

Submission  
No 25

## **INQUIRY INTO HOMELESSNESS AMONGST OLDER PEOPLE AGED OVER 55 IN NEW SOUTH WALES**

**Organisation:** Community Housing Industry Association NSW

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Community Housing Industry  
Association NSW

# Submission: Inquiry into homelessness amongst older people aged over 55 in NSW

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 02 9690-2447

 [www.communityhousing.org.au](http://www.communityhousing.org.au)

 Suite 5, 619 Elizabeth Street  
Redfern NSW 2016

 [adminassistant@communityhousing.org.au](mailto:adminassistant@communityhousing.org.au)



*The Community Housing Industry Association (CHIA NSW) is honoured to work on the ancestral lands of the Gadigal People. CHIA NSW acknowledges that the land is, was and always will be Aboriginal land. We recognise the Gadigal People as custodians of the land, sea and waterways and celebrate their strength, history, and enduring culture.*

This submission was prepared by:

Community Housing Industry Association NSW  
Suite 5, 619 Elizabeth St, Redfern NSW 2016  
E: [info@communityhousing.org.au](mailto:info@communityhousing.org.au)  
T: 02 9690 2447 | W: [www.communityhousing.org.au](http://www.communityhousing.org.au)

## About this submission

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide a submission to the Legislative Council's inquiry into homelessness amongst older people aged over 55 in New South Wales.

Safe, secure, and affordable housing is a basic human right. It is the foundation for individuals, families, and communities to experience positive social, health, wellbeing, and economic outcomes. It plays a key role in supporting older people to continue to contribute to society by participating in family and community life, and experience positive mental health and wellbeing.

The number of older people who are homeless in NSW has been growing at an alarming rate in recent years, largely due to changing structural trends in Australian society and the housing system. These trends include an ageing population, falling rates of home ownership, an increase in private rental households, a decline in social housing supply, and a lack of affordable housing for low-income households to either rent or purchase.

For older people, insecure housing and the risk of homelessness can mean living in extreme housing stress, forgoing essentials such as food, medicine, and heating or becoming homeless. It can exacerbate existing health vulnerabilities, resulting in premature entry to residential aged care or death. Many older people are becoming homeless for the first time in later life, because of divorce or relationship breakdown, lower rates of homeownership, and increased housing costs. This has been the case particularly amongst older women.

To address the growing cohort of older people who are homeless or at risk of homelessness, the NSW Government's housing policies and interventions need to respond to the changing structural trends in the Australian population and housing system. Without strong action, the number of older people who are homeless or at risk of homelessness will only increase further.

This submission outlines several recommendations aimed at preventing homelessness amongst older people and supporting older people who are homeless or at risk of homelessness in NSW.

## Recommendations

### **Housing options for older people who are homeless or at risk of homelessness**

To provide long term solutions for older people who are homeless or at risk of homelessness, the NSW Government should increase supply of social and affordable housing by:

1. Expanding the Community Housing Innovation Fund (CHIF) to deliver new social and affordable housing by investing \$200 million per annum for the next two years.
2. Establishing a \$500 million Regional Housing Fund to deliver new and renewed social housing properties, affordable housing properties, and key worker homes over two years.
3. Building an additional 200 social housing properties over two years for people exiting from the Together Home program, who are assessed as requiring access to longer-term housing and support services.

In recognition of the increased vulnerability of older people who are homeless or at risk of homelessness:

4. The age of eligibility for priority social housing should be lowered to 55 years, and to 45 years for Aboriginal and Torres Strait Islander people.

To meet the needs of older people who are homeless or at risk of homelessness, in the short term the NSW Government should:

5. Consider funding the Together Home program on a long-term or permanent basis.
6. Conduct an audit of government-owned vacant buildings and properties that are potentially appropriate for meanwhile use housing. This would make it easier for stakeholder to identify opportunities for new projects.
7. Investigate opportunities to use vacant aged care homes or other appropriate buildings across NSW as meanwhile use housing for older people.
8. Develop a Rent Choice product targeted for older people, which assists them to remain in their own home.

To improve the NSW planning system to deliver appropriate housing for older people, the NSW Government should amend the definition of 'seniors' in the State Environment Planning Policy (Housing) 2021 to:

9. Restore the age threshold to 55 years old for non-Aboriginal and Torres Strait Islander people.
10. Include a culturally appropriate age threshold for Aboriginal and Torres Strait Islander people.

#### **Early intervention measures to prevent older people becoming homeless**

11. The NSW Government should increase awareness of, and access to, housing services available for older people through a media campaign. This campaign should:

- be targeted to reach older people
- provide clear guidance on where and how to seek housing assistance
- simplify the process of applying for housing assistance.

This campaign should link with promotion of the Federal Government's My Aged Care and the care finder program.

12. Develop a specialist older persons' housing information and support service comprising both early intervention and crisis response, similar to the Home at Last model in Victoria.

This would provide wraparound services such as assistance with housing applications, support with housing, moving, and establishing a new home, accessing aged care services and referrals into aged care as appropriate.

13. That longer term leases of at least 3 years become the standard in residential tenancy agreements to increase security of tenure in the private rental market.

## About CHIA NSW and community housing providers

CHIA NSW is the peak body representing 94 registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 51,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Since 2012, CHPs have delivered more than 4,400 new homes across NSW, representing an investment of over \$1.6 billion. Critically, these are new homes that the private sector cannot – or will not – deliver in response to housing need.

The community housing sector supports the people of NSW, with tenants located in small and large communities, coming from a range of backgrounds, including:

- People on a disability or aged care pension.
- Those who have experienced family violence or homelessness.
- Aboriginal and Torres Strait Islander people.
- Key workers (such as health and childcare workers, retail and hospitality staff, and other essential service workers) who would otherwise be priced out of the area.

CHPs deliver housing with the needs of their current and future tenants in mind, tailoring projects to match the housing need in the local area and the profile of those on social housing waiting lists where relevant. CHPs retain most of their new housing stock for the long-term, meaning that they are focused on designing high-quality homes which are environmentally sustainable, require less maintenance because of innovative design, and deliver cost savings to their tenants.

## Homelessness amongst older people is increasing

The number of older people who are homeless in NSW has been growing at an alarming rate in recent years. From 2011 to 2016, there was a 43% increase in number of people aged 55 and over experiencing homelessness (from 4,475 to 6,407).<sup>1</sup> The situation for older people is likely to have deteriorated further since 2016, due the pandemic and associated economic and employment impacts.

This increase in homelessness amongst older people is occurring as more people are becoming homeless for the first time later in life. This has been the case particularly amongst older women, with NSW experiencing an increase of 88% in the number of older women accessing homelessness services between 2013-14 and 2016-17.<sup>2</sup>

In 2020-21, 1,413 applicants from the NSW Housing Register with a household head aged 55 years or over who were previously homeless or at risk of homelessness, were newly housed in social housing. This was an increase of 14.6% or 180 households from the previous year. Of these 628 were female household heads.<sup>3</sup>

## The increase in homelessness amongst older people is due to changing structural trends

The increase in older people who are homeless or at risk of homelessness is largely due to changing structural trends in Australian society and the housing system. Declining rates of home ownership, an

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<sup>1</sup> Australian Bureau of Statistics, [Census of Population and Housing: Estimating Homelessness 2016](#), released 14/03/2018, Table 1.3.

<sup>2</sup> Australian Government, Australian Institute of Health and Welfare, (2018) [Specialist homelessness services annual report 2016-17](#), Data Tables: Historical Data 2011-12 to 2016-17. Tab: Older clients.

<sup>3</sup> NSW Department of Communities and Justice (2021) [Annual Statistical Report 2020-21, Newly housed applicants from the NSW Housing Register in social housing who were previously homeless or at risk of homelessness](#).

increasingly unaffordable housing market, and a significant shortfall in the required level of social and affordable housing, has led to increasing numbers of people with insecure housing upon retirement.

### **Australia is facing an ageing population with declining rates of homeownership**

Australia's population is continuing to age. Between 2009 and 2018, there was a 35% increase in the number of people aged 65 years and over (from 2.9 million to 3.9 million people). By comparison, there was a 10% increase in those aged 0 to 64 years over the same period (from 18.9 million to 20.8 million).

The rate of home ownership has been declining since the 1960s. In 1994-95, just over 70% of households in NSW owned their home (the majority without a mortgage). However, by 2017-18 the rate of home ownership in NSW had dropped to 64% (the majority still with a mortgage), and a third of households were renting.

In 2018, the main source of income for 57% of older Australians was a government pension or allowance. More than a quarter (27%) of Australians receiving the Aged Pension were not homeowners in December 2021.

In NSW in 2021:

- 793,540 people were receiving the Aged Pension
- 30% (82,728) of residents receiving Jobseeker were aged more than 55 years.
- 41% (186,612) residents receiving Commonwealth Rent Assistance (CRA) were aged more than 55 years.

Sources: ABS, [Disability, Ageing and Carers, Australia: Summary of Findings](#); Australian Government, Australian Institute of Health and Welfare (2021) [Home ownership and tenure](#); and Australian Government, Department of Social Services, [DSS Payment Demographic Data](#), December 2021.

As discussed in NSW Treasury's [Intergenerational Report](#), the rates of home ownership across the population have been decreasing from a peak in the 1960s, and this trend is expected to continue.<sup>4</sup> Older people who do not own their own home are likely to face housing stress renting in the private market, particularly if they are dependent on the Aged Pension or other social support.

The current rates of the Aged Pension, Jobseeker and other social security payments are increasingly inadequate to cover housing as well as other basic living costs. Commonwealth Rent Assistance (CRA) has also failed to keep up with increasing rents. Anglicare Australia's most recent snapshot of rental affordability found that less than 1% of available rental properties were affordable for a single person receiving the Aged Pension. For a single person receiving Jobseeker, no properties were affordable.<sup>5</sup>

Therefore, as the population ages, more people will become eligible for social housing, particularly if increases in the Aged Pension continue to fall behind increases in housing costs. Currently, 37% of households over 65 who are not homeowners require social housing. NSW Treasury estimates that the

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<sup>4</sup> NSW Treasury (2021) [2021-22 NSW Intergenerational Report](#), p. 67.

<sup>5</sup> Anglicare Australia (2022) [Rental Affordability Snapshot National Report](#), Table 1. To be considered affordable, rent needs to be no more than 30% of a household's income for low- and very low-income households.

forecast decline in homeownership and consequent increase in demand for social housing will increase the demand for social housing by an additional 68,000 households by 2060-61.<sup>6</sup>

In addition to the above, factors driving the huge growth in older women who are homelessness include:

- Greater incidence of divorce and relationship breakdown than previous generations.
- Lower lifetime earnings due to lower wages for work performed compared to men, part time employment and periods out of the workforce to undertake caring responsibilities, and less access to higher paid positions.

For many women this has contributed to fewer assets in older age, including superannuation. In 2017, the gap in superannuation balances between men and women aged 55-59 was 47.8% and 42.0% for the 60-64 age range.<sup>7</sup>

- Domestic violence in the home.<sup>8</sup>

The current shortage social housing in NSW is primarily due to historic underinvestment in new, permanent supply of purpose-built housing. In 2020, social housing in NSW as a proportion of total housing stock was 4.71%.<sup>9</sup> This is 2.9% lower than the latest available OECD average of 6.6%. In Australia in 1991 the proportion was 7.1%.<sup>10</sup>

At the same time there is growing demand for social and affordable housing. Modelling undertaken by the City Futures Research Centre on behalf of CHIA NSW prior to the COVID-19 pandemic, estimated that an additional 213,200 social and 103,500 community housing properties are required by 2036 to meet current and estimated future demand.<sup>11</sup>

## Opportunities for early intervention to prevent homelessness

Actions that can prevent older people becoming homeless are critical to avoid the mental and physical health impacts of homelessness. Early intervention and prevention policies have been found to be effective for older people and deliver long-term benefits for the Australian economy and society. The benefits include lower overall expenditures on government services, for example in the health and aged care systems due to the impact of homelessness on health and the possibility of premature entry into residential aged care.<sup>12</sup>

To ensure support reaches those who need it before they become homeless, CHIA NSW is recommending that the NSW Government commits funding for an awareness campaign targeted towards older people, the establishment of a specialist support program for older people and commits to legislative reform to support increased security of tenure in the private rental market.

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<sup>6</sup> NSW Treasury (2021) [2021-22 NSW Intergenerational Report](#), p. 67.

<sup>7</sup> R. Clare, 2017, [Superannuation account balances by age and gender](#), Table 1, p 9.

<sup>8</sup> Thredgold, C., Beer, A., Zufferey, C., Peters, A. and Spinney, A. (2019) [An effective homelessness services system for older Australians](#), AHURI Final Report 322, Australian Housing and Urban Research Institute Limited, p 2

<sup>9</sup> Barnes, E., Writer, T., Hartley, C. (2021) [Social Housing in New South Wales: Report 1 Contemporary analysis](#), (2021), Sydney: Centre for Social Impact, p 26.

<sup>10</sup> Equity Economics (2021) [Maximising the Returns – The Role of Community Housing in Delivering NSW's Future Housing Needs](#), [Equity Economics](#), p 8

<sup>11</sup> Troy, L., van den Nouwelant, R., Randolph, B. (2019) [Estimating need and costs of social and affordable housing delivery](#), University of NSW, City Futures Research Centre, p 3.

<sup>12</sup> Thredgold, C., Beer, A., Zufferey, C., Peters, A. and Spinney, A. (2019) [An effective homelessness services system for older Australians](#), AHURI Final Report 322, Australian Housing and Urban Research Institute Limited, pp 55-56.



## Increasing awareness and access to housing services available for older people

Many older people may not recognise their precarious housing situation as homelessness, which is often compounded by fear and social stigma associated with seeking support. This is especially the case for older people who may have had stable housing through their lives and never had to seek assistance previously. Lower levels of digital literacy can increase barriers for some older people when seeking access to information on support services and/or completing online applications for assistance.

Greater awareness of the housing support available, and assistance in applying, is required to better meet the needs of older people who are homeless or at risk of homelessness. For example, affordable housing can be accessed through aged care services. This includes aged care homes and the Commonwealth Home Support Programme.

Under the Commonwealth Home Support Programme there are several services such as Assistance with Care and Housing (ACH) to help older people that are homeless or at risk of being homeless as they get older. ACH can link people with a provider – usually a charitable or religious organisation – to find better, more stable accommodation, and also link people to other services to receive help at home or in the community.<sup>13</sup> Such services can support older people wanting to remain in their own homes, rather than move prematurely into residential aged care.

In addition, the care finder program, announced in the 2021-22 Federal Budget is intended to provide specialist and intensive assistance to help people understand and access aged care and connect with other relevant supports in the community.<sup>14</sup> Its development follows the Aged Care System Navigator trial and calls to provide a face-to-face presence in the community for people who require extra support to access My Aged Care and the aged care system. Under the program, Local Primary Health Networks (PHNs) are responsible for establishing and maintaining a network of care finders within the target population.<sup>15</sup>

**CHIA NSW recommends** that the NSW Government conduct a media campaign that:

- is targeted to reach older people
- provides clear guidance on where and how to seek housing assistance
- simplifies the process of applying for housing assistance.

This campaign should link with promotion of the Federal Government's My Aged Care and the care finder program as many older people are unaware of what assistance is available for older people with unpredictable housing arrangements or experiencing homelessness.

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<sup>13</sup> Australian Government, My Aged Care, [Support for people facing homelessness](#).

<sup>14</sup> Australian Government, Department of Health, Budget 2021-22, [Home Care \(Pillar 1 of the Royal Commission response\) – Connecting senior Australians to aged care services](#).

<sup>15</sup> Australian Government, Department of Health, (2022) [Care finder policy guidance for PHNs](#).

## Specialised housing assistance for older people

While prevention and early intervention is a key focus area in the [NSW Homelessness Strategy 2018-2023](#), it does not address the particular issues faced by older people who are homeless or at risk of homelessness.

A specialist homelessness service (SHS) is an organisation that receives government funding to deliver accommodation related and/or personal services to people who are homeless or at risk of homelessness. SHS agencies vary in size and in the types of assistance they provide. Across Australia, agencies provide services aimed at prevention and early intervention, as well as crisis and post crisis assistance to support people who are homeless or at risk of homelessness.<sup>16</sup>

In 2020-21, 70,588 people sought assistance from SHS in NSW, of which only 5,216 or 7.4% were people aged 55 years or older.<sup>17</sup> This age group accounts for 28% of the population in NSW.<sup>18</sup> This suggests that older people are underrepresented in their usage of SHS, and that there is a need for Specialist Homelessness Services focussed on helping older people. In addition, such a service would assist the many older people who are homeless or at risk of homelessness who have never interacted with social services systems and may struggle to navigate the system. Stigma and shame may create further barriers to seeking support.

For those who do present at housing and homelessness services, options include emergency or temporary accommodation, and/or an application for social housing. Temporary or meanwhile housing is often not a viable option for older people who are homeless or at risk of homelessness. Emergency supports, including rental subsidies such as Rent Choice do not address the insecurity of the private rental market.<sup>19</sup>

The Home at Last service model operated by the Housing for the Aged Action Group (HAAG) in Victoria is an example of a service focussed on helping older people who are homeless or at risk of homelessness. It provides accessible, equitable and appropriate support and housing information for older people. Services range from providing tailored housing information, assistance with housing applications, support with securing housing, moving, and establishing a new home, accessing aged care services and referrals into aged care. A key aspect of the model is its focus on early intervention through direct community engagement and reaching people before they become homeless.<sup>20</sup>

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<sup>16</sup> Australian Government, Australian Institute of Health and Welfare, (2021) [Specialist homelessness services annual report 2020-21](#).

<sup>17</sup> Australian Government, Australian Institute of Health and Welfare, (2021), [Data tables: Specialist homelessness services annual report 2020-21](#), Tab Clients.1.

<sup>18</sup> Australian Bureau of Statistics (2022) [National, state and territory population](#), Data downloads, September 2021.

<sup>19</sup> Ageing on the Edge NSW Forum (2021) [Home at Last: Solutions to End Homelessness of Older People in NSW](#), p 12.

<sup>20</sup> Ageing on the Edge NSW Forum (2021) [Home at Last: Solutions to End Homelessness of Older People in NSW](#), p 14; and [Home at Last brochure](#).

**CHIA NSW recommends** that a specialist older persons' housing information and support service comprising both early intervention and crisis response be established in NSW, similar to the Home at Last model in Victoria.

This would provide wraparound services such as assistance with housing applications, support with housing, moving, and establishing a new home, accessing aged care services and referrals into aged care as appropriate.

### Increase security of tenure in the rental market

For older people who are renting, security of tenure is extremely important. As found by the Productivity Commission's report on the housing decisions of older Australians, most older people prefer to 'age in place'.<sup>21</sup>

However, older tenants are particularly vulnerable to landlord-initiated moves. As the Productivity Commission found in their [2019 Report on Vulnerable Private Renters](#), renters living in households headed by older Australians were more likely to move because of a landlord notice compared with private renters in general. One explanation for the latter could be that older renters are less likely to move voluntarily, and thus more likely to face landlord-initiated moves. Older renters tend to hold longer tenures, which is consistent with a preference for not moving. However, the Commission did not conclude that the likelihood of receiving a landlord notice increased with the length of a renter's tenure.<sup>22</sup>

CHIA NSW members have reported an increase in requests for assistance from older people receiving no-grounds eviction notices for their private rental properties, including homes they have lived in for up to 20 years. For these tenants, receiving such a notice can be traumatising, and finding a new home which is affordable can be extremely difficult. The private rental application process, such as completing applications, organising references, and navigating online lodgement systems is also very challenging for older people with no recent experience of applying through the private rental system.

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<sup>21</sup> Productivity Commission (2015) [Housing decisions of older Australians](#), p 5.

<sup>22</sup> Productivity Commission (2019) [Vulnerable Private Renters: Evidence and Options](#), pp 80-81.

### **Case Study – Elderly couple at risk of homelessness after receiving notice to vacate**

Margaret and Edward\* have lived in the mid north coast for most of their adult lives. Now in their 80s, the couple lived in a modest and affordable rental in Port Macquarie for over seven years.

They were taken by surprise in March this year, when the property they were renting was put up for sale. The couple was given 42 days' notice to vacate the property when it sold, and their lives started to unravel.

The couple found themselves in a desperate situation during an unprecedented housing crisis. Despite applying for over 20 properties within two weeks, they were unable to secure a new rental property. They began to despair, and Edward told their neighbour they were considering ending their lives as they contemplated becoming homeless.

Thanks to the advocacy and support of their neighbour, the couple were referred to Community Housing Limited (CHL) by their local MP. With continued support from their neighbour, Margaret and Edward applied for social housing via Housing Pathways, making them eligible for social housing through CHL.

In April 2022, the couple signed a lease with CHL and are now living in an affordable rental property in an over 55s apartment complex. Margaret and Edward say they are now settling into their new home and have a deep appreciation for social and community housing.

Although CHL was able to assist Margaret and Edward, it is increasingly difficult for CHPs to meet the growing demand for housing by some of the most vulnerable people in our communities because of the housing crisis.

\*Names have been changed to protect the privacy of the couple in this case study.

CHIA NSW's submission to the NSW Housing Strategy *Discussion Paper* in 2020 argued that that the current residential tenancy laws in NSW fail to provide adequate protections for private renters or reflect an equitable balance between tenure security and housing mobility, and recommended that the NSW Government urgently initiate private rental reform by introducing registrable, longer-term leases with a minimum period of three years or more, with the objective of providing greater tenure security to long-term and lifelong renters. Better protection for private renters would also benefit those living in sub-standard accommodation who fear making repair requests in case of a rent increase or eviction.<sup>23</sup>

In March 2020 several changes to the standard tenancy agreement were introduced, including an option for a five-year fixed term to encourage longer fixed-term agreements.<sup>24</sup> However, despite this change and the fact that the NSW [Residential Tenancies Act 2010](#) does not prescribe a set length for residential tenancy agreements, most tend to 12 months. Many people will continue to rent their homes on a continuing month-to-month basis (that is, a periodic agreement).

Fixed term leases provide greater protection against eviction as the landlord cannot end the lease without grounds (such a breach of the tenancy agreement) before the end of the fixed term. In addition, a fixed term agreement cannot be terminated early for the property to be sold. However, on a periodic

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<sup>23</sup> CHIA NSW (2020) [Built to Last – submission to the NSW Government's Housing Strategy](#), pp 70-71.

<sup>24</sup> NSW Government, Fair Trading, [Changes to residential tenancy laws](#).

agreement, the landlord can terminate the agreement with 30 days' notice if the property is being sold, or 90 days' notice to terminate without giving a reason (no grounds).<sup>25</sup>

**CHIA NSW recommends** that longer term leases of at least 3 years become the standard in residential tenancy agreements to increase security of tenure in the private rental market.

## Services to support older people who are homeless or at risk of homelessness

Increasing awareness of available housing assistance and reducing insecurity in the private rental market may assist in reducing the risk of homelessness for older people. However, as the trend towards lower rates of home ownership continues and the private rental market remains unaffordable, especially for older people whose main source of income is the Aged Pension, it is critical that housing policy and options are primarily focused on the delivery of permanent social and affordable housing supply.

Reducing homelessness is one of the NSW Premier's key priorities, with a target of halving the number of people sleeping rough across NSW by 2025.<sup>26</sup> Older people are categorised as one of nine key cohorts in the *NSW Homelessness Strategy 2018-23*, and the Strategy recognises the need to consider new housing options that provide long-term affordable accommodation for groups with a growing risk of homelessness such as older women. It targets the development of social housing in partnerships with CHPs to meet the needs of older women, for example through the trial of small units.<sup>27</sup> This is also reflected in the NSW Government's *Housing 2041 Action Plan*.<sup>28</sup>

While these strategies are welcome, greater action needs to be taken to address the critical shortage of social and affordable housing in NSW and to tackle the growing issue of homelessness amongst older people. The sections below outline how the NSW Government can achieve this in partnership with the community housing sector.

### Increase social and affordable housing by partnering with the community housing sector

Since 2016 the NSW Government has committed to building over 9,000 new social housing dwellings over the next ten years as part of its [Future Directions for Social Housing in NSW](#).<sup>29</sup> However, this falls far short of the ongoing investment required to address the current and projected shortfall in social housing.

The NSW community housing sector has a demonstrated track record in delivering new and social affordable housing in perpetuity through key government initiatives including the Social and Affordable Housing Fund, Communities Plus, the Community Housing Innovation Fund (CHIF), and the National Rental Affordability Scheme. The sector is well positioned to work alongside government and the private

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<sup>25</sup> [Residential Tenancy Act 2010](#) (NSW) ss 85-86.

<sup>26</sup> NSW Government, [Premier's Priorities – reducing homelessness](#).

<sup>27</sup> NSW Government, [NSW Homelessness Strategy 2018-23](#), pp 10, 21-22, 30.

<sup>28</sup> NSW Government, Department of Planning, Industry and Environment, [Housing 2041 2021-22 Action Plan](#), Action 3.34, p 16.

<sup>29</sup> Barnes, E., Writer, T., Hartley, C. (2021) [Social Housing in New South Wales: Report 1 Contemporary analysis](#), (2021), Sydney: Centre for Social Impact, p 8.

sector to build the social and affordable homes that NSW needs. The NSW Government's *Housing 2041* strategy recognises the community housing sector as a key partner in growing social housing in NSW.

Not-for-profit CHPs are a cost-effective way to deliver social housing. The sector's charitable status makes it exempt from GST, land tax and stamp duty, and enables the sector to attract philanthropic donations. In addition, the recognition of CHPs as private landlords enables tenants to receive Commonwealth Rent Assistance, thereby increasing CHPs' income stream and rent revenue.

When undertaking property development activities, CHPs with charitable status can redirect the value of their tax exemptions and their developer margins into additional housing supply. As a result, CHPs can potentially deliver between 25 and 30% more social and affordable properties than would otherwise be available if the CHP or government purchased them from a private developer.

Modelling undertaken by Equity Economics found that delivering a significant social housing supply program through CHPs would generate a return on investment over 50% higher compared to delivery through public housing and save the NSW Government between \$316 million to \$631 million per year.<sup>30</sup>

The CHIF is strongly supported by CHPs as an efficient way to deliver new social housing. Based on a co-contribution model it provides upfront funding to CHPs and leverages the additional resources CHPs can contribute including debt, capital, land, and tax concessions, as well as the community networks partnerships and local connections that can support future tenants.

To date, the combined value of CHIF Round 1 and CHIF Stimulus projects is nearly \$170 million with CHPs contributing around \$93 million. An estimated five people are employed for each \$1 million of building activity, which equates to around 850 jobs that will be created or sustained.<sup>31</sup> Notably, some of the housing being delivered through the CHIF is specifically targeted to older people, particularly older women.<sup>32</sup>

Community housing providers have recently identified multiple shovel ready projects throughout NSW which can be kickstarted quickly to build more than 2,500 social and affordable homes and create over 9,100 jobs in Greater Sydney and regional NSW during 2022 and beyond.<sup>33</sup>

The COVID-19 pandemic and natural disasters, such as the recent floods on the North Coast of NSW, have exacerbated housing affordability pressures in regional housing markets. Addressing regional housing affordability is critical for the many older people facing increasingly unaffordable rents in the regions, as set out in the case studies below.

The Regional Housing Taskforce recently recommended that the NSW Government commit to the establishment of an ongoing program to deliver new and renewed social and affordable housing in regional NSW, through partnership approaches involving government agencies, local government, and the community housing sector.<sup>34</sup>

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<sup>30</sup> Equity Economics (2021) [Maximising the Returns – The Role of Community Housing in Delivering NSW's Future Housing Needs](#), Equity Economics, p 4. Based on 5,000 new social housing dwellings per year with estimated savings of \$316 million if half of these were delivered through CHPs, and \$631 million if delivered exclusively through CHPs.

<sup>31</sup> NSW Government, Department of Communities and Justice, [Community Housing Innovation Fund](#).

<sup>32</sup> NSW Government, Department of Communities and Justice, [Announced CHIF projects](#).

<sup>33</sup> [CHIA NSW 2022-23 Pre budget submission](#), p 6.

<sup>34</sup> NSW Government, Department of Planning, Industry and Environment (2021) [Regional Housing Taskforce Recommendations Report](#), p 5.

CHIA NSW has called on the NSW Government to commit to the establishment of a \$500 million Regional Housing Fund to deliver new and renewed social housing properties, affordable housing properties and key worker homes over two years. Consistent with the recommendation of the Regional Housing Taskforce, it is proposed that responsibility for project delivery be shared evenly between government agencies and the community housing sector.<sup>35</sup>

**CHIA NSW recommends** that the NSW Government:

- Expand the Community Housing Innovation Fund (CHIF) to deliver new social and affordable housing by investing \$200 million per annum for the next two years.
- Establish a \$500 million Regional Housing Fund to deliver new and renewed social housing properties, affordable housing properties, and key worker homes over two years.

The following case studies illustrate the issue of unaffordable rental properties in regional areas, and the impact on older people.

### **Case Study**

Connie (not her real name) is 77-year-old women who had been couch surfing with a relative who sadly passed away. Connie contacted Housing Plus after she was required to vacate the property as she was not on the lease.

Connie's caseworker assisted her to access temporary accommodation initially through Link2Home and then through the local office of DCJ-Housing. Connie was working towards getting onto the priority waitlist and was required to look for and apply for private rentals. The private rental market in Orange is extremely competitive, but Connie continued to seek private rentals even though she felt that there was little chance that she would be approved for one. Connie became despondent and discouraged each time her application was declined.

Connie's caseworker spoke to Connie about Housing Plus's refuge, Wirree, but initially Connie was reluctant, as she was very unsure as to whether she would cope in a refuge setting, particularly as most of the other residents were significantly younger. When Connie had used all her allowable temporary accommodation, she ended up sleeping in her car, at which time she reconsidered the offer of a refuge spot. She then completed a risk assessment for Wirree where she quickly settled into a room.

Connie was assisted by her caseworker to work towards priority housing. She lodged an application, provided required documents including a medial assessment and rental diaries to show that she had been trying to solve her own accommodation needs. Connie was also referred to the Orange Housing Network Meeting, which is a meeting to help overcome barriers to long term accommodation and reduce the impact of homelessness. As a result of the advocacy and collaboration Connie is now on the priority waitlist and hopes to be offered a long-term property soon.

Source: Housing Plus (2021) [Annual Report 2020-21](#).

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<sup>35</sup> [CHIA NSW 2022-23 Pre budget submission](#), p 6.

## Case Study

When Amanda and Jane (not their real names) contacted Community Housing Limited (CHL) in Port Macquarie in December 2021, they were homeless and sleeping in their car.

Amanda is in her 70s and cares for her adult daughter Jane. Jane lives with a disability and her mother has been her carer throughout her childhood and adult life.

Prior to contacting CHL, Amanda and Jane had been living in a private rental property in Port Macquarie for two years. They found themselves homeless after the property owner decided to return to Australia and move back into the property due to the COVID pandemic.

With skyrocketing rental prices in the region, Amanda and Jane were unable to find another affordable rental and resorted to sleeping in their car.

Amanda told CHL that she had to take her daughter to the Emergency Department of the local hospital on most nights as Jane would become agitated and unwell as she did not understand why they were sleeping in the car and did not have a stable home.

CHL was unable to find a permanent home for Amanda and Jane immediately due to the extreme shortage of social and affordable housing in the region but provided temporary accommodation while prioritising their housing request.

Amanda and Jane are now feeling safe and secure in their new CHL home instead of living in fear and experiencing the trauma of being homeless and living in their car.

Amanda and Jane are just two of the hundreds of thousands of Australians who are either homeless right now or at risk of becoming homeless due to the dire shortage of affordable housing.

The price for a regional rental property soared by 12.5% in the 12 months to September 2021, the largest annual increase on record. (Corelogic data October 2021).

On the Mid North Coast over the past twelve months:

- In Port Macquarie, rents have increased by 18.6% and property prices by 39.8%
- In Coffs Harbour, rents have increased by 25.1% and property prices by 16.3%.

## Lowering the age of priority for social housing

As demand for social housing in NSW far outstrips supply, eligible applicants can wait years to be housed. 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. Of these, 13,180 were general applicants and 1,856 were priority applicants. In total, on 30 June 2021 there were 44,127 general applicants and 5,801 priority applicants across all ages.<sup>36</sup>

There is a stark difference in waiting time for priority and general applicants. In 2020-21 the median waiting time was 2.2 months for priority approved social housing applicants to be housed in public

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<sup>36</sup> NSW Government, Department of Communities and Justice (2021) [Annual Statistical Report 2020-21, Social housing applicants on the NSW Housing Register at 30 June](#).



housing or Aboriginal Housing Office (AHO) properties.<sup>37</sup> However, the waiting time for applicants on the general waiting list can vary from two to more than 10 years depending on the allocation zone and the size of the property.<sup>38</sup>

In NSW, people who have met general eligibility criteria for social housing may be approved for housing assistance as an elderly client if they are:

- aged 80 years and over, or
- confirmed to be an Aboriginal or Torres Strait Islander person and aged 55 years and over.

These elderly clients may be prioritised ahead of applicants on the general waiting list.<sup>39</sup>

By contrast, in Victoria has a special priority category for people aged 55 years and over who are eligible for social housing and are not eligible for another priority category.<sup>40</sup>

In recognition of the increased vulnerability of older people experiencing homelessness, CHIA NSW recommends that the age of eligibility for priority social housing be lowered to 55 years and to 45 years for Aboriginal and Torres Strait Islander people. This would significantly reduce social housing waiting times for older people. However, without an increase in the supply of social housing it could increase median waiting times for people currently on the priority waiting list and potentially for those on the general waiting list.

**CHIA NSW recommends** that the age of eligibility for priority social housing be lowered to 55 years and to 45 years for Aboriginal and Torres Strait Islander people.

### The Together Home program should be continued on a long-term basis

Launched in 2020 in response to the COVID-19 pandemic, the Together Home program aims to support people street sleeping across NSW into stable accommodation, linked to wraparound supports. It is being delivered through a partnership between the NSW Government, 19 CHPs and the specialist homelessness services sector. Currently, more than 700 people have been housed through the program.

For participants, Together Home is a two-year program. A key component of each person's support plan involves identifying a long-term, sustainable housing pathway following participation in the program. A high proportion of Together Home participants have been aged 55 years or older. It is likely these participants will need to transition into social housing at the end of the program.

To date the NSW Government has committed \$122.1 million to the program, including funding in the 2021-22 NSW Budget to build 100 new social housing properties to house Together Home participants once the program ends. In our 2022-23 Pre-Budget Submission, CHIA NSW recommended the NSW Government build an additional 200 social housing properties over two years for participants exiting

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<sup>37</sup> NSW Department of Communities and Justice (2021) [Annual Statistical Report 202-21, Median waiting time for priority approved applicants housed in public housing and Aboriginal Housing Office \(AHO\) properties.](#)

<sup>38</sup> NSW Department of Communities and Justice, [Expected waiting times.](#)

<sup>39</sup> NSW Department of Communities and Justice, [Social Housing Eligibility and Allocations Policy Supplement.](#)

<sup>40</sup> Housing Victoria, [Social Housing eligibility.](#)

from the Together Home program, who are assessed as requiring access to longer-term housing and support services.

Beyond this, ongoing government investment in Housing First programs such as Together Home is crucial to achieving the NSW Premier's Priority to reduce rough sleeping by 50% by 2025.

**CHIA NSW recommends** that the NSW Government:

- Build an additional 200 social housing properties over two years for participants exiting from the Together Home program, who are assessed as requiring access to longer-term housing and support services.
- Consider funding the Together Home program on a long-term or permanent basis.

### A potential role for 'meanwhile use' housing to provide short-term assistance

Meanwhile use housing is the temporary use of buildings which are vacant and otherwise unused while awaiting redevelopment, planning decisions or financing. Although meanwhile use housing should not be regarded as substitute for the delivery of new permanent social and affordable housing, such projects can potentially offer a temporary solution for the provision of transitional housing and respond to homelessness, albeit on a limited scale.

In NSW, meanwhile use projects have been successfully initiated by some CHPs and other charitable organisations, including Bridge Housing, Link Wentworth Housing, MyFoundations, and Womens Housing Company. These projects have increased access to safe, secure, and affordable housing for people who would otherwise not have suitable accommodation options. With the right support, meanwhile use housing can help people transition into long-term housing, noting that this must be available when the meanwhile use period ends.

An example of a meanwhile use project aimed at older women is Beecroft House.

### **Case study: Beecroft House**

A partnership between Women's Community Shelters, Link Wentworth, PAYCE Foundation and Twilight Aged Care (who donated the property rent free), Beecroft House was established in 2019 to provide safe and secure housing for women aged 55 years and over. Beecroft House provides secure housing for up to two years, with follow-on support provided to identify permanent housing options at the end of their tenancy.

Formerly an aged care home, Beecroft House was refurbished as meanwhile use housing to offer studio-style accommodation for 20 women. This included fresh interiors, shared bathrooms, well-appointed communal kitchen facilities, three social rooms and car parking.

The property is located within walking distance to public transport and provides easy access to the Sydney CBD. Staff are available onsite or are on-call during working hours, with after-hours on-call support and other tailored support provided on an as-needs basis.

Although meanwhile use housing can provide temporary accommodation solutions for some people who are homeless or at risk, it is important to note that some meanwhile use projects may lack the existing infrastructure and design features to provide safe or appropriate accommodation for older people.

**CHIA NSW recommends** that the NSW Government:

- Conduct an audit of government-owned vacant buildings and properties that are potentially appropriate for meanwhile use housing. This would make it easier for stakeholder to identify opportunities for new projects.
- Investigate opportunities to use vacant aged care homes or other appropriate buildings across NSW as meanwhile use housing for older people.

### Private rental assistance

Rental subsidies provide a short-term measure to prevent people becoming homeless. This is particularly important given the current shortfall in social and affordable housing.

The NSW Government provides a range of private rental assistance products to help eligible people set up and maintain a tenancy in the private market including Rentstart, Rent Choice and private rental brokerage. In 2020-21, 17,903 households were assisted with private rental assistance in NSW. Of these, 2,178 had a household head aged 55 years or over; 1,028 of which were female household heads.<sup>41</sup>

Private rental subsidies can help people at risk of homelessness remain in their current property. This is particularly important in markets with limited vacancies and rising rents, and a shortfall in social housing. However, for new leases, especially in small rental markets, these private rental subsidies may end up

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<sup>41</sup> NSW Department of Communities and Justice (2021) [Annual Statistical Report 2020-21, Households assisted with private rental assistance products.](#)

competing for the same properties with other rental subsidies, for example the Community Housing Leasing Program.

One way to overcome this may be to target private rental assistance to those already in the private rental market to ensure they are able to remain in their homes. This could be through the development of a Rent Choice product targeted for older people.

Currently the various Rent Choice products are targeted at people aged 16-24, people escaping domestic and family violence, and veterans. There is also a trial of Rent Choice Assist in several locations. These subsidy programs are time limited (3 years) and bridge the gap between market rent and a percentage of the tenant's income plus Commonwealth Rent Assistance (CRA). The rate of subsidy tapers over the 3-year period.<sup>42</sup>

A Rent Choice product for older people could operate in a similar way, however as the income for this cohort is unlikely to increase (as expected in the youth cohort for example) tapering the level of subsidy may not be appropriate. Potentially this assistance could be targeted to people who are at retirement age and eligible for social housing. The subsidy could be based on the difference between 30% of their income plus CRA and (a capped) average market private rental.

**CHIA NSW recommends** that the NSW Government develop a Rent Choice product targeted for older people, which assists them to remain in their own home.

### Improving the NSW planning system to deliver housing for older people

The planning system plays a vital role in the delivery of affordable and appropriate housing. Careful planning for age appropriate social and affordable housing properties, in or adjacent to shopping, transport and other services will become increasingly important to ensure that older people can continue to experience positive health, wellbeing and social outcomes.

The new Housing SEPP (*State Environmental Planning Policy (Housing) 2021*), which began on 26 November 2021, incorporates the previous Seniors SEPP (*State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004*). Section 82 of the Housing SEPP defines 'seniors' as:

- a) people who are at least 60 years of age,
- b) people who are resident at a facility at which residential care, within the meaning of the Aged Care Act 1997 of the Commonwealth, is provided,
- c) people who have been assessed as being eligible to occupy housing for aged persons provided by a social housing provider.<sup>43</sup>

The Housing SEPP increased the age threshold for 'seniors' from 55 to 60 years. In submissions to the consultation draft for the Housing SEPP, CHIA NSW was one of several organisations that suggested that

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<sup>42</sup> NSW Department of Communities and Justice, [Help renting in the private market](#). The tenant's contribution starts at 25% of their income.

<sup>43</sup> *State Environmental Planning Policy (Housing) 2021*, s82.

the current age should be maintained, noting its impact on older people and affordable housing options.<sup>44</sup>

While parts (b) and (c) of the definition may provide some scope for CHPs to house older people in need who are aged less than 60 years old, it is not sufficiently clear how these elements of the definition are to be applied. CHIA NSW is concerned that the lack of clarity will lead to inconsistent interpretation of the definition by consent authorities, creating uncertainty for CHPs and barriers to delivery.

Greater clarity is required particularly for older Aboriginal and Torres Strait Islander people who are eligible for aged care support at 50, compared to at 65 for the rest of the population.<sup>45</sup> In recognition of the greater level of ill health and shorter life expectancies of Aboriginal and Torres Strait Islander people, it is appropriate that this is explicitly reflected in the definition of 'seniors'.

**CHIA NSW recommends** that the definition of 'seniors' in the Housing SEPP be amended to:

- Restore the age threshold to 55 years old for non-Aboriginal and Torres Strait Islander people.
- Include a culturally appropriate age threshold for Aboriginal and Torres Strait Islander people.

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<sup>44</sup> NSW Government, Department of Planning, Industry and Environment (2021) [Housing SEPP Submissions report](#), consultation draft exhibition outcomes, November 2021, p 44.

<sup>45</sup> Australian Government, Department of Health, [What is aged care? Who is eligible?](#)