

SUBMISSION

**NATIONAL HOUSING AND
HOMELESSNESS PLAN**

CITY OF CASEY – OCTOBER 2023

CONTENTS

1. Executive summary
2. Introduction
3. Our priorities for the National Housing and Homelessness Plan
4. List of recommendations



1. EXECUTIVE SUMMARY

Situated in Melbourne's south-east growth corridor and suburban fringe, the City of Casey is one of most populous and fast-growing municipalities in Australia. Such rapid urbanisation presents challenges in ensuring appropriate housing diversity and typologies (including social and affordable housing), services and support, keep pace with present and emerging community needs. There is no single solution to increasing the provision of social and affordable housing. An integrated approach to addressing the shortfall is required from private sector stakeholders, not-for-profits, and all levels of governments, including local government. That is why this National Housing and Homelessness Plan is critical and we thank the Federal Government for progressing this initiative.

Casey City Council (Council) has the long-term vision that all our residents have access to secure, appropriate, and affordable housing and welcomes the opportunity to make a submission to the consultation for the plan. This submission includes key issues for consideration and recommendations for how they can be addressed. The recommendations are as follows:

- 1. That the National Plan recognise the critical and diverse role of local government as a partner in delivering social and affordable housing outcomes and commit Federal and State Governments to provide the requisite resources, information sharing, and platform to execute this function.**
- 2. That the National Plan commit all levels of government to work more effectively together on identifying sites and delivering the projects for increased social and affordable housing.**
- 3. That the National Plan commit State Governments' support for broad use of mandatory inclusionary zoning, including co-developing the reform with local government and setting a timeline for its implementation.**
- 4. That, prior to implementation of reforms in recommendation 3, the National Plan commit State Governments to reduce the barriers for councils to negotiate and enforce affordable housing agreements.**
- 5. That the National Plan commit all levels of government to co-develop regional targets for social and affordable housing which stipulate housing typologies according to local need.**
- 6. That the National Plan establish agreed definitions of social and affordable housing to enable effective setting of targets.**
- 7. That the National Plan support an expanded view of social housing locations, considering the local context and target cohort.**
- 8. That the National Plan take a 'Housing First' approach to homelessness.**
- 9. That the National Plan commit to developing Emergency Accommodation service capacity that meets the demonstrated need.**
- 10. That the National Plan commit to funding proven models of homelessness prevention and facilitate the implementation of them at scale.**
- 11. That income support be restored for people seeking asylum awaiting their claims to be assessed to prevent homelessness.**
- 12. That the National Plan commit State Governments commit to increasing funding provisions to tenant advocacy groups and organisations across Australia.**

2. INTRODUCTION

The local need for social and affordable housing

In the City of Casey, research into the current and forecast need for social and affordable housing has demonstrated an existing shortfall of more than 5,600 social and/or affordable housing dwellings.¹ Between 2016 and 2041 Casey's population is forecast to almost double and number of households to grow by 83,000.² The AHURI housing need model was used to forecast the need for social and affordable housing in accordance with Casey's population growth.³ The forecasting suggests that, without any intervention, the number of households with an unmet social and affordable housing need could exceed 10,200 by 2041. This represents 5.6 percent of all households in 2041 or an additional 4,600 households above the current unmet need.⁴ A minimum of 12% of all new dwellings built would need to be social and/ or affordable housing to meet the total future estimated social and affordable housing need by 2041.

Urgent action is required to increase the supply of social and affordable housing to support people on moderate, low, very low and nil incomes, including those at risk of, and experiencing, homelessness in the community. There are also local cohorts with specific housing support needs such as women and children experiencing family violence, those seeking asylum living in our community, and older people – particularly women – facing structural barriers to secure and affordable housing.

The local emergency accommodation shortfall

At the crisis point of the housing shortfall, there are limited and inadequate emergency accommodation service providers within our region. For example, the Local Government Homelessness and Social Housing Group Charter region of thirteen local government areas supports more than two million residents, including 24,536 people at risk or experiencing homelessness.⁵ Providers and specialist homelessness services in this region are often unable to assist people, or can only offer costly, inappropriate (and sometimes unsafe) accommodation such as motel rooms and rooming houses. For example, the major provider, Launch Housing at Bob's Place in Dandenong, advised in 2019 that over 500 women were turned away, unable to be assisted by their service.

These shortfalls are the result of a combination of factors including a rapidly growing population, housing prices, expenses and rents increasing faster than wages, and insufficient investment in social and affordable housing over many years.

¹ .id Consulting (2019). Casey Social and Affordable Housing Needs Assessment Report.

² .id Consulting (2019). Population and households forecasts, 2016 to 2041. Retrieved from <https://forecast.id.com.au/casey/population-households-dwellings>.

³ Affordable housing need is defined as “the aggregate of households unable to access market provided housing or requiring some form of housing assistance in the private rental market to avoid a position of rental stress” (AHURI (2017), Modelling housing need in Australia to 2025).

⁴ .id Consulting (2019). Population and household forecasts, 2016 to 2041. Retrieved from <https://forecast.id.com.au/casey/population-households-dwellings>.

⁵ AIHW (2022). Specialist Homelessness Services Collection (SHSC) data cubes, 2021-22.

The Casey Approach

Council is committed to leading and influencing change, and directly contributing to an increase of social and affordable housing supply in the municipality. This has been demonstrated through two strategic commitments: [Casey's Affordable Housing Strategy](#) (The Strategy) and membership in the [Regional Local Government Homelessness and Social Housing Group Charter](#) (The Charter).⁶ These Council commitments and associated principles, actions, and research form the basis of this submission and recommendations.

Council's role in social and affordable housing is defined in The Strategy, which establishes Council's policy position regarding the need for social and affordable housing and details an action plan to implement Council's role in advocating, partnering, and facilitating social and affordable housing outcomes. Through community and stakeholder engagement, three themes were identified and formed the three strategic principles of The Strategy.

The three strategic principles are implemented through actions, which consider homelessness, social and affordable housing investment, policy and legislative change, awareness-raising, data and research, and capacity building.

Council joined twelve other councils in Melbourne's east and southeast to form the Regional Local Government Homelessness and Social Housing Group Charter (The Charter). The Charter region is home to over two million residents and this coalition is a powerful platform from which to elevate advocacy, partnerships, and collaboration towards increased social housing in the region, with the ultimate goal of ending homelessness.



⁶ Casey's Affordable Housing Strategy was adopted by the City of Casey at its Council meeting on 15 December, 2020. A policy review will occur in December 2024. The Regional Local Government Homelessness and Social Housing Group Charter (The Charter) was formed in August 2020.

3. OUR PRIORITIES FOR THE NATIONAL HOUSING AND HOMELESSNESS PLAN

Recognising the role of local government

Local governments play a significant, and often unheralded, role in advocating for, partnering, and facilitating social and affordable housing outcomes for their communities. As the closest level of government to communities themselves, councils have great understanding and insight into local need for social and affordable housing as well as potential land and locations appropriate for development.

Local governments work in partnership with Federal and State governments, and public and private sector partners, in a coordinated approach to enable increased provision of social and affordable housing and enhanced service responses to homelessness. This role goes well beyond what is described in the issues paper of being a mere planning authority and highlights the need for all levels of government to work in concert to address the lack of social and affordable housing and close the shortfall.

Local governments are active in assessing population needs on an ongoing basis. Analyses of priority cohorts and appropriate locations are conducted at the local level using a range of approaches and methodologies borrowed from the planning literature and whilst conclusions are drawn in earnest, there is often little guidance and direction from other levels of government as to the extent of alignment with future development criteria and priorities. The criteria to which social and affordable housing developments are justified, and decisions made, mostly remain opaque. This needs to improve for councils to be an effective partner of State governments. Enhanced information sharing between different levels of government is crucial.

Local governments perform community engagement and educational functions through listening and responding to community concerns, as well as disseminating information that supports greater awareness throughout the community on the nature of, and need for, social and affordable housing. The range of concerns can differ depending on the location and demographic make-up of an area making Councils well placed to respond.

To effectively respond to social and affordable housing need, local governments are a critical partner, bringing local knowledge, connections, and influence to, what is ultimately, a place-based challenge. The Plan should reflect that sustainable place-based solutions are only possible in true partnership with local government at all stages.

Recommendation 1 – That the National Plan recognise the critical and diverse role of local government as a partner in delivering social and affordable housing outcomes and commit Federal and State Governments to provide the requisite resources, information sharing, and platform to execute this function.

