

**Submission
No 69**

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

Organisation: Shelter NSW

Date Received: 11 June 2022

June 11, 2022

Chair, Standing Committee on Social Issues,
NSW Parliamentary House,
6 Macquarie Street,
Sydney NSW 2000
Via email: socialissues@parliament.nsw.gov.au

**RE: *Inquiry into Homelessness amongst older people aged 55 in New South Wales*
Shelter NSW endorsement of the *NSW Ageing on the Edge Forum* submission**

Shelter NSW is a non-profit organisation that conducts housing research and advocacy on behalf of households on ordinary incomes — those in low- and moderately-paid work, in casual or part-time employment, or getting by on government support payments. We were founded in 1975 as a member-based organisation that today represents a diverse network of other organisations and individuals who share our vision of a sustainable housing system that provides a secure home for all. To advance our vision, we engage our members, experts, and partners and advocate on housing reforms that aim to benefit our economy, our society, and our environment. One of our primary aims is to find a way to mitigate the growing impact of housing inequality across our cities and towns.

Shelter NSW is a member of the *NSW Ageing on the Edge Forum*. Collectively we are working towards ending homelessness of older people in NSW. Please accept this document as an endorsement of the entire *Ageing on the Edge* submission to the Committee; it should be considered as a supplement to that broader submission.

As a reminder, the coalition is calling on the NSW Government to:

- **Fund a specialist older person's housing information and support service** that comprises both an early intervention and crisis response, similar to the HAAG 'Home at Last' model in Victoria.
- **Lower the priority age for social housing eligibility from 80 years** as a matter of urgency.
- **Build 5,000 social and affordable homes per year for 10 years**, at least 20% of which should be dedicated to older people.

In addition, Shelter NSW calls on the NSW Government to:

- **Increase recurrent funding to Specialist Homelessness Services (SHS) by 20% to enable them to move beyond a crisis response and deal with the steadily increasing demand on its services**
- **Strengthen protections to ensure renters are not unreasonably or unfairly forced into the challenging private rental market.** Specifically, replace 'no grounds' eviction provisions in current NSW tenancy law with a range of specified reasonable grounds' for ending a tenancy.
- **Ensure key NSW institutional processes in corrective services and mental health for example, for 'exiting' or 'discharging' people, do not in fact tip people into housing precariousness and homelessness.** Formally integrate housing into planning processes. Establish strong case management support of vulnerable individuals with complex needs to access and maintain stable housing.
- **Expand rental assistance to support low-income private renters to access and sustain tenancies. Establish a genuine and permanent rental relief hardship framework** to address extraordinary circumstances that do and will continue to impact renters.

Please refer to the attached appendices A-E for further information regarding these supplementary recommendations.

We also support an additional a range of recommendations made by the *Ageing on the Edge Forum* relating to practical procedures. We are recommending that NSW government:

- **Adopt concrete measures to address ageism, sexism, gender and disability discrimination** in government services, finance institutions, including banks, and private rental markets.
- **Remove unnecessarily burdensome requirements**, such as, completion of 'seeker diaries' to maintain temporary accommodation imposed on older people who are already in challenging housing situations.

- **Increase transparency and accountability by increasing availability of data** including:
 - Social and priority housing waiting list data broken down by age, gender, disability status and geographic area,
 - The number of social and affordable housing dwellings available in NSW, including age and gender breakdown of allocations,
 - The number of dwellings assigned under State Environmental Planning Policy (Housing for Seniors and People with a Disability) (Seniors SEPP) and Public Housing Seniors Communities (PPOPH), and
 - The number of dwellings built under the commitments in different housing commitments including the *NSW Homelessness Strategy 2018-2023*, Social and Affordable Housing Fund (SAHF) and Community Housing Innovation Fund (CHIF).
- **Provide exemptions to strict documentary evidence for housing applications, including identity documents**, especially for Aboriginal and Torres Strait Islander people, older people from migrant and refugee backgrounds and older women escaping domestic and family violence to ensure equitable access for all older people.
- **Adopt the new mandatory minimum accessibility standards contained in the revised National Construction Code for all future constructions in NSW.**

And the additional Shelter NSW recommendation (described at Appendix E):

- **Change planning regulation to support 'Meanwhile Use'**, described as the short-term utilisation of temporarily empty buildings such as aged care facilities, residential premises, retail, and office buildings for short term housing for vulnerable cohorts. While theoretically allowable, approvals to apply for 'hostel' or 'transitional group home' uses can be cost-prohibitive, complicated, and time-consuming.

