National Housing and Homelessness Plan

Submission- **Brimbank City Council**

September 2023

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Preamble

This submission addresses relevant questions for consideration by the government in preparing the National Housing and Homelessness Plan (NHHP) by providing analysis of the key issues and presenting recommendations for consideration. It is informed by data analysis, published research and local stakeholder engagement, including:

- A Federal/State Budget Workshop, attended by local service providers, that was convened by Council on 17 July 2023;
- Findings of *From at Risk to at Home*, a research report commissioned by Council in 2019, which was informed by lived experience consultations, input from local homelessness service providers and Council staff;
- Research undertaken by ███████████████████████████ ███████████████████████████ investigating local government responses to homelessness: E*verybody's Business. What local government can do to end homelessness.*
- *Social and Affordable Housing Position Statement,* endorsed in 2022.

Council looks forward to the release of the NHHP and the recognition that local government has a number of key roles to play in this space. We welcome opportunities to partner with the Federal and Victorian governments to implement recommendations at the local level.

Summary of Recommendations

Recommendation 1: The NHHP recognises the role of local government in the prevention of homelessness and identifies prevention strategies across all levels of government.

Recommendation 2: The NHHP recognises the importance of income security in preventing homelessness and commits to increasing support payments to reduce housing stress.

Recommendation 3: The Federal and state governments commit to adequate funding for homelessness early intervention, including tenancy support programs

Recommendation 4: Fund local government to deliver homelessness prevention and early intervention services and programs.

Recommendation 5: Commit to implementing Federal and state aspirations to ensure victim-survivors have access to stable housing.

Recommendation 6: Recognise the critical role of providing post-release housing assistance for people exiting prisons to address the imprisonment–homelessness cycle.

Recommendation 7: The Federal and state governments provide additional funding to expand homelessness service provision, including sustained investment in Housing First programs.

Recommendation 8: The Federal and state governments work with specialist homelessness services to improve access to safe, secure and appropriate crisis accommodation, through funding for fit-for-purpose facilities.

Recommendation 9: Recognise the crucial role of specialist homelessness services that conduct assertive outreach, through funding programs that support a localised service response.

Recommendation 10: The NHHP recognises the role and interplay of mental health and homelessness, through funding programs for mental health services to provide outreach to people at risk of homelessness.

Recommendation 11: Commit to a plan to end children and youth homelessness, in recognition of the unique needs of children and young people.

Recommendation 12: The NHHP commits Federal and state governments to deliver on annual targets to increase supply of social housing.

Recommendation 13: The NHHP recognises the role of social housing as an essential form of social infrastructure.

Recommendation 14: Ensure lived experience of social housing consumers and people experiencing homelessness are embedded in Federal and State policy and decision making.

Recommendation 15: Commit to supporting local government to undertake analysis of local land and development opportunities, including property audits and feasibility analyses, and the potential use of council assets to contribute to social and affordable housing projects.

Recommendation 16: Undertake reforms of the tax system that provide incentives for increased supply of social and affordable housing.

Recommendation 17: Introduce national rental reforms which strengthen renters' rights and provide options for long term security of tenure.

Recommendation 18: Increase both National Construction Code and Building Code of Australia's minimum standards for environmental sustainability.

Recommendation 19: Identify suitable ways to allow streamlined approvals processes for social and affordable housing proposals which respond to site conditions, design standards and guidelines.

Recommendation 20: Implement upgrades to existing public transport infrastructure required to support increased population – with a focus on Melbourne's western region which lacks transport infrastructure and service standards.

Recommendation 21: Consider zoning provisions to facilitate the accommodation of second dwellings or tiny houses without the requirement for a planning permit.

Recommendation 22: Consider mandatory planning controls such as inclusionary zoning within state planning provisions to secure social and affordable housing outcomes as part of new development.

Recommendation 23: introduce measures to incentivise housing modifications for landlords and/or investigate other options to encourage landlords to improve the energy efficiency of existing private rental properties.

Recommendation 24: Explore opportunities to mandate urban greening (vegetation), which is imperative to ensuring that homes are resilient to extreme heat.

Recommendation 25: The NHHP commit to the introduction of measures that support people displaced due to climate-induced natural disasters

1. Introduction

The City of Brimbank ('Brimbank') is situated on the traditional lands of the Wurundjeri and Bunurong peoples, who have cared for this country for generations.

Brimbank is located in the western and north-western suburbs of Melbourne, between 11 and 23 kilometres from the Central Business District. It is a growing residential area, with substantial industrial and commercial areas. Brimbank encompasses a total land area of 123 square kilometres. Brimbank is an established middle-ring municipality with an estimated resident population of 193,146 as of June 2022. It is set to grow gradually over the next 20 years.

Brimbank is one of Australia's most culturally diverse communities, with 48% of our residents born outside Australia, and 57% speaking a language other than English at home. Brimbank City Council ('Council') and the community are proud of our cultural diversity and consider this cultural diversity one of its core strengths and greatest assets.

The municipality continues to attract families, with a relatively high proportion of households with children, and two-thirds of households owning or purchasing their home. Approximately 23% were renting privately, and 2.4% were in social housing in 2021. Brimbank currently has limited housing diversity, with almost two-thirds of dwellings comprising separate houses with three or more bedrooms. [1]

Brimbank residents experience entrenched structural disadvantage that persists across much of Melbourne's outer suburban areas due to a range of factors such as unemployment, low levels of educational attainment, high levels of homelessness and financial / housing stress compared to Greater Melbourne and Victoria. Brimbank residents also have higher levels of modifiable health risks such as diabetes and smoking[2], and consistently experiences Victoria's highest losses from electronic gaming machines[3]. Notably, Brimbank also has the highest incidence of homelessness in Melbourne's west and fifth highest in Victoria. [4]

Policy context

Council's commitment to addressing homelessness and housing stress is articulated in a number of policy documents, including:

- *Together We Are Brimbank Council Plan 2021-2025* and *Community Vision 2040* which includes a strategic direction that "housing meets the needs of different people in the Brimbank community" and a strategy to "facilitate housing diversity, population growth and development through planning and assessment processes"
- Draft *Advocacy Plan 2023-2024*[5]
- *Social Justice Charter 2018*, which recognises the relationship between housing and vulnerability to inequality and discrimination.

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[1] .id (2021) *City of Brimbank Community Profile*, https://profile.id.com.au/brimbank, accessed August 2023
[2] Ibid.
[3] VCCC (2023) *Victorian Gambling and Casino Control Commission*. https://www.vgccc.vic.gov.au/ accessed August 2023
[4] Australian Bureau of Statistics (2018) *Census of Population and Housing: Estimating homelessness 2016*, Cat. No. 2049.0
[5] Subject to Council endorsement

- In 2019, a research report into homelessness in Brimbank, titled *From At Risk to At Home* aimed to address gaps in local understanding of homelessness, and to clarify the role Council can play to improve outcomes for people experiencing homelessness. The research informed development of a Homelessness Implementation Plan with annual actions.
- In 2022, Council endorsed the *Social and Affordable Housing Position Statement*, which recognises that "access to safe and secure housing is a fundamental human right and need" and articulates Council's commitment to support social and affordable housing outcomes.

2. Homelessness

"Homelessness is a profound assault on dignity, social inclusion and the right to life. It is a prima facie violation of the right to housing and violates a number of other human rights in addition to the right to life, including non-discrimination, health, water and sanitation, security of the person and freedom from cruel, degrading and inhuman treatment."

- Special Rapporteur on the right to adequate housing (A/HRC/43/43, para.30)

Homelessness in Brimbank

Brimbank has the highest numbers of people experiencing homelessness of all the western Melbourne local government areas ('LGAs'). The 2021 census identified 1528 people experiencing homelessness or living in severely overcrowded dwellings in Brimbank, which is the fifth highest in Victoria and represents an increase of 35% since 2011[6].

Analysis of data collected in the 2020-2021 financial year by the Australian Institute of Health and Welfare (AIHW) shows where people were living seven days before they sought homelessness support and calculates average distances from their last postcode to where they found help. The data indicated that 3,687 people were in Brimbank in the week before contacting the homelessness system. Of these, 2,197 were women and 1,490 were men. 587 were 10 – 19 and 572 were 20 – 29 years of age. 1,031 were identified as experiencing homelessness and 2,178 were at risk of homelessness. [7]

While this data provides some insight into the prevalence of homelessness in Brimbank, it lacks qualitative detail and is almost certainly an undercount. Anecdotally, local service providers and Council have noted an increase in incidences of people sleeping rough across the municipality. In addition, the census was completed during COVID-19 lockdowns and the implementation of the Homelessness to Home (H2H) funding by the Victorian government. Notably, the number of people accessing specialist homelessness services (SHS) does not account for the numbers of individuals who were turned away from services, which constitutes a higher proportion than those who were supported. Anecdotally, the Brimbank-Melton intake and access point have said that they are turning away 800 people per month, without an appointment.

Lived experience plays a crucial role in ensuring that homelessness responses are fit-for-purpose and suitable for diverse consumers, including CALD and newly arrived communities, victim-survivors of family violence, older women over 55, LGBTIQA+ people, people with disabilities and Aboriginal and Torres Strait Islander people.

Council's research in 2019 included a consultation with people with lived experience of homelessness, who were asked to respond to the question: **What would you say if you could sit down with the Mayor or Councillors of Brimbank and talk about your situation?**

> *"Provide more assistance to the homeless and provide affordable housing."*

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[6] Australian Bureau of Statistics (2021), *Estimating Homelessness: Census*, ABS Website, accessed 15 June 2023.
[7] Convery and Nicholas; 'Outer suburbs of Melbourne and Sydney are homelessness hotspots, data reveals', June 2023; https://www.theguardian.com/australia-news/2023/jun/07/outer-suburbs-of-melbourne-and-sydney-are-homelessness-hotspots-data-reveals?CMP=Share_iOSApp_Other

"I have 4 kids, one of them with ADHD. All of us are living in a tiny apartment now, sleeping anywhere on the floor or on some mattress. Having to move out every year is taking a toll on my kids' and my own mental health. We are in desperate need of help to get a permanent roof."

"I would ask them for suggestions on how to improve my situation. At this point, I'll take anything."

"(We need) more youth refuges, more support for youth in the area as most are located in the city (Melbourne)"

"I would ask him or her if they can help me in affordable long-term housing, so we can settle down and the children won't ask me 'where are we going next mummy?'. I would like things to be safe and settled for my children so they can have friends and know they are in a house that they can stay in for a long time."

This feedback highlights the limited understanding of local government's ability to provide support, with no clearly defined role in the homelessness system; yet often councils are expected by community members to intervene.

Figure 1. Total number of people who are homeless by type of accommodation[8]
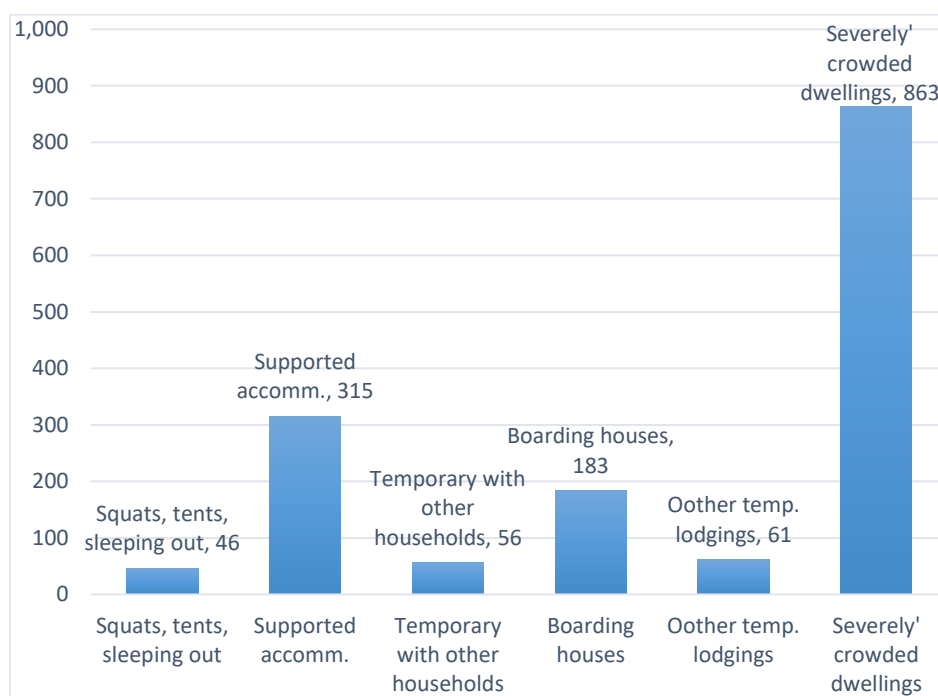
Overcrowding

According to 2021 census data, over half of all people experiencing homelessness in Brimbank are experiencing severe overcrowding. Overcrowding creates significant social, economic and health risks for families, exacerbated by the COVID-19 pandemic and the current cost of living crisis. Council's research indicated that families in overcrowded dwellings are at great risk and that the key factors associated with overcrowding include diminished housing affordability, socioeconomic disadvantage and people born overseas.

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[8] Australian Bureau of Statistics (2021), *Estimating Homelessness: Census*, ABS Website, accessed 15 June 2023.

Local Brimbank research has also found that many young people dislike common labels used to define homelessness, and may be unaware of available services or even that they are experiencing homelessness themselves.[9] For example, more than half of young people surveyed were unaware of the term 'couch surfing' and did not understand this to be a form of homelessness.

Overcrowding impacts particular marginalised groups to a greater extent. Newly arrived communities (of which there is a high proportion in Brimbank) are particularly vulnerable to overcrowding and often lack the government support required to maintain adequate and safe tenancies. Data also shows that Aboriginal and Torres Strait Islander communities are also at greater risk of experiencing overcrowding.[10]

It is important to note, that for some households, multi-generational living arrangements and extended familial groups are important to strengthening cultural identity and family connections. Provided that people are living in healthy, safe and functional environments, overcrowding is not detrimental by definition. The ABS' measurement of overcrowding relies exclusively on objective and physical measures (i.e. the number of people compared to the number of bedrooms in a house). [11]

Prevention

The most effective way to end homelessness is by preventing it from occurring in the first instance. Local government have key role to play in prevention of homelessness but lack the mandate and recognition of this role.

While access to social and affordable housing is the key to preventing homelessness (addressed further in section 4), the NHHP has the opportunity to articulate and address societal conditions that lead to homelessness, noting the role that all levels of government, and in particular local government, as the closest to the community, can play.

Census data shows that disproportionate number of Brimbank community members lack the protective factors that prevent homelessness. Risk factors for experiencing homelessness include unemployment, not finishing high school, mental ill-health and contact with the justice system[12]. For many communities in Brimbank, including people with disabilities, single women, LGBTIQA+ communities, culturally and linguistically diverse and newly arrived communities and Aboriginal and Torres Strait Islander people, these experiences are compounded by marginalisation and discrimination which increase their risk of homelessness.

The coalescence of these factors result in a community that is vulnerable to housing stress and homelessness. It is recognised that vulnerability is not inherent nor inevitable; it is determined by the failure of policy decisions and systems which produce and entrench vulnerability. Indeed, when housing is affordable and readily available, family violence, unemployment and mental illness in themselves do not *cause* homelessness.

A greater focus on addressing these issues through prevention and early intervention measures has significant opportunity to prevent homelessness from occurring from the outset. Early identification,

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[9] Thielking, M. (2016) *Young People's Perceptions of Student Homelessness in Brimbank Secondary Schools*, Report prepared by Swinburne University for Brimbank City Council.

[10] Dockery, A.M., Moskos, M., Isherwood, L. and Harris, M. (2021) How many in a crowd? Assessing overcrowding measures in Australian housing, AHURI Final Report No. 382, Australian Housing and Urban Research Institute Limited, Melbourne, https://www.ahuri.edu.au/research/final-reports/382, doi: 10.18408/ahuri8123401.

[11] Ibid.

[12] Crane, M., Byrne, K., Fu, R., Lipmann, B., Mirabelli, F., Rota-Bartelink, A., ... & Warnes, A. M. (2005). The causes of homelessness in later life: Findings from a 3-nation study. *The Journals of Gerontology Series B: Psychological Sciences and Social Sciences*, *60*(3), S152-S159.

investment in social safety nets and targeted programs to address poverty are crucial in preventing homelessness from occurring. Local government are instrumental in providing programs to the local community which play a role in homelessness prevention, including libraries, neighbourhood houses, maternal child health, recreation and leisure services and youth services.

The NHHP must recognise the crucial role of increasing social security, notably Jobseeker and Youth Allowance, to adequate levels to ensure the risk of homelessness in vulnerable communities is reduced. This aligns with recommendations of the Interim Economic Inclusion Advisory Committee, who state "all indicators available to the Committee show current rates of these payments are seriously inadequate, whether measured relative to the National Minimum Wage, in comparison with pensions, or against a range of income poverty measures. People on these payments face the highest levels of financial stress in Australia."[13]

Income security levels are inadequate to cover the costs of housing. This inevitably leads to homelessness, which is costly to the individual and to the community. Punitive Centrelink policies place additional pressure on vulnerable individuals and families.

International evidence also demonstrates that preventing homelessness is also more cost-effective than responding to people who are in crisis. Investing in prevention plays a crucial role in taking pressure off the homelessness response system and has wider social and economic benefits.[14] Until the structural conditions that create and exacerbate homelessness are addressed, efforts to end homelessness will be limited at best.

Recommendation 1: The NHHP recognises the role of local government in the prevention of homelessness and identifies prevention strategies across all levels of government.

Recommendation 2: The NHHP recognises the importance of income security in preventing homelessness and commits to increasing support payments to reduce housing stress.

Early Intervention
As discussed, policies that are designed to address disadvantage and poverty play a crucial role in reducing the risk that individuals will experience homelessness. For individuals that are at the precipice of homelessness, targeted programs that support individuals to maintain their housing are crucial in preventing homelessness and its flow-on effects. This is more cost effective than supporting people in immediate crisis and without a home.

Council has strong relationships with Tenants Victoria and other community organisations who assist renters to avoid evictions and homelessness. Knowledge about these programs is limited, particularly in CALD communities, newly-arrived communities and people with disabilities.

Through Council's consultation with community services, newly arrived communities are particularly vulnerable to exploitive rental practices as they are both unaware of their rights and fearful of losing their tenancies.

Recommendation 3: The Federal and state governments commit to adequate funding for homelessness early intervention, including tenancy support programs.

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[13] Commonwealth of Australia, 2023; Interim Economic Inclusion Advisory Committee 2023–24 Report to Government
[14] Shinn, M., & Cohen, R. (2019). Homelessness prevention: A review of the literature. *Center for Evidence-Based Solutions to Homelessness.* http://www.evidenceonhomelessness.com/wp

Role of local government in early intervention and prevention of homelessness

As the level of government closest to the community, Council plays a role as 'the eyes and ears' of the community. Early intervention and prevention is where Council has a key role to play in addressing homelessness.

In her ██████████████ report, ██ ████████████ ██, notes that as the closest level of government to the community, Australia's local councils are in a unique position to act on homelessness prevention.

This is possible because local government authorities are well positioned to see problems close up, are well connected and can enable collaboration with diverse partners, are in the position to inform and educate local communities about homelessness and the local homelessness and housing situation and are set to respond at appropriate levels and times.

████████ notes that unlike Federal and State governments, local councils are able to build a deep understanding of the community they serve through the delivery of programs and services, including maternal and child health, libraries and youth services, which can be vital in identifying early indicators of homelessness. Established connections between councils and local homelessness and housing support services can enable and embed prevention and early intervention initiatives.

Internationally, locations such as Newcastle in the UK have proven how a locally built homelessness prevention approach, embedded within a council, can identify and utilise touchpoints into the community and help staff - especially those whose jobs are customer facing but not homelessness specific - to identify risks and trigger points in the community. Off the back of these connections, and with appropriate training, council staff can help connect residents into local homelessness and housing services.

Similarly, social workers and people who have experienced homelessness, mental illness and drug and alcohol history are successfully working in libraries across the United States, and now more so in Australia, building on the ability of these accessible, government-owned spaces to connect into communities and provide support and connections into services. Australia's first library social worker program, run through City of Melbourne libraries proved how effective homelessness outreach undertaken in these trusted and welcoming spaces could be, as opposed to on street interventions.[16]

While there is considerable scope for local government to respond to homelessness, and a handful of, mostly central city, councils have initiated action, the responsibility for homelessness response in Australia has primarily rested with Federal and State Governments. Without recognition and with very limited access to commonwealth or state funding streams, local government has been effectively left out of our national homelessness response, missing an important contribution, particularly in the area of prevention and early response. The National Housing and Homelessness Plan presents an opportunity to articulate and support local government's role in homelessness prevention.

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[16] Garner G, Mitchell L, Bell K, Lockwood A & Wardle S (2020). *Social Work in Australian Public libraries: An Interdisciplinary Approach to Social Justice*. Public Library Quarterly. https://doi.org/10.1080/01616846.2020.1825917

Recommendation 3: The Federal and state governments commit to adequate funding for homelessness early intervention, including tenancy support programs.

Family violence

Nationally, family violence is the leading cause of women and children's homelessness. It's estimated that half of women who experience homelessness first become homeless due to experiences of family violence.[17]

In addition, women aged 55 years and older have become the fastest growing population of homeless persons in Australia, largely due to an accumulation of inequalities over a lifetime and family violence.[18]

The Victorian Royal Commission into Family Violence specifically recommended that victim-survivors gain access to "stable housing as quickly as possible and with a minimum number of relocations, are not accommodated in motels and other ad hoc accommodation, and spend on average no longer than 6 weeks in refuge and crisis accommodation." The link between victim-survivor's safety and the ability to recover from family violence, and access to long-term housing is crucial.[19]

The National Plan to End Violence against Women and Children 2022-2032 also committed to "ending family violence Improve access to short-term, medium and long-term housing for women and children experiencing violence, including those living in institutional settings, and support women to stay in their own homes when they choose to do so" [Action 10].[20]

While both the Federal and Victorian governments have stated their commitment to ensuring victim-survivors have access to safe and secure housing, these goals will not be realised without a significant investment and shared agreement to ensure every person in Australia has access to suitable housing.

Brimbank residents experience disproportionately high rates of family violence[21] and the local access point reports that the high numbers of people presenting with family violence place a significant burden on the homelessness system.

Recommendation 5: Commit to implementing Federal and state aspirations to ensure victim-survivors have access to stable housing.

Incarceration and people leaving the justice system

There is a cyclical relationship between housing insecurity, homelessness and imprisonment. 33% of prison entrants said they were homeless in the 4 weeks before prison – 28% were in short-term or emergency accommodation, and 5% were in unconventional housing or sleeping rough. More than half (54%) of prison dischargees expected to be homeless on release from prison.[22]

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[17] Australian Institute of Health and Welfare (2020) Specialist homelessness services annual report 2019-20, AIHW, Australian Government, accessed 12 September 2023.
[18] Australian Institute of Health and Welfare (2020) Specialist homelessness services annual report 2019-20, AIHW, Australian Government, accessed 12 September 2023.
[19] Victorian Government, 'Give priority to victims gaining stable housing as quickly as possible', September 2021, https://www.vic.gov.au/family-violence-recommendations/give-priority-victims-gaining-stable-housing-quickly-possible
[20] Commonwealth of Australia (Department of Social Services) 2022, The National Plan to End Violence against Women and Children 2022-2032
[21] Crime Statistics Agency (2023). https://www.crimestatistics.vic.gov.au/family-violence-data-portal/family-violence-data-dashboard/victoria-police, Accessed 2023
[22] Australian Institute of Health and Welfare (2019). *The Health of Australia's prisoners*. Canberra: AIHW.

People exiting prison may face stigma and marginalisation due to their history of incarceration leading to discrimination from landlords and employers. These compounding factors mean that people leaving custody on bail, parole or a community-based order are at greater risk of homelessness. In addition, they face the additional burden of being returned to custody if unable to comply with bail or parole conditions, which requires a fixed address. It often results in formerly incarcerated people being placed in unsafe dwellings, including caravan parks and rooming houses.

Access to safe, supported and stable accommodation is essential for positive reintegration into the community. Rates of re-incarceration have shown to be less for ex-prisoners with complex needs who receive public housing compared with those who receive private rent assistance only.[23] Re-incarceration places additional burden on the justice system, is more costly and has worst outcomes for individuals.

There is a strong link between socio-economic / place-based disadvantage and justice system involvement.[24] Anecdotally, services report that a large number of community members being supported by homelessness services have a history of incarceration. Combined with high crime rates, it is expected that Brimbank has a disproportionate number of people exiting the prison system seeking support.[25] Council supports a number of residents who have interacted with the justice system through its services and programs.

Recommendation 6: Recognise the critical role of providing post-release housing assistance for people exiting prisons to address the imprisonment–homelessness cycle.

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[23] Martin C, Reeve R, McCausland R, Baldry E, Burton P, White R and Thomas S (2021), *Exiting prison with complex support needs: the role of housing assistance-* external site opens in new window, AHURI Final Report No. 361, Australian Housing and Urban Research Institute Limited.

[24] Tanton, R., Dare, L., Miranti, R., Vidyattama, Y., Yule, A. and McCabe, M. (2021), *Dropping Off the Edge.* Persistent and multilayered disadvantage in Australia, Jesuit Social Services: Melbourne.

[25] Crime Statistics Agency (2023). Latest crime data by area. https://www.crimestatistics.vic.gov.au/index.php/crime-statistics/latest-crime-data-by-area, Accessed September 2023

Homelessness System

The 2021 census, as well as locally collected information, is showing us that the incidence of homelessness across Australia is changing, moving from being an issue contained in city centres to one that is felt in middle and outer belt suburbs as well as regional and rural areas.

This change is evident in Melbourne's west, where specialist homelessness services are being overwhelmed by increasing demand, limited resources, and lack of short, medium and long-term housing options. The Salvation Army Social Housing and Support (SASHS) Network, a homelessness access point based in Sunshine, servicing Melton and Brimbank, is currently unable to provide appointments to around 800 people each month due to limited resources.[26] More broadly, of the 13,546 households that presented to the SASHS and Unison (another homelessness access point located in Melbourne's west) during 2017-18, just 11 per cent were able to access a support response and only two per cent were provided with transitional housing.[27] Clearly, additional funding is needed to employ staff at homelessness access points to ensure that no clients are turned away without a timely appointment.

Additional investment from the Victorian and Federal Governments is needed to strengthen the current response, as well as introducing additional services to meet growing demand. Brimbank needs locally-based, assertive outreach services and individualised, ongoing case management for clients with complex needs.

Crisis accommodation

The changing scale and nature of homelessness is placing considerable strain on existing homelessness services. The system is increasingly unable to meet the needs of vulnerable groups due (in large part) to limited emergency and crisis accommodation options. Access to safe, secure and appropriate emergency and crisis accommodation is a critical issue in Brimbank, with just two crisis accommodation properties in the municipality and 423 government-provided crisis beds available across the state.

Given these constraints, homelessness services inevitably turn to privately-operated rooming houses, hotels and motels to meet the initial housing needs of vulnerable clients. In most cases, clients are required to pay a portion of these costs. This is an unsatisfactory and costly outcome for government, service providers and clients. In 2017, for example, the six homelessness access point services in Melbourne's north and west spent $2.5 million of Housing Establishment Fund and other brokerage funds to purchase crisis accommodation, a five-fold increase since 2011.[28]

Rooming houses are often the only option for single people in housing crisis in Melbourne's west, or the 'housing of last resort'; these are regularly at capacity and unable to meet the needs of new

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[26] Western Homelessness Network (2019) *Ending homelessness in Melbourne's West*, August 2019, p.5
[27] *Ibid.*, p.5
[28] Northern and Western Homelessness Network (2019) *A Crisis in Crisis: The appalling state of emergency accommodation in Melbourne's north and west*, p.3.

homelessness service clients. Service users report negative experiences when using these crisis accommodation options, with many describing them as 'unclean', 'not appropriate for children' and 'unsafe'.[29] The Residential Tenancies (Rooming House Standards) Regulations 2023 came into operation on 26 February 2023 and replace the Residential Tenancies Regulations 2012 and introduce new updated minimum standards for safety, security, privacy and amenities[30]. Despite these changes, rooming houses continue to be unsuitable, unsafe and unhealthy for consumers.

Additionally, there is a lack of diversity in the size of crisis accommodation dwellings, with few options for larger families. Ultimately, some clients even prefer to return to sleeping rough than remain in sub-standard and dangerous crisis accommodation, while the decision to send vulnerable clients to these locations can place considerable professional and emotional strain on crisis workers.

Resources to support people to maintain stable housing has been identified by local services as a crucial need. Homelessness services spend a considerable human resources and time assisting people to find stable housing, meaning that there is no capacity to continue to support people into their tenancy. Resourcing to support an individual or household who require assistance through the first year of their tenancy would assist in reducing the crisis response.

Recommendation 8: The Federal and state governments work with specialist services to improve access to safe, secure and appropriate crisis accommodation, through funding for fit-for-purpose facilities.

Assertive Outreach

Assertive outreach plays a crucial role in supporting people experiencing homelessness, and in particular rough sleepers, by connecting them to the homelessness service system.

Responses from local government to rough sleeping and homelessness through homelessness assertive outreach models varies across the state and nationally. There are examples of local governments directly funding assertive outreach programs or local government areas receiving assertive outreach resourcing / funding from government and philanthropic sources.

While there are benefits to localised responses to homelessness, the ad-hoc resourcing and reliance on the good-will and support of local NGOs has resulted in an inequitable service system across the state. A lack of homelessness outreach services in Brimbank means that there is little opportunity to access the people experiencing chronic and entrenched homelessness.

Substantial evidence supports the benefits of the Advance to Zero model, led by the Australian Alliance to End Homelessness (AAEH). Council supports this evidence-based approach in addressing rough sleeping and their aspirations for rough sleeping to be rare, brief and a non-recurring. While opportunities to implement an Advance to Zero (AtoZ) approach in Brimbank have been explored, the current homelessness service system is limited in its capacity to integrate the model. Without considerable investment in culturally responsive homelessness outreach services, and emergency accommodation (and housing) options, the AtoZ model will not be possible and not be able to facilitate housing outcomes.

Recommendation 9: Recognise the crucial role of specialist services that conduct homelessness assertive outreach, through funding models to support a localised service response.

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[29] *Ibid.*, p.5.
[30] Tenants Victoria, 'Moving in (rooming houses)', May 2023 https://tenantsvic.org.au/advice/different-tenancies/rooming-houses/moving-in/, accessed September, 2023

Intersection with mental health and alcohol and other drugs (AOD)

In the Brimbank and Australian context, homelessness is both a cause and consequence of mental ill-health. Individuals are rarely able to address or stabilise their mental health issues without access to safe and secure housing. Likewise, many of the current services are not equipped to support individuals experiencing homelessness, leading to a mainstream service system that is only able to support housed people.

The introduction of Mental Health and Wellbeing Locals were a key recommendation of the Royal Commission into Victoria's Mental Health System, providing support and treatment for adults aged 26 and older experiencing mental illness or psychological distress in their community, including those with co-occurring substance use or addiction. The Brimbank Local acts as a 'front door' to the mental health system by offering welcoming and inclusive spaces, staffed by qualified mental health professionals, including peer support workers to cater for the diverse needs of the Brimbank community. Brimbank has welcomed the introduction of the Brimbank Local and their role in addressing crucial gaps to support mental health of the community.

However, these services are not sufficiently equipped or funded to respond to individuals in housing crisis and experiencing homelessness. Brimbank lacks many of the services required to support people in experiencing acute mental health issues and those requiring immediate support. Unlike most equivalent municipalities, Brimbank and Melton do not have a Homelessness Outreach Psychiatric Service (HOPS) team or other mental health outreach services.

The City of Brimbank recorded Victoria's second-highest number of heroin overdoses between July 2020 and June 2022.[31,32] LGAs with equivalent or lesser rates of heroin overdoses (including City of Melbourne and Yarra) are well serviced with out of hours AOD / homelessness assertive outreach, safe injecting rooms, a 'Sobering Up Service' and Safe Needle Exchange.

For many people in Brimbank, including people experiencing homelessness, attending an unfamiliar service in an unfamiliar location is not suitable. In addition, existing homelessness outreach support services do not have capacity to support people experiencing acute mental health issues and AOD issues.

Outreach based mental health support workers are effective in supporting consumers in locations in which they feel safe and secure, or in conjunction with support workers with whom they already have a trusting relationship. Ensuring homelessness case workers and allied mental health services work collaboratively are crucial in transitioning people out of homelessness.

Recommendation 10: The NHHP recognises the role and interplay of mental health and homelessness through funding programs for mental health services to provide outreach to people at risk of homelessness.

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[31] The Coroners Court of Victoria data, released to the Victorian Drug and Alcohol Association, reveals there were 28 heroin overdose deaths in the Brimbank between July 2020 and June 2022.

[32] Pittorino and Michell, 'Brimbank's heroin crisis' 12 May 2023, https://brimbanknorthwest.starweekly.com.au/news/brimbanks-heroin-crisis/, accessed 1 September 2023

Young people and homelessness

According to 2021 ABS data, out of the 3,687 people accessing specialist homelessness services who identified that they were in Brimbank in the week prior, 587 were 10-19 and 572 were 20-29 years of age. The main reasons young people presented alone for assistance from Specialist Homelessness Services in 2020-21 were: family and domestic violence, Housing crisis and relationship/family breakdown. [33]

Local research found that many young people dislike common labels used to define homelessness, and may be unaware of available services or even that they are experiencing homelessness themselves.[34] For example, more than half of young people surveyed were unaware of the term 'couch surfing' and did not understand this to be a form of homelessness.[35] .

Young people who become homeless have lower educational attainment, are more likely to experience chronic physical and mental health conditions, be disengaged from the labour market, and remain homeless for longer.[36] These factors compound to perpetuate cycles of homelessness throughout the lifetime.

Current approaches to reducing homelessness among young people are largely reactive, driven by crisis management and focus on intervening after homelessness is experienced. Young people in Brimbank who access homelessness services are highly limited in their housing options, and are often required to travel to the Melbourne CBD, leading to displacement from friends and communities.

LGBTIQA+ young people are at greater risk of experiencing homelessness than the general population. Family of origin violence, discrimination and family rejection lead to the over-representation of LGBTIQA+ young people in the homelessness response system. It is crucial that specialist service system are able to provide culturally safe service responses to LBGTQIA+ people.

Reducing youth homelessness across the life-course requires proactive strategies, which focus on prevention and early intervention. Notably, it is crucial that responses differentiate and adapt to the different needs of children, adolescents and young adults.

Recommendation 11: Commit to a plan to end children and youth homelessness, in recognition of the unique needs of children and young people.

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[33] Convery and Nicholas; 'Outer suburbs of Melbourne and Sydney are homelessness hotspots, data reveals', June 2023;https://www.theguardian.com/australia-news/2023/jun/07/outer-suburbs-of-melbourne-and-sydney-are-homelessness-hotspots-data-reveals?CMP=Share_iOSApp_Other

[34] Thielking, M. (2016) *Young People's Perceptions of Student Homelessness in Brimbank Secondary Schools*, Report prepared by Swinburne University for Brimbank City Council.

[35] Black, C. (2020) '*From at Risk to at Home*' prepared by Black Ink Writing and Consulting for Brimbank City Council

[36] Johnson and Chamberlain (2015) *op. cit.*, p. 18-19.

3. Social and Affordable Housing

The Universal Declaration of Human Rights recognises housing as part of the right to a standard of living adequate for health and wellbeing.[37] Despite 'adequate housing' being recognised in the United Nations' Declaration of Human Rights as part of the right to an adequate standard of living, current policy statements and responses by the Federal and State governments do not reflect the crucial role of social and affordable housing as a pre-requisite for health and wellbeing.

Lack of social and affordable housing can lead to significant health and wellbeing impacts, many of which have been exacerbated by the COVID-19 pandemic. Conversely, increased access to housing supports improved employment and education participation, better connections with local social networks, and reduced demand for health and other services.

Victoria has the lowest percentage of social housing nationally (at 2.9%) and the lowest investment per capita. An additional 1,700 social housing dwellings are needed in Victoria each year over the next 20 years to simply maintain social housing at its current proportion. This is an increase of over 30,000 dwellings over the next two decades. The Victorian State Government recently released their Housing Statement which seeks to boost housing supply.[38] The Housing Statement does not adequately address the urgent need for social and affordable housing. 60,000 new social housing dwellings are needed in Victoria in the next decade in order to meet demand.

In Brimbank alone, it is estimated that an additional 4,000 social housing dwellings are required to meet current demand, and this does not consider future growth. Current measures do not deliver the volume of additional housing required in Brimbank.

Recommendation 12: The NHHP commits Federal and state governments to deliver on annual social housing targets to increase supply.

Social housing should be considered as an essential form of social infrastructure. Access to housing provides benefits such as improved employment and education participation, better connections with local social networks, and reduced demand for health and other services, leading to economic prosperity. Direct public investment in social infrastructure has been well documented as the cheapest and most effective means to generate housing supply and bridge the gap between social housing supply and demand.[39]

Recommendation 13: The NHHP recognises the role of social housing as an essential form of social infrastructure.

Users of social housing or 'consumers' are crucial stakeholders that are not sufficiently considered within government policy, at all levels. Mechanisms to ensure that the voices of consumers are captured in policy need to be enhanced to ensure that social housing adequately meets their needs and is fit-for-purpose.

Recommendation 14: Ensure lived experience of social housing consumers and people experiencing homelessness are embedded in Federal and state policy and decision making.