Partnering with State and Federal Government

To meet the current and forecast needs for social and affordable housing, Council also needs to partner with the State and Federal Governments for investment of both capital and land. Land is an expensive component of delivering social and affordable housing and land holdings of all levels of government should be reviewed to meet the shortfall.

There is Federal and State government owned land that is currently not being used to its full potential, given its proximity to public transport, services, education, employment, and public open space, and may be appropriate for social and affordable housing consideration. Council recognises the potential value of surplus Victorian and Commonwealth Government land and where appropriate to provide additional social and affordable housing stock. Local governments can also leverage their own land for social and affordable housing outcomes; however, they need the financial support from other levels of government to both facilitate the development of that land but also to make sure that the appropriate supports are in place to make that successful.

For any national plan, leveraging existing Federal and State infrastructure projects, particularly when already happening at locations with good transport access and nearby services, is critical. Currently in Victoria for example, the Level Crossing Removal project is not being adequately leveraged despite occurring along train lines. Local government can be a valuable partner here, with its aforementioned role in building community and knowledge of community's needs.

Recommendation 2 – That the National Plan commit all levels of government to work more effectively together on identifying sites and delivering the projects for increased social and affordable housing.

The role of the private sector and our planning system

The private sector has an essential role in delivering social and affordable housing. The plan emphasises a need for faster planning approvals to increase housing supply, however, due to capacity constraints within the building sector more planning permits being issued will not necessarily lead to more housing being built. Moreover, there is clear evidence that planning approvals are not the primary obstacle to increased housing supply.⁷ Additionally, the lack of diversity being currently delivered by the private housing market (e.g. lack of one bedroom housing), means greater supply will never meet the needs of very low to moderate income households. Market intervention is necessary and overdue.

In Victoria, the facilitation of social and affordable housing is currently voluntary, a mechanism which does not produce the outcomes at scale needed to address the social and affordable housing shortfall, either now or into the future. Whilst local governments in Victoria were encouraged by the 2018 provision to enter into local agreements with developers (known as Section 173 agreements), these agreements are being routinely overturned by state level administrative tribunals (VCAT in Victoria) and not resulting in the delivery of social and affordable dwellings at scale. These

⁷ The Municipal Association of Victoria (MAV) has identified 120,000 dwellings across Victoria that have planning approval but have not commenced construction. Reference: <https://www.mav.asn.au/news/first-steps-taken-lets-walk-together>.

agreements are also complex, time and resource intensive.

Local governments need the ability to mandate social and affordable housing in developments. As part of commitments within its own Affordable Housing Strategy and Charter membership, Casey City Council advocates that statewide mandatory mechanisms such as inclusionary zoning and affordable housing contributions be introduced to provide certainty to the private sector and effect the scale required. In a 2017 'Understanding Inclusionary Zoning Brief', the Australian Housing and Urban Research Institute (AHURI) demonstrated how planning systems can be leveraged through inclusionary zoning to deliver more social and affordable housing.⁸ Successful inclusionary zoning models exist in London and New York, and South Australia have already made it mandatory.⁹ We can learn from these examples. Given local governments' role in processing the majority of planning applications, local planners have a deep knowledge of the barriers and challenges within the planning system. Accordingly, any legislative reform should be co-developed with local government, drawing on expertise and 'on-the-ground' experience. The time is now for all levels of government to embrace mandatory inclusionary zoning to address the housing shortfall.

Recommendation 3 – That the National Plan commit State Governments' support for broad use of mandatory inclusionary zoning, including co-developing the reform with local government and setting a timeline for its implementation.

Recommendation 4 – That, prior to implementation of reforms in recommendation 3, the National Plan commit State Governments to reduce the barriers for councils to negotiate and enforce affordable housing agreements.

The need for local and regional perspectives

As previously discussed, housing and homelessness challenges manifest differently region to region, municipality to municipality. A regional or even place-based focus is necessary to understand the particular local challenges and devise local solutions. Significant challenges within the City of Casey itself include:

- Family violence the main reason (40% of cases) that women and children seek support from specialist homelessness services in Casey.¹⁰
- Second highest number of female adults (aged 20 or over) who accessed specialist homelessness services in 2021-22 of Victorian LGAs.¹¹
- Third highest number of children (aged 0 to 9) who accessed specialist homelessness services in 2021-22 of Victorian LGAs.¹²
- Second highest number of residents living in overcrowded dwellings for Victorian LGAs.¹³
- Housing stress is an increasing issue as costs of living put pressure on household finances. Some of the highest rates of mortgage and rental stress for very low-income earners are found

⁸ Gurran, N., Milligan, V., Baker, D., Bugg, L., & Christensen, S. (2008). New directions in planning for affordable housing: Australian and international evidence and implications. AHURI final report, 120, 1-143.

⁹ *Ibid.*

¹⁰ AIHW (2019). Specialist Homelessness Services Collection (SHSC) ad hoc request, 2017-18.

¹¹ AIHW (2022). Specialist Homelessness Services Collection (SHSC) data cubes, 2021-22.

¹² *Ibid.*

¹³ ABS (2021). Census 2021: Estimating Homelessness.

in Casey's growth areas.¹⁴

- A housing mix mismatch where Casey has the second lowest rate of studio/one-bedroom dwellings (0.8% or 992 dwellings) for Victorian LGAs, with thousands on the Victorian Housing Register seeking one-bedroom dwellings (the overwhelming dwelling preference).¹⁵

Strategies that recognise and respond to this local context are required. Moreover, agreed targets co-developed by all levels of government would provide a compact and shared understanding of objectives. Without specified targets for local housing supply, the public, private, and not-for-profit sectors lack an organising force for measuring success. Establishing agreed definitions of social and affordable housing are an essential step in setting targets. There still exists far too much ambiguity in what constitutes affordable housing with other concepts such as 'key worker housing' muddying the waters further. Legislated definitions of all relevant terms are critical to shared success.

When considering appropriate locations for social and affordable housing, the local context and priority cohorts must again be front of mind. In the case of social housing (for very low and low-income households amongst other priority cohorts), ideal locations are, of course, ones that afford ready access to employment, education, health providers and other services, and public transportation. Regarding the last criterion, the City of Casey encompasses both established and significant growth areas, with poor to average public transport coverage, making these ideal locations in most cases a rare commodity. A narrow focus on rail services further limits prospective social housing locations. Within this outer suburban context, bus service access must be considered given they are often the only option available. Additionally, depending on the cohort and location, consideration should be given to whether social housing occupants will likely have access to a car. Transportation considerations are just one example where applying criteria that work in an inner urban or middle ring suburban context may require adjustment for the outer suburban context.

Recommendation 5 – That the National Plan commit all levels of government to co-develop regional targets for social and affordable housing which stipulate housing typologies according to local need.

Recommendation 6 – That the National Plan establish agreed definitions of social and affordable housing to enable effective setting of targets.

Recommendation 7 – That the National Plan support an expanded view of social housing locations, considering the local context and target cohort.

Prevention and 'Housing First' in the homelessness service system

Casey City Council advocates the importance of an integrated approach to addressing homelessness and promoting the value of locally driven service coordination. This includes the provision of services, accommodation, and available pathways to transition out of homelessness and up through the housing continuum. Council acknowledges that providing safe, accessible, and secure housing –

¹⁴ .id (informed decisions), City of Casey Housing Monitor. Retrieved from <https://housing.id.com.au/casey/>.

¹⁵ ABS (2021).

known as a “Housing First’ approach – is the priority for people experiencing homelessness.¹⁶

Once a person experiencing homelessness has appropriate housing, multidisciplinary support services can help in their transition. As mentioned earlier, services within the region are inadequate to meet the demand. In the absence of sufficient emergency housing service providers, there is anecdotal evidence that operators of Rooming Houses are compelled to assist individuals find accommodation through their networks. These operators are often not equipped with the expertise of a formal service provider. A Rooming House Standards Taskforce, commissioned in 2009 by then Victorian Premier John Brumby, found predatory behaviour of some operators of intentionally sub-standard rooming houses who prey on some of the most vulnerable members of the community.¹⁷

Greater focus and investment are also needed to prevent homelessness before it occurs. The Productivity Commission reported that around 2,000, or 7% of tenants in public housing were evicted in 2012-13.¹⁸ This was despite an existing program – the Victorian Tenancy Plus program (formerly Social Housing Advocacy and Assistance Program: SHASP) – proving to be a successful model intervention with most people who engaged maintaining their tenancy.¹⁹ Other successful programs include the Education First Youth Foyers which provide targeted housing and support for young people into education and employment for up to two years who are experiencing or are at imminent risk of homelessness. The five-year evaluation of the Education First Youth Foyers in Victoria found that 85% of the young people were in work or education twelve months after exiting the foyer, 75% had completed Year 12 or higher and 50% were in their own housing, with only 2% in crisis accommodation.²⁰ With proven models already out there, what is lacking is the funding and implementation at scale.

Another cohort for which modest support would prevent homelessness, Casey City Council has over 350 people seeking asylum living in the Casey community.²¹ Most people seeking asylum do not receive any welfare or rental assistance from the Federal Government due to changes made to the eligibility requirements for Status Resolution Support Services (SRSS) in 2018. Hence it should be no surprise that it was found in 2021, Australia-wide, 56% are at risk of being evicted from their homes, 55% are at risk of homelessness, and 14% were homeless.²² Council has been a Refugee Welcome Zone since 2013 and been a member of the national advocacy coalition known as the Local

¹⁶ AHURU (2018). What is the Housing First model and how does it help those experiencing homelessness? The benefits of prioritising housing for those experiencing homelessness. Retrieved from: <https://www.ahuri.edu.au/analysis/brief/what-housing-first-model-and-how-does-it-help-those-experiencing-homelessness>.

¹⁷ Victorian Government (2009). Rooming House Standards Taskforce Chairperson's report. Retrieved from: <https://www.vgls.vic.gov.au/>.

¹⁸ Productivity Commission (2017). Introducing competition and informed user choice into human services: Reforms to human services-draft report. Retrieved from: <https://www.pc.gov.au/inquiries/completed/human-services/reforms/report/human-services-reforms.pdf>.

¹⁹ *Ibid.*

²⁰ Coddou, M., Borlagdan, J., & Mallett, S. (2019). Starting a future that means something to you: outcomes from a longitudinal study of Education First Youth Foyers. Melbourne: Brotherhood of St Laurence.

²¹ Department of Home Affairs (2023). Illegal maritime arrivals on bridging E visa. Retrieved from: <https://www.homeaffairs.gov.au/research-and-stats/files/unauthorised-maritime-arrivals-bve-june-2023.pdf>.

²² Refugee Council of Australia (2021). Homelessness and hunger among people seeking asylum during COVID-19. Retrieved from: <https://www.refugeecouncil.org.au/homelessness-and-hunger-among-people-seeking-asylum-during-covid-19/>.

Government Mayoral Taskforce Supporting People Seeking Asylum since 2021. Restoring income support would prevent some of our most vulnerable community members falling into homelessness.

Recommendation 8 – That the National Plan take a ‘Housing First’ approach to homelessness.

Recommendation 9 – That the National Plan commit to developing Emergency Accommodation service capacity that meets the demonstrated need.

Recommendation 10 – That the National Plan commit to funding proven models of homelessness prevention and facilitate the implementation of them at scale.

Recommendation 11 – That income support be restored for people seeking asylum awaiting their claims to be assessed to prevent homelessness.

Improving the current tenancy system

Changes ought to be made to the current tenancy system to improve outcomes for tenants by increasing funding provisions to tenant advocacy groups and organisations across the country. In Victoria, there is limited access to support (by Tenants Victoria) due to the high number of people in acute crisis. Those with existing tribunal claims, or those unable to access their home due to flood, fire, storm, etc. take precedence, limiting prevention work. As call centres do not take non-emergency calls, early prevention, advice, and advocacy is lacking, which would otherwise support tenants with information about their rights and options to legally act against inadequate housing standards.

Recommendation 12 – That the National Plan commit State Governments commit to increasing funding provisions to tenant advocacy groups and organisations across Australia.

4. LIST OF RECOMMENDATIONS

The following recommendations are made by Casey City Council, both for the benefit of its own residents as well as residents elsewhere in Australia.

1. That the National Plan recognise the critical and diverse role of local government as a partner in delivering social and affordable housing outcomes and commit Federal and State Governments to provide the requisite resources, information sharing, and platform to execute this function.
2. That the National Plan commit all levels of government to work more effectively together on identifying sites and delivering the projects for increased social and affordable housing.
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11. That income support be restored for people seeking asylum awaiting their claims to be assessed to prevent homelessness.
12. That the National Plan commit State Governments commit to increasing funding provisions to tenant advocacy groups and organisations across Australia.