



20 August 2021

Ms Wendy Lindsay MP
Chair
Committee on Community Services
Parliament House
Macquarie Street
Sydney NSW 2000
communityservices@parliament.nsw.gov.au

Dear Ms Lindsay

Submission: Inquiry into options to improve access to existing and alternate accommodation to address the social housing shortage

Uniting NSW.ACT is the service and advocacy arm of the Uniting Church NSW/ACT and is a committed advocate for the disadvantaged. Uniting provides innovative and person-centred services that last year supported over 100,000 people at all stages of their lives, including the aged, vulnerable children, young people and families, early learning, and people with disability.

Why is Uniting making a submission?

Uniting NSW.ACT delivers a range of services designed to help individuals and families secure stable housing through crisis accommodation, tenancy and rental support, family mediation, access to health and education services and assistance with locating accommodation.

We work with the Uniting Church and community partners to advocate for affordable housing and government programs and policies that assist the vulnerable to achieve safe and stable accommodation. Our services also have strong links to the social housing sector, with social and affordable housing providing the stability and security that many of our clients need, and a base through which to address other complex issues they may be experiencing. This includes Participating in the NSW Government's Social and Affordable Housing Fund (SAHF) initiative, under which Uniting NSW.ACT will deliver 600 social and affordable dwellings over three to four years for seniors.

Head Office

ABN 78722 539 923
Level 4 / 222 Pitt Street
Sydney NSW 2000
PO Box A2178

Sydney South NSW 1235
T 1800 864 846
E ask@uniting.org

Prior submissions

Most recently, in July 2020, Uniting made a submission to the NSW Government discussion paper: A Housing Strategy for NSW. A copy of this can be found here:

<https://www.uniting.org/community-impact/research-and-innovation>

In that submission, among other things, we recommended:

- Developing a long-term plan for social housing renewal, including: 5,000 additional social housing dwellings per year; increasing supply in regional communities; and repairs and maintenance of existing social housing stock
- Inclusionary Zoning that mandates targets for affordable rental in new developments of 15% for private land and 30% for government land
- Working with existing providers such as Uniting NSW.ACT to bring forward redevelopments that prioritise social and affordable housing
- Reforming commissioning and risk sharing arrangements with government to encourage provider participation and reduce costs
- A fairer deal for renters including tax reforms and replacing ‘no grounds’ evictions with reasonable grounds
- Expanding provision of affordable and appropriate housing options for older people that are close to public transport and community services and designed to facilitate social interaction
- Trialling a seniors’ housing support service to improve housing outcomes for older people
- Conducting a review of eligibility criteria for priority social housing with a view to lower the age from 80 at which older people are eligible.

Options to improve access to existing and alternate accommodation

Uniting submits that, in the context of the Inquiry, two priority actions are:

1. Providing a specialist seniors’ housing information and support service to improve housing outcomes for older people
2. Tailoring local government planning processes to better facilitate short-term use and temporary adaptive use or pop-up affordable housing.

Specialist seniors’ housing information and support service

A specialist seniors’ housing information and support service would improve housing outcomes for older people by providing a central point of contact for older people at immediate risk of homelessness to support the client until they secure and move into appropriate long-term housing and ensure that they are linked in with other support services.

It is challenging for older people who are homeless, or at risk of homelessness, to navigate the complex housing and aged care systems.

A Productivity Commission report found that current levels of awareness and knowledge regarding aged care and housing options are low among older people and that more effective provision of information is needed to support better housing decisions.¹ Other research has

¹ Productivity Commission, 2015, *Housing Decisions of Older Australians*, Commission Research Paper, Canberra.

found that most older people experiencing, or at risk of, homelessness do not know where to go for assistance.² Service providers are also often unsure about how to assist older women experiencing, or at risk of, homelessness.

Uniting NSW.ACT has recommended to Government a trial of a specialist seniors' housing support service to improve housing outcomes for older people so that they can age well in appropriate and affordable housing, with the necessary supports to enable them to stay longer in their home.

The service would provide a central point of contact for older people at immediate risk of homelessness and those who wish to plan for their housing future in retirement. It would support the client until they secure and move into appropriate long-term housing and ensure that they are linked in with other support services.

This proposal has wide support from housing and aged service peak bodies and providers through the NSW Ageing on the Edge Forum.

Facilitating adaptive use or pop-up affordable housing

Uniting has experience in, and has been increasingly considering interim use for buildings as temporary accommodation or pop-up affordable housing. Our ability to use our buildings for 'meanwhile use' in a timely and cost-effective way is hampered by local government planning processes that are not tailored to facilitating short-term use, particularly where proposals involve structures that are compliant and no change in building classification is required – only type of use.

Uniting has been working to develop a pop-up shelter for women aged over 55 years, utilising an aged care home that we have closed. The building was fully compliant but no longer meets contemporary expectations for residential aged care, and is part of a broader site redevelopment proposal. While we have recently received Development Approval for change of use, we consider that streamlining such processes would better facilitate similar proposals by Uniting and other providers.


The building has the capacity to house many women, however, we were initially restricted to only 10 people under complying development codes, which we have used to start operating services while a development application for change of use was submitted. This in turn required engagement of specialist consultants, creation of plans, surveys and other required material for submission. This process takes a minimum of three months as it also involves exhibition, assessment and potentially approval.

This represents a significant direct cost to Uniting through the development consent process, and to our service partners who are identifying clients, as the facility is operating at much less than capacity. We are concerned that many organisations in a similar position will be discouraged from short term, or even longer term, utilisation of vacant buildings for the benefit of temporary and affordable accommodation.

² Australian Association of Gerontology, 2018, Background paper, older women who are at experiencing, or at risk of, homelessness; Batterham, D., Mallett, S., Yates, E., Kolar, V. & Westmore, T., 2013, Ageing out of place? The impact of gender and location on older Victorians in homelessness: A pilot study. Final Report. Hanover Welfare Services, Melbourne

However, it also represents a significant opportunity cost as a large building lies substantially vacant for over three months while older women experiencing homelessness or precarious accommodation are unable to be housed. This is disappointing for a building that meets all compliance standards for a similar, but higher risk, activity of residential aged care and is located in a well serviced, mixed-use area.

We are of the view that local government planning processes need to be able to cater more effectively with this type of change of use proposal, with appropriate safeguards in place, where a building's existing use rights closely align with the new use proposed and there are no safety risks such as fire egress and protection, or any could be easily ameliorated.



Yours sincerely



Emma Maiden
Head of Advocacy and Media