Shelter NSW commends the NSW Government for its action across the 'pandemic years' of 2020-22. Substantial initiatives such as the *Together Home* program and expanded 'assertive outreach' were and remain important programs; demonstrating the almost self-evident maxim - that the best way to help someone to not be homeless is to provide them with housing; first temporarily and then longer-term. These programs mark progress towards the NSW Premier's Priority of reducing street homelessness by 50% by 2025. The pandemic however, has exposed the deep fault lines of the housing system and the inability of the private housing sector to supply enough secure and affordable housing where and where it's needed. The need for Government to step in is compelling. In 2022-23, NSW faces an uncertain economic recovery with rising housing costs contributing to a cost-of-living concerns for many, but especially for lower incomes households; and especially for older people running the gauntlet of the private rental market.

We urge the committee to adopt these recommendations highlighted above and welcome the opportunity to engage with the inquiry process where possible.

If you wish to discuss our submission in more detail, please contact Cathy Callaghan on _____ or by email at _____ or our CEO, John Engeler, on _____ or by email at _____

Sincerely yours,

John Engeler
Chief Executive Officer, Shelter NSW

Cathy Callaghan
Senior Policy Officer, Shelter NSW

Appendix A: Increase recurrent funding to Specialist Homelessness Services (SHS) by 20% to enable them to move beyond a crisis response and deal with the steadily increasing demand on its services

Close to 50% of the over 47,000 people seeking accommodation assistance from the Specialist Homelessness Sector (SHS) in NSW in 2020-21 were turned away¹

This has steadily worsened since 2015-16 where 15,471 or 34.2% had the same experience (*Refer Appendix A - Table 1 for key trends*).

Table 1 - Specialist Homelessness Services (SHS) – accommodation needs met in NSW

Accommodation Services in NSW (notes a, b and c)				
<i>Financial Year</i>	<i>Clients with identified need for accommodation who were not provided with that service (No.)</i>	<i>Total Clients (No.)</i>	<i>% of total clients need <u>not</u> met</i>	<i>Total Support days ('000)</i>
2020-2021	22 709	47 121	48.2	7454
2019-2020	21 790	46 437	46.9	7122
2018-2019	21 552	47 652	45.2	7163
2017-2018	19 306	46 072	41.9	6806
2016-2017	17 354	46 643	37.2	6571
2015-2016	15 471	45 240	34.2	

Table 3 Notes (extract from Table 19A.7 and 19A.16 Productivity Commission 2021/22 Homelessness Services):

- Need for accommodation includes need for 'Short-term or emergency accommodation', 'Medium-term / transitional housing' or 'Long-term housing'.
- Unmet need for accommodation and services other than accommodation is dealt with differently by different jurisdictions and data may not be comparable.
- For some central intake models, the role of intake agencies is to identify and link clients to an agency well suited to the individual client's needs, rather than to provide clients with particular services. This may have an inflationary effect on the proportion of clients with unmet need for services for jurisdictions which operate such central intake models.
- Recurrent cost to Government per day of support for clients, 2019-20 dollars (accommodation & other services)

¹ Productivity Commission (2021) Annual Report on Housing and Homelessness

Putting aside the critical problem of unmet need a key question for this inquiry then is how many SHS clients are older?

According to the Australian Institute of Health and Welfare (AIHW) ² in 2020-21 there were 23,900 or **8.6% of total SHS clients considered 'older clients' (over age 55 years)** across Australia. Of the total cohort, one fifth (18%) were indigenous; 56% were female and **5,216 of the 23,900 older clients were from NSW.**

Overall, the main reasons for seeking help were due to housing crisis/evictions (18%); family and domestic violence (18%) and financial difficulties (15%). The majority of older clients (51% or 12,100) did not have additional vulnerabilities but of those that do, vulnerabilities included mental health (31%), family and domestic violence (24%) and drugs and alcohol (6.5%)

For older clients in 2020–21, more than one third (36% or 5,700 clients) were experiencing homelessness at the start of support; over 2,100 (14%) were in short term temporary accommodation and 1,900 (12%) had no shelter or were in an improvised/inadequate dwelling.

Shelter NSW contends that the state cannot tolerate a situation where close to 50% of people seeking help from SHS, the 'front-line' of the community's homelessness response, are turned away. It is not clear how many of those being turned away are older people but by even a conservative estimate it must be in the thousands.

In another review the NSW Auditor-General also found³ that the reach of SHS services into regional areas was limited, with just 34 of 128 local government areas receiving direct support (and noting a 75% increase in regional clients between 2013-2017)

According to Equity Economics research ⁴ the NSW Social Sector provides essential care and support to over 1 million people each year – *including those impacted by poverty, homelessness, domestic violence, mental health challenges, disability or other complex issues.* Its workforce is bolstered by 1.7 million hours of volunteer time each week. In spite of this, it is a system under considerable strain with steadily rising

² [Specialist homelessness services annual report 2020–21, Older clients - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/2020-21/older-clients)

³ Office of the Auditor-General (2021) *Responses to Homelessness* at pp 9 and 15

⁴ Equity Economics (2021), *The Social Sector in NSW*, report prepared for NCOSS [Link](#)

demand and a well-documented very large unmet need⁵. In terms of a sector, there is clear evidence of it making a difference for the clients it is able to support. In 2020/21 for example, 14.7% of clients were living in crisis accommodation before approaching SHS; reduced to 6.8% after support. The 5.1% of clients sleeping rough reduced to 2.6% after support.⁶

The NSW Council of Social Services (NCOSS) in its prebudget submission⁷ notes the appreciation of the \$50 million Social Sector Support Fund but notes that as a *one-off injection does not address the fact that the social services system was already straining well before the pandemic and will continue to do so without adequate, sustainable funding.*

Shelter NSW supports the NSW Council of Social Service's call for a 20% increase in recurrent baseline funding.

⁵ Productivity Commission (2021) *Annual Report on Housing and Homelessness – refer Appendix A Table 3 for more detail*

⁶ Productivity Commission (2021) op. cit. Table 19A.31

⁷ NCOSS Pre-Budget Submission 2022-23, [link](#)

Appendix B: Strengthen protections to ensure renters are not unreasonably or unfairly forced in to the challenging private rental market. Specifically, replace ‘no grounds’ eviction provisions in current NSW tenancy law with a range of specified ‘reasonable grounds’ for ending a tenancy.

The NSW Tenants Union (TU) in its *Eviction, Hardship and the Housing Crisis paper*⁸, makes the case that *housing is an essential service* and that as such, *good public policy requires regulatory arrangements that provide a stronger disincentive for landlords (as providers of housing, an essential service) against unnecessary eviction*. Shelter NSW strongly supports this proposition.

Eviction is too often relied on. In NSW it is relatively easy for a landlord to evict a renter, and often accepted as a standard or common practice. This is so much so that we currently accept ‘no reason’ in NSW tenancy law to be a good enough reason to evict.

*The Residential Tenancies Act 2010 includes ‘no grounds’ eviction provisions allowing a landlord to evict a renter with 30 days’ notice at the end of a fixed term (section 84), or 90 days’ notice during a periodic tenancy (section 85) to vacate the property. The landlord is not obliged to give a reason for the eviction. These are also referred to as ‘no reason’ or ‘no cause’ in other jurisdictions*⁹

‘No-grounds’ evictions can be used to circumvent regulations that are otherwise in place to limit annual rent increases¹⁰ and prevent rent-bidding¹¹ (as is being considered in other jurisdictions).

⁸ Tenants’ Union of NSW (Feb 2022) Special paper, *Eviction, Hardship and the Housing Crisis* at p8 accessed from [2022-Eviction-Hardship-and-the-Housing-Crisis-TUNSW.pdf \(tenants.org.au\)](https://www.tenants.org.au/2022-Eviction-Hardship-and-the-Housing-Crisis-TUNSW.pdf)

⁹ Ibid at p15

¹⁰ Gramenz, E. (June 19, 2021). *Proposed changes to leasing and tenancy agreements for renters met with mixed reactions*. ABC News. Retrieved from <https://www.abc.net.au/news/2021-06-19/qld-rentals-renting-lease-tenancy-agreements-laws-changes/100227230>

¹¹ Burnside, N. (August 7, 2021). *Bidding on rentals could be restricted in the ACT as government moves to introduce tenancy reforms*. ABC News. Retrieved from [ABC News website](https://www.abc.net.au/news/2021-08-07/act-rental-bidding-restricted-tenancy-reforms/100227230)

The TU cites Productivity Commission analysis in noting that some groups of renters are more likely to face an eviction than others. *These include single parent households, households on income supports, households with a disability or health condition, and **older households (households where at least one resident is 65 or older)***¹² In a general sense, *low-income renters are not necessarily evicted more often than other renters, but they are at a higher risk if they experience an unforeseen event or setback because of their relative financial vulnerability, and the amount they are paying each week towards housing costs*¹³ (analysis by the Productivity Commission shows that among low-income private renters, older persons, amongst other vulnerable cohorts are much more likely to be in rental stress - that is, paying over 30% of their income towards rent).¹⁴

Shelter NSW contends that tenancy law is tipped in favour of landlords in NSW and that it is too easy for tenants to be evicted.

Shelter NSW stands with the NSW Tenants' Union in calling for the replacement of 'no grounds' eviction provisions in current NSW tenancy law with a range of fair, balanced and specified reasonable grounds for ending a tenancy.

¹² Tenants' Union of NSW (2022) op.cit. at p15

¹³ Ibid. at p18

¹⁴ Ibid at p 20

Appendix C: Ensure key NSW institutional processes in corrective services and mental health for example, for 'exiting' or 'discharging' people do not in fact tip people into housing precariousness and homelessness.

This paper looks at the NSW institutional setting of corrective services but recommends the inquiry consider other settings such as mental health residential treatment.

NSW's prison population is growing and ageing. In March 2022 there were 12,352 adults in custody in NSW, a 15.4% since December 2014.¹⁵ And while the average age was 38.2 years¹⁶, according to the NSW Parliament Research Office¹⁷ NSW Corrective services are experiencing a version of what is happening in the general population, a growing population of 'older prisoners'—commonly defined as inmates aged 50 years and over. The number of NSW prisoners aged 45 years and over has increased significantly over the past three decades. Between 1982 and 2014, the proportion of NSW prisoners over 45 years old tripled, from 7.2% of the State's prison population in 1982 to 21.1% in 2014.

A Shelter NSW student research paper examined what happens when people leave prison and specifically the important role of secure, affordable longer term housing in preventing homelessness and recidivism.¹⁸ One important study cited in that paper noted that *it is clear that each year, at least 4000 people leave prison into either homelessness or unstable accommodation. In NSW there are only 38 specialist beds for people leaving prison who are homeless* (where most are short-term less than 12 week crisis beds)¹⁹. Concerningly, regarding post-prison planning it noted: *People in prison are not considered homeless by the NSW Homelessness service system, until they have literally*

¹⁵ NSW Bureau of Crime Statistics and Research (March 2022) [Custody Statistics \(nsw.gov.au\)](#)

¹⁶ Adult Custody Profile at end of quarter [NSW Custody Statistics Mar2022.pdf](#) p25

¹⁷ Angus, C, NSW Parliamentary Research Service (2015) ebrief [Older prisoners - trends and challenges.pdf \(nsw.gov.au\)](#)

¹⁸ Pinner, J (2021) [Ensuring-safe-secure-housing-options-for-people-leaving-prison-report.pdf \(shelternsw.org.au\)](#)

¹⁹ Sotiri, M (2020) Community Restorative Centre, *Submission to Standing Committee on Social Policy an legal affairs inquiry into homelessness* ([CRC Submission Federal Inquiry Housing FINAL JUNE \(crcnsw.org.au\)](#))

walked out of the prison gate on their day of release. This means that planning for release is very challenging.²⁰

A very recent research paper, *Inquiry into enhancing the coordination of housing supports for individuals leaving institutional settings*²¹, while not exclusively focused on older people in such settings has some strong recommendations about how Governments can ensure that they are not in fact tipping people out of settings like mental health residential treatment, out-of-home care and the criminal justice system into homelessness. In the case of the latter, it also concludes that the failure to support the housing needs of inmates exiting the system actually drives recidivism.

The research notes the rate of imprisonment in Australia is increasing, and ex-prisoner housing need is growing, but at the same time, housing assistance capacity is declining. Further that without people, planning and resources, *prisoner pre-release planning for accommodation is often last minute*. On the nature of the assistance given, the research suggest that the provision of public housing produces superior longer-term results than say, providing private rental assistance:

Ex-prisoners with complex support needs who receive public housing have better criminal justice outcomes than comparable ex-prisoners who receive private rental assistance only. Public housing 'flattens the curve' of average predicted police incidents (down 8.9% p.a.), time in custody (down 11.2% p.a.), and justice system costs per person (down \$4,996 initially, then a further \$2,040 p.a.).

• *In dollar terms, housing ex-prisoners in public housing tenancy generates, after five years, a net benefit of between \$5,200 and \$35,000 per person relative to private rental and homelessness assistance.(at p29)²²*

²⁰ ibid at page 11

²¹ Duff, C., Randall, S., Hill, N., Martin, C., Martin, R. (2022) *Enhancing the coordination of housing supports for individuals leaving institutional settings*, AHURI Final Report No. 379, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/379>, doi: 10.18408/ahuri5321001.

²² Duff et al (op cit) at p 29

Shelter NSW recommends that the NSW Government:

- in institutional settings, formally integrate housing into exit or discharge planning processes taking account of the particular needs of the older cohort which is likely to experience compounding risks due to multiple homelessness risk factors. This would require the establishment of strong case management support of vulnerable individuals with complex needs to access and maintain stable housing.
- Reform of exit processes within the prison system to ensure that all individuals can access housing support services prior to their release and the period immediately following.
- Expansion of the eligibility criteria for social and affordable housing so that inmates do not have to wait until discharged to apply, and can access stable, secure, and affordable housing immediately upon release.
- Adopt a *Housing First* approach across all institutional settings.

Appendix D: Expand rental assistance to support low-income private renters to access and sustain tenancies. Establish a genuine and permanent rental relief hardship framework to address extraordinary circumstances that do and will continue to impact renters.

When put to the test of the pandemic, the rental housing system was found wanting. The need for the rapid introduction of hardship protections and support for renters, while necessary and welcomed, in themselves, demonstrated the weakness and very limited nature of existing hardship protections. Existing protections and settings were not sufficient to protect against the 'wave of evictions' widely anticipated once the pandemic's economic impact began to be felt. In spite of moratoriums designed to prevent them, NSW saw evictions, even during the worst of the pandemic.²³ According to one report, 4,600 NSW rental tenancies were subject to termination proceedings in the first 10 weeks of its 2021 'stay at home' lockdown.

According to an early 2021 report²⁴ renters were hit much harder by the COVID-19 pandemic than homeowners with incomes falling at a much greater rate than their rent. Nationally, *renter incomes fell by 5% March-June 2020, while housing costs dropped by only 0.5%; mortgage holders, by contrast, saw a 0.2% decline in incomes alongside a 5% decline in housing costs.*

While there has been significant media attention about the opportunities for renters in pockets of Sydney over the last year, this has not in the main, alleviated significant rental stress for low-income renters. If anything, surveys like [Rental Affordability Index](#)²⁵, has observed increased competition between lower income renters at the less-expensive end of the rental market. According to the index Sydney, Greater Sydney and now, many regional centres, are critically unaffordable to significant proportions of the renting population, especially very low and low-income households and cohorts such as single pensioners.

²³ Pawson, H., Martin, C., Sisson, A., Thompson, S., Fitzpatrick, S. and Marsh, A. (2021) '*COVID-19: Rental housing and homelessness impacts – an initial analysis*'; ACOSS/UNSW Poverty and Inequality Partnership Report No. 7, Sydney (Executive Summary)

²⁴ op. cit.

²⁵ SGS Economics, (December 2021) [SGS Rental Affordability Index Rental-Affordability-Index-2021](#)

According to the same index, while the average rental household in Greater Sydney is spending around 24% of its total income on rent, at the median rental rate, lower income households are paying much more. In Greater Sydney for example, a single pensioner now pays 66% of income on rent while a single person on JobSeeker now pays a staggering 110% per cent of their income on rent (unchanged between 2011-2019).

Regional NSW has been hard hit by increasing rental costs, with the average rental household paying around 26 per cent of its total income on rent – fast approaching the ‘rental stress’ threshold of 30%. This is consistent across all regional NSW postcodes. Regional areas such as Wollongong are now unaffordable for households earning under\$80,000 per annum. The regional areas most affected by the worsening of rental affordability are coastal areas such as Tweed Heads, Woolgoolah, Port Macquarie, Kiama and inland areas such as Wellington, Cooma, Orange, and Mudgee. While many low-income households live regionally to find affordable rentals there is nothing in the coastal strip of NSW affordable to average regional incomes.

In case observers believe this is a temporary phenomenon, driven by the pandemic for example, another report by the Australian Government National Finance and Investment Corporation (NHFC) ²⁶ notes these trends of declining affordability, particularly for low-income households in the private rental market are long-term (since 2008) and likely to persist.

Beyond Commonwealth Rental Assistance, there are a range of rental assistance programs administered by the NSW Government. In the absence of genuine reform of rental tenancy laws as previously discussed (to cap rent increases or restrict evictions for example), and in the absence of a large increase in the stock of social and affordable housing, these programs assist a great many people, particularly in vulnerable groups (youth and veterans for example).

As a snapshot this includes, according to the NSW Government²⁷:

- \$63.18 million to support 6,786 households to access and maintain tenancies in the private rental market through the various *Rent Choice rental* subsidies (2020-2021)²⁸

²⁶ NHFC, (15 December 2020) [State of the Nation's Housing - NHFC](#)

²⁷ Department of Communities & Justice, 2019-2020 *Annual Report* at p45

²⁸ *Ibid* at p46

According to this report, of the recipients, *85 per cent did not require further housing assistance in the following 12 months* (proving its efficacy as a program)

- 16,744 households were provided with other forms of Private Rental Assistance including brokerage services and bond loans (down from 22,296 in 2019-20 and 21,000 in 2018-19 (up from 21,000) in 2018-19)²⁹

This is a significant and commendable investment but again, given the rates of rental stress, unmet demand for homelessness services and threats to private rental tenancies Shelter NSW is concerned that these products are not consistently accessible to enough people, to make a real difference.

Shelter NSW recommends that the NSW Government:

- **increase its investment in rental assistance products** to enable very-low to low-income private renters including older renters at risk of homelessness, to remain in the private rental market; avoiding eviction and possible homelessness that would otherwise require an expensive response by Government and the SHS sector.
- **Establishes a genuine and permanent rental relief hardship framework to address** extraordinary circumstances that do and will continue to impact renters (further public health emergencies, bushfires, floods and storms as examples)³⁰
- **Fund a scoping project to look at feasibility of such a framework** and explore options such as mandatory landlord insurance and/or a mandatory landlord rental bond scheme.

²⁹ Department of Communities & Justice, 2018-2019 *Annual Statistical Report*.

³⁰ Shelter NSW understands that the NSW Tenants' Union is currently scoping a detailed proposal for this framework and offers its in-principle support.

Appendix E: Change planning regulation to support ‘Meanwhile Use’ (an additional Shelter NSW recommendation)

‘Meanwhile Use’ can be described as the short-term utilisation of temporarily empty buildings such as aged care facilities, residential premises, retail, and office buildings for short term housing for vulnerable cohorts, until they can be brought back into commercial operation or demolished. While theoretically allowable, approvals to apply for ‘hostel’ or ‘transitional group home’ uses are reported to be cost-prohibitive, complicated, and time-consuming.

We have been advised that there are currently a number of planning hoops frustrating the efforts of some from community and ‘for purpose’ sector organisations wanting to apply it. Many of those organisations are hoping to support cohorts such as older women.

Advocates of ‘meanwhile use’ argue that it is pragmatic and practical; making good use of otherwise empty spaces. At best, it enables options such as Temporary Supportive Accommodation (TSA) – currently in short supply.

Detractors of ‘meanwhile use’ however, note that these approaches provide comparatively very little additional housing compared to overall need; open the way for potentially unscrupulous developers to take advantage of community organisations and their clients and with some risk to important health, safety and wellbeing requirements (especially for vulnerable cohorts).

Shelter NSW asserts that there is no substitute for dramatically increasing the stock of social and affordable rental dwellings across NSW. ‘Transitional housing’ options should be temporary, as people move into longer-term secure, appropriate and affordable housing. However, we do recognise that there are many organisations such as some women’s shelters and churches valiantly trying to promote some excellent examples of these types of ‘meanwhile use’ developments; often supported by local councils and community housing but thwarted by planning regulations that only serve to chew up the ‘meanwhile use’ time when something useful might have been provided.

Shelter NSW has, in an earlier inquiry, made very specific recommendation about the need for technical changes in planning regulations to facilitate 'meanwhile use'. We offer the same recommendations and detailed case studies etc for the consideration of this Committee.³¹

³¹ Shelter NSW (2021) Submission to the NSW LA Committee on Community Services accessed from the Shelter NSW website: [Shelter NSW-Submisison-LA-Committee-on-Community-Services-August-2021.pdf \(shelternsw.org.au\)](#)