



Submission to the Inquiry into the redevelopment of Melbourne's public housing towers

Housing for the Aged Action Group

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About Housing for the Aged Action Group

Housing for the Aged Action Group (HAAG) is a member-based, community organisation specialising in the housing needs of older people. The organisation has over 900 members across the country actively working towards achieving housing justice. Established over 40 years ago as a grassroots movement, the organisation has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across Victoria and the country. HAAG is the only organisation of its type in Australia that specializes in Housing and Homelessness for older people, and as such, we bring a valuable perspective to policy development and service delivery.

During the 2023-24 financial year, HAAG supported over 1,800 older Victorians. HAAG was established based on the recognition that having safe, affordable, accessible and long-term housing is fundamental to healthy ageing and the wellbeing of older people. However, an increasing number of older people are experiencing homelessness, at risk of homelessness, or in housing stress. These older Victorians are retiring into insecure and unstable housing, and the number experiencing this is only continuing to grow.

Cost of living pressures, due to skyrocketing housing costs and the significant inadequacy of Age Pension and Jobseeker payment are pushing older people into severe housing stress and poverty. These are in addition to a lack of affordable housing due to decades of underinvestment by governments in social and affordable housing, a retirement system that assumes home ownership and structural gender inequality. And yet, we know that as people age their need for secure, affordable and appropriate housing grows in importance.

HAAG welcomes the opportunity to provide input into the Inquiry into the redevelopment of Melbourne Public Housing Towers. This submission is based on our experience delivering housing and related support services to older people, research and lived experiences of older people experiencing housing stress or homelessness in Victoria. HAAG has a robust history of public housing advocacy and understands the



tangible impact that secure, affordable long-term housing can have on people's livelihoods. We especially acknowledge the contributions to this submission made by members of HAAG's advisory groups and our members who have made their own submissions and contributed to HAAG's submission by voicing their experiences.

This submission:

Our submission is informed by extensive consultations with our members, whose firsthand experiences provide crucial insights into the challenges facing older public housing residents. Through comprehensive surveys, dedicated working groups, and previous submissions on housing policy, our members have consistently highlighted the urgent need for affordable housing reform. HAAG thanks the following experts with lived experience whose invaluable insights and perspectives have helped shape this submission:

- **National Alliance of Seniors for Housing**
- **Retirement Accommodation Action Group**
- **LGBTQIA+ Community Reference Group**
- **Culturally and Linguistically Diverse Reference Group**
- **40+ HAAG Members who contributed to our Public Housing Survey**

Our ongoing casework with older people navigating housing insecurity uniquely positions us to understand both systemic issues and individual impacts. This grassroots perspective, combined with our policy expertise, enables us to offer recommendations that address the practical realities faced by older Australians in the housing market. The lived experiences of our members demonstrate that current "affordable housing" definitions fail to serve those most vulnerable, particularly aging Australians on fixed incomes who fall between eligibility thresholds for different housing supports.

Our recommendations:

1. Ensure that 100% of housing built on public land remains in public ownership and there is no loss of public housing.
2. Release any existing or commission new independent expert building reports for each of the 44 high rises that provides an accurate condition report, as well as options for refurbishment and renovation to modern energy efficiency and accessibility standards.
3. Fund dedicated support to older renters to understand their rights and options.
4. Adequately fund repairs and maintenance of public housing.
5. Exempt refusals of offers in high rises from being considered “valid offers” and provide tenants with clear timelines.
6. Implement the recommendations from the Social Housing Regulation Review.

Further Recommendations

7. Increase Public and Community Housing Stock
 - a. Increase public and community housing in Victoria to 10% of the total housing stock by 2040.
 - b. Ensure that 20% of this housing is ringfenced for older people to reflect an ageing population growth and demographic changes.
8. Legislate a Definition of Affordable Housing
9. Safeguard Rights and Provide Support for Older Renters in Relocation

1. Ensure that 100% of housing built on public land remains in public ownership and there is no loss of public housing.

Government must maintain 100% ownership and management of public housing on public land to protect vulnerable tenants' rights, affordability, and housing security. As outlined in the 8 Shared Principles identified by Inner Melbourne Community Legal Centre¹:

- (a) The Victorian Government must invest in and grow public housing stock. There should be no reduction of public housing on the renewal sites as a result of the redevelopment.
- (b) No public land should be sold off in the redevelopment.

The Victorian Government's plans to "retire and redevelop" public housing towers in Flemington and North Melbourne raise serious concerns about the future of genuine public housing. While residents have been promised relocation assistance and the right to return, the proposed redevelopments will only increase "social" housing units by a mere 10%, with the majority of new apartments being privately owned. Critical details regarding land ownership, development types, and the preservation of public housing remain undisclosed.

HAAG strongly supports the retention and growth of public housing and is deeply concerned about the Victorian Government's deliberate shift away from public housing toward community housing – a change concealed under the umbrella term of 'social housing.' For older people, public housing provides essential protections through income-based rent caps (25%) and security of tenure that community housing often cannot match. Although community housing has a place in providing housing for low-income people, it cannot adequately address Victoria's enormous housing need on its own and is not equipped to provide housing to some of the most vulnerable people on the Victorian Housing Register.

¹ Recommendation 2; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.



HAAG assists approximately 150 older people annually to secure public and community housing, and so we are uniquely placed to observe the difference between these housing types for older tenants. For this reason, we support “growth in both”² public and community housing, and do not want to see any further loss of public housing through these redevelopments. Public Housing should continue to be a key component of Victoria’s social housing strategy.³

The Victorian Government should also ensure that substantial and increased public housing is maintained in Melbourne’s inner city, as central locations close to public transport, hospitals, public amenities, community spaces and services⁴.

All redeveloped housing must remain in public ownership with no net loss of public housing units. If community housing providers are to manage any portion of this housing on behalf of the government, they must be held to the same standards regarding allocation procedures, tenancy management practices, and rent-setting policies as public housing, as outlined in recommendation 7.

I see the effect in homeless, we need Public housing and Social and community housing. But as social and community housing is run by the not-for-profit sector when they make offers to people on the VHR the NFP companies will often select people off the VHR who have higher incomes so that they can take a larger rent fee for the 30% income proportional rent – HAAG Member
When living on a pension it is impossible to pay for a rental property and live off the rest of your pension – HAAG Member, 84

[Public Housing] provides stable, affordable housing. This enables people to live a life without the worry of being evicted from your housing and being able to have money available to pay energy bills and buy food and medicines. – HAAG Member, 69

² Victorian Public Tenants Association’s Response to the 10 year Social and Affordable Housing Strategy Discussion Paper <https://vpta.org.au/wp-content/uploads/2021/04/VPTA-response-to-10-Year-Social-and-Affordable-Housing-Strategy-discussion-paper-2021.pdf> pg. 6.

³ Victorian Public Tenants Association’s Response to the 10 year Social and Affordable Housing Strategy Discussion Paper <https://vpta.org.au/wp-content/uploads/2021/04/VPTA-response-to-10-Year-Social-and-Affordable-Housing-Strategy-discussion-paper-2021.pdf>.

⁴ Recommendation 9; Inner Melbourne Community Legal Centre’s Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne’s public housing towers.



"If the resulting new housing is retained as public housing in the same locations, I have no problems with replacement. We desperately need more high-quality low-income housing, so I care. Housing is a basic right." HAAG member, 77

It is an essential option for low-income older people as the community housing sector doesn't have the capacity to provide the scale required to meet the current and future need for older people and the private rental sector is too expensive and does not meet the needs of older people as they lose mobility and are faced with health issues. – Peter, 69.

- 2. Release any existing or commission new independent expert building reports for each of the 44 high rises that provides an accurate condition report, as well as options for refurbishment and renovation to modern energy efficiency and accessibility standards.**

The Victorian Government should engage in open and transparent decision-making when deciding to relocate and uproot residents' lives and communities, including being transparent with residents about how decisions are made and what evidence is being relied upon ⁵.

No publicly available documents justify the government's decision to demolish the public housing towers. If independent assessments of the buildings' condition have not been conducted by a third party with no financial or other vested interest in the redevelopment, it is essential that they be undertaken and made publicly available. If such assessments have already been completed, the government must release them immediately to ensure transparency and accountability.

It remains unclear whether all high-rises are beyond repair or if their conditions vary. While some towers have documented issues with heat and ventilation, it is not clear whether these problems can be addressed through refurbishment or if demolition is the only viable solution. Comprehensive, independent evaluations are necessary to determine whether upgrading the buildings to meet modern energy efficiency and accessibility standards is feasible.

This [Older Person's High Rise] block is really, really sound. It doesn't have any ongoing or serious issues. It was renovated in the mid-1990s where they turned about 200 bedsits into single apartments, so that the apartments are now twice the size they used to be. Some of the residents who were here living in the bedsits then are still living here now, and they saw the process of incorporation and it wasn't this disruptive. – Royal, mid 60's

⁵ Recommendation 4; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.



It doesn't make sense. Aware that there could be safety issues which surely can be addressed without putting hundreds out of their homes and their community.
– Diane, 79.

Totally unplanned and very badly timed in face of the current housing crisis. Decimates good community connections and will take years to demolish and re-build. Building costs and regulations have never been more onerous and it would have been much cheaper effective and better to renovate and add balconies to existing properties and increase security to control illegal drug use on estates. – Peter, 69.

I don't want to see the privatisation by stealth of public housing. It would be far cheaper for the government to renovate the existing flats rather than trying to make money out of a land grab. – Sue, 83

This is the most ridiculous plan. It will cost way more to demolish and rebuild than to renovate... It is not right that people's lives will be upended so the government can sell off many of the new builds to private developers. – HAAG member, 69

3. Fund dedicated support to older renters to understand their rights and options.

Relocation presents a significant emotional and physical burden for older residents in public housing, causing anxiety, loss of community, and health concerns during what should be their years of stability and security⁶. Many older residents, particularly those in general public housing rather than designated older persons' housing, lack access to tailored support services to help them navigate their rights and options. Without clear and accessible information, many are left uncertain about their housing future⁷.

While 12 high-rise buildings currently provide housing for residents over 55, redevelopment plans remain unclear and still years away. Current tenants and HAAG members frequently express satisfaction with their living arrangements, particularly valuing their proximity to essential services such as medical clinics, public transport, and community support networks. However, uncertainty around relocation and a lack of dedicated support services are leaving many older residents vulnerable.

Key concerns raised by residents include:

- Lack of certainty regarding when and how relocations will occur.
- Displacement from established communities, particularly affecting more vulnerable groups such as older LGBTQIA+ residents, CALD communities, and disabled people.
- Dismantling of the Older Person's High-Rise Program, with reductions in staffing and staff being used as intermediaries to deliver bad news rather than providing meaningful support.

Many older tenants remain invisible within the broader public housing system. Those living outside designated older persons' high-rises do not have access to tailored services and struggle to navigate an increasingly complex housing landscape.

⁶ Recommendation 1; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.

⁷ Recommendation 6; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.



Currently, no independent, dedicated support exists to help them understand their rights, access clear information, and receive relocation assistance when necessary.

A funded, independent service dedicated to supporting older renters would provide essential assistance by:

- Ensuring tenants receive timely, accessible, and transparent information about redevelopment plans.
- Offering relocation support, including advocacy for fair and appropriate housing alternatives.
- Providing specialized assistance for older tenants who do not live in designated older persons' housing.
- Rebuilding trust by offering independent guidance separate from Homes Victoria or government agencies.

Older public housing tenants must not be left to navigate these challenges alone. The establishment of a dedicated support service would be a crucial step toward ensuring their housing rights are protected and that they can make informed choices about their future.

At my age and with a terminal illness, [this has] been unsettling – Marlene, 76, public housing resident.

Truly the liberal moment is over and naked capital has triumphed if a Labor government has come up with this scheme to break up communities for the profit of a few. – Jo, 60.

Some of us don't have a lot of money & with the cost of living being so ridiculous, affordable, safe housing is very important. If the Housing office worked more efficiently to re-let vacant properties it would be much better. – Branagh, 69.

It is said that older people are not discriminated against. If you are on a government pension the Real Estate Agents don't recommend you to Landlords because of the amount of your income, so the older you get and rents going up older people are being pushed out of private rentals. So then comes public housing, with a waitlist 10 years long, that could give older people security indefinitely. I am lucky at the moment as I am in Private rental,



however, if my rent goes up again this year, I will not be able to afford it. – Deborah, 69.

I live in public housing and, although I don't live in the high-rise buildings that are being demolished, the building I live in is very old. I am worried that the govt will want to demolish the building I live in, and the buildings around mine, next and that me and my son will be houseless again. Lack of security around housing as I age is a huge source of stress for me. I worry for all those people in the high-rises losing their homes, communities and support networks. – HAAG Member, 61.

Many older people cannot withstand the expense and physical effort of moving every 12 months due to the whims of a poor-quality landlord or "housing provider". Secure housing, whatever the sector, means a better life – Will, 63.

[I feel] more anxiety about the future, to be honest. I do not feel there will be housing for me as I grow older. The governments that serve the banks and billionaires may well try to dig a pit and push us all into it, or some of us may choose to end our lives earlier. – Will, 63.

As we age we need more support from community, and everyone knows rich people have no sense of community. Only the poor are generous. Old people have much still to give, if given time. – Jo, 60

4. Adequately fund repairs and maintenance of public housing.

Public housing in Victoria has been systematically underfunded, leaving many older tenants in unsafe and inaccessible homes. Urgent action is needed to ensure proper maintenance, accessibility upgrades, and temperature regulation so that older people can age in place safely.

Approximately 50% of HAAG's clients in 2023/24 had mobility issues affecting their housing needs. Many could remain independent with simple modifications like ramps and handrails, but the backlog of essential repairs means these changes are often delayed or ignored. Future public housing developments must incorporate best-practice accessibility standards from the outset, rather than treating accessibility as an afterthought.

Temperature regulation is also a critical issue. While portable air conditioning units have been provided to some tenants, many decline them due to electricity costs, struggle to use them, or find them ineffective in extreme weather. These band-aid solutions fail to address long-term climate resilience in public housing⁸.

Additional key concerns include:

- Severe maintenance delays, leaving tenants in deteriorating conditions.
- Unsafe living environments, including broken fixtures, leaks, and faulty wiring.
- Loss of green spaces, essential for social connection and well-being.

"Before, maintenance used to be bad. Now, it's impossible. You wait months for someone to even look at a problem." – HAAG member

Successive governments have ignored maintenance and upgrades - the day of reckoning has arrived. – HAAG member.

⁸ Recommendation 7; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.



The government must commit to sustained investment in public housing upkeep, ensuring that:

- Repairs are done promptly, so tenants are not left in hazardous conditions.
- Accessibility modifications are funded and prioritized.
- Adequate heating and cooling solutions are implemented.

Without urgent investment, older tenants will continue to suffer in unsafe, unsuitable housing. The government must take action now to ensure public housing remains liveable, dignified, and accessible for all.

5. Exempt refusals of offers in high rises from being considered “valid offers” and provide tenants with clear timelines.

Older public housing tenants should not be penalised for refusing offers in high-rise buildings, particularly when these placements fail to meet their needs. Some older people reject high-rise housing due to concerns about accessibility, safety, and future displacement, yet under the current system, these refusals are counted as “valid offers”, putting tenants at risk of being deprioritised for alternative housing.

At the same time, a lack of clear relocation timelines is causing stress and uncertainty. Many tenants do not know when or how they will be affected by redevelopment, making it difficult to plan for their future. Older people, particularly those with disabilities or chronic health issues, require transparent and written relocation timelines to make informed decisions.

To provide fairness and certainty, the Victorian Government must:

- Exclude refusals of high-rise offers from being counted as “valid offers.”
- Provide clear, written relocation timelines so tenants understand their rights and options.
- Prioritise stable, accessible housing solutions that allow older renters to remain in their communities.

Without these changes, older public housing tenants will continue to experience unnecessary stress, housing instability, and a lack of genuine choice in the relocation process.

If the government goes ahead and demolishes the towers now, where are all the current tenants going to go? We need more housing made available BEFORE any decision to demolish the current housing. - Heather, 66

I do not know how they are intending to re-house tower residents. I am very concerned that the displacement will affect already disadvantaged people. - Laurian 74



Where will all of those public housing tenants live during the rebuild? There is a chronic shortage of accommodation so I would like to know where hundreds of tenants will be housed. Also will they be able to return to their original flats? People have jobs, support networks, schools and transport in the areas in which they currently live. – HAAG member, 69

I wonder about the logistics, relocating people, uprooting their lives, returning them if they choose, the impact of change on tenants who have high support needs, on the children. Ideally the relocation would be nearby to reduce the impact of loss of community: this would not be easy. Relocating people to outer suburbs where infrastructure is not in place, is demonstrably stressful. – Louise, 70

Many people have lived in these flats for years and have formed a community there. This sense of community will be lost if the flats are demolished. There are no guarantees that residents will be rehoused in the same suburb or when and how they will be rehoused. – Sue, 83

6. Implement the recommendations from the Social Housing Regulation Review.

HAAG urges the Victorian Government to fully implement the recommendations of the Social Housing Regulation Review, ensuring that the redevelopment of Melbourne's public housing towers is carried out in genuine consultation with tenants and the housing sector. A more detailed government response is needed to clearly outline the reasoning behind decisions to support, modify, or reject each recommendation.

HAAG strongly supports uniform service delivery and tenant management standards across public and community housing, ensuring that all tenants have the same rights and protections. However, community housing providers' financial models create a disincentive to house people on the lowest incomes, undermining equitable service delivery. To apply common standards meaningfully, the government must address these financial barriers and ensure that tenants displaced by redevelopment are guaranteed secure, affordable housing.

Other Matters: Further Recommendations

7. Increase Public and Community Housing Stock

- a. Increase public and community housing in Victoria to 10% of the total housing stock by 2040.
- b. Ensure that 20% of this housing is ringfenced for older people to reflect an ageing population growth and demographic changes.

Increasing the number of public, community and affordable homes is essential to address the housing crisis facing Victoria.

Victoria has the lowest rates of social housing in the country. In 2023, the proportion of social housing households in Victoria was 2.8% (a decline from 3.5% from 2014) compared to 4.1% nationally.⁹ Given the scale of the issue, Victorian government should urgently increase public and community housing stock to bring the housing level to the national average.

The 2021 Census recorded that there were about 85,000 older people in the lowest two income quintiles in the private rental market in Victoria.¹⁰ Since then, there was an 'unusually strong pace of growth in rent values nationally from late 2020, where the estimated median weekly rent value across Australian dwellings increased by \$115 through to the end of April 2023'.¹¹ These older renters are now likely to be in significant rental stress, at risk of or experiencing homelessness.

⁹ Australian Institute of Health and Welfare, Housing assistance in Australia, 2024, accessible at: <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia/contents/households-and-waiting-lists>

¹⁰ Housing for the Aged Action Group, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia, 2023, supplementary information Decades of Housing Decline: 2011 & 2021 Census Analysis Victoria accessible at: <https://www.olderrenters.org.au/publications/decades-of-housing-decline-2011-2021-census-analysis-victoria>

¹¹ Core Logic, Housing Affordability Report: Reflections on the Pandemic and the Rental Market, 2023, accessible at: <https://www.corelogic.com.au/news-research/reports/housing-affordability>



Measures to increase the supply of general or affordable housing to address the current housing shortages across the country will not increase supply for the most vulnerable older people, unless it is dedicated public or community housing. While Victorian and Federal programs designed to increase social housing, such as the Big Housing Build, are providing important increases in homes, these are not enough to meet the needs of low- and middle-income Victorians. With growing demand and the unprecedented housing crisis, we are calling on the government to invest more in public and community housing.

HAAG supports calls from the sector for increasing public and community housing to 10% of all housing stock by 2040.

I thought the government were building more public housing not removing a large amount of it – HAAG member, 84

I am scared of being homeless in the future – Debbie, 64.

It makes the hope of getting any help with housing even further away, to very much non existent. – HAAG member, 59

We can't afford open market rent also you don't have any grantee that you can stay there – Patricia, 77

When living on a pension it is impossible to pay for a rental property and live off the rest of your pension – HAAG member, 84

8. Legislate a definition of affordable housing

The Victorian Government has committed to allocating a proportion of rebuilt housing on public housing estates as 'affordable housing'. However, the definition of 'affordable' currently varies between housing providers, creating inconsistency and a lack of enforcement.

Affordable housing should be defined as housing that costs no more than 30% of household income for people in the lowest 40% of income households. This definition should apply consistently across all State or local government-funded housing projects, including those where private developers receive government incentives or land/capital contributions¹².

Affordable housing represents a critical option for older people who don't qualify for public and community housing. Currently, Homes Victoria defines affordable housing as charging rents no higher than market rate, capped at 30% of median income, with 3-year leases. Different approaches exist for Melbourne (up to 10% below market rent) and regional areas (up to market rent)¹³. These rates remain prohibitively expensive for older Australians, particularly those no longer employed.

This situation effectively excludes older people from affordable housing options when they don't qualify for public or community housing based on their savings. The current structure also incentivises housing providers to target higher-income households to maximise their 30% revenue share.

To ensure equitable access to affordable housing for older Australians from low to moderate-income households, affordable housing costs should be capped at 30% of the individual household's income, implement a meaningful discount from market rates, and specifically designate affordable dwellings for households in the bottom 40% income brackets.

¹² Homes Victoria, Affordable, accessible at: <https://www.homes.vic.gov.au/homes-victoria-affordable>

¹³ Public Accounts And Estimates Committee, Inquiry into the 2021–22 and 2022–23 Financial and Performance Outcomes, accessible at: <https://www.parliament.vic.gov.au/4afee5/contentassets/457afe827b3549fdac8d30faa116c3a5/paec-2021-22-and-2022-23-fpo-24-nov-2023-dffh.pdf>

9. Safeguard Rights and Provide Support for Older Renters in Relocation

Public housing residents, especially older people, deserve robust protection of their rights throughout all phases of development projects that affect their homes and communities¹⁴. This can be achieved by providing:

- Provide specific, trauma-informed support for older LGBTQIA+, disabled, and culturally and linguistically diverse (CALD) renters.
- Offer accessible information and relocation support to older public housing residents.
- Ensure home modifications and accessibility adjustments are available for older tenants as needed.
- Provide specific support and information to 55+ people on the public housing waiting list.
- Legislate a binding guarantee of the right to return for all displaced public housing tenants.
- Implement a moratorium on forced relocations until all tenant protections, return options, and alternative housing plans are clearly established and independently monitored.

Further, the Victorian Government should consult with relevant stakeholders – centring the views of community members most directly impacted by any housing or relocation decisions – before decisions are made, in line with established government processes and best practice¹⁵.

Talk to residents and get their opinions. There is a need for far more public housing, not less. – HAAG member

People on the wait lists need to be consulted on design – HAAG member, 56

¹⁴ Recommendation 3; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.

¹⁵ Recommendation 5; Inner Melbourne Community Legal Centre's Eight Shared Principles; Submission to Inquiry into the redevelopment of Melbourne's public housing towers.