



Wyndham City Council

Submission to National Housing &
Homelessness Issues Paper
October, 2023



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National Housing and Homeless Plan Issues Paper Submission 2023

Overview

Introduction

Wyndham City welcomes the opportunity to submit to development of the National Housing and Homelessness Plan. Housing, especially the provision of crisis accommodation and social and affordable housing, is a major challenge for a growth municipality such as Wyndham. Wyndham City Council recognises housing as a basic human right, essential to the health and wellbeing of individuals and families and the social and economic growth and liveability of the community.¹

Wyndham has endless economic opportunities. As the link between Victoria's two largest cities, Melbourne and Geelong, Wyndham holds great economic significance extending beyond the region and impacting the state of Victoria. The diverse economic and social opportunities in our region are some of the many reasons people relocate and migrate to Wyndham.

Strong and consistent population growth makes Wyndham one of the faster growing local government areas in Melbourne's outer west. Wyndham is well positioned to be a liveable and sustainable city with thriving local jobs, businesses and recreational spaces. However, providing homes and community infrastructure are ongoing challenges.

Wyndham's population of 322,226 is forecast to grow to 501,634 by 2041.² The Wyndham suburb of Tarneit is an area with one of the highest growth rates in Australia at 28.2 per cent.³ Existing infrastructure and services are not keeping pace with our rapidly growing population and the need to partner with all levels of government is critical.

About Wyndham

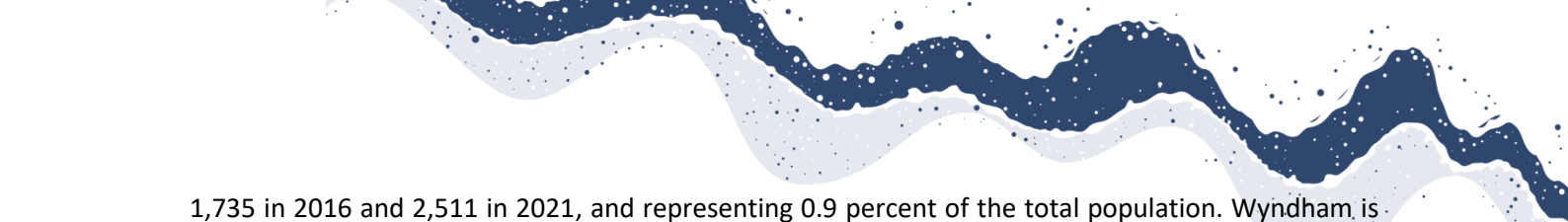
Wyndham City is located on the western edge of Melbourne, covering an area of 542km² and featuring 27.4km of coastline. Wyndham is a designated growth area of Melbourne, ranked as the third fastest growing local government area in Victoria.

The municipality is home to a large and diverse First Nations population. In recent years, First Nations people from across Australia have moved to Wyndham, marking a steady increase from

¹ In accordance with UN International Covenant on Economic, Social and Cultural Rights, Article 11, 1997.

² City of Wyndham Population Forecast. Available at: <https://forecast.id.com.au/wyndham>

³ Australian Bureau of Statistics (ABS), Regional Population, 20 April 2023. Accessed 18 August 2023: <https://www.abs.gov.au/statistics/people/population/regional-population/2021-22#key-statistics>



1,735 in 2016 and 2,511 in 2021, and representing 0.9 percent of the total population. Wyndham is also a multicultural community with around half of our population born overseas. We value the rich cultural, linguistic and faith diversity that our community brings. Wyndham is also a young and diverse community. The 2021 Census found that 21 percent of the population is aged 11 years or younger, 48 percent of the population was born overseas, and 49.8 percent speak a language other than English as their first language.

The Wyndham economy recorded a Gross Regional Product (GRP) of \$13.1b in June 2021, growing 1.4 percent since the previous year despite the impacts of the health crisis. Almost a third of Wyndham workers were in insecure positions as the pandemic began.⁴ Due to the high numbers of casual and shift workers in Wyndham at that time impacts were most severe from mid-2020 to mid-2022. For example, mortgage stress averages 13.3 percent in Wyndham, compared with 12.4 percent for the region and 11 percent for the state. This also varies by suburb. It is highest in Wyndham's fastest growing suburbs Truganina (16.7%) and Tarneit (15.6%). Thus, while financial confidence is returning, it remains lower than average in growth areas like Wyndham.⁵ Almost a quarter (24%) of those in growth areas selected 'housing affordability' as one of their top five priorities from government.⁶

Wyndham City Council adopted its first Affordable Housing Strategy in 2022. In doing so, Council has recognised the importance of quality, safe and secure homes for wellbeing. The importance of housing was acknowledged during the health crisis as people were asked to 'stay at home' to suppress the virus to protect lives and alleviate strain on health and community services. Now, in pandemic recovery cost-of-living increases and a housing crisis pose further stresses.

Summary

In summarised form these are the main points of Wyndham City's submission.

Homelessness

HOMELESSNESS SYSTEM EFFECTIVE RESPONSES

- ♦ Wyndham City Council and the Wyndham Health, Homelessness and Housing (H3) Alliance demonstrate an effective place-based collective impact model in homelessness prevention, response and recovery.

HOW CAN HOMELESSNESS SYSTEM ENSURE APPROPRIATE SUPPORT

- ♦ Lack of crisis accommodation in Wyndham is acute. Federal funding to expand the *Tenancy Stress Victoria* pilot to a full program is a short- and medium-term measure Government can take to ensure effective legal services remain part of the crucial suite of prevention initiatives.

ACTIONS GOVERNMENTS CAN TAKE FOR EARLY INTERVENTION AND PROTECTION

- ♦ Federal Government investment in prevention services around legal support, tenancy support and mental health is crucial and should form part of the National Housing and Homelessness Plan.

Social Housing

ROLE OF SOCIAL HOUSING

- ♦ Wyndham City Council views affordable housing as a human right and as essential community infrastructure, aligning with the Wyndham 2040 community vision. Social

⁴ (National Growth Areas Alliance, 2020)

⁵ Ibid

⁶ Ibid

housing plays a critical role in social inclusion, social connection and social integration to create socially cohesive communities.

- ♦ Benefits of social housing investment include returns on social housing investment comparable to, or better than major infrastructure projects.

ENSURING SOCIAL HOUSING IS BUILT IN THE RIGHT LOCATION

- ♦ The Housing and Homelessness Plan should identify strategies that assist all levels of government to work to the same end goals. It should also determine clear and agreed social and affordable housing targets that states and territories can be accountable for delivering.
- ♦ Wyndham City Council's preference is to locate social and affordable housing within town centre catchments such as Activity Centres and areas of high amenity, close to transport, essential services, and training and employment opportunities.

CHANGES TO COMMUNITY HOUSING REGULATION TO IMPROVE OUTCOMES FOR TENANTS

- ♦ The Housing and Homelessness Plan could include action to promote information and access to community housing organisations to ensure people at risk of homelessness are identified early.

AFFORDABLE HOUSING

- ♦ The Housing and Homelessness Plan could set a national definition for affordable housing.

ENCOURAGING DELIVERY OF AFFORDABLE HOUSING IN SHORT, MEDIUM AND LONG-TERM

- ♦ Address the gap in affordable housing provision for quality, medium density homes for key and essential workers.
- ♦ Public Private Partnership investment can help to expand housing stock as an important element of any long-term solution.

Planning, zoning and development

HOUSING SUPPLY, PLANNING AND ZONING

- ♦ The Planning Institute of Australia (Vic) planning reform agenda 'Better Places, Better Housing' notes insufficient guidance on planning for housing diversity, with mounting evidence of demand for compact, mid-scale housing in well-located established areas.
- ♦ The current lack of housing affordability has multiple factors. Investors and potential homeowners competing in the same marketplace on unequal terms, industry capacity and construction constraints all play a role in house prices and rents in Australia.

PLANNING & ZONING REGULATIONS AND HAZARD RISK

- ♦ Hazard mapping and related directions for allowable development are not typically sufficient. Future metropolitan planning should take a more integrated view of the city settlement in its landscape including a more holistic 'blue-green' focus (on green spaces, tree cover, biodiversity, vital waterways, and connections through and to urban areas).

GOVERNMENTS WORKING TOGETHER TO BE MORE RESPONSIVE

- ♦ Early delivery of new infrastructure (transport and community) or renewal of existing infrastructure can aid quicker response to housing demand pressures.

DEVELOPMENT ASSESSMENT PROCESS AND COMMUNITY CONCERNS

- ♦ PIA Vic recommend that precinct and local place-based scales offer the greatest opportunities to engage communities in effective planning and to deliver 'great places' aligned with broader policy objectives such as housing targets or net zero outcomes.



KEY SHORT, MEDIUM AND LONG-TERM PLANNING REFORMS

- ♦ Short term, planning schemes and zones need updating to enable self-contained secondary suites on private properties, including self-contained suites within existing dwellings or granny flats and laneway houses.
- ♦ Medium term, inclusionary zoning developed at the state level is required. Inclusionary zoning is a land use planning intervention by government that either mandates or creates incentives so that a proportion of a residential development includes a prescribed number of affordable housing dwellings.

Response to Focus Areas

Homelessness

Wyndham City Council convenes The Wyndham Health, Homelessness and Housing (H3) Alliance which is funded by the Victorian Government. This alliance of health, housing and homelessness service providers works together with Council to deliver and improve affordable housing and homelessness services and options across Wyndham. Formed in 2007, the Wyndham H3 Alliance operates as a collective impact model. It is led by a Strategic Partnership Group (SPG) and implemented by an Operational Partnership Group (OPG). Council is the local area coordinator of the Alliance seeking to ensure a strong local focus and alignment with the Wyndham 2040 Community Vision.

In 2023, following a recommendation by Victorian Government agency Homes Victoria, the Alliance successfully attracted ongoing funding of \$2 million per year to ensure these services remain in Wyndham and that the Alliance can strategically plan for both future growth and current demand for affordable housing and homelessness services. Homes Victoria has conducted two evaluations of the Alliance and found that it has delivered significant housing outcomes, reduced homelessness and enhanced service delivery across Wyndham.

Members of the Wyndham H3 Alliance include: Cohealth, Mercy Mental Health, Bolton Clarke, WEstjustice, Melbourne City Mission, Unison, Uniting, Whitelion, Salvation Army, Wyndham Community Education Centre, Refuge Victoria and Wyndham City Council.

Some Alliance members are funded by the Victorian Government Department of Family, Fairness and Housing and Homes Victoria funding model, and some are not. Services not funded include, Tenancy stress, legal advice and support, emergency relief, education and employment support for newly arrived community members, clinical mental health services, the Iramoo youth refuge, women's refuge and financial counselling.

The responses to this section are provided jointly by Wyndham City Council and the Wyndham H3 Alliance.

- ♦ [What are the different challenges for people experiencing homelessness in urban, regional, and rural areas?](#)

As an urban growth area, Wyndham was disproportionately impacted by the onset of the pandemic in 2020-2021. Many households lost income due to a combination of repeated lockdowns, dependency on casual work and loss of income through loss of work hours and resulting job losses. In pandemic recovery residents have experienced cost-of-living increases, and rental and mortgage

stress. Household expenses such as grocery, power, insurance and housing costs have also risen significantly. This means that all households, including those on government payments, spend a higher proportion of income on these expenses. The impacts of this are being felt deeply across Wyndham.

Food relief through Food Banks is offered in many locations across Wyndham, including at places of worship and Council’s Community Learning Centres.

Australian Bureau of Statistics data show that annual living costs rose between 6.3 per cent and 9.6 per cent in the 12 months to June 2023.⁷ The rate of increase is considerably greater than increases in government payments for unemployment, carer’s allowances, pensions and child payments.

Wyndham City Council Community Connectors program provides support to residents across the municipality. Data since January 2022 show a general spike in requests for food, financial aid and housing, although requests dropped significantly in June 2023. In 2021, 27 per cent of Wyndham residents experienced rental stress which is defined as spending more than 30 per cent of income on rent.

There has been a significant increase in the number of matters that have come to H3 Alliance member WEstjustice which involve:

- possession orders or Notices to Vacate
- rent increase issues or arrears
- clients presenting with complex psycho-social issues

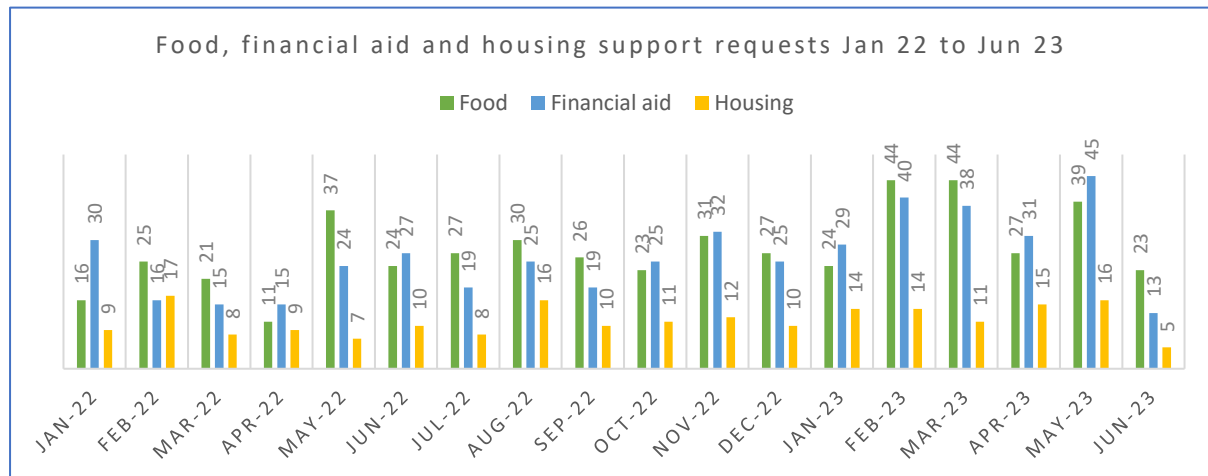



Figure 1. No of requests for food, financial aid and housing support taken by Wyndham Community Connector Program January 2022 to July 2023.