[37] United Nations General Assembly (1948) Universal Declaration of Human Rights, proclaimed 10 December 1948, www.un.org/en/about-us/universal-declaration-of-human-rights, accessed August 2023

[38] Victorian Government (2023) Good decisions, made faster | Victorian Government (www.vic.gov.au), Accessed September 2023

[39] Lawson, J., Pawson, H., Troy, L., Nouwelant, R., and Hamilton, C. (2018) Social housing as infrastructure: an investment pathway, AHURI Final Report No. 306, Australian Housing and Urban Research Institute Limited, Melbourne, https://www.ahuri.edu.au/research/final-reports/306, doi:10.18408/ahuri-5314301.

The Brimbank context – supply, demand and affordability

Brimbank has high levels of unmet housing need, with an estimated 4,800 households or 7.2% experiencing housing stress. This is higher than both the Western and Greater Melbourne regions[40] . As an urban municipality, the average house price in Brimbank is generally lower than other municipalities with the Greater Melbourne region. However, this does not translate to more affordable housing. Brimbank households earn an average income that is lower than Greater Melbourne[41].

Combined with other inequities – such as limited access to public transport in some suburbs, overstretched and ageing infrastructure, poor access to services and amenities and high levels of socio-economic disadvantage, including higher than average unemployment – a one size fits all approach may only sustain and entrench the inequities that already persist. This type of inequity needs to be recognised when designing policy with ability to tailor or incentivise outcomes to better meet the needs of defined areas.

Within Brimbank there are a number of constraints that increase the cost of development or reduce the density of development, therefore impacting the ability of developers to provide higher levels of social and affordable housing. Constraints include: the presence of contamination (groundwater and soil), developing on basalt, airport, rail and freeway noise and other adverse amenity and environmental risks (including major hazard facilities). These factors, combined with increased construction costs, all need to be considered when designing social and affordable housing and land use policy.

Sunshine has been identified by the Victorian Government as a priority precinct; this includes the Sunshine National Employment and Innovation Cluster, the Sunshine Health, Wellbeing and Education Precinct, and the St Albans Health and Wellbeing Hub. Council is planning for unprecedented population growth earmarked for the Sunshine Priority Precinct which will need to be supported by increased local services and infrastructure.

In 2020, Council adopted a Transforming Brimbank agenda, which seeks to leverage these investments to help address a range of socio-economic challenges.[42] Transforming Brimbank outlines a vision to solidify the Sunshine Priority Precinct as the capital of Melbourne's west, through the integration of the Sunshine Super Hub with the region's key job, health, education and social precincts. Fundamental to its success will also be how the Victorian Government considers the role of housing (particularly social and affordable housing) in and around significant infrastructure investments in the region. It is important that the approach taken takes into consideration localised conditions and market needs to ensure there is a cost benefit for delivery. An unbalanced approach may impact market investment and delivery, which will mean housing aims are not achieved.

Role of Local Government in Social and Affordable Housing

The role of local government in social housing is ill-defined and is not formally recognised by state and federal government. Yet local government are often forced to manage the consequences of the lack of social and affordable housing and reliance on more transient forms of housing such as rooming houses and in some cases, rough sleeping. This impacts both the individual and the health and wellbeing of the wider community. Victorian local governments have a legislated responsibility

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[40] University of New South Wales, 'Housing Need Dashboard', https://cityfutures.ada.unsw.edu.au/cityviz/housing-need-dashboard/, accessed September 2023

[41] .id (2021) *City of Brimbank Community Profile*, https://profile.id.com.au/brimbank, accessed August 2023

[42] Brimbank City Council (2019) *Transforming Brimbank*, https://www.brimbank.vic.gov.au/advocacy-initiatives, accessed January 2020.

to maximise public health and wellbeing outcomes but have limited scope and resources to increase the supply of social and affordable housing.

In May 2022, Council adopted a [Position Statement on Social and Affordable Housing](#) (Position Statement). It aims to encourage and support an increased supply of social and affordable housing in Brimbank. The purpose of the Position Statement is to:

- Articulate Council's position on social and affordable housing to Brimbank residents and other key stakeholders;

- Outline the principles, roles and pathways that will guide Council's decisions and actions to encourage and support increased local supply;

- Lay the foundations to further grow and develop Council's approach to social and affordable housing.

It outlines three core roles that Council can play: **advocate**, **facilitator, and planner.** These roles provide a broad spectrum of potential intervention, enabling Council to focus on multiple approaches which can be adapted in response to current priorities and emerging opportunities.

As an advocate, Council plays a key role in representing the local community and advocating for its interests. Its role extends to targeted, strategic and coordinated advocacy which encourages and supports increased local housing supply, while deterring 'cost shift' or other adverse impacts on Brimbank and local communities.

As a facilitator, Council understands that delivering social and affordable housing requires multiple organisations to contribute and share resources. Council plays an important role in building relationships and brokering partnerships between registered housing agencies, developers, government agencies and other key stakeholders.

In its capacity as a planning authority, Council plans for the efficient, orderly and appropriate use of land in Brimbank, including through planning permit assessment processes, planning scheme amendments, and the preparation of strategies, policies and plans. Councils plays a key role by encouraging and negotiating social and affordable housing contributions through discretionary policy and voluntary agreements.

Council can also play a discretionary role through partnerships to deliver social and affordable housing, subject to a range of matters including resourcing, by exploring the use of Council-owned assets or other contributions to projects.

Local governments are operating in a fiscally constrained environment that is impacted by rate capping, state government cost shifting, and increasing costs to deliver core services and facilities, as well as increasing legislative requirements. The capacity of local government to play an active role through resourcing and land supply varies considerably across Australia. In Brimbank there are limitations relating to resourcing, land contamination and lack of suitably sized and located land. In addition, local governments lack the incentive to address housing supply, when short-term and insufficient funding opportunities are not delivered at the scale required to address the substantial and chronic undersupply of housing.

Recommendation 15: Commit to supporting local government to undertake analysis of local land and development opportunities, including property audits and feasibility analyses, and the potential use of council assets to contribute to social and affordable housing projects.

4. Housing costs, home ownership and the rental market

Policy

Reforming the taxation system is necessary to address current policy settings that are contrary to affordable housing and social housing outcomes. Incentives that drive the market towards negative gearing and land/property banking favour investors rather than new home owner-occupier buyers. Governments should also consider the unintended consequences of providing models of financial assistance that only serves to add more capital into the housing market, which inevitably drives up house prices. Existing housing market and taxation policies support housing as a commodity for wealth creation, counteracting the goal of achieving housing affordability. The lack of social housing needs to be recognised as an outcome of market failure, which requires direct and immediate Federal and state government intervention.

Recommendation 16: Undertake reforms of the tax system that provide incentives for increased supply of social and affordable housing.

Utilisation of existing government owned land, housing stock and urban consolidation

The Victorian Government's Big Housing Build initiative, managed by Homes Victoria, is an important step in enabling better utilisation of existing State-owned properties to deliver more social and affordable housing. However, the scale of this initiative and commitments in Victoria's Housing Statement, do not deliver the number of new dwellings required to address the shortfall in social and affordable housing stock.

The NHHP should provide consistent policy that mandates the delivery of social and affordable housing in private residential developments over a certain size / cost that is proportionate to the location and locational attributes, land value and cost of construction. This mandate should apply to well serviced areas, or areas where there is the potential for adequate services, when associated with real commitments for government investment in supporting infrastructure.

Further, there are significant development opportunities associated with State and Federal owned land with new acquisitions facilitated by the Major Transport Facilitation Act for the delivery of social and affordable housing.

There may be instances where well serviced land is temporarily vacant, which may present an opportunity to accommodate temporary housing in the form of modular / tiny houses – which has occurred in City of Maribyrnong. The length of tenure would need to be limited, to avoid what is intended as temporary development becoming permanent. The temporary tenure of these means housing is not being delivered in perpetuity, which doesn't necessarily resolve current housing shortfalls. They may however fill an immediate gap. Temporary development is often built to a lesser standard than a permanent structure – design standards may need to be improved if there is a policy position to deliver these.

In the shorter term Federal and state government land could be used to deliver social and affordable housing stock. The delivery of temporary solutions such as tiny houses could be considered in some locations.

Residential growth

Urban consolidation is another way for existing properties can be better utilised. Urban consolidation can be facilitated by applying a residential zone that supports it, e.g. the Residential Growth Zone (RGZ). However the land must be fit for purpose, local conditions must be responded

to and necessary infrastructure, services and amenities, must also be present to both service the tenants and encourage the market.

To encourage residential growth in well-located areas, land needs to be in a residential zone or a zone where dwellings are supported e.g. the Commercial 1 Zone (C1Z) and Activity Centre Zone (ACZ). It can be easier to encourage residential growth if the necessary infrastructure, services and amenities are already present rather than providing retrospectively, which is often the case with Greenfield developments on the fringes of Greater Melbourne. Local governments are responsible for many of this infrastructure and require adequate compensation to support population growth.

Private rental market

Nationally, households in the private rental market are contending with surging rents, low vacancy rates and a global cost-of-living crisis. According to the 2021 Census, 23% of Brimbank residents live in private rental housing. Lack of control on rent levels, rental standards and tenancy rights, coupled with high rates of poverty in Brimbank mean that renters experience high rates of rental stress.[43]

The Victorian Government has progressed amendments to the Residential Tenancies Act in Victoria and have announced changes through the Housing Statement[44] that introduce measures to improve housing supply. These are encouraging steps and will make the private rental market fairer. However, vacancy rates are low, meaning that private rental tenants are often subject to the whims of private property owners who still hold the balance of power.

Recommendation 17: Introduce national rental reforms which strengthen renters' rights and provide options for long term security of tenure.

Resilient and environmentally stable buildings

The ideal mechanism to ensure new builds are resilient is the National Construction Code (NCC). The NCC requirements to achieve building resilience should be mandatory as this would provide certainty for the market, create market demand which should lead to competitive costs.

In its submission to the then Victorian Department of Environment, Land, Water and Planning's Environmentally Sustainable Development (ESD) Roadmap, Council has previously outlined a number of key changes required to the NCC, and Victoria's planning system, to improve the environmental sustainability of new builds. See Submission from Brimbank City Council to the Environmentally Sustainable Development Roadmap for Victoria's Planning System (3).

At a local level, Council introduced a new local policy into the Brimbank Planning Scheme to integrate environmental sustainability principles into land-use planning, new developments and redevelopment of existing infrastructure. The policy only applies to residential and non-residential development that require a planning permit in accordance with the thresholds specified in the policy. This means single dwellings, which make up a large proportion of new housing stock, are not affected. Given a building permit is still required to construct a single dwelling, an updated NBC that includes ESD measures would significantly help deliver more resilient and affordable housing in the future.

Recommendation 18: Increase both National Construction Code and Building Code of Australia's minimum standards for environmental sustainability.

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[43] .id (2021) *City of Brimbank Community Profile*, https://profile.id.com.au/brimbank, accessed August 2023
[44] State of Victoria (2023) *Housing Statement*. https://www.vic.gov.au/housing-statement, accessed September 2023

5. Planning, zoning and development

Limitations of the planning and zoning regulations and administrative processes

In the current context, local government planning and zoning regulations and administrative processes have limited affect on housing supply, affordability and diversity.

In September 2023, the Victorian State Government announced reforms to the planning system.[45] Amendment VC242 makes changes to the Victoria Planning Provisions (VPP) and all planning schemes by introducing two new particular provisions to facilitate significant residential development and significant economic development.[46] The intention of these reforms are to boost housing supply by bypassing local government planning processes.

The implication of the Victorian State Government reforms is that local government is impeding housing growth through its planning processes; which is misleading. In the Brimbank municipality, there are numerous instances where a planning permit to use and develop land for high-density residential developments has been granted but not acted upon (i.e. in Sunshine Metropolitan Activity Centre). This is an issue that extends across other municipalities, including the City of Melbourne, where 20,000 potential dwellings have received planning approval but not commenced construction.

There are a range of reasons why developers are not converting approvals into new dwellings, which include low returns as a result of the immaturity of the property market, development costs, high costs of materials and scarcity of the construction labour force. In addition, it is often more profitable for developers to delay supply. On balance, it is considered that the delays and costs associated with planning are not the main contributor to insufficient diversity of housing in Brimbank, and that this is largely more a result of market conditions.

Housing diversity

Brimbank has low numbers of single person dwellings and high density housing. Council encourages housing diversity in appropriate locations through its planning scheme, but the extent of diversity is reliant on the market.

Within residential areas, there is significant capacity afforded by the residential zones, however in many cases denser development requires land consolidation to increase lot sizes. On this basis the take up for such infill redevelopments is low - despite the relatively lower average price of residential land in Brimbank.

Council's *Home and Housed Strategy* (Housing Strategy) directs where future population growth should go and how much growth should occur at various locations across the municipality though residential zones. A planning scheme amendment is required to implement the Housing Strategy, and the amendment process is complex and time-consuming. Delays in the process are typically due to:

- The extended time taken by the Minister for Planning to authorise preparation of the amendment;

- The need to review numerous submissions, given the complexity of the amendment, and refer it to an independent planning panel if there are objections that cannot be resolved;

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[45] State of Victoria (2023) Good decisions, made faster | Victorian Government (www.vic.gov.au), Accessed September 2023
[46] : State of Victoria Gazette (2023, September 20), *Victoria Planning Provisions,* < https://www.gazette.vic.gov.au/gazette/Gazettes2023/GG2023S497.pdf>, no. S 497, accessed September 2023.

- The extended time taken by the Minister for Planning to approve the amendment once adopted.

After the amendment is approved and gazetted by the Minister for Planning, there is no guarantee that the market will respond quickly, due to the market conditions discussed. Attracting market investment over other local government areas can also be difficult, particularly when there are less costs/risks and increased profits to be made. This example demonstrates that while administrative factors do impact housing supply, the effects are limited and typically due to State Government processes and not local government.

Any future regulatory changes / initiatives that seek to facilitate affordable and social housing projects within the planning system, should include mechanisms that secure the delivery of these projects in perpetuity. On a number of occasions, Council officers have received planning permit applications which seek considerable waivers to development standards and objectives that would usually be required by developers, because they are proposing social / affordable housing. Throughout the assessment process, the original proposal often shifts from an 'affordable social housing model' to a 'profitable housing project' while also benefiting from the waivers which were tied to the original proposal. Also witnessed are proposals that seek to deliver 'affordable housing' but the price point is very high, with often a lesser standard of living and design.

Role of planning and zoning regulations in increasing the supply of land in well-located areas

Planning and zoning regulations can ensure land in proximity to well-located areas, not constrained by current or future potential hazards, are appropriately zoned to support higher density residential developments. Examples in Brimbank include the Activity Centre Zone (ACZ) around the Sunshine Metropolitan Activity Centre, and the Residential Growth Zone (RGZ) around the Major Activity Centre of St Albans, Deer Park and Sydenham. The Comprehensive Development Zone (CDZ), which provides for a range of uses and the development of land in accordance with a comprehensive development plan, can also be used to facilitate well-planned residential areas around a well-located area.

Council, through its Industrial Land Strategy, has identified some existing industrial land as having the potential for redevelopment to support higher-order uses, e.g. residential, subject to future strategic work to support a rezoning. However, these sites need to be thoroughly investigated for potential contamination and other hazards and environmental risks as required by the Environment Protection Act 2017, Ministerial Direction No. 1 and No. 19, and Planning Practice Note 30 - Potentially Contaminated Land (PPN30). Consultation with the Environment Protection Authority Victoria and other stakeholders would also be required.

As explored in the previous section, land use conflict and sites with environmental risk are not considered an appropriate solution for housing provision, without the necessary investigations, clean-up and/or mitigation measures.

Responding to housing demand

To be more responsive and flexible to housing demand pressures, all levels of governments must enter into an agreement that clarifies the responsibilities of respective parties, how all parties will communicate and cooperate with each other on a well-defined set of issues, and how information is shared and used between parties. The agreement must ensure meaningful collaboration and an agreed outcome that considers the appropriate capacity for each tier of government, ensuring an approach which is commensurate to the capacity of each level of government's ability to respond. Council's *Position Statement on Social and Affordable Housing* sets out Council's current thinking and capacity to be involved.

Further to this, the Position Statement identifies practical opportunities for the State Government, and where relevant, the Federal Government, to work with Council to grow and improve social and affordable housing in the local community.

Role of state and local governments in the improvement of speed and/or transparency of development assessment processes

Improving the vetting of applications prior to formal lodgement could improve the process. For example there is potential for VicSmart style applications if the application has been properly vetted and certified prior to lodgement. While this additional step won't necessarily save time or money, it would improve transparency of the development assessment process.

Another solution is an application process that is lodged by a state certified body for social and affordable housing to local government. That is, the state body becomes the applicant who is better equipped and resourced in ensuring the proposal is appropriate with merits. This would remove subjective approaches and delays by inexperienced draftspersons, building designers and planning consultants. This would also ensure that the application is being assessed against local conditions, policy context and design standards while also ensuring it integrates with surrounding proposals and can be implemented in line with relevant standards and requirements.

Recommendation 19: Identify suitable ways to allow streamlined approvals processes for social and affordable housing proposals which respond to site conditions, design standards and guidelines.

Development that achieves minimum design and amenity standards could go some way to addressing community concerns about the quality of development. If these standards are achieved, the process could allow for the application to not require notification. These standards would need to be more restrictive than a standard unit development, to justify removal of the public notice process.

The role of state and local governments in improving accessibility through planning and zoning

The State and Federal Government have the primary responsibility in delivering improved public transport networks. The response from an affordable housing perspective is to focus the delivery of affordable housing on well-serviced public transport networks, or have a pre-arranged plan for, and inclusive of the delivery of an efficient and regular public transport network that services new estates and provides succinct connections to activity centres and main public transport corridors, e.g. train lines. All transport projects must include scope to include walking and cycling infrastructure, with funding also made available for councils to respond to key projects by delivering connectivity in response to delivery of larger government projects.

The development and implementation of State Government integrated transport plans for metropolitan regions of Melbourne that guide necessary public transport investment is required to support increased population. This could support Federal investment and catalyse greater private development in key areas.

Recommendation 20: Implement upgrades to existing public transport infrastructure required to support increased population – with a focus on Melbourne's western region which lacks transport infrastructure and service standards.

Planning and zoning reforms

The State government could explore how specific zones may be revised to accommodate one or more tiny houses on a vacant lot or a lot with one or more existing dwellings without needing a

planning permit – subject to relevant design standards. The state of the land would need to be factored in, with locations where risks / hazards are present would not be appropriate.

Recommendation 21: Consider zoning provisions to facilitate the accommodation of a second dwellings or tiny houses without the requirement for a planning permit.

In the medium-term, reforms should focus on converting, as much as possible, discretionary requirements that affect residential developments, i.e. the ResCode provisions in Clause 54 and Clause 55 of the Victoria Planning Provisions, into mandatory ones with a higher standard to provide greater certainty and reduce the need for notification or detailed assessments. This would in turn reduce the time taken to assess applications.

In the medium to long-term, the reforms could consider introducing zoning in well-located areas that encourages infill development with a particular focus on social and affordable housing. That is, include in the zone purpose and provide tangible measures and benefits for the delivery of affordable housing outcomes. As outlined above, this would need to be reflective of the local context and market.

Recommendation 22: Consider mandatory planning controls such as inclusionary zoning within state planning provisions to secure social and affordable housing outcomes as part of new development.

6. The Impact of Climate Change and Disasters on Housing Security, Sustainability and Health

Climate change and inequality are intrinsically linked. Vulnerability to the impacts of climate change, both on a local level and globally, is linked to geographic, social, economic and biological factors. Climate change exacerbates inequality, as people with fewer material, social and health resources will be more vulnerable to the adverse impacts of climate change.[47]

Climate change will result in heatwaves and extreme heat becoming more frequent and widespread, exposing vulnerable communities to heat stress, heat stroke, dehydration and mortality.

The Brimbank community is particularly vulnerable to heatwaves, partly due to the heat island effect[48] and historic and entrenched disadvantage which means that the Brimbank community is disproportionately affected. Key cohorts who are at greater risk of heat stress include (but are not limited to):

- People experiencing homelessness

- People with chronic health conditions

- People with disabilities

- Elderly populations

- People in public and social housing

- People experiencing socio-economic disadvantage

- Young children

- Socially isolated people.

Hazard resilient housing

Low-income communities are more likely to live in poorly constructed, heat-affected rental accommodation and least able to afford air conditioning; those living in social housing and private rentals may be restricted from installing air conditioning units. Many Brimbank residents live in dwellings which are poor quality and unsuitable for withstanding extreme weather events.

The NHHP must take the climate emergency into account and mitigate against the impacts of severe weather events in the future. This is particularly the case for social housing residents, who are likely to be on lower incomes, and subsequently may need to reduce utility costs. There is a critical need to improve public housing quality with a focus on thermal comfort. While programs are being implemented to retrofit existing public and social housing to withstand current climatic conditions, they are not being delivered at the scale required.

Current state and Federal policy and regulation are insufficient in managing climate change impacts. Building regulations and planning scheme are inadequate in ensuring that private development is required to address the impacts of climate change, in particular heat implications from urban heat island and thermal comfort of buildings.

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[47] Islam, N., & Winkel, J. (2017). Climate change and social inequality.
[48] Department of Transport and Planning (2023) *Cooling and Greening Interactive Map*, https://mapshare.vic.gov.au/coolinggreening/, Accessed September 2023

Recommendation 23: introduce measures to incentivise housing modifications for landlords and/or investigate other options to encourage landlords to improve the energy efficiency of existing private rental properties.

In addition, the policy support and funding should be directed to recognise the function of open space and trees in the planning and building process to reduce ambient air temperatures during hot weather. This is of particular value in areas that are undergoing a significant level of higher density development activity, exacerbating the urban heat island effect.

Recommendation 24: Explore opportunities to mandate urban greening (vegetation), which is imperative to ensuring that homes are resilient to extreme heat.

Support for people who have been displaced due to climate disasters

Some communities, including people living in poor quality housing, overcrowded dwellings, and people with limited access to resources are particularly vulnerable to climate disasters. Governments must consider and investigate:

- The provision of short-term and long-term relocation for people impacted by climate disasters.

- An automatic register (set up an opt-out situation) that allows people to obtain assistance in finding permanent residence following a disaster if required.

- Provision of financial aid where appropriate.

- Communication and assistance with a particular focus on CALD communities, Aboriginal and Torres Strait Islander people, older communities and people with disabilities.

Recommendation 25: The NHHP commit to the introduction of measures that support people displaced due to climate-induced natural disasters.

Conclusion

Thank you for the opportunity to provide this submission to inform the development of NHHP.

The NHHP provides an opportunity for governments to commit to working together to end homelessness in Australia.

If you would like to discuss Brimbank City Council's submission further, please contact: