



Building Designers  
Association Victoria

22 November 2017

The Secretary  
Legal and Social Issues Committee  
Parliament House, Spring Street  
EAST MELBOURNE VIC 3002  
Via email: [phrp@parliament.vic.gov.au](mailto:phrp@parliament.vic.gov.au)

Dear Secretary

### **Submission to the Inquiry into the Public Housing Renewal Program**

Thank you for the opportunity to present our contribution to the Inquiry into the Public Housing Renewal Program (PHRP).

The Building Designers Association of Victoria (BDAV) represents in excess of 1,600 members who are active building design professionals and offer services spanning the entire spectrum of building design services in Victoria and beyond. BDAV's membership consists of building designers, draftspersons, architects, interior designers, service designers, town planners, surveyors and energy raters.

As an association of professionals in the building design space, we consider that our expertise relates directly to the planning and regulatory changes involved in connection with the PHRP. BDAV therefore makes no comment in relation to related issues such as the quantity of the increase in public housing or interim housing requirements for public housing residents; we leave these to stakeholders more closely involved in those issues, in particular the Public Tenants Association.

#### **Affordable land, affordable housing**

The most important contribution the BDAV can make relates to the cost components to "affordable housing". Our position is that there is no such thing as affordable housing per se, only affordable land. The price of land in the regions of Melbourne we are discussing is at historical highs. This means it is counterproductive to hand over public land to private developers, since the land itself is the main consideration that determines the cost of a new development. Affordable housing is not the problem, affordable land is, and therefore Government should retain the land component of the development and invest in new housing itself.

#### **Exemptions from Clause 55**

The Victorian Government has said they wish to allow the developments under the PHRP to progress rapidly, reflecting their understanding of the long standing undersupply of public housing in Victoria. This is a commendable aim. Regarding the exceptions to Clause 55 that have been



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proposed, however, BDAV has concerns that this new public housing will provide inferior amenity to residents than comparable private housing. After examining the exemptions, we are not convinced that the proposals would substantially reduce the amount of time these developments take to gain approval. Instead, enforcing the design guidelines as they are, without exception, will support the efficiency of the system and thereby reduce red tape and the consequential time lags that greatly add to the cost of construction.

#### **Exemptions from car parking provision requirements**

We also have some concerns regarding the exemption from normal standards regarding carparking. Even considering the well evidenced lesser private car use of public housing tenants, releasing the government from obligations to provide car parking at all is a proposition that has been inadequately researched and BDAV would welcome further discussion with the Victorian Government and interested parties on the costs and benefits of this proposal.

#### **Exemption from community review**

Exemptions from normal review, notice and appeal processes will remove the ability of the community and third parties to challenge what are sometimes improper or unworkable proposals; this lack of community oversight increases the risk of developments identified by the experts as being inadequate nonetheless going ahead. The process for community review should be retained.

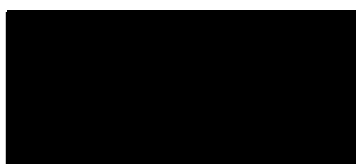
#### **Other issues**

Public housing should not be segregated as different to all other developments by design, layout or siting. BDAV believes that best practice is to “salt and pepper” units of private and public housing within each building (that is, they should be randomly spread through each building) so that there is no physical distinction between them and to reduce as much as possible the stigma and isolation of public housing.

We support moves towards medium density housing in activity areas; however, this should not be achieved at the expense of open space and/or public amenity. We are concerned that some elements of the PHRP could in effect mean a reduction of these amenities, and wish to discuss this further with the Victorian Government.

Thank you again for the opportunity to contribute; we will be seeking to communicate further with Victorian Government stakeholders and look forward to helping to achieve an outcome that delivers the best practice in building design for the people of Victoria.

Yours sincerely



Lindsay Douglas  
**President**