- ♦ What short, medium, and long-term actions can governments take to help prevent homelessness or to support people who may be at risk of becoming homeless?

The Wyndham H3 Alliance provides a range of prevention and early intervention services to people at risk of homelessness. This includes settlement support services, mortgage stress support, the

⁷ ABS Selected Living Cost Indexes, Australia (August 2023). Retrieved 3 August 2023: <https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/selected-living-cost-indexes-australia/latest-release#data-downloads>



Private Rental Assistance Program, outreach and case management with young people who are couch surfing or sleeping rough, emergency relief, mental health and wellbeing support.

In 2022 and 2023, Council supported the Alliance by focusing on strengthening the relationships between members post pandemic, collating data, reinvigorating the Alliance to be innovative in the current and emerging housing crisis, and collaborating effectively with other key agencies and stakeholders in Wyndham such as: The Orange Door, Victoria Police Proactive Policing Unit, Western Leisure Services, IPC Health Gamblers Help and AMES.

Actions taken to help prevent homelessness or to support people who may be at risk of becoming homeless by the H3 Alliance include:

- ♦ Successful pilot - *Swim and Shower Access* program with Wyndham City Council's recreation centre Aquapulse.
- ♦ Expanding the H3 Alliance *Rough Sleeper Outreach* program to include a partnership with the Victoria Police Proactive Policing Unit.
- ♦ Commencing a significant change project of transforming the Alliance by listening to and embedding *Client and Community voices* through the development of an H3 Alliance Client and Community Voice Framework.
- ♦ Strengthening H3 Alliance participation and advocacy with the Western Homelessness Local Area Services Network.
- ♦ Hosting events and activities (5) during Homelessness Week across Wyndham including a film screening at Point Cook Community Learning Centre in partnership with the Housing for the Aged Action Group.
- ♦ Delivering a range of presentations on request to the *Murdoch Children's Research Institute*, the *Wyndham Family Violence Network* and the *Wyndham Humanitarian Network* to upskill the local health, family violence and settlement service sectors and build relationships for advocacy.

Since May 2023, Alliance member WEStjustice has piloted a *Tenancy Stress Victoria* (TSV) model similar to the successful *Mortgage Stress Program* piloted previously through the Alliance. However, the current TSV pilot is restricted (by eligibility criteria), to people affected by the Maribyrnong flooding. This innovative project aims to provide people at risk of losing rental accommodation (whether due to arrears, for-cause eviction, no-fault eviction, safety issues, or family violence) with holistic wraparound support.

WEStjustice provide access to:

- ♦ *Community Lawyer* with expertise in tenancy and with the capacity to advise and assist in other legal issues which may be impacting the tenancy
- ♦ *Financial Counsellor* to assist with debts or financial problems aggravating risk of losing housing
- ♦ *Social Worker* to help navigate services, manage safety and wellbeing risks, and enhance the person's sense of support

Data thus far illustrate the effectiveness of the model.

- ♦ Most clients are seen prior to entering the crisis homelessness system and are better positioned to make the most of available homelessness supports.

- ♦ Social work support is proving invaluable in addressing serious barriers to service navigation in the housing, health and disability spaces for clients who need it.
- ♦ Clients receive additional timely support and advice on Family Violence Intervention Order and Personal Safety Intervention Order processes where this is a barrier to being in their housing or returning to it.

Learnings from the model include the following:

- ♦ TSV is considerably more effective when already established and operating at the time of a crisis (i.e., flood, fire, family violence). Lapse of initial response due to setting up the services, even on the basis of rapid grants, means that those people worst affected had already given up their properties without seeking initial supports.
- ♦ TSV as a general and ongoing response to community need is a valuable and cost-effective remedy, especially in an environment of ongoing cost-of-living and housing affordability crisis that threatens to have longitudinal health, justice and educational impacts. As the Australian Productivity Commission noted (2022), preventing people from becoming homeless results in better outcomes for people and is less costly for government (taxpayers) than addressing homelessness, and this should include tailored tenancy support services to help renters maintain their tenancies and avoid evictions.⁸
- ♦ [How can the homelessness system more effectively respond to those at risk of, or already experiencing homelessness?](#)

Wyndham City Council and the Wyndham H3 Alliance have demonstrated that a place-based collective impact model is effective in homelessness prevention, response and recovery. The model provides flexibility and draws on the strengths and expertise of a range of local stakeholders from the health, housing, homelessness, settlement and legal sectors.

The H3 Alliance provides an innovative model within the housing and homelessness system in Victoria having enabled us to successfully pilot a range of interventions, programs as well as advocate collectively.

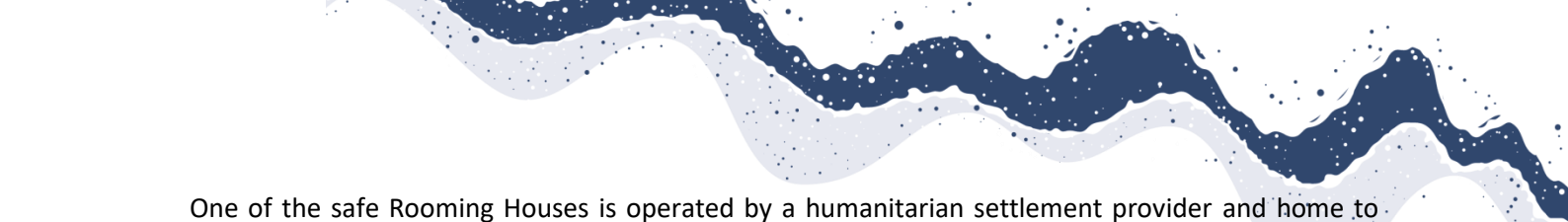
However, the model operates within a broken system and its success depends on strong relationships with State and Federal stakeholders. Overall, the system requires more adequate and appropriate crisis accommodation, more affordable housing, more social housing and ongoing funding for the prevention, response and recovery services.

H3 Alliance members, WEstjustice (legal and tenancy services) and Unison (Private Rental Assistance Program) work collaboratively to prevent individuals and families experiencing rental stress from becoming homeless. Increased funding to address the increased demand on services in the short and medium terms is a measure Government can take to ensure effective system responses to those at risk now and experiencing homelessness now.

[Lack of safe and adequate rooming houses](#)

As of 27 April 2023, there were just 23 registered Rooming Houses across Wyndham. However, H3 Alliance *Rough Sleeper Outreach Program* workers do not refer clients to many of these due to the conditions and safety concerns.

⁸ Australian Productivity Commission, *In Need of Repair: The National Housing and Homeless Agreement*, p.30-1. Commonwealth of Australia, 2022.



One of the safe Rooming Houses is operated by a humanitarian settlement provider and home to about 80 newly arrived residents. It provides short term (28 days) accommodation support to refugees from Afghan, Ethiopia, Tibet, Thailand and Myanmar. Over 2,000 newly arrived community members have come through this supported Rooming House since it was set up. These residents face a range of barriers to securing private residential rental property in Australia including the lack of affordable options and lack of local rental history all of which impacts successful settlement. Whereas it used to take about 4-6 weeks to secure private residential rental accommodation, the time now averages 12 weeks. Unfortunately, some residents remain in this Rooming House after 2 years.

The lack of safe and adequate rooming houses across Wyndham has been identified in the Wyndham Affordable Housing Strategy 2022-2025, and Council has committed to explore in partnership with the Wyndham H3 Alliance, improvements in standards, identification and regulation.

- ♦ [How can the homelessness system ensure those at risk of homelessness or in crisis receive appropriate support to avoid homelessness or so they are less likely to fall back into homelessness?](#)

The Wyndham H3 Alliance and Council believe the TSV model works best within the wider ecosystem of the Wyndham's H3 Alliance, as well as within other similar socio-economic profile and rapid growth communities. Funding from the Federal level to expand the TSV pilot to a full program is a short- and medium-term measure Government can take to ensure effective legal services remain part of the crucial suite of prevention initiatives.

H3 Alliance member Unison Housing is the Central Access Point for homelessness services and through the Wyndham H3 Alliance advocacy it has established an *Initial Assessment Program* (IAP) and a *Private Rental Assistance Program* (PRAP) in Werribee, located at the Cottrell Street social housing apartments. From January to December 2022, Unison provided IAP to 1,073 clients across its Wyndham and Seddon offices. From January to May 2023 this has increased to 1,474 clients, and then from June to September 2023, Unison has provided IAP services to an additional 688 clients from their Werribee office alone. In the nine months to September 2023, this is already more than double the number of clients serviced in 2022. Unison's IAP services are funded to achieve a target of 1,946 clients assessed in the 2023-2024 financial year. It is on track to exceed this by April 2023. Current demand exceeds the funded capacity of the service.

The availability of accessible (particularly in relation to the physical environment) crisis and/or transitional accommodation must increase in the short to medium-term.

In Wyndham the lack of crisis accommodation is particularly acute. There are only five hotels across the Western Region to which homelessness agencies can refer clients for crisis accommodation. Only two of these are in Wyndham and these are largely inappropriate for crisis accommodation resulting in poorer health and wellbeing outcomes for clients.

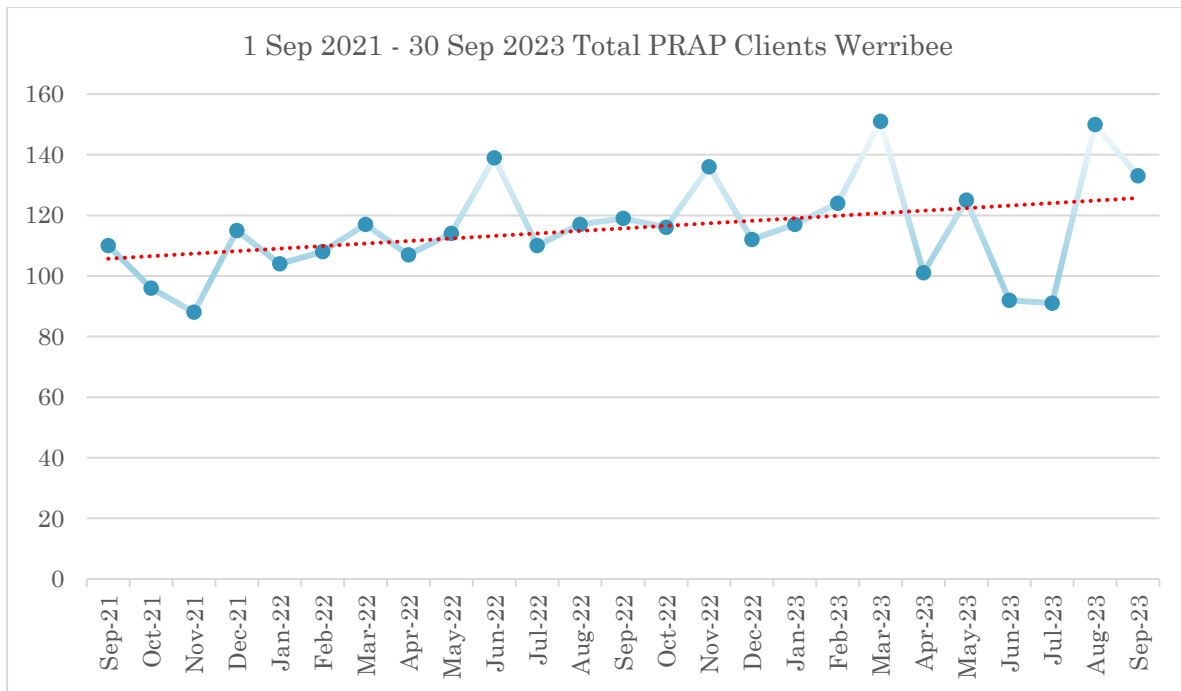


Figure 2. Private Rental Assistance Program, Unison Housing Administrative Data, September 2021 to September 2023.

- ♦ What actions can governments take to facilitate early intervention and preventative responses?


The Wyndham H3 Alliance members collectively provide a range of prevention, intervention, response and recovery services that reduces homelessness and the impacts of homelessness on community across Wyndham. Homes Victoria found that since the Wyndham H3 Alliance began in 2007, there has been a 46% increase in people seeking support from local health, housing and homelessness services. Prior to its establishment in Wyndham, people had to travel to other municipalities to access services.

The Alliance has responded to an increased demand by offering tailored services locally and expanded to support a 311% increase in the number of clients it serviced since 2017.

The Alliance has collectively delivered services that have decreased housing insecurity across Wyndham. In 2020-21 and 2021-22, there was a 64 percent reduction in people sleeping rough and 53 percent reduction in people couch surfing.

The Alliance was successful in obtaining \$15 million funding from the Victorian Government in 2017 and a further \$4 million in 2021. This has been used to:

- ♦ Build the *Youth Foyer* in Market Road and provide 1-2 year supported tenancies to young people experiencing homelessness.
- ♦ Build 70 x 1- and 2-bedroom apartments in Cottrell Street for social housing.
- ♦ Pilot the *Mortgage Stress Program* a prevention initiative that was so successful it has been scaled up across the state and funded by another Victorian Government Department.
- ♦ Establish 16.5 FTE positions to boost the local service system in early intervention response and recovery.

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- ♦ Establish a *Private Rental Assistance Program* and *Initial Assessment and Planning* office in Werribee.
 - ♦ Establish the *H3 Alliance Rough Sleeper Outreach Program* (adults and youth)

Wyndham City Council and the Wyndham H3 Alliance have demonstrated that by partnering with other local sectors such as health, legal and housing we can more effectively prevent, respond and support recovery from homelessness. Demand for support has exceeded the current funded capacity of services, and many of the key prevention services are not funded within the sector. Federal Government investment in the prevention services around legal support, tenancy support and mental health is crucial and should form part of the National Housing and Homelessness Plan.

Further comments

The following local case study is provided for information and due consideration. It demonstrates the place based collective impact of the H3 Alliance through:

- ♦ local service referral and coordination,
- ♦ strong partnerships with Council's Enhanced Maternal and Child Health team,
- ♦ long term advocacy that led to the Cottrell Street apartment build being available.

It also highlights the challenges faced such as:

- ♦ inappropriate crisis accommodation available in Wyndham
- ♦ lack of affordable housing options in Wyndham
- ♦ impacts of family violence and family breakdowns

In 2023, Kendra and her 18-month-old daughter moved to Wyndham from Perth.⁹ Kendra was pregnant, having left an abusive relationship defined by emotional, financial, psychological violence and coercive control. Having grown up in Wyndham, she sought refuge from her brother who lived in Wyndham Vale. Kendra gave birth to her second child at Werribee Mercy Hospital. Her 18-month-old child was cared for by her brother while she was at the hospital, but her brother was not able to provide longer term accommodation for Kendra and her young family beyond the birth.

The hospital social worker secured emergency accommodation through H3 Alliance member Unison. They were temporarily housed at a Werribee hotel (one of only 2 options available for crisis accommodation) in a small room with a double bed and room for a porta cot. Prior to discharge Council's Enhanced Maternal Child Health Team (EMCH) received a referral for intensive support for the family. EMCH nurses engaged Council's social worker to visit Kendra weekly. Over time, visits included an EMCH nurse as the children and Kendra had become unwell attributed to the stress of her situation. Visits with Kendra and the children would usually take 1- 2 hours.

The EMCH social worker supported Kendra by caring for the children to enable her to shower. Kendra was further supported through conversations with local services who provided parenting tips. Appropriate and adequate housing, rather than temporary hotel accommodation, could have helped Kendra to get sufficient rest and proper nutrition. Kendra's toddler and baby woke simultaneously during the night, she was exhausted. Her toddler lost her appetite as Kendra was not able to cook nutritious meals for her. She relied on local take-out food and packaged processed foods as the hotel had no cooking facilities.

⁹ Kendra is not her real name. We have used this name to protect her identity and privacy.

The hotel crisis accommodation was temporary and guaranteed for only 2-3 days at a time. It was an ongoing stressful situation for the young mother. Sometimes she would not find out until towards the end of the 3rd day. She was often too scared to leave her room in case her room key would be de-activated, and she would not be able to re-enter. Kendra managed to persevere and after a five-week period of uncertainty she and the children were finally offered an apartment in the Unison Cottrell Street apartments.

H3 Alliance member Uniting secured a Family Violence Flexible Support package for the family and Kendra used this to buy mattresses, a couch, washing machine and dryer. The support that she received from Mercy Hospital, Unison, EMCH and Uniting also provided a level of care that supported Kendra's overall emotional and mental wellbeing over the period. As a result, her children now sleep regularly, and she is making new ties, establishing routines, cooking nutritious meals in her new apartment and making a home for her two little ones. The EMCH social worker reported that the difference in all three is heart-warming.

Social Housing

The shortfall of social and affordable housing is a social and economic issue for individuals and the broader Wyndham community. The mismatch between demand and supply of social housing is considerable due to an overall lack of investment by all levels of government. The lack of social and affordable secure housing has negative social impacts including making individuals less financially independent.¹⁰

Nationally, social housing stock has fallen from 5.8 per cent (1997-98) to 3.1 per cent (2017-18). Social Housing tenure also declined markedly in Wyndham from 2.05% (2000) to just 0.9% (2021).¹¹

The Victorian Government's Big Housing Build is the single largest investment in new social and affordable housing of any state government in Australia. The \$5.4 billion program leans heavily on the use of state and local government owned land to reduce the cost of the new housing and aims to create over 12,000 homes in four years - 9,300 social housing with the rest as affordable or market-rate housing.

To meet projected demand Wyndham needs 11,700 new dedicated affordable housing dwellings, primarily social housing. Meeting this demand requires 732 social and affordable homes delivered each year to 2036.¹²

♦ What is the role of social housing for low-income Australians?

Wyndham City Council views affordable housing as a human right and as essential community infrastructure, aligning with the Wyndham 2040 community vision.¹³ It provides tenants with affordable rent (tenants typically pay 25 per cent of their income as rent) and secure tenancy.

Social and affordable housing is essential infrastructure for successful communities.


SGS Economics & Planning, 2022

¹⁰ (The McKell Institute, 2019)

¹¹ Wyndham Affordable Housing Strategy 2022-2025. Available at: <https://www.wyndham.vic.gov.au/affordable-housing-strategy-2022-2025-meeting-wyndhams-diverse-housing-needs>

¹² (Wyndham City Council, 2022)

¹³ Ibid



protecting their vulnerability in the private housing rental environment. Secure tenure is an important benefit, as are tenancy support services.¹⁴

Wyndham strives to be an equitable and inclusive municipality, holding to housing first principles. Housing first principles recognise that access to permanent, secure housing is a human right, and not conditional upon addressing other issues. Its philosophy is founded on two key principles:

- ♦ The right to an adequate standard of living entails the right to adequate housing.¹⁵
- ♦ The provision of housing is not contingent upon certain behaviours.

The benefits of social housing investment that delivers good-quality, well-managed homes that low-income earners can afford include returns on social housing investment comparable to, or better than major infrastructure projects.¹⁶ National and international literature reveals several primary benefit categories suitable for considerations and quantification via cost benefit analysis such as:¹⁷

- ♦ improved health outcomes
 - reduced expenditure in health services
- ♦ reduced incidence of anti-social and criminal behaviours
 - savings in the criminal justice system
- ♦ reduced expenditure through human services such as Centrelink
- ♦ enhanced human capital and educational outcomes
- ♦ increased productivity due to less efficient labour markets
- ♦ increased community diversity, inclusion and equity

Every \$1 the Australian community invests in social and affordable housing will deliver \$2 in benefits.

SGS Economics & Planning, 2022

The rate of return on investment in social and affordable housing is comparable to, and can be better than, those achieved in many other major Australian infrastructure investments. For example, empirical evidence repeatedly demonstrates that supporting a person to move from crisis accommodation into a stable and affordable long-term dwelling can reduce government costs by an average of \$11,935 per person, per year, as a result of reduced interaction with services.¹⁸

Social housing also plays a role in social inclusion, social connection and social integration to create communities that reduce discrimination and the stigma associated with social housing development. Social housing needs to be fully integrated into local communities including through a mix of housing types and medium density housing that better integrates within local neighbourhoods.

Discrimination and stigmatisation of low-income households are barriers to ensuring affordable housing is fully integrated into communities. Reducing discrimination and stigma are pillars of a human rights-based approach to housing.

¹⁴ (Productivity Commission, 2022)

¹⁵ As articulated in Article 11(1) of the International Covenant on Economic, Social and Cultural Rights.

¹⁶ (Pawson, et al., 2022)

¹⁷ (Spiller & Hobbs, 2022)

¹⁸ (The McKell Institute, 2019)

- ♦ How can governments ensure social housing is built in the right location (including close to amenities, environmental, socio-economic, current and future hazard risk and cultural factors) and will meet current and future needs of social housing tenants and the broader community?

Governments can ensure that social housing is built in the right locations by following similar planning and policy directives to produce coherent, integrated and whole-of-government approaches. For example, the 20-minute city is an important concept in planning for social housing.

The Housing and Homelessness Plan should identify strategies that assist all levels of government to work to the same end goals.

Wyndham City Council's preference is to locate social and affordable housing within town centre catchments such as Activity Centres and areas of high amenity, close to transport, essential services, and training and employment opportunities. Council's priority is to locate affordable housing in areas with good access to infrastructure and services and approx. 800m to public transport.¹⁹

The Wyndham Plan 2023 provides a spatial response to development of the municipality beginning with the 20-minute neighbourhood concept, as per the benchmark set by Plan Melbourne and the Victorian Government for creating liveable places. This brings our local spatial response to development into alignment with State government policy, thinking and guidance.


The Wyndham Plan 2023 advocates 'Big Ideas to Transform Wyndham' from a 2 Hour to a 20-minute City including:

- ♦ Creation of Neighbourhood and Village Pulses that foster the development of 20-minute neighbourhoods.
- ♦ A City Heart that transforms Wyndham from a 2-hour to a 20-minute city.
- ♦ A Wyndham Transport Network that better connects people and places.
- ♦ Liveable Residential Neighbourhoods that deliver quality residential development.

The National Housing and Homelessness Plan could establish priority areas and housing targets in consultation with state and territory governments and councils. As the level of government closest to the people, local government authorities know the demographic make-up of populations. This is necessary to be able to provide local services and programs that cater to demographic need across the lifecycle. Population forecasts provide relatively clear strategic planning direction.

Available data can help determine clear and agreed social and affordable housing targets that states and territories can be accountable for delivering. Targets can be set jointly with councils to allocate social and affordable housing development in preferred locations and areas with greatest need.

¹⁹ Wyndham Affordable Housing Strategy 2022-2025, The Wyndham Plan 2023, Wyndham Housing and Neighbourhood Character Strategy 2023.

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- ♦ [What future role should the community housing sector play in Australia and what initiatives and funding mechanisms would support this?](#)

The community housing sector has a critical role to play in the delivery of social housing in Australia. For example, Austria has a well-defined 'cost rent', limited-profit housing association (LPHA) system.²⁰

The Austrian regulatory approach is designed to create effective, mission-focused housing outcomes via not-for-profit providers that employ resources appropriately, efficiently and transparently. It promotes affordability, well-maintained assets and growth over the short and longer term. It has also prospered in turbulent economic and political climates.²¹

The model operates on the basis of revolving funding. Equity is permanently tied up for limited-profit purposes and surpluses are continuously reinvested.

This is guaranteed by a limitation on profit distribution among owners and by an obligation to regularly reinvest any surpluses in housing construction. Furthermore, shares in a limited-profit housing association may only be sold off at a nominal value of the initial investment.

Insecure funding streams constrain the activities of the community housing sector in Australia. Federal and State Government funding streams should seek to provide certainty into the future. Austria's model shows that limited-profit housing provides community benefits especially through social inclusion.

- ♦ [What changes to community housing regulation could improve outcomes for tenants, the community housing sector, governments and investors?](#)

The National Regulatory System for Community Housing (NRSCH) is a voluntary registration system which would benefit from greater government oversight, especially if the Commonwealth intends to grow the sector. Victoria has its own regulatory system.²²

An action of the Housing and Homelessness Plan could be around the promotion of information and access to community housing. For example, currently people at risk for homelessness, experiencing family violence or homelessness are redirected to crisis lines rather than specifically to community housing organisations. Admittedly, this would also require a more efficient pipeline of community housing development. However, it is a critical gap which could see people at risk fall between the cracks.

Victoria has a Commissioner for Residential Tenancies to provide independent advice to the Victorian Government to recommend changes to renting laws, programs and services to improve the renting rights, practices and tenant experiences across Victoria.²³ The Commissioner:

- ♦ listens to the first-hand experiences of renters
- ♦ furthers initiatives to increase renters' understanding and knowledge of their rights
- ♦ works collaboratively with government and rental sector stakeholders for their consideration and action

²⁰ (United Nations Habitat, 2023)

²¹ Ibid

²² (Victorian Government, 2023)

²³ (Commissioner for Residential Tenancies, 2023)

The Victorian Government commissioned an independent Social Housing Regulation Review as part of the Big Housing Build to identify future regulatory arrangements to support the long-term interests of social housing residents and communities.²⁴

Review Chair, Professor David Hayward, called for ‘no evictions into homelessness’, and common regulation across public and community housing to regulate and standardise rents.

Key proposals of the review include:

- ♦ A single independent Social Housing regulator overseeing community and public housing
- ♦ Regulator facilitates ‘good growth’ of social housing stock
- ♦ Sector growth and innovation to meet overwhelming housing need
- ♦ Stronger accountability and transparency in the system
- ♦ Development of tenant consultation infrastructure

Affordable Housing

The Housing and Homelessness Plan could set a national definition for affordable housing. The *Planning & Environment Act 1987* (Vic), section 3AAA, defines Affordable Housing as housing, including social housing, that is appropriate for the housing needs of very low income, low income and moderate income households.

The Victorian Planning Authority (VPA) adopted the following definition in its Key Worker Action Plan.²⁵

Housing that is owned or rented

that is

occupied by households in the lower 60 % of the income distribution scale and/or an identified key worker in the region

providing

housing choices that are of appropriate size, liveable, affordable to occupy, accessible, secure in tenure and located in good proximity to employment services and critical infrastructure such as transport.

The housing can be:

- ♦ Private home ownership where the purchaser’s mortgage costs do not exceed 35 % of the gross household income of the occupant
- ♦ Rental housing that is owned and managed by private individuals or corporations and where rent does not exceed 30 % of the income of the gross household occupant
- ♦ Rental housing that is owned and managed by the state housing authority
- ♦ Rental housing that is owned or managed by a not for profit housing organisation

²⁴ (Commissioner for Residential Tenancies, 2023)

²⁵ (Victorian Planning Authority, 2020)

- ◆ How can governments encourage delivery and availability of affordable housing in the short, medium and long-term? How can governments partner with institutional investors to support more housing development (particularly affordable housing)?

Governments need to ensure housing supply is more responsive to avoid affordability pressures from demand shocks.²⁶ Historically, low rates of home ownership will create a greater need for social housing into the future. In the long term therefore, this could mean a focus on key worker housing to ensure affordable homes close to activity and employment centres.

Our work, age, family and caring needs will influence where we want to live and the kind of home we require.

Scottish Government, Housing to 2040

The Victorian Planning Authority (VPA) has adopted a key worker definition in its Key and Essential Worker Housing Supply Action Plan (2020).²⁷ The definition includes providers of services to residents such as teachers, doctors, nurses, health care workers, pharmacists, and Council staff.

An employee who provides a vital service, especially in the essential services, health, or education sectors.

A current gap in affordable housing provision is for higher quality and medium density dwellings suited to key and essential workers. In Wyndham as in many other municipalities across Australia there is a 'missing middle', areas with potential for revitalisation and densification bringing more people closer to where they work, shop and socialise. These areas need medium density precinct planning to cater for the needs of diverse populations with diverse housing options.

Addressing the shortage requires investment from public, private and community sectors. The scale of the challenge implies that private sector finance to expand housing stock will be an important element of any long-term solution.²⁸

Public Private Partnerships (PPPs) have played an important role in affordable housing investment in Scotland over many years. In (PPPs) governments contract providers to build and/or manage social housing infrastructure. The Scottish Government's Affordable Housing Supply Programme (AHSP) comprises a range of funding mechanisms to enable affordable housing providers to deliver homes for social rent, mid-market rent, and low cost home ownership in communities across Scotland to support local authorities' Local Housing Strategies.²⁹ The AHSP combines government grant funding and private finance in the form of loan funding.

The Housing All Australians approach is similar. This organisation seeks to re-position discussion and action on social and affordable housing that it is in Australia's long term economic interest to house all Australians, including those on low incomes.³⁰ Housing All Australians suggest that private capital can be attracted with government making up the difference between reasonable commercial requirements and the returns available from investments in affordable housing.³¹

²⁶ (Rowley, et al., 2023)

²⁷ (Victorian Planning Authority, 2020)

²⁸ (The Allen Consulting Group Pty Ltd, 2004)

²⁹ (Scottish Government, 2023)

³⁰ (Housing All Australians, 2023)

³¹ (Spiller & Hobbs, 2022)

PPPs have often been used to procure community infrastructure such as health, recreation and community learning facilities. If we regard social and affordable housing as essential community infrastructure, social and affordable housing is no different as a PPP investment opportunity.

The importance of planning, zoning and development

The two most populous states have enacted two decades of planning reforms including higher-density housing near transport and town centres, simplified rules and accelerated decision-making.³² On the flip side however, the development industry has maintained a practice of drip-feeding new housing supply to keep prices buoyant.³³ Commentators note that, even if planning relaxation could enable ramped-up construction, it's hard to imagine that being sustained in the face of any resulting market cooling.

- ♦ To what extent is the supply, affordability and diversity of houses affected by planning and zoning regulations and administrative processes?

Planning and Zoning can and should be an enabler of affordable housing – they include important mechanisms like inclusionary zoning and density bonusing whereby zoning becomes a critical tool used by governments to set a higher benchmark for the private development industry.

Third party appeal rights within the planning system may be a hindrance to the development of affordable housing or higher density developments that can deliver housing diversity.

Housing diversity is set through zoning clauses and schedules and through structural and spatial plans developed by Local Governments in collaboration with state government and private stakeholders. Developers will always seek to deliver what is the most profitable housing product within the current market unless an approved spatial plan or planning provision requires more e.g., in the form of greater densities or housing diversity.

The Planning Institute of Australia (PIA) Victorian branch planning reform agenda 'Better Places, Better Housing' has noted that strategic plans have provided insufficient guidance on planning for housing diversity, with mounting evidence of demand for compact, mid-scale housing in well-located established areas (the 'so-called' missing middle).³⁴ Housing supply has been dominated by detached dwellings in greenfield areas and higher density (mostly one and two bedroom) flats in selected activity centres. In inner and middle suburbs, traditional detached housing for families built in the mid to late 20th century is being selectively replaced by two attached dwellings typically larger than the one they replaced. These do not add to housing diversity.


PIA Victoria rejects the idea that planning is 'to blame' for a lack of housing affordability. Multiple factors such as the investment status of housing (in tension with its critical role as shelter), its tax treatment, interest rate cycles, industry capacity and construction constraints, as well as the geographic reality of economic opportunities being concentrated in a few major metropolitan centres, all play a role in house prices and rents in Australia.

PIA has also noted that prices for new housing are influenced by prices achieved for existing housing. Thus, it would likely take years of sustained 'oversupply' across sub-markets to impact on prices. The

³² (Ruming & Goodman, 2016)

³³ (Pawson, et al., 2022)

³⁴ (Planning Institute Australia (Vic), 2023)



planning system does more than just set the conditions for the supply of land for new houses. PIA believes there is risk in reform which tinkers at the edges with, for example, provisions enabling higher densities in service rich areas with hastened development approval processes without appropriate consideration of context.

‘Streamlining’ or ‘removing red tape’ in isolation is unlikely to make a meaningful difference to the housing supply pipeline potential. Further, without consideration of minimum standards of design quality and other measures, it runs the risk of eroding the liveability, sustainability, and productivity of our cities.

- ♦ How can planning and zoning regulations effectively increase the supply of land in well-located areas taking into consideration current and future hazard risk?

Planning and zoning regulations can facilitate development in appropriate locations, but also discourage, prevent, or prohibit particular uses of land. Land is a finite commodity so an effective increase in supply requires either increasing intensification of use in existing residential parcels or opening up new residential parcels.

For increased intensification and achieving greater density of development, strategic plans at local government level such structure plans, municipal land use framework plans, and housing strategies can effectively increase supply of land by identifying areas appropriate for greater density of housing through subdivision potential or increased height limits, and by directing changes in zoning that is strategically justified.³⁵

State and regional level plans such as Victoria’s Plan Melbourne and its draft land use framework plans also can provide direction. The Victorian Planning Authority (VPA) Precinct Structure Plan (PSP) 2.0 Guidelines are a core planning tool to implement the Plan Melbourne principle of the ‘20-Minute Neighbourhood’ which is all about living locally to ensure accessible, safe and attractive local communities.

Brownfield or greyfield development may also be an approach to increase the supply of land. Rezoning from industrial to residential uses is one approach that can release land for development when the rezoning is strategically justified and adequately takes account of all risks.

Current and future hazard risks that should be considered may include:

- ♦ land contamination for brownfield areas
- ♦ increased risk of flooding or bushfire due to climate change
- ♦ impacts of global warming such as the urban heat island effect
- ♦ risk of future pandemics and the need for social distancing or other public health measures
- ♦ other risks resulting from encroachment on productive agricultural uses or existing commercial or industrial uses

PIA Victoria has noted that as climate related hazards including bushfires and flooding increase in frequency and severity it is imperative that state guidance is provided. This should be integral to effective strategic planning.

³⁵ For example, Wyndham Affordable Housing Strategy 2022-2025, The Wyndham Plan 2023, Wyndham Housing and Neighbourhood Character Strategy 2023.

Hazard mapping and related directions for allowable development are not typically sufficient. Beyond enhancing the technical dimensions of identifying natural hazards and risks, future metropolitan planning should also take a more integrated view of the city settlement in its landscape. A more holistic 'blue-green' focus (on green spaces, tree cover, biodiversity, vital waterways, and connections through and to urban areas) needs to be 'front and centre' in metropolitan and regional planning to maintain its renowned liveability.

- ♦ [How can governments work together to be more responsive and flexible to housing demand pressures, both now and in the future?](#)

Government's role in delivering housing is limited, and it is mostly left to the market. Innovative new governance mechanisms are needed to approve and expedite new housing in priority locations agreed by state and local government, with incentives for developers to focus on these locations and deliver high-quality sustainable product.

Victoria's efforts to set planning direction for Melbourne and its regions include Plan Melbourne and the Regional Growth Plans; the Land Use Framework Plans, and state and local government collaboration on local government housing strategies, growth corridor strategies, Urban Design Frameworks (UDFs) and structure plans.

PIA Vic have noted, however, that it is frequently unclear what the designations of places mean in terms of responsibilities. This means that interventions, typically by state agencies, can sometimes appear arbitrary, confusing lines of accountability and creating resentments with local governments and local communities.


Early delivery of new infrastructure (transport and community) or renewal of existing infrastructure is essential for governments to be able to respond more quickly to housing demand pressures. This requires state government acknowledging and responding to local government advocacy priorities as they apply to planning issues.

- ♦ [What is the role of state and local governments in the improvement of speed and/or transparency of development assessment processes to help improve supply of housing and the affordability of homes?](#)

Local governments struggle to recruit sufficient town planners to assess applications. In growth area local authorities like Wyndham the volume of demand is significant. In the past state government has initiated approaches to assist councils with resolving backlogs through Flying Squads etc. Secondments in both directions may help with maintaining a skilled and flexible workforce and help with transparency.

Where development applications align with both state and local government strategic plans approvals should not be unduly help up.

Even if supply in places like growth areas is not an issue, affordability and particularly affordable living is frequently compromised by inadequate transport infrastructure or delayed investment in community infrastructure such as schools or healthcare facilities. State and local investment should be timely and adequate to service new communities.

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- ♦ How can the development assessment process address community concerns, so the length of appeals processes is minimised, and developers have an efficient path to resolve issues and gain approval?

A development assessment process that is clear, expeditious, assesses applications against up-to-date strategic plans and gives community ample time to respond should be the starting point for resolving issues and gaining approval. At the level of local government, community concerns about development in particular places are well-known and understood.

Planning panels that are overly dominated by legal processes and personnel do not necessarily result in good planning outcomes. There needs to be greater scope for local government to implement planning strategies developed and endorsed by professional officers.

PIA Vic have recommended that precinct and local place-based scales offer the greatest opportunities to engage communities in effective planning and to deliver ‘great places’ which are aligned with broader policy objectives such as housing targets or net zero outcomes.

- ♦ How can state and local governments improve accessibility (particular in the physical environment) through planning and zoning, for example, to ensure transport systems are accessible for the whole community?

A principal consideration for affordable housing (including social housing) is its location. The best way to ensure accessibility is to have well-located houses that are close to major transportation hubs, activity centres, and local amenity such as parks and community centres, schools.

Governments should seek to locate housing where transportation networks already exist. Where planning in new locations, identification of major transport and other infrastructure required to support the achievement of the preferred settlement future should be prioritised. This includes prioritising sustainable travel, reflected in transport and infrastructure plans including identifying corridors for protection.

- ♦ What key short, medium and long-term planning and zoning reforms could be explored in the Plan?

Short-term

Planning Schemes and zones need to be updated to allow for self-contained secondary suites on private properties. These include self-contained suites within existing dwellings or granny flats and laneway houses. This approach can achieve greater population density within existing built-form and free up accommodation and rental opportunities.

Secondary suites can free-up access for rental accommodation in well-located housing in established areas. The benefits of secondary suites extend to the landowner who receives rent (a ‘mortgage helper’). There is no logical reason why this could not be implemented safely and appropriately in Australia as it has in cities all around the world.

Medium-term reform

Inclusionary zoning developed at the state level is required. Inclusionary zoning is a land use planning intervention by government that either mandates or creates incentives so that a proportion of a residential development includes a prescribed number of affordable housing dwellings.

We know from current experience that the voluntary incentive model is not delivering the amount of affordable housing that is required to meet demand. A mandated model is required, where and if a property is well-located (close to transport and amenity) and of a particular density or value that would trigger the provision of affordable housing.

Currently there are no levers available at local government level to require developers to deliver affordable housing in well-located higher value developments where it would be logical and beneficial to do so. State Governments create the planning provisions including zones in Australia. Therefore, an inclusionary zoning provision can only be created by state governments with implementation at the local level.

Inclusionary Zoning has successfully been implemented through the Housing Plan for South Australia and over 2,000 affordable homes (and 3,300 committed) have been delivered.

- ♦ [What other reforms, beyond planning and zoning, can governments implement to improve the speed and efficiency of the supply of housing?](#)

Governance reforms – PIA Vic recommend that plan-making and development assessment powers should be aligned with the most appropriate level of governance given the relative place significance of the matter at hand, i.e., state, metropolitan/regional or local.

- ♦ Policy decisions in plan making and development assessment should have a democratic mandate.
- ♦ Compliance with policy and planning requirements should be determined via technical processes operating at arm's length from related political processes.
- ♦ Duly mandated plan making and development assessment authorities should have autonomy in their deliberations, free of ad hoc intervention from higher authorities.

In the longer term it is essential that any major housing package at the state and/or federal level include critical tax reform, to shift the housing market from being investor driven to majority owner-occupied.

These reforms should principally include:

- ♦ Changes to negative gearing policy; currently no limits are placed on deductions that can be claimed for investment expenses relating to rental properties
- ♦ Changes to capital gains tax discount will over the longer term see rents reduce. Currently there is a 50 percent discount on CGT for investors.

Other reforms could look at additional tax for vacant properties. The City of Vancouver, Canada, introduced an Empty Homes Tax program that requires homeowners to submit a declaration each year and requires homes to be occupied for a minimum period of six months annually. Owners are taxed 3 percent of last assessed value of the property.

- ♦ How can governments and other stakeholders (e.g., property developers) ensure that planning and housing decisions do not create or embed hazard risks?

Planning and housing decisions by government and stakeholders should be informed by comprehensive risk assessments, such as bushfire risk assessment, Environmental Impact Assessments (EIAs) and other risk management approaches such as municipal emergency management plans.

As stated above, current and future hazard risks that should be considered may include land contamination for brownfield areas; increased risk of flooding or bushfire due to climate change; impacts of global warming such as the urban heat island effect; risk of future pandemics and the need for social distancing or other public health measures; or other risks resulting from encroachment on existing commercial or industrial uses such as major hazard facilities.

Existing buffer overlays may assist in informing planning and housing decisions, such as the Victorian Buffer Area Overlay (BAO) proposed to be applied to land surrounding Major Hazard Facilities.

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