

**From:** Inquiry into the Public Housing Renewal Program  
**Sent:** Wednesday, 1 November 2017 10:39 PM  
**To:** phrp  
**Subject:** New Submission to Inquiry into the Public Housing Renewal Program

Inquiry Name: Inquiry into the Public Housing Renewal Program

Mr Jack Mahoney

T: [REDACTED]  
 E: [REDACTED]

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## **SUBMISSION CONTENT:**

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My submission is based on my concerns regarding the flawed Housing Renewal Programme. I am an affected local resident of the North Brighton estate and attached my details SAC submission for details reference in relation to this site specific proposal.

At a renewal programme level - i have the following primary concerns which overly empower the State to meaningfully and unfairly influence the process and remove normal rights from the public.

1. Removal of 3rd party appeal rights;
2. Removal of local councils as the Responsible Authorities for permit approvals. The proposal to have The Minister for Planning as the Responsible Authority represents an unnecessary concentration of decision-making at Ministerial level and a conflict of interest.
3. There has been NO contemplation of alternative funding models - resulting in an unnecessary sell off of public land and significant over densification of each estate.
4. There has been no lifecycle analysis to assess the future cost of buying back land from the private sector to fund future social / public housing supply (which will be required following the sell-off of public land)
5. The Proposal is artificially inflating land values via (otherwise unjustified) land rezoning (typically converting general residential to mixed use zoning) to 'pump the value' of the land for the stated 'economic return' objectives outlined in the DPO documentation for each estate.
6. There is major conflict in the Programs objectives i.e. between urban and neighbourhood outcomes vs. economic return
7. There is no justification for maximising density on the sites in excess to planning controls already implemented - this is NOT about achieving Plan Melbourne objectives as this is already embedded in the recently adjusted planning controls (by the same government) in March 2017.
8. There is a significant lack of site specific due diligence being conducted to properly assess the appropriate controls for each site - in the context of the Brighton Estate this includes; incomplete community consultation, utilisation of outdated site flooding data, incorporation of exhibition documents with significant errors and references to different estate proposals etc etc
9. The principal issue is the programme is not appropriately funded, with a poorly conceived solution proposed. This is the key issue and driver behind;

- over densification and the artificial inflation of land values via otherwise unjustified land rezoning;
- the removal of councils as Responsible Authorities
- the removal of 3rd party appeal rights
- the creation of non-mandatory controls over the build form of each estate which are in stark contrast to their surrounds and even surrounding activity centre zones (the planning controls are deliberately less restrictive and discretionary to allow for maximum Ministerial control over densification - this conflicts with all other controls the Planning Department has implemented in other residential zones)

I am shocked at the short-sighted nature of this program, the removal of basis rights from its affected stakeholders and the lack of financial options and 'whole of life' assessment which has been undertaken. There is an extremely high likelihood this program is more expensive than alternatives which would retain government control of crown land in the long-term.

Can the enquiry please make a suggestion / explore the option of an alternative funding option for the redevelopment of these estates. This program could be funded by the private sector WITHOUT the need to privatise any of the estates (if the correct tax or rental agreement / guarantees or incentives were provided to the private sector). There is a solution whereby long-term leases backed by the social / public housing estates is granted to the private sector for c. 25yrs (underwritten by the government). At the expiry of the lease, the private sector investors (typically superannuation funds seeking 'bond like' investments would return the asset back to the government at nil cost. This is a standard model which is utilised throughout the world for property and infrastructure projects and could fund this program outright without the need to sell public land. This retains taxpayer assets, provides land for future social housing supply, reduces delivery time for the replacement of the existing housing stock (lower density requirement) and has a significant broader benefit to the surrounding communities of these estates and the estate residents. It will also be materially more beneficial to the tax payer to undertake this model.

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File1: [59f9b2369a036-Parliamentary Inquiry\\_1-11-2017.docx](#)

File2:

File3: