



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

Tenants Victoria

31 March 2025

Our offices are on Wurundjeri Woi Wurrung Country. Our work gives us a special insight into the value of place and home, and we respect the Wurundjeri people's ongoing connection to Country, culture and community. We also acknowledge the connection of all First Nations peoples on whose Country Victoria is today situated. We recognise that sovereignty was never ceded and pay our respects to Elders past and present.

About Tenants Victoria

Tenants Victoria is the peak body for Victorian renters, and the rental law specialist community legal centre in Victoria.

Our vision is for safe, secure and affordable homes for Victorian renters in a fair housing system.

We provide information and referrals, legal advice, casework support, representation, financial counselling, and social work services to renters experiencing hardship and disadvantage, each year assisting more than 10,000 individual renters. We also provide rental law advice, support, and training to tenancy and community sector workers, and advocate to make laws fairer for Victorian renters.

More specifically, in the context of this inquiry, Tenants Victoria is dedicated to a fair housing system, and safe, secure and affordable housing for all. For some renters, that will only be achieved through social housing. Tenants Victoria has long-standing experience performing legal and advocacy work for and with public and community housing renters, and we work to improve their rights. We also provide advice and assistance to those at risk of homelessness or dealing with housing insecurity.

Acknowledgments

Tenants Victoria acknowledges the support of the Victorian Government.



This Centre is accredited by



Tenants Victoria | P.O. Box 18022, Melbourne VIC 3000

ABN 36081348227 | ACN 081 348 227

tenantsvic.org.au

Safe, secure and affordable homes

Contents

| | |
|---|----------|
| Recommendations | 4 |
| Introduction | 6 |
| Social impacts of government-initiated relocation on public housing renters | 6 |
| The importance of open and ongoing communication with affected residents | 7 |
| Building standards and features for new housing | 10 |
| The importance of public housing | 11 |
| The need for an ongoing increase in public and community housing stock | 14 |

Recommendations

Recommendation 1: Seek to provide affected renters with appropriate relocation offers close to their current housing.

Recommendation 2: Where affected renters are unable to be offered relocation proximate to their existing neighbourhoods and communities, recognise that greater funding and support will need to be available for important local services and amenities.

Recommendation 3: Identify important local services and amenities that play a role in supporting the strength of communities residing in redevelopment sites. Consult with these services and amenities, and where necessary, provide funding to support their continued success through the relocation period.

Recommendation 4: The Victorian Government should commit to clear and transparent communications campaigns, that are tenant-centred and are continually reviewed throughout the relocations process.

Recommendation 5: Communication with impacted residents should be consistent with the principles:

- Honest and transparent
- Timely
- Accessible, offered in plain English and languages other than English, and supported by verbal communication
- Frequent and repetitive so that all residents can be informed
- Subject to regular review
- Informed by tenant-centred consultation with a partnership approach
- Supported by a sufficient level of detail so that residents may forward plan

Recommendation 6: Renters should be provided with information that helps them to understand the difference between public and community housing, and how it might apply to them.

Recommendation 7: The Victorian Government should clearly define and communicate the right of return for impacted renters.

Recommendation 8: The right of return should include a right to return to the site a household has relocated from, and any exceptions to this right should be clearly communicated.

Recommendation 9: Where a right of return is unlikely to be feasible, households should be informed of this, and of what rights are guaranteed.

Recommendation 10: Existing public renters should be subject to public housing policies and rent settings during relocation.

Recommendation 11: Mixed-tenure redevelopments must be designed in a way that intersperses different tenure types throughout the building, ensuring that tenure types are indistinguishable.

Recommendation 12: Mixed-tenure redevelopments must not include any features such as entrances, amenities or shared common spaces that are delineated by tenure type.

Recommendation 13: Redevelopments should feature the following characteristics:

- Well-located near amenities, transport, jobs and services
- Co-designed via consultation with affected renters
- Energy efficient, comfortable, aesthetically pleasing, provide access to gardening and green space, be designed using universal design principles, be physically adaptable to renters through varying life stages and degrees of disability, safe and healthy, universally accessible
- Appropriate for meeting priority and under-served needs (e.g. singles, large family units)
- Appropriate for meeting the needs of the range of household types likely to be living in the public housing towers
- Designed for a variety of household sizes
- Located near on-site or adjacent facilities with relevant support services
- Designed to ensure all residents from all tenure types have access to common areas and amenities, including entrances

Recommendation 14: The Victorian Government should make commitments ensuring the redevelopments do not lead to a net decrease in public housing in Victoria.

Recommendation 15: Implement the recommendations of the Social Housing Regulation Review.

Recommendation 16: All proposed evictions during the relocation period should be subject to Homes Victoria approval, contingent on whether the eviction is consistent with public housing practice.

Recommendation 17: The Victorian Government should commit to a higher social housing uplift target than 10% on the redevelopment sites.

Recommendation 18: The Victorian Government should increase social housing stock on an ongoing basis to match the national average proportion of total housing stock.¹

¹ The Housing Peaks Alliance has commissioned new modelling on Victorian social housing targets, and this will be provided at a later date.

Introduction

Tenants Victoria welcomes the opportunity to respond to the Legislative Council Legal and Social Issues Committee Inquiry into the redevelopment of Melbourne's public housing towers. This inquiry follows the 2023 announcement in Victoria's Housing Statement that all 44 of Melbourne's public housing towers will be successively demolished and replaced. The Victorian Government has said that the existing public housing towers are "...reaching the end of their useful lives, and no longer fit for modern living."²

The Housing Statement seeks to address the housing crisis that Victoria currently finds itself in. Having access to a safe, secure and affordable home is a right that is essential for health, wellbeing and dignity, and participation in the community through employment, education or social activities. In the current housing crisis, conditions in the private rental market are difficult, complicated by historically high house prices, low vacancy rates (around 2% in Melbourne), large rent increases, a very high cost of living and very low real wage growth.³ Renters, including those on middle incomes who previously would have moved into home ownership, are remaining in the rental market longer. Many Victorian renters are now experiencing insecure housing, and under current conditions, some face homelessness.⁴ Recent investments in social housing have been welcome, however, they have not been of the necessary scale to overcome decades of underinvestment in social housing, and waitlists continue to grow.

These factors are making the private rental market more inaccessible for renters for whom the private rental market has proven unable to provide safe, secure and affordable homes. Many of these renters need public and community housing. Given this context, government must ensure all affected tenants maintain their access to safe, secure and affordable social housing during and after the redevelopment. It is essential that the government gets this relocation process right and ensures throughout that affected public renters retain their current tenancy rights and protections, whether they are in public or community housing. At such a critical time, low income and vulnerable renters must not be unnecessarily exposed to housing insecurity and the private rental crisis.

Social impacts of government-initiated relocation on public housing renters

The Victorian Government has proposed that all 44 public housing towers be demolished and redeveloped by 2051, a process that will affect approximately 10,000 renters.⁵ Each redevelopment is estimated to take six to eight years to complete, and each affected renter will likely need to move up to twice before the process is over – first to a temporary property, and then back to the original neighbourhood if this is what the renter chooses.⁶

² Victorian Government Department of Premier and Cabinet (2023). Victoria's Housing Statement: the decade ahead 2024-2034. Accessed 4 March 2025. [Weblink](#).

³ Anglicare (2024). Victorian Rental Affordability Snapshot 2024. Accessed 4 March 2025. [Weblink](#); Victoria State Government, Department of Families, Fairness and Housing (2024). Rental report. Accessed 4 March 2025. [Weblink](#); Australian Bureau of Statistics (ABS) (2024). Wages. Accessed 24 March 2025. [Weblink](#).

⁴ Anglicare (2024). Victorian Rental Affordability Snapshot 2024. Accessed 4 March 2025; Pawson, H., Parsell, C., Clarke, A., Moore, J., Hartley, C., Aminpour, F. & Eagles, K. (2024). Australian Homelessness Monitor 2024. Sydney: UNSW City Futures Research Centre. Accessed 18 March 2025. [Weblink](#).

⁵ Victorian Government Department of Premier and Cabinet (2023). Victoria's Housing Statement: the decade ahead 2024-2034. Accessed 4 March 2025. [Weblink](#).

⁶ Homes Victoria (2025). Frequently asked questions. Accessed 13 February 2025. [Weblink](#).

Tenants Victoria understands, based on advice from Homes Victoria, that all renters subject to relocation to date have been able to be offered a temporary property close to their existing home. Relocation, especially outside of the neighbourhood in which people already live, can result in renters being removed or distanced from their social networks, supports, services, communities and employment. As such, this process will represent a significant and sustained change and disruption for affected renters. It is important to ensure that the existing communities in the public housing towers, and their strengths, are protected during the proposed relocation process.

A 2018 national survey of renters found that over 50% of renters reported they had to connect to new local services whenever they were required to move properties – such as finding a new family doctor, new community groups and a new place of worship.⁷ This survey also found that over 50% of renters worried, when having to move, about increased distance from their support networks and existing social and community groups, and the isolation this could cause for them.⁸

Having to relocate from communities and support systems can also result in unexpected additional costs for the renter, such as having to pay for professional childcare rather than being able to rely on a trusted friend or neighbour to assist with childcare.⁹

Ideally, many of these potential social and economic impacts will be minimised or mitigated by ensuring affected renters are relocated to sites close to their current housing. Should this no longer be possible in future redevelopments, dedicated planning needs to go into ensuring that relocated communities, impacted services and places of worship are supported to retain their important community networks through the relocation period.

Recommendation 1: Seek to provide affected renters with appropriate relocation offers close to their current housing.

Recommendation 2: Where affected renters are unable to be offered relocation proximate to their existing neighbourhoods and communities, recognise that greater funding and support will need to be available for important local services and amenities.

Recommendation 3: Identify important local services and amenities that play a role in supporting the strength of communities residing in redevelopment sites. Consult with these services and amenities, and where necessary, provide funding to support their continued success through the relocation period.

The importance of open and ongoing communication with affected residents

Communication about the redevelopment process and the relocations it necessitates must be transparent, and place residents' needs and preferences at the centre. In the first announcement of the redevelopment plan, there was significant scope for improved communications with residents about the demolition and redevelopment of the public housing towers. Tenants Victoria understands that some

⁷ National Shelter, Choice and the National Association of Tenant Organisations (NATO) (2018). Disrupted: the consumer experience of renting in Australia. Accessed 5 March 2025. [Weblink](#).

⁸ National Shelter, Choice and the National Association of Tenant Organisations (NATO) (2018). Disrupted: the consumer experience of renting in Australia. Accessed 5 March 2025. [Weblink](#).

⁹ Tenants' Union of New South Wales (2022). Eviction, Hardship and the Housing Crisis. Accessed 27 February 2025. [Weblink](#).

residents who found out about the plan through the media found that this experience took an emotional toll on them.¹⁰ A study of previous relocations of public housing tenants in Victoria found that clear, honest, early and ongoing information provision is critical to achieving a successful process and reducing stress for affected tenants.¹¹ The communication of the second phase of the redevelopments, including sites in Richmond and South Melbourne, included improved availability of timely information for impacted renters.

The Victorian Government should commit to continual review of communications campaigns with residents throughout the relocation process to ensure that best practice is achieved and disruption to tenants is minimised.

We recommend the following principles to guide further communications for this process.

Future written communications should be:

- Honest and transparent
- Timely
- Accessible, offered in plain English and languages other than English, and supported by verbal communication
- Frequent and repetitive so that all residents can be informed
- Subject to regular review
- Informed by tenant-centred consultation with a partnership approach
- Supported by a sufficient level of detail so that residents may forward plan

Communications should also reflect that, at present, there are critical differences between public and community housing, such as rent setting and policies and practices that affect renters. If, after the relocation, renters are to be moved from public to community housing tenures, this needs to be clearly communicated from the start, along with information about the differences between public and community tenancies. If residents are to be subject to new policies and settings, they should be informed.

Recommendation 4: The Victorian Government should commit to clear and transparent communications campaigns, that are tenant-centred and are continually reviewed throughout the relocations process.

Recommendation 5: Communication with impacted residents should be consistent with the principles:

- Honest and transparent
- Timely

¹⁰ Silva, K. and Willingham, R. (2024). Residents sue the Victorian government over public housing demolition plans. ABC News. Accessed 27 February 2025. [Weblink](#).

¹¹ Porter, L., Davies, L., Ruming, K., Kelly, D., Rogers, D. & Flanagan, K. (2023). Understanding the drivers and outcomes of public housing tenant relocation, AHURI Final Report No. 413. Australian Housing and Urban Research Institute Limited, Melbourne. Accessed 10 February 2025. [Weblink](#).

- Accessible, offered in plain English and languages other than English, and supported by verbal communication
- Frequent and repetitive so that all residents can be informed
- Subject to regular review
- Informed by tenant-centred consultation with a partnership approach
- Supported by a sufficient level of detail so that residents may forward plan

Recommendation 6: Renters should be provided with information that helps them to understand the difference between public and community housing, and how it might apply to them.

Right of return

The Victorian Government has confirmed that impacted residents will have a right to return.¹² While it is positive that a right of return has been confirmed, some uncertainty remains as to what this right means in practice. Tenants Victoria contends that this should mean that residents can opt to return to the site they have had to leave, and that any exceptions to this right should be clearly communicated.

A right of return is likely to have a relatively low rate of uptake. An evaluation of the 2008 redevelopment of public housing in Kensington found that even with a right of return in place, only 20% of residents returned to the estate, and another evaluation of a 2013 redevelopment of public housing in Carlton found that 40% of residents chose to return once the redevelopment was complete.¹³ Given historically low rates of utilisation of the right of return, it may be appropriate for redevelopment plans to alter the site makeup, such that redevelopments prioritise the needs of prospective households (denoted by the Victorian Housing Register) as well as relocated households.

Critically, if sites are to be redeveloped in a configuration that makes a right of return to the site unactionable for certain households (such as by developing fewer apartments suitable for large households than are currently resident) affected renters need to know what it means to have a right of return, so that they can make an informed decision about their relocation, and future.

Of particular note is that many of the towers currently accommodate large households, while much recent social housing development has focused on smaller household sizes. Existing large households in the public housing towers and future large households would benefit from a clear commitment from the Victorian Government to build homes suitable to their needs, whether on the existing site or surrounding neighbourhood.

The Victorian Government should communicate very clearly to affected residents about the right of return, and what it will involve. Publicly, the government has stated that current residents will have the

¹² Parliament of Victoria (2025). Legislative Council Hansard: Wednesday 19 February 2025. (Hon. Harriet Shing, Minister for Housing and Building). Accessed 18 March 2025. [Weblink](#).; Parliament of Victoria (2024). Legislative Council Hansard: Thursday 14 November 2024. (Hon. Harriet Shing, Minister for Housing and Building). Accessed 18 March 2025. [Weblink](#).

¹³ Chaplin, C., Hulse, K., Raisbeck, P. and Shaw, K. (2013). Evaluation of the Kensington redevelopment and place management models: Final Report. University of Melbourne Faculty of Architecture Building and Planning, prepared for the Department of Human Services. Accessed 10 February 2025. [Weblink](#).; Arthurson, K., Levin, I., and Ziersch, A. (2018). Experiences of tenants' relocation in the Carlton public housing estate redevelopment, Melbourne. Urban Policy and Research. 1-13. Accessed 20 February 2025. [Weblink](#).

right to return to their “current neighbourhood” once redevelopment is complete based on “...ongoing eligibility and needs and suitability of new homes”.¹⁴

Qualifying statements such as “subject to... suitability of new homes” are likely to leave renters uncertain as to whether the right of return is guaranteed. If the Victorian Government anticipates that certain households may not be able to be offered a suitable home in new developments, these households will need to understand what offers will be guaranteed.

The government has also publicly committed that “...there will be no change to renters' rights or security of tenure during their relocation.”¹⁵

Recommendation 7: The Victorian Government should clearly define and communicate the right of return for impacted renters.

Recommendation 8: The right of return should include a right to return to the site a household has relocated from, and any exceptions to this right should be clearly communicated.

Recommendation 9: Where a right of return is unlikely to be feasible, households should be informed of this, and of what rights are guaranteed.

Recommendation 10: Existing public renters should be subject to public housing policies and rent settings during relocation.

Building standards and features for new housing

The planned redevelopments with mixed-tenure housing must have the same building standards for public, community and private housing, and these different tenures should all be interspersed unit-by-unit within the same building so that tenure types are indistinguishable.¹⁶ The different sorts of tenure should also all have the same appearance, or be ‘tenure blind’, with social housing properties being properly integrated with any private housing. This approach minimises the stigma attached to social housing dwellings and increases the likelihood of achieving a successful and cohesive community.¹⁷ It should also be ensured that these new mixed-tenure properties enable all residents to move freely within the site and do not have features such as separate doors for social housing renters or separate recreational areas just for private renters.¹⁸ Such features create stigma and defeat the purpose of a mixed-tenure approach.

The redevelopments should also feature the following characteristics:

- Well-located near amenities, transport, jobs and services
- Co-designed via consultation with affected renters

¹⁴ Homes Victoria (2024). High-rise development Frequently Asked Questions. Accessed 10 February 2025. [Weblink](#).

¹⁵ Homes Victoria (2024). High-rise development Frequently Asked Questions. Accessed 10 February 2025. [Weblink](#).

¹⁶ Van Den Nouwelant, R. and Randolph, B. (2016). Mixed tenure development: Literature review on the impact of differing degrees of integration. City Future Research Centre, UNSW Built Environment. Accessed 12 March 2025. [Weblink](#).

¹⁷ Van Den Nouwelant, R. and Randolph, B. (2016). Mixed tenure development: Literature review on the impact of differing degrees of integration. City Future Research Centre, UNSW Built Environment. Accessed 12 March 2025. [Weblink](#).

¹⁸ Lucas, C. (2017). ‘Social mix’ approach to public housing is failing, research finds. The Age. Accessed 12 March 2025. [Weblink](#).; Wall, T. (2021). ‘Poor floors’: anger over new plan to segregate tower block residents. Accessed 12 March 2025. [Weblink](#).

- Energy efficient, comfortable, aesthetically pleasing, provide access to gardening and green space, be designed using universal design principles, be physically adaptable to renters through varying life stages and degrees and types of disability, safe and healthy, universally accessible
- Appropriate for meeting priority and under-serviced needs (e.g. singles, large family units)¹⁹
- Appropriate for meeting the needs of the current households living in the public housing towers
- Designed for a variety of household sizes
- Located near on-site or adjacent facilities with relevant support services
- Designed to ensure all residents from all tenure types have access to common areas and amenities, including entrances

Recommendation 11: Mixed-tenure redevelopments must be designed in a way that intersperses different tenure types throughout the building, ensuring that tenure types are indistinguishable.

Recommendation 12: Mixed-tenure redevelopments must not include any features such as entrances, amenities or shared common spaces that are delineated by tenure type.

Recommendation 13: Redevelopments should feature the following characteristics:

- Well-located near amenities, transport, jobs and services
- Co-designed via consultation with affected renters
- Energy efficient, comfortable, aesthetically pleasing, provide access to gardening and green space, be designed using universal design principles, be physically adaptable to renters through varying life stages and degrees of disability, safe and healthy, universally accessible
- Appropriate for meeting priority and under-serviced needs (e.g. singles, large family units)
- Appropriate for meeting the needs of the range of household types likely to be living in the public housing towers
- Designed for a variety of household sizes
- Located near on-site or adjacent facilities with relevant support services
- Designed to ensure all residents from all tenure types have access to common areas and amenities, including entrances

The importance of public housing

As per the government's eligibility criteria, Priority Access social housing is for people who are homeless and receiving support, escaping or have escaped family violence, have a disability or significant health needs or need to move for health reasons. People wanting to access social housing also must meet income eligibility (an income of a maximum of \$640 a week for a single person for Priority Access) and asset limits.²⁰ People who do not meet this Priority Access criteria but seek to live in social housing can register interest for the Victorian Housing Register (VHR) providing they are an Australian citizen or permanent resident residing in Victoria, with an income of a maximum of \$1,144 per week for a single

¹⁹ Housing Peaks Alliance (2020). Make social housing work: A framework for Victoria's public and community housing 2020-2030. Accessed 10 February 2025. [Weblink](#).

²⁰ Victoria State Government Department of Families, Fairness and Housing. (2024). Social housing eligibility. [Weblink](#).

person and assets worth no more than \$37,212.²¹ Social housing stock also helps put downward pressure on the private rental market.²²

Public housing is an essential feature of social housing and is, in Tenants Victoria's experience, currently the most secure type of tenancy for low-income renters and larger families on low incomes, including Culturally and Linguistically Diverse families and family violence victim survivors and their children. Public housing offers affordable, long-term and secure housing, with rent capped at 25% of a household's income.²³ Presently, community housing does not offer the same level of security, but with the framework recommended by the 2022 Social and Affordable Housing Regulation Review (SHRR), it is hoped that greater parity between the renter experience in the two sectors can be achieved.²⁴

While the Housing Statement committed to a 10% uplift in social homes as part of the demolition and redevelopment of Melbourne's public housing towers, no detail was provided about the make-up of this social housing, and specifically how much of it would be public housing. The make-up of social housing has been changing drastically across Australia, with public housing going from representing 81% of all social housing in 2011, to 67% of all social housing by 2023.²⁵

In Victoria there has been an emphasis on community rather than public housing for much of the recent past. Some renewed emphasis on increasing public housing stock has been evident recently, including through the Regional Housing Fund, and Carlton 'redbrick' tower redevelopments.²⁶ Nonetheless, the Victorian Government has continued to promote the comparative cost effectiveness of community housing over public housing.²⁷

Given this context, and the trends it establishes, the Victorian Government should ensure that appropriate priority is given to public housing through the redevelopment process. The redevelopments should not lead to a net decrease in public housing in Victoria.

Recommendation 14: The Victorian Government should make commitments ensuring the redevelopments do not lead to a net decrease in public housing in Victoria.

Community housing standards and the implementation of the Social and Affordable Housing Regulation Review

Recent Victorian Government announcements provided that some redevelopments will consist of community, rather than public housing.²⁸ As described above, there is some disparity in renters'

²¹ Victoria State Government Department of Families, Fairness and Housing. (2024). Social housing eligibility. [Weblink](#).

²² Australian Government National Housing Supply and Affordability Council (2024). State of the Housing System 2024. Accessed 18 March 2025. [Weblink](#).

²³ Johnson, G., Scutella, R., Tseng, Y., and Wood, G. (2018). How do housing and labour markets affect individual homelessness? Housing Studies. Accessed 10 February 2025. [Weblink](#).

²⁴ Social and Affordable Housing Regulation Review (2022). Final Report: Social and affordable housing regulation in Victoria. Accessed 12 March 2025. ; Tenants Victoria (2021). 10-year Social and Affordable Housing Strategy for Victoria. Accessed 24 March 2025. [Weblink](#).

²⁵ AIHW (2011). Housing assistance in Australia. Accessed 12 March 2025. [Weblink](#).; AIHW (2023). Housing assistance in Australia. Accessed 12 March 2025. [Weblink](#).

²⁶ Premier of Victoria Hon Jacinta Allan MP (2024). More homes means more opportunity in regional Victoria. Accessed 18 March 2025. [Weblink](#).; Premier of Victoria Hon Jacinta Allan MP (2024). Designs unveiled for hundreds of homes in Carlton. Accessed 18 March 2025. [Weblink](#).

²⁷ Newport, S. (CEO, Homes Victoria) (2023). Transcript: Legislative Council Legal and Social Issues Committee Inquiry into the Rental and Housing Affordability Crisis in Victoria. Accessed 24 March 2025. [Weblink](#).

²⁸ Premier of Victoria Hon Jacinta Allan MP (2025). Landmark renewal project delivering hundreds of homes. Accessed 18 March 2025. [Weblink](#).

experiences of public and community housing, which we hope can be reduced through the implementation of the SHRR recommendations.

While both sectors are subject to the *Residential Tenancies Act 1997*, public and community housing are subject to differing standards, procedures or policies on oversight mechanisms, service delivery standards and asset management standards. The practical impact of this is that community housing renters have fewer protections than public housing renters. The SHRR found that because of this, social housing renters “have different entitlements in relation to rent-setting rules, dwelling standards, tenancy conditions, customer service standards, maintenance arrangements, complaints and dispute resolution processes and likelihood of eviction”.²⁹ These findings are consistent with Tenants Victoria's observations, as we have seen through our work the relative difficulties community housing renters face in sustaining their tenancies and ensuring enforcement of rights, compared with their public housing counterparts.

Community housing regulatory standards need to be strengthened, and community housing policies should be made consistent with public housing policies.³⁰ Community housing policies must be transparent and supported by a robust accountability mechanism, and policies need to be made consistent with public housing policies relating to issues including temporary absences, rent setting, rent arrears, tenancy sustainment and dispute resolution.³¹ The SHRR has recommended that the government achieve these changes by implementing actions including establishing common performance standards for social housing (Recommendation 2.1) and enhancing the measurement of tenancy sustainment (Recommendation 3.6).³²

Any growth in community housing stock as a result of the redevelopment of the public housing towers should be complemented by implementation of the supports and protections for community housing renters recommended by the SHRR. Renters being relocated, potentially from public to community housing stock, must have adequate and uniform protections, particularly relating to tenancy sustainment.

Recommendation 15: Implement the recommendations of the Social Housing Regulation Review.

Evictions from community housing

Currently, another inequality that exists for community housing renters is the difference in eviction rates. Tenants Victoria's data shows that more community housing renters seek assistance from our organisation with eviction processes than public housing renters, despite the performance standards dictating that eviction should be a mechanism of last resort.³³ For example, from 1 July 2024 to 28

²⁹ Social and Affordable Housing Regulation Review (2022). Final Report: Social and affordable housing regulation in Victoria. Pg. 56. Accessed 12 March 2025. [Weblink](#).

³⁰ Tenants Victoria (2021). *Building a fair and effective social housing sector* – submission in response to Consultation Papers 2 and 3 of the Social Housing Regulation Review. Accessed 19 March 2025. [Weblink](#).

³¹ Tenants Victoria, Justice Connect, Inner Melbourne Community Legal, Peninsula Community Legal Centre, West Heidelberg Community Legal, Victorian Aboriginal Legal Service, Westjustice, Victoria Legal Aid (2022). Joint legal assistance sector response to the Interim Report of the Social Housing Regulation Review. Accessed 19 March 2025. [Weblink](#).

³² Social and Affordable Housing Regulation Review (2022). Social and affordable housing regulation in Victoria: Final Report. Accessed 12 March 2025. [Weblink](#).

³³ Victoria State Government (2015). Performance standards for registered housing agencies. Accessed 12 March 2025. [Weblink](#); Unison (2025). Ending a Residential Rental Agreement Policy. Accessed 19 March 2025. [Weblink](#).

February 2025, Tenants Victoria assisted 251 public housing renters across 447 matters. Of these matters, 11.2% (50 matters) related to a notice to vacate. For comparison, over that same period we assisted 252 community housing renters across 495 matters. Of these matters, 17.4% (86 matters) related to a notice to vacate. While the number of renters assisted between the two sectors is comparable, it is noteworthy that there are fewer community housing renters in Victoria than public renters, reflecting a high incidence of seeking Tenants Victoria's support. It is also noteworthy that a greater proportion of community housing matters related to a notice to vacate.

While it is positive that renters impacted by the redevelopments will have public housing policies applied by their community housing operator through the relocation period, practice is important too. The Victorian Government should, through Homes Victoria, review all proposed evictions of renters relocated to community housing, to ensure that evictions are consistent with public housing practice, and renters are not disadvantaged through the relocation process.

Recommendation 16: All proposed evictions during the relocation period should be subject to Homes Victoria approval, contingent on whether the eviction is consistent with public housing practice.

The need for an ongoing increase in public and community housing stock

The Housing Statement committed to a 10% increase in social homes through the redevelopment of the public housing towers. However, when compared with the number of people who are waiting to be allocated social housing in Victoria, this 10% increase will be insufficient if it is not accompanied by a much larger commitment to increase public and community housing stock, on an ongoing basis.³⁴ Analysis of Victoria's social housing waitlist reveals significant unmet need, and this must be met with decisive government action.

Victoria's social housing waitlist

As of June 2023, Victoria had 64,720 public housing dwellings and 16,363 community housing rental units.³⁵ By September 2024, there were 53,554 applicants on the Victorian Housing Register (VHR), the social housing waitlist, and 29,060 (54%) of these applicants were priority or greatest need applicants.³⁶ These figures demonstrate the massive unmet need for public and community housing in Victoria.

Such a large wait list means that individual households are subject to long waits, and the significant harms associated with prolonged housing instability. Data from the Department of Families, Fairness and Housing (DFFH) revealed that in 2023-24 the average waiting time for public housing access for priority applicants was 19.8 months, and 19.5 months for priority applicants who needed an allocation due to family violence.³⁷

³⁴ Victorian Government (2023). Victoria's Housing Statement. Accessed 12 March 2025. [Weblink](#).

³⁵ Australian Government Productivity Commission (2024). Report on Government Services 2024. Accessed 12 March 2025. [Weblink](#).

³⁶ Homes Victoria (2024). Applications on the Victorian Housing Register (VHR). Accessed 12 March 2025. [Weblink](#).

³⁷ Victorian Government Department of Families, Fairness and Housing (2024). Department of Families, Fairness and Housing Annual Report 2023-24. Accessed 12 March 2025. [Weblink](#).

To meet this demand, the Victorian Government should commit to an ongoing plan for continued growth in social housing stock which goes beyond the 10% increase promised by the Housing Statement. Recently it was announced that two of the first towers to be demolished and redeveloped (Racecourse Road Flemington and Alfred Street North Melbourne) will result in a 39% increase in social homes across the two sites.³⁸ This is significantly more than the current target of 10%, demonstrating that achievement of a higher level of ambition is possible.

Recommendation 17: The Victorian Government should commit to a higher social housing uplift target than 10% on the redevelopment sites.

Recommendation 18: The Victorian Government should increase social housing stock on an ongoing basis to match the national average proportion of total housing stock.³⁹

³⁸ Premier of Victoria Hon Jacinta Allan MP (2025). Landmark renewal project delivering hundreds of homes. Accessed 18 March 2025. [Weblink](#).

³⁹ The Housing Peaks Alliance has commissioned new modelling on Victorian social housing targets, and this will be provided at a later date.