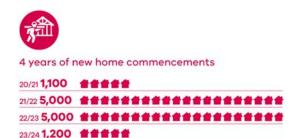
- \$532 million constructing new homes on public land
 - Homes Victoria land across Melbourne is the ideal asset to convert to social and affordable housing at a time when we need to build big and build quickly. Work has already commenced at 6 Homes Victoria sites, and they are now ready for regeneration. [NB: this funding is tagged for metropolitan projects]
- \$948 million working with the private sector to spot-purchase homes, projects in progress or ready to build
 - To ensure we can add to our supply of social and affordable housing quickly, we'll be working with developers and construction firms, to identify appropriate, existing housing developments we can acquire, provided they are up to a suitable standard and well located. This may also include working with the private sector to identify suitable developments that may be partially complete, or which may not otherwise progress.
- \$1.38 billion funding for projects by the community housing sector
 - The community housing sector is uniquely placed to lend its expertise and experience to Victoria's Big Housing Build. The Social Housing Growth Fund will invite proposals from community housing providers for new social and affordable housing developments to add to the available supply and help provide more homes for more Victorians.
- \$2.14 billion funding for new opportunities with private sector and community housing partners
 - As the Big Housing Build rolls out, we want to maximise opportunities for the best value and best outcomes for Victoria. Homes Victoria will explore building on Victorian government land sites; as well as engaging with the market to identify new sites, new ideas, new opportunities and ways to build more homes. This will occur through the remainder of 2020 and into next year. We will pursue opportunities to partner with industry, community housing providers, local government and institutional investors to identify new projects that deliver homes across Victoria.



The Homes Victoria website also outlines additional spending:

- \$498 million new construction, upgrades and maintenance to existing housing
 - We've committed a record amount of money to maintain, refurbish, repair and build new public housing across Victoria. Work has already begun, and when we're finished, more than 23,000 social housing dwellings will be significantly improved.
- \$185 million replacing old public housing with new dwellings
 - The Public Housing Renewal Program is underway with the task of replacing 7 major public estates with completely new, modern, attractive and energy efficient dwellings. It will generate \$1.29 billion in construction and economic activity.

Overall, Homes Victoria has set targets for both the number of dwellings and the number of jobs:





The Big Housing Build allocation of \$5.3 billion covers the state, with 25% of the allocation to be spent in regional Victoria.

In addition, Homes Victoria has recognised the need to avoid historical problems for rapidly growing communities by identifying a 'guaranteed minimum spend' in key growth municipalities. In the G21 region these have been identified as:

- City of Greater Geelong \$180 million
- Surf Coast Shire \$20 million
- Golden Plains Shire \$15 million

Allocations for Colac Otway Shire and the Borough of Queenscliffe have not yet been specified.

Homes Victoria has also acknowledged a need to clarify working relationships with local government. The Homes Victoria website explains this arrangement as follows:

We will work with local governments to develop a social and affordable housing compact - this will include an important role for local government in identifying priorities for social housing growth in their municipality. It will also seek to bring social housing closer to the treatment of other valuable public infrastructure such as schools and hospitals, which are exempt from council rates.

In implementing this change, we recognise that local governments rely on revenue certainty to deliver the services their communities need and we will work with councils to ensure that changes are able to be revenue neutral and phased in over time where necessary. In this new relationship we will provide a new annual payment to the relevant local government area, set at a proportion of current rates.

This change reflects the public benefit that access to safe, secure and affordable housing brings to local communities.

For further details regarding the Big Housing Build see: https://www.vic.gov.au/homes-victoria

This social housing plan is based on the assumption that the Big Housing Build will have an impact on every municipality in the G21 region and that the Borough of Queenscliffe must play a key role in 'shaping' the spend by understanding the unmet need for additional housing and advocating on behalf of the community and the region.

4.0 Regional picture: demand for social housing

Estimating the unmet demand for social housing is critical to developing ideas for solutions.

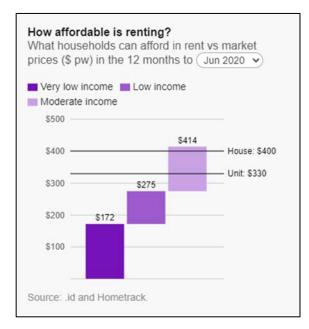
Estimating unmet demand involves adding the number of homeless people to the number of households with the twin characteristics of very modest income (to fit the eligibility criteria) and already spending more than 30% of that modest household income on rental.

Whilst this sounds simple, the calculation for 'bracketing' the Australian Bureau of Statistics estimates for income and rental is complex.

G21 and the City of Greater Geelong have purchased an online data set which accurately describes the unmet demand for social housing.

The regional profile, called Housing Monitor, can be found on the G21 website at https://g21.com.au/g21-region/social-economic-profiling/ along with a range of other data profiles.

The following data has been extracted from the online Housing Monitor.



As discussed in the previous chapter, eligibility for social housing is based on income, classified as 'very low', 'low' and 'moderate'.

This chart maps the average weekly cost of private rental as: house \$400 per week and unit \$330 per week. The columns indicate the level of income available for the three income categories.

Clearly all households on very low and low income bands are most unlikely to find affordable rental and are highly likely to be paying more than 30% on rent.

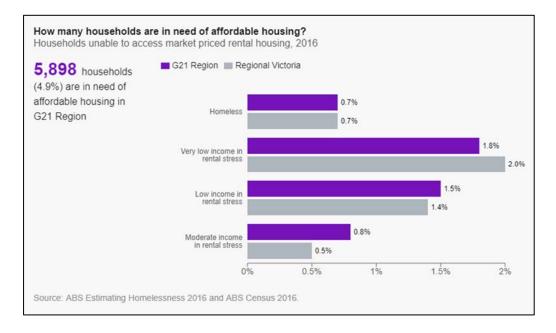


Another indicator is the supply of affordable rentals in the area. Over the past 12 months, just 0.4% of all rental listings would have been affordable to a household on a very low income.



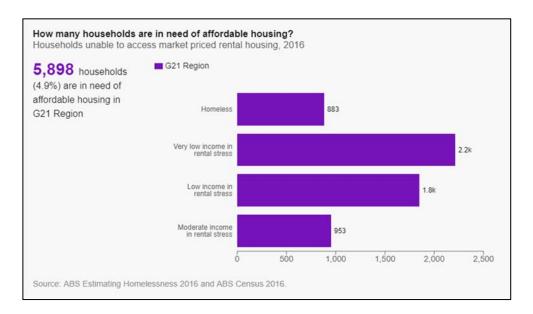
The table above compares the five municipalities of the region. The black circles and diamonds mark the median costs of rental. This table reinforces that households on very low and low income bands are most likely only able to secure a rental property by paying more than 30% of their income.

The table below consider the proportion of households across the income bands and compares that need with regional Victoria.

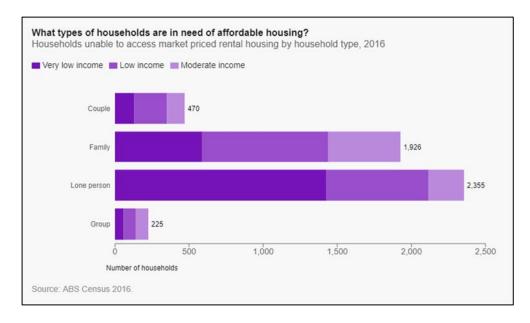


Whilst the table above explores the proportions of households in rental stress, compared with regional Victoria, the table below outlines the numbers of households, already living in our communities across the region who are either homeless or in rental stress.

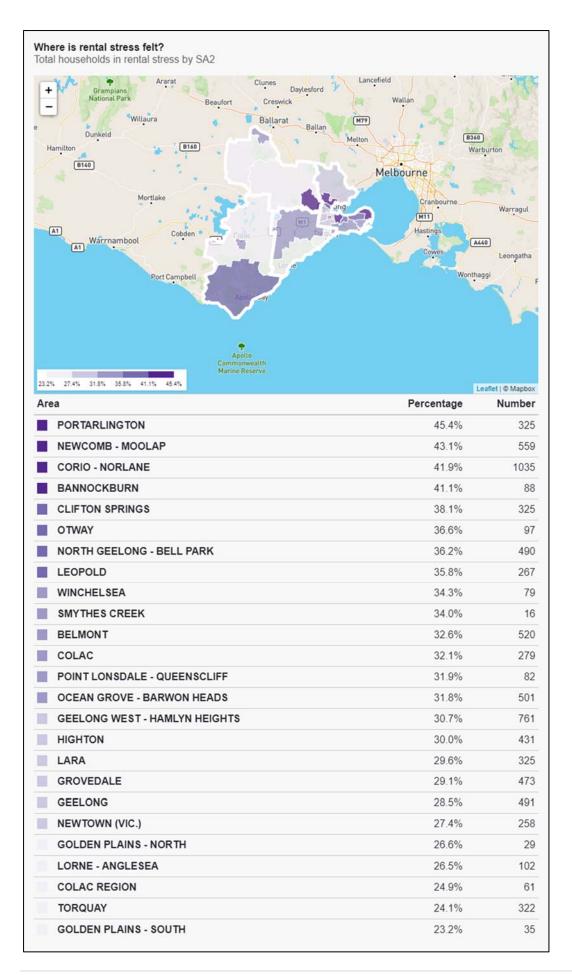
Some 883 people noted as homeless and a further 5,000 households who are known to be onvery modest income and currently paying more than 30% of that inomce on rental. The 2,200 households on 'very low' income are of particular concern.



The online data also reveals that, across the region, families and lone persons are the most common types of households in need of affordable housing.



The following 'heat map' compares areas (at SA2 level) across the region. A table ranking areas of greatest need is also provided.



More detailed data used to calculate the charts above has also been provided. This data assists in the comparison between the five municipalities of the G21 region:

	CoGG	cos	GPS	BoQ	scs	G21
Very low income in rental stress	1,906	158	36	17	96	2,213
Low income in rental stress	1,592	101	42	17	97	1,849
Moderate income in rental stress	811	23	18	7	94	953
Total homeless persons	750	62	17	6	48	883
Total affordable housing need	5,059	344	113	47	335	5,898

This table identifies that around 6,000 additional homes are required to meet the demand for social housing across our region. This figure is acknowledged as being very conservative for several reasons:

- The figures are based on the 2016 Census and do not take into account the rapid growth in population in our communities
- The ABS acknowledges the difficulties of estimating the numbers of people who are homeless on census night and that the numbers provided are clearly an underestimate
- There are several techniques used by social planners and this approach is said to be deliberately cautious
- The negative effects of the pandemic-based recession on our region are not known –
 however, it is assumed that households on low incomes are being affected and will be for
 some time this reinforces the conclusion that the figures above are conservative.

The overall figures, even if they are conservative, relay a challenging story: there is an urgent need to build additional social housing in our region, in every municipality.

