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Submission to the Parliamentary Inquiry into the redevelopment of Melbourne's Public Housing towers

31 March 2025

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Who we are

RAHU is a member-run union. We are renters, Public Housing tenants, squatters, the homeless, home-owners, and people in unstable housing from all Australian states and territories. Collectively we organise for the right to affordable, accessible, and appropriate housing for all, through self-advocacy, education and eviction defence.

Acknowledgement of Country

RAHU acknowledges that we live and work on the stolen and unceded lands of First Nations peoples across this continent. As the custodians of these lands we pay our respects to their elders, ancestors and warriors past, and present.

We recognise that First Nations peoples are first and foremost affected by displacement, dispossession, and housing insecurity, and as such RAHU commits to engaging with the continued struggle for decolonisation.

<https://rahu.org.au/commitment-to-decolonisation/>

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Submission Summary

- **RAHU strongly condemns and calls for an immediate halt to the demolition of 44 public housing towers** and the privatization of the sites of the towers.
 - RAHU emphasises specific concerns regarding the **impact on residents** and the **lack of transparency** surrounding these demolitions.
 - RAHU believes that **alternatives to public housing**, such as community housing, affordable housing, and new builds, are **insufficient** and **more costly** when compared to the retention and upgrading of existing public housing.
 - RAHU observes the government's **prioritisation of the private interests over public good**, and its resulting **exacerbation of the housing crisis**.
 - RAHU notes that the voices of public housing tenants are frequently overlooked by the government.
 - **RAHU urges the government to invest in public housing as a fundamental human right.**
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Recommendations

Our central demands are to retain, repair, and reinvest in Public Housing.

1. Immediately cease the demolition of Public Housing.
 2. Halt the leasing and sale of public land.
 3. Facilitate genuine government consultation and engagement with Public Housing tenants regarding decisions that impact them.
 4. Build, repair, or acquire 20,000 properties for use as Public Housing every year until the state's Public Housing waiting list hits zero.
 5. Ensure that all LGAs (Local Government Areas) in the state have a minimum 15% of dwellings be Public Housing.
 6. Eliminate means testing for Public Housing, making it accessible to all, and removing such burden from current tenants.
 7. Phase out government support for market-based Affordable Housing and NGO-operated Community Housing.
 8. Improvements of Public Housing management to fully accommodate and support tenants and their needs.
 9. Conduct extensive maintenance and improvements on all Public Housing to align with the standards mandated for private rentals.
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Definitions

There is ambiguity about the meaning of words when discussing government interventions (or lack thereof) in the housing space. In this document going forward we use these definitions of words:

- **Public Housing** - Government owned and operated housing rented to tenants.
 - **Community Housing** - Rented housing provided by NFPs (Not For Profits), NGOs (Non-Governmental Organisations) and Charities.
 - **Social Housing** - Umbrella term used to refer to both Public and Community Housing
 - **Affordable Housing** - Rented housing provided in a market context and market but with consideration for affordability and lower rates
 - **Market Housing** - Rented housing provided in a private context and market without any consideration for affordability.
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General remarks

The Renters And Housing Union (RAHU) welcomes the opportunity to submit comments to the Legislative Council Legal and Social Issues Committee in relation to the Victorian Parliamentary Inquiry into the redevelopment of Melbourne's Public Housing towers.

As a member-led union of Public Housing tenants, renters, and people in unstable and insecure housing, we are outraged by the Victorian Minister for Housing's recent announcement that the Public Housing towers across Melbourne will be demolished with no commitment for new Public Housing.¹

RAHU strongly condemns the plan to demolish 44 Public Housing tower estates and the privatisation of the land on which they currently stand. This announcement is especially egregious when compared to the recent announcement that the similarly aged VicRoads offices in Kew will be converted into modern housing.²

Despite positive framing that this project is "delivering hundreds of homes", the vast majority of these will be Community or (so called) Affordable Housing, not Public Housing. RAHU calls for investment in *Public Housing* that is fully owned and operated by the government, with rent capped by income and secure tenancy. The government's plan to replace almost all of the Public Housing with community and private housing further erodes the state of Public Housing in Victoria.

The planned demolitions will massively increase stress, expenses and costs for families who are amongst some of our most vulnerable Victorians, and the proposed solutions are utterly inadequate to address the costs of the government's actions.

¹ *Landmark Renewal Project Delivering Hundreds Of Homes*. (2025). premier.vic.gov.au <https://www.premier.vic.gov.au/landmark-renewal-project-delivering-hundreds-homes>; RAHU and SPHC condemn the Victorian State Government's "Innovative Ground Lease Model" (2025). rahu.org.au. <https://rahu.org.au/rahu-sphc-condemn-ground-lease-model/>

² *Unlocking Land + Converting Buildings = More Homes*. (2025). premier.vic.gov.au. <https://www.premier.vic.gov.au/unlocking-land-converting-buildings-more-homes>; RAHU response to Victorian Minister for Housing and Building Harriet Shing's statement "Unlocking Land + Converting Buildings = More Homes". (2025). rahu.org.au. <https://rahu.org.au/2025-03-02-response-to-harriet-shing/>

RAHU opposes these demolitions, we demand the government:

- **Be transparent about its decision making**
- **Commit to ending the housing waiting list**
- **Keep the homes on this land, and retain it as Public Housing.**

Government Investment

Public Housing is a vital form of social infrastructure and public investment and must be maintained as such. Demolishing Public Housing in the midst of a housing crisis is cruel, and will only exacerbate the housing crisis in Melbourne, and flow on to the rest of Victoria and the other states and territories.

As an internationally recognised human right, according to the United Nations; “[I]ncreasingly viewed as a commodity, housing is most importantly a human right.”³

It is clear that so-called “Affordable” and “Community” housing are insufficient in supporting individuals’ basic human right to shelter, particularly when rising costs are forcing people out of their homes. It is essential for both state and federal governments to intervene in situations where the market fails to provide adequate housing and meet Victorian’s basic rights.

As according to the government's own policy platform they will “ensure the current stock of Public Housing is maintained and expanded”⁴, we ask them to live up to this policy.

Impact on Public Housing residents

RAHU is outraged by the lack of consideration toward the health and wellbeing of Public Housing tenants who will be seriously impacted by compulsory relocation and displacement. In spite of recommendations from the *Inquiry into the Public Housing Renewal Program*, ‘no considerations have been made about any of these social and health impacts that displacement and forced relocation will have, and is having on Public Housing residents.’

Both independent and government commissioned research has found that in previous pilot projects, less than 20% of Public Housing residents were able to exercise their ‘right to return,’ despite state governments ostensibly guaranteeing the right to return.⁵ There is no

³ United Nations. (2022). *The human right to adequate housing*. OHCHR.
<https://www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing>

⁴ Victoria Labor. (2022). *Victoria Labor 2022 Platform*. Victoria Labor; Victoria Labor.
<https://viclabor.com.au/wp-content/uploads/2024/08/Platform-22-26-VicLabor.pdf>

⁵ Kelly, D., & Porter, L. (2019). *Understanding the assumptions and impacts of the Victorian Public Housing Renewal Program Final report of a research project with Cities of Moreland, Darebin and Yarra*.
<https://cur.org.au/cms/wp-content/uploads/2019/05/understanding-the-assumptions-and-impacts-of-the-phrp-final-report-28-5-19.pdf>

evidence, nor actual reassurances from the Victorian government that these demolitions would result in a different outcome.

Fundamentally many Public Housing residents do not want to leave Public Housing to move into Community Housing because of both the higher rents and the more insecure nature of such tenures. Forcing hundreds of households to relocate in the middle of a housing crisis is a daunting task even for households with high incomes; let alone some of the poorest in our community. This is made worse given that rental affordability is the worst on record.⁶ It condemns these households to a lifetime of insecure, unaffordable housing. That is even before accounting for the long term impacts on resident's social, emotional and physical wellbeing. It is a well established fact that poverty leads to a far greater cost for the government in the areas of social service provision, health and law enforcement.

Public Housing tenants deserve to have a meaningful say in decisions about their housing and be treated with dignity. It is appalling that the government has not listened to residents and members of the community who have been organising protests and calling for the government to change the decision to displace them. Public consultation must meaningfully engage with and respond to Public Housing tenant concerns.

The lack of respect or care shown for public tenants by the Victorian Government in this latest plan echoes the COVID-19 hard lockdown of Public Housing towers in 2020.⁷ This impacted public tenants including those in the first three tenanted towers identified for demolition:

1. 33 Alfred Street, North Melbourne
2. 12 Holland Court, Flemington.
3. 120 Racecourse Road, Flemington.

Tenants in these towers, still affected by the trauma of the hard lockdown, are again being forced to endure a top-down decision about their lives. The disregard shown by the Government towards public tenants across these estates also sits in a broader context of racial profiling by Victoria Police and racist vilification in the media of these communities.⁸

Broadly, the most recent attack on the towers are a part of a larger, long-term strategy by the Victorian Government to bring an end to Public Housing in the state. Rather than attending to widespread housing insecurity by investing in a form of housing tenure that will alleviate stress for some of our most marginalised households, the Government has leaned further

⁶ Witte, E., & Ratnam, K. (2024). 2024 Rental Affordability Index. SGS Economics & Planning. <https://sgsep.com.au/publications/insights/rental-affordability-index-2024>

⁷ Victorian Ombudsman. (2020). Tower lockdown breached human rights, Ombudsman finds. Victorian Ombudsman. <https://www.ombudsman.vic.gov.au/our-impact/news/public-housing-tower-lockdown/>

⁸ Pittaway, Troy & Dantas, Jaya. (2021). African Youth Gangs: The Marginalization of South Sudanese Young People in Melbourne, Australia. Journal of Immigrant & Refugee Studies. 22. 1-17. 10.1080/15562948.2021.2017534

into market 'solutions' which are known to be inadequate and are proven consistently to fail.⁹ The Government has withdrawn investment in maintaining and building Public Housing which predictably has led to a deterioration of conditions of the household in Public Housing, increasing wait times, and inadequate or even no responses to maintenance and repair requests.¹⁰

The Government's decision to step back from housing provision has involved a gradual process of replacing Public Housing with various alternatives such as community and Affordable Housing. The issues with these alternatives are numerous, and elaborated on later in the "Alternatives to Public Housing" section of this submission.

Lack of transparency

The Government has claimed *without providing evidence* that these buildings are "no longer fit for modern living" and are not worth refurbishing.¹¹ Contrarily, published research from OFFICE suggests that refurbishment is more cost effective than the Government's current demolition plan.¹²

It is unacceptable that the government has failed to share any documents that provide a clear and justifiable rationale for demolishing the 44 towers, nor is there any rationale publicly available for using public land to build predominantly private housing.¹³

The Victorian government has a responsibility to the public and to residents of the towers. It is not clear that alternatives were seriously considered before making this decision. Without transparency, the government skirts their responsibility to be accountable to the public. A lack of transparency will lead to community distrust of government decisions and a reluctance to engage with important services.

Alternatives to Public Housing

None of the government's alternatives to Public Housing are able to meet the needs of the most vulnerable in society. Community Housing, Affordable Housing, and New Builds all have major issues and lack the ability to meet basic needs and minimum standards required

⁹ Lawson, J., Pawson, H., Troy, L., van den Nouwelant, R., & Hamilton, C. (2018). Social housing as infrastructure: An investment pathway. AHURI Final Report, 306.
<https://doi.org/10.18408/ahuri-5314301>

¹⁰ Henriques-Gomes, L. (2020, October 25). Decades of neglect: Victoria has built less than 10% of its Public Housing pledge as waiting list swells. The Guardian.
<https://www.theguardian.com/australia-news/2020/oct/26/decades-of-neglect-victoria-has-built-less-than-10-of-its-public-housing-pledge-as-waiting-list-swells>

¹¹ Premier of Victoria. (2024, September 24). Australia's Biggest Ever Urban Renewal Project | Premier of Victoria. Premier of Victoria.
<https://www.premier.vic.gov.au/australias-biggest-ever-urban-renewal-project>

¹² OFFICE. (2024). Retain repair reinvest flemington estate: Feasibility study and alternative design proposal OFFICE.
https://office.org.au/api/wp-content/uploads/2024/10/Retain-Repair-Reinvest-Flemington-Estate_OFFICE_Full-Report.pdf

¹³ <https://www.theage.com.au/national/victoria/judge-startled-by-victoria-s-no-documents-claim-in-housing-towers-case-20240917-p5kb5w.html>

for housing such households. This, along with a variety of other issues that are detailed below, is why RAHU advocates for Public Housing; and why we remain steadfastly against the use of alternatives to Public Housing.

Community Housing

The largest issues with Community Housing is their management by non-governmental organizations (NGOs). While NGOs may operate under the guise of being "not-for-profit," their practices and business models often mirror those of for-profit businesses. Just because an organisation is classified as not-for-profit does not mean it operates purely out of charity. These organisations often enrich their employees and CEOs, with salaries for executives sometimes rivaling those in the for-profit sectors. Despite their *actual name*, often these not-for-profit NGO's make huge profits. For example, Evolve – a NSW based not-for-profit Community Housing provider – made over \$16 Million in profits in the 2022-2023 financial year.¹⁴

The lack of accountability of NGO's in the Community Housing sector is a major issue. With undemocratic, technically complicated and opaque practices, there is often little transparency in decision-making, and tenants rarely have any way of knowing and understanding how decisions are being made and how they can be involved with such decisions. The aforementioned Ombudsman's report highlighted that the complaint systems in these organizations are inadequate, with many tenants finding them less responsive and effective compared to the Public Housing system.

Public Housing, in comparison, offers far greater transparency due to the pre-existing structures within the Victorian Government; Along with clearer procedures and far fairer practices and established methods for listening to and addressing tenant grievances.

NGO's can also be connected to ideological, religious or other beliefs that can be prejudicial towards tenants. RAHU members (who wish to remain anonymous) have spoken to us about an experience living in Community Housing owned by a cult, with the cult placing intense pressure on the households to join them. We've also heard anecdotal evidence from several tenants who alleged discrimination and being rejected from Community Housing on the basis of their sexuality; with the housing in question being owned by one of the largest christian organisations in the country.

While such prejudice or discriminatory practices are technically illegal, households in such housing are often unable or unwilling to risk potentially compromising their access to housing. In such a tight rental market with rampant power imbalances, tenants often have little choice but to put up with bad practices in order to remain housed. Further, often the households in such housing are already in poverty, and aren't in a position to cover legal costs to fight such discrimination—which is notoriously hard to prove in such situations.

¹⁴ Kelly, C., & Convery, S. (2024, April 26). "It's not the 19th century": tenants in new social housing block in Victoria say they go weeks without flushing toilets. The Guardian. <https://www.theguardian.com/australia-news/2024/apr/27/its-not-the-19th-century-tenants-in-new-social-housing-block-in-victoria-say-they-go-weeks-without-flushing-toilets>

Even if one doubts such discrimination; It is not appropriate to force households with trans or gender diverse individuals to go into Community Housing provided by the Salvation Army; Which has been accused multiple times of prejudice against LGBTQI+ people.¹⁵ It is especially worthwhile to highlight the Salvation Army, given it makes large profits from Community Housing.¹⁶

This is especially the case when we compare it to Public Housing. Once again, the secular nature of government and public provisioned housing means such discrimination - real or perceived is unable to occur.

Affordable Housing

The term “affordable” is completely misleading. While one might think it may relate to something more concrete or based on the *tenants* income, in reality what meets definition of Affordable Housing is based upon the *prevailing market rate*. These homes are priced according to a percentage of market rates. And considering the conditions of the market, as well as its variability in past years, what meets this definition of “affordable” in reality often means most low-income households are unable to afford such prices. The core issue with Affordable Housing is that it is based on market-driven prices rather than what is realistically affordable for the target demographic.

The lease terms in Affordable Housing are often restrictive, with tenants only allowed to stay as long as they remain eligible for the program (this is known as “means testing”). This lack of tenure security creates instability, as tenants can find themselves displaced when they no longer qualify, leaving them vulnerable to housing insecurity. It, counter-intuitively, creates incentives to keep one's own income down, especially when vacancy rates are low, they are likely to be kicked out if their income increases.

Affordable Housing projects also rarely offer long-term leases, further contributing to the temporary and uncertain nature of such arrangements. The temporary nature places stress on these vulnerable households in such housing, and contradicts the stability and security that Public Housing is able to offer.

Affordable Housing also *doesn't* make sense from an economic viewpoint. The way Affordable Housing gets its lower rates is via subsidies to a private landlord. “Affordable Housing” leads to the government directly supporting a “job” that is notorious for acting as

¹⁵ Salvation Army denies trans prejudice after Michael Sheen tweet. (2021, February 2). BBC. <https://www.bbc.com/news/uk-wales-55902917>; Del Valle, G. (2019, December 16). *The Salvation Army's anti-LGBTQ controversies, explained*. Vox. <https://www.vox.com/the-goods/2019/12/16/21003560/salvation-army-anti-lgbtq-controversies-donations>; Street, A. P. (2016, December 7). *Why I won't be supporting the Salvation Army this Christmas*. The Sydney Morning Herald. <https://www.smh.com.au/national/nsw/why-i-wont-be-supporting-the-salvation-army-this-christmas-20161207-gt5ohs.html>

¹⁶ *Salvation Army made a Profit of \$7 Million dollars from providing Community Housing in 2023 - 2024 financial year* - Salvation Army Housing. (2024). 2023-2024 Annual Report. In Salvation Army. https://www.salvationarmy.org.au/subscribe/sites/housing/files/Annual_Reports/annual-report-2023-2024.pdf

an economic “sponge”, providing little value in the overall economy.¹⁷ Public Housing allows for the government to actually make revenue, and a net gain over the long term — even when accounting for setup costs. Any profits from Public Housing increase government revenue; Meanwhile, any profits occurring from “Affordable Housing” become private gains with, by definition, subsidies not being able to create revenue for the government. Cameron Murray detailed this further, but in summary; Over the long run (i.e: 10+ years).¹⁸ Public Housing is a cheaper solution than “Affordable Housing.”

New Builds

“New Builds” — as the Victorian Government refers to them — falls under a large umbrella of a variety of different Community, Affordable, and Private Housing. However, the issues elaborated on here are reported on from across all New Builds done by the Victorian government.

A primary issue is many of the New Builds feature smaller apartments that are unsuitable for larger households. This problem disproportionately affects migrant families where extended families or multiple generations often live together.

New builds also often suffer from lower building standards, compromising the quality and safety of the living environment.¹⁹ Despite what the government says; These buildings often fail to meet the durability and livability standards necessary to provide long-term comfort and security for tenants and follow the same standards as Public Housing.

Summary

The alternatives to Public Housing are not able to offer the same level of support, stability, and security that Public Housing can provide. They all have major and significant flaws that make them all a worse solution and a poor substitute for the most vulnerable Victorians. Public Housing is a far superior way to deliver housing in Victoria that is able to effectively meet the needs of those who require housing, providing a stable and secure foundation for individuals and families in need.

¹⁷ Smith, A. (1776). Chapter XI - Of the Rent of Land. In *An Inquiry into the Nature and Causes of the Wealth of Nations*. Cosimo; Aly, W. (2023, October 14). *In Australia, why do people who produce nothing get rewarded the most?* Prosper Australia.
<https://www.prosper.org.au/2023/09/in-australia-why-do-people-who-produce-nothing-get-rewarded-the-most/>

¹⁸ Murray, C. (2022, March 22). *Public Housing is way cheaper than rental subsidies*. FreshEconomicThinking.com; Fresh Economic Thinking.
<https://www.fresheconomicthinking.com/p/public-housing-is-way-cheaper-than>

¹⁹ Kelly, C., & Convery, S. (2024, April 26). *“It’s not the 19th century”: tenants in new social housing block in Victoria say they go weeks without flushing toilets*. The Guardian.
<https://www.theguardian.com/australia-news/2024/apr/27/its-not-the-19th-century-tenants-in-new-social-housing-block-in-victoria-say-they-go-weeks-without-flushing-toilets>

Statements from RAHU members

"I lived in Public Housing for the first 21 years of my life with my mum, dad and older sister. My parents still live there. Prior to that my parents lived in a rental apartment in a one bedroom apartment with my baby older sister. I don't recall how long they were on the waiting list but I recall it was a big deal when my grandparents got accepted with a Public Housing flat. Then they got a public house in a 3 bedroom with my whole family. It was really important because they were recent migrants, factory workers and were looking for stable housing. There was a lot of financial strain so having Affordable Housing was important to raise kids. We were close proximity to schools and a community of other similar places individuals. Despite an increase in crime within the area, we were able to feel safe that we had a home at least."

"My parents still live there and are so lucky to have had a place to live for over 30 years. Similarly, my grandparents also received a Public Housing with my uncle. This meant that the whole family could stick together in Australia far from their more difficult lives overseas. Years later, I applied for Public Housing. It took 5 years to let know that a flat was finally available. It's clear how high the demand is with such little Public Housing in comparison. My family is very lucky to have had government Public Housing, would this not have been the case, it's very likely that I wouldn't have a home for myself today."

- Mich, North Melbourne

Content Warning: mention of suicide

In late December of 2022, after being forced to move back in with my mother by the ongoing, worsening & deepening housing crisis, I tried to kill myself.

As a result of this, I now have an acquired brain injury. I spent around eight months in hospital, first at the RMH Parkville campus, and then at the Royal Park rehabilitation campus. It wasn't until I was discharged to the Austin Hospital outpatients department that it was finally discovered that I had a badly & chronically dislocated right elbow. To date, I've had to have two procedures on this elbow; including one aborted surgery after it was discovered that a vital part for my elbow reconstruction was missing. I'm slated for a third procedure on my right elbow on the 19th of September to remove a part of the reconstruction that has failed, leaving my right elbow partially dislocated again and with a pin loose. As I'm sure you can only begin to imagine, this is extremely painful. I have spasticity in all of my limbs, I use a motorised wheelchair, I have extreme tightness in my hands, and I can barely lift my arms.

I need assistance to feed, wash and toilet myself. For about a year, I could barely speak in an intelligible fashion. I've been told that I will never again speak in what I think of as "my" voice. For many, many years, ever since I was a young teen, all I wanted was a place of my own to call home. I tried to die by suicide because I could not access affordable housing that was safe for me.

And so I'm sure you can appreciate why it is that as your constituent, I'm deeply concerned about Labor's plans to demolish and privatise our state's 44 Public Housing towers.

This is an alarming thing to do in the middle of a housing and homelessness crisis. This plan will displace more than 10,000 people, break up communities and move vulnerable Victorians away from the health and social services they need. It just doesn't add up to me.

As part of the plan, across Melbourne 6,660 public homes are going to be destroyed. There is no Public Housing guaranteed on this land into the future. The average increase in "social" housing proposed over the next 28 years, as part of this plan, is just 15 homes per year. Again, this does not make any sense.

- Cassandra, Brunswick

"I believe the towers should not be demolished, Public Housing is scarce enough as it is it makes no sense to knock it down and replace it with privatised land. As someone who spends about 60% of my income on rent, on a month to month contract that I can be kicked out from at any time, I am in desperate need of cheaper and secure housing. And I think Public Housing is by far the best solution for this."

- Athena, Preston

"I didn't grow up in Melbourne, but did need to move into the state during a very unstable part of my life. I was exploited in abusive private sharehouse arrangements, targeted by rental scams and still have to bear the brunt of not being able to afford a home. If I had Public Housing, like many of my newfound friends in the Public Housing towers, this would not have happened.

To me, the public towers are a Melbournian icon and showcase what is possible when we care about our community, and work to guarantee personal freedom on the basis of a truly fair basis for life."

- Jordie, Bentleigh

"I work for a small non-profit, earning about 30k per year, there's simply no way I can afford to rent in the current market. I'm very lucky to have a friend give me a stable home, but human needs should not be based on luck."

- Harry, Thomastown

"Public Housing allows people to stay in their communities. It is stressful enough as it is being low income but at least they have that stability. I can count on one hand the number of renters I know who have stayed in their community for a decade (it's one). "Social" housing will mean higher rent increases, more evictions, and more wealth leaving the families who most need it. We are asking for the towers to remain."

- Elle, Carlton

Further Reading

- https://office.org.au/api/wp-content/uploads/2024/10/Retain-Repair-Reinvest-Flemington-Estate_OFFICE_Full-Report.pdf
- https://office.org.au/api/wp-content/uploads/2022/11/OFFICE_RRR_Barak-Beacon_Report.pdf
https://alastairswaynfoundation.org/wp-content/uploads/2022/07/Retain-Repair-Reinvest_OFFICE.pdf
- <https://www.monash.edu/mada/news/2025/demolition-should-be-the-last-resort-for-melbournes-44-public-housing-towers> - There's a link to a comparative study in this article
- <https://www.office.org.au/resources/>
- <https://www.ombudsman.vic.gov.au/our-impact/news/social-housing-renters-failed-by-poor-complaint-handling-systems-ombudsman-says/>