Finally, it is possible to construct a broader picture of regional demand for social housing by considering the data above along side a range of other measures such as an index of disadvantage – see the table below:

	cos	COGG	GPS	BOQ	scs	G21
SIEFA INDEX	961.0	994.0	1,035.0	1,075.0	1,077.0	1,003.3
HOUSEHOLDS						
Total households (number)	8,198	87,931	7,252	1,234	10,457	115,072
Total renting households (number)	1,837	24,381	637	224	2,168	29,283
Median weekly rental payments	\$220	\$286	\$261	\$296	\$367	\$285
SOCIAL HOUSING CURRENT						
Households renting social housing (number)	290	3,305	8	11	62	3,676
Households renting social housing (% of all households)	3.3%	3.6%	0.1%	0.8%	0.6%	3.1%
RENTAL STRESS						
Rental stress all income levels (number)	537	8,066	191	73	510	9,377
Rental stress all income levels (% of all rental properties)	28.7%	33.1%	30%	32%	23.5%	32.0%
Rental stress with moderate, low or very low income levels (number)	282	4,309	96	41	287	5,015
HOMELESS						
Number of homeless people (number)	62	750	17	6	48	883
Percentage of total households homeless (% of all households)	0.7%	0.8%	0.2%	0.5%	0.4%	0.7%
SOCIAL HOUSING REQUIRED						
Unmet demand for social housing (% of all households)	4.0%	5.5%	1.5%	3.6%	3.1%	4.9%
Social housing properties required to meet the need (number)	344	5,059	113	47	335	5,898
KEY COS Colac Otway Shire COGG City of C BOQ Borough of Queenscliffe SCS Surf Coas	Greater Gee st Shire	elong	GPS G	olden Plai	ns Shire	

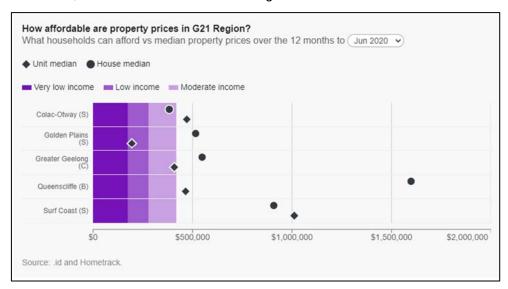
This table above is based on ABS census data from 2016. Of note is:

- Socio-Economic Indexes for Areas (SEIFA) ranks areas according to relative socio-economic advantage and disadvantage using ABS census data. A higher rating indicates a lower level of disadvantage.
- Median weekly rental payments can broadly indicate affordability.
- **Rental stress** is when a household spends more than 30% of all their income on rental payments. It is represented as a number of households and percentage of households.
- Unmet demand for social housing is calculated using the number of households in rental stress with moderate, low or very low income levels plus the number of homeless households. It is represented first as a percentage of all households and finally as a number of units of housing estimated to be required to meet the demand for social housing.

The table above demonstrates the relationship between income, disadvantage and rental costs. The table also includes the number of social housing units currently across each municipality, totalling 3,676 across the region. This indicates that, regionally, there should be around 10,000 social housing dwellings.

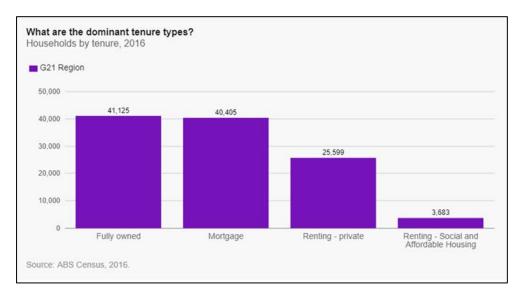
This social housing plan is focused on the immediate needs of people who are on very modest incomes and known to be in rental stress.

In addition, there are broader issues relating to the overall costs of affordable house purchase.

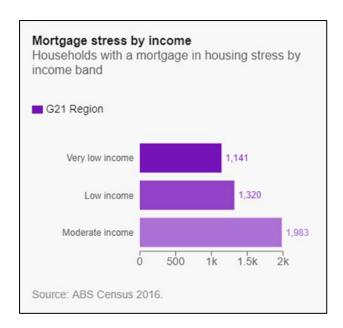


This table graphically represents the level of affordability across the G21 region for those households on very modest income who are seeking to purchase a home.

Overall, across the region, the majority of households are privately owned, either fully or under mortgage.



Given the concern regarding the effects of the pandemic-based recession, it is reasonable to assume that, despite historically low interest rates, the number of households under mortgage and in housing stress will increase.



This table indicates that, across the region, some 4,400 of all households on a very modest income were paying more than 30% of that income on mortgage repayments.

There is a risk that mortgages may become unsustainable for some of these households if there was an increase in interest rates or any long term negative recessionary downturn. If houses were sold, there would be an increased demand for rental properties, and therefore a likely increase cost in rental.

Note that these figures all relate to the 2016 ABS Census and are very likely an underestimate given rising population and housing prices in many areas of our region.

The importance of affordable (including social) housing is recognised by the Victorian Public Health and Wellbeing Plan 2019-23:

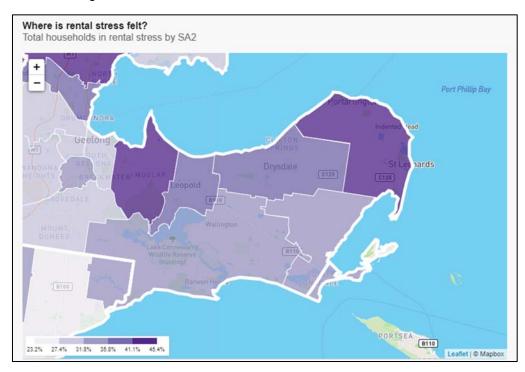
"Liveable communities provide a basis for good health and wellbeing for all age groups and can contribute to reducing health inequalities. A liveable place has been defined as a place that is safe, attractive, socially cohesive/inclusive and environmentally sustainable, with affordable and diverse housing linked to employment, education, public open space, local shops, health and community services, and leisure and cultural opportunities via convenient public transport, walking and cycling infrastructure." (Victorian Public Health and Wellbeing Plan 2019-23)

The absence of local, affordable housing also acts as a drag on economic prosperity as workforce vacancies become harder (and thus more expensive) to fill. This is particularly the case for low to moderate income positions for whom local home ownership or expensive (and very limited) rental properties are already out of reach.

Councils may choose to address affordable housing challenges, beyond the scope of this plan, in additional strategies or plans.

5.0 Local demand

The data within the online Housing Monitor tool outlines key data regarding demand for social housing in the Borough.



This map demonstrates that the levels of rental stress in the Borough is lower than areas along the northern Bellarine.

The percentages and numbers of households in rental stress are noted below:

Affordable housing need category	Borough of Queenscliffe
Very low income in rental stress	17
Very low income in rental stress %	1.3%
Low income in rental stress	17
Low income in rental stress %	1.3%
Moderate income in rental stress	7
Moderate income in rental stress %	0.5%
Total homeless persons	6
Homeless % (of total households)	0.5%
Total affordable housing need (number)	47

An indication of range of family types living with rental stress is estimated as:

Household type	Income band	Number of households
	Very low	5
Lone Person Household	Low	18
Lone Person Household	Moderate	21
	Total	44
	Very low	3
Couple family no children	Low	3
Couple lamily no children	Moderate	0
	Total	6
	Very low	0
Couple family with children	Low	4
Couple lamily with children	Moderate	3
	Total	7
	Very low	7
One parent family	Low	3
One parent family	Moderate	5
	Total	15

Note that the total numbers within this table do not match the estimated demand of 47, due to boundary issues – see the online tool.

This table indicates that, although numbers are very low, it appears that the most predominant type of family is lone person household – which is in line with our understanding of the age profile in the community.

There is, however, a significant number of one parent families indicated.

Overall, the data relating to the Borough indicates that:

- Around 41 to 70+ of the 1,234 households in the Borough are living on very modest income
 with rental stress.
- There are only 11 social housing properties currently in the municipality, this is 0.8% of all housing.
- Lone person households are the predominant family type.
- Median weekly rental costs are amongst the highest in the region this figure is affected by the very low numbers of properties coming onto the rental market each year.
- The overall index of disadvantage indicates lower levels of disadvantage than almost all other areas in the region.
- The high cost of housing is a critical barrier to affordability.

Further, the Borough is in a unique situation in that:

- There is no land available for development of any new housing, including social and affordable housing.
- The Borough lacks a range of practical services (including a full line supermarket) that are required for effective social housing.
- People who work in the Borough may well live outside the municipality, as a direct result of the high costs of housing – this indicates that the development of additional social housing is a regional issue and that the Borough has few options for development.

6.0 Action plan

This Borough of Queenscliffe Social Housing Plan is part of a suite of plans in the G21 region, which in turn have been used as the foundation for a G21 Region Social Housing Plan.

By taking a regional approach, the five Councils of the G21 region see clear advantages in mutually supporting each council to share ideas, information and expertise that will deliver the best outcomes through the Big Housing Build.

The councils all acknowledge a clear leadership and advocacy role and have developed an agreed framework to productivity shape social housing initiatives across the region.

G21 SOCIAL HOUSING REGIONAL FRAMEWORK

Economic recovery, building jobs & addressing disadvantage

Purpose

Recognise, acknowledge and address disadvantage in the community through the provision of increased safe, secure and affordable social housing

Council roles

STEWARDSHIP

Advocate for public policy, government investment and community participation in the development of social housing initiatives

PARTNERSHIP

Support regional partnerships with government regarding investments and collaborations with housing agencies on key projects

PLANNING

Negotiate the inclusion of social housing in new private developments where rezoning and planning approvals add value to land

CAPACITY

Continue to develop capacity within Council and awareness within the community to sustainably implement this Social Housing Plan

Council strategies

Continue to participate in the G21 regional, collaborative approach to the planning and development of increased social housing stock

Use tools such as the Municipal Strategic Statement and the Municipal Health and Wellbeing Plan to link social housing with Council strategies

Identify and consider the suitability of Council and other Government owned land that may be suitable for social housing initiatives

Provide information and support to parties seeking to develop opportunities for increased social housing in the municipality

Borough of Queenscliffe Social Housing Plan				
Area	Action	Rationale		
A regional response	The Borough is committed to working with neighbouring municipalities, Homes Victoria, housing agencies and community services to expand social	The Borough is in unique position, as it has no available land for development and very high costs of housing.		
	housing across the G21 region.	People who work in the municipality may well live elsewhere, given high costs.		
		It is in the interests of the Borough and its community to support initiatives to develop social housing in nearby areas, to assist with employment opportunities, as the Borough seeks to expand commerce, including tourism.		
Land owned community groups or government bodies	The Borough is committed to working with community groups and government bodies if there was any future opportunity to re-purpose land in the municipality for social housing – this would include collaborating with Homes Victoria, which is responsible for the implementation of the Big Housing Build.	Whilst taking statutory requirements into account, Council is well placed to use local knowledge in the development of any initiatives to use land owned by groups such as churches, community groups or government bodies. Through partnerships with the other councils in the G21 region the Borough is also well placed to maintain a proactive working relationship with Homes Victoria.		

Recommendations

- R1 That Council acknowledge the need for social housing for vulnerable groups within the community and the role that developing social housing would play in building economic and social capacity across the municipality.
- R2 That Council acknowledge the opportunities of the Big Housing Build, which will enable a sustained focus on building new social housing stock over the next four years
- R3 That Council adopt the G21 Social Housing Regional Framework as an approach to collaboration across the G21 region on the development of social housing.
- R4 That Council work towards targets and commitments that increase availability of social housing by supporting initiatives within the municipality.
- R5 That Council adopt the Borough of Queenscliffe Social Housing Plan.

G21 and the Borough of Queenscliffe acknowledge the Traditional Custodians of the land, the Wadawurrung People of the Kulin Nation. We pay our respects to their Elders past and present, Elders in our community and our emerging leaders.



