



Centre for  
Urban Research

**School of Global, Urban and  
Social Studies**

GPO Box 2476  
Melbourne VIC 3001  
Australia

Tel. +61 3 9925 3585  
Fax +61 3 9925 9888  
Email:

26 July 2023

Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
Canberra ACT 2600

## **INQUIRY INTO THE RENTAL CRISIS: SUBMISSION**

Dear Committee,

Thank you for the opportunity to contribute to the inquiry into the worsening rental crisis in Australia. We are housing justice researchers and advocates working primarily in the context of the State of Victoria. Our submission is attached, which we have also submitted to the current Victorian Parliamentary inquiry into the rental and housing affordability crisis. We also attach here a copy of our submission to the Housing Australia Future Fund Bill provisions inquiry. These documents directly address the current inquiry terms of reference, specifically:

- A. The experience of renters and people seeking rental housing;
- B. Rising rents and rental affordability;
- C. Actions that can be taken by governments;
- D. Improvements to renter's rights;
- E. Factors impacting supply and demand of affordable rentals;
- and
- G. The impact of government programs on the rental sector.

### **Summary of major recommendations:**

- 1. Focus on the provision of public and social housing as social infrastructure
- 2. Establish clear, unambiguous definitions of 'affordable housing' and 'housing stress'
- 3. Include housing and access to Country as integral to the Voice, Treaty, Truth processes
- 4. Develop a State and Territory framework to institute a moratorium on the sale of public land during Voice, Treaty, Truth processes;
- 5. Establish an independent rent guidelines board to provide oversight and national standards on rent adjustments, with a majority board membership comprised of tenants;
- 6. Develop State and Territory frameworks for stricter legislation around rental increases including rent caps and standardising the frequency of rent increases across private rentals;
- 7. Provide a Federal framework for the application of vacant residential land tax
- 8. Provide a Federal framework for standards of liveability in all existing and new rental properties including strengthened energy efficiency and ventilation standards

9. Provide a Federal framework for dedicated legal services programs to provide residential tenancy legal support to tenants;
10. Use the National Housing and Homelessness Agreement framework to ensure the retention and repair of existing public housing and significantly expand the direct provision of new public housing to immediately address waiting lists;
11. Increase social security payments above the Henderson poverty line and raise minimum wage accordingly.

Yours sincerely,

Professor Libby Porter, Dr David Kelly and Dr Priya Kunjan

*Precarious Dwelling*

*Centre for Urban Research*

*RMIT University*

## **Submission to the Senate Standing Committee on Economics, Inquiry into the Provisions of the Housing Australia Future Fund Bill – March 2023.**

### **Concerns with consultation process**

The rapid turnaround for this inquiry significantly undermines the rationale under which the Housing Legislative Package was referred to the Committee for inquiry by the Senate Committee for the Selection of Bills in its Report No. 1 of 2023, that is, a need to consult with stakeholders on details of the package.<sup>1</sup> In particular, the Committee for the Selection of Bills identified that submissions or evidence would be sought from stakeholders in the community and affordable housing and homelessness sectors, tenants' unions, public housing advocates and housing academics. Considering the scope of the Housing Legislative Package and its technical complexity, the two-week submission window from 9 to 23 February is wholly inadequate to obtain considered and detailed feedback. This narrow time frame instead serves to curtail input from the primary stakeholder group affected by the Package: people currently experiencing homelessness or housing insecurity and any tenant unions or grassroots collectives representing their interests. We note that this is an issue carried over from the public consultation process established to obtain feedback on the draft Housing Legislative Package, which was open from 19 December 2022 to 11 January 2023.<sup>2</sup> Both the two-week turnaround and timing of this initial call for submissions were clearly antithetical to the Treasury receiving a broad range of stakeholder feedback on the package.

We present the Committee with the following timeline of the Albanese government's actions on housing since the 2022 federal election to illustrate the pace at which national housing reform is progressing, limiting opportunities for considered stakeholder consultation.

- 30 September 2022: [response](#) to Productivity Commission's [review](#) (released 30 September 2022) of the National Housing and Homelessness Agreement
- 25 October 2022: Federal budget handed down, including:
  - o Establishment of [National Housing Accord](#)
  - o Intent to establish 10-year [National Housing and Homelessness Plan](#) ([Budget Paper No. 2, p. 183](#))
  - o Investment in Housing Australia Future Fund ([Budget Paper No. 2, p. 191-192](#))
- 19 December 2022: announced [Housing Australia Future Fund draft legislation](#), called for responses by 11 January 2023.
- 20 December 2022: announced [interim National Housing Supply and Affordability Council](#), interim council operations commenced 1 January 2023.

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<sup>1</sup> [https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Selection\\_of\\_Bills/Reports/rep0123](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Selection_of_Bills/Reports/rep0123)

<sup>2</sup> <https://treasury.gov.au/consultation/c2022-343652>

- Second quarter of 2022: [consultations](#) will open for the development of the National Housing and Homelessness Plan.

We are also concerned about the specification on the inquiry page that:

“...the committee is not obliged to accept every document it receives as a submission. The committee has the option to accept a document as correspondence, or not accept it at all depending on its content.”<sup>3</sup>

While the inclusion of this proviso is understandable in some cases, we are concerned that its explicit statement on the Housing Legislative Package inquiry page may have specifically discouraged submissions from individuals with lived expertise on housing insecurity, given that the cost of personal disclosure may not be mitigated by the potential benefit of committing this information to the public record via its acknowledgement by the Committee as a legitimate contribution to the inquiry. Adding this proviso also raises questions about the basis upon which the Committee has chosen to accept particular documents as submissions or correspondence, or to reject them outright, and whether any specific group/s of individuals or organizations are more likely to have their submissions received as correspondence or rejected.

## 2. Context

### 2.1 Housing affordability

The financialization of housing in Australia<sup>4</sup> has placed a significant strain on renters, severely compromising their ability to fully enjoy the basic human right to an adequate standard of living as enshrined in article 11 of the International Covenant on Economic, Social and Cultural Rights. The Australian Human Rights Commission notes that this right extends beyond shelter alone to include factors such as the legal security of one’s tenure, affordability, accessibility, habitability, location, cultural adequacy, and the availability of necessary services, materials, facilities and infrastructure.<sup>5</sup> This is especially the case for low-income households, defined by the Australian Bureau of Statistics as “those containing the 38% of persons between the 3rd and 40th percentiles of equivalised disposable household income.”<sup>6</sup>

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<sup>3</sup> [https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Economics/HousingPackageofBills](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/HousingPackageofBills)

<sup>4</sup> <https://theconversation.com/explainer-the-financialisation-of-housing-and-what-can-be-done-about-it-73767#:~:text=The%20financialisation%20of%20housing%20has%20been%20central%20to%20wealth%20creation,and%20foreign%20real%20estate%20investment.>

<sup>5</sup> <https://humanrights.gov.au/our-work/rights-and-freedoms/projects/housing-homelessness-and-human-rights#housing>

<sup>6</sup> <https://www.abs.gov.au/statistics/people/housing/housing-occupancy-and-costs/latest-release>

As outlined in the Productivity Commission's August 2022 review of the National Housing and Homelessness Agreement (NHHA):

"Low-income households spend a higher proportion of their income on rent ('rent burden') than the median renter. The median rent burden for households in the lowest income quintile was 43 per cent in 2019-20, and 32 per cent for households in the second quintile.

Median values can hide very different experiences of rental affordability. The majority — 66 per cent — of private renters with low incomes spent over 30 per cent of their income on rent in 2019-20,<sup>1</sup> while 20 per cent spent over half their income on rent (figure 2).

Private renters who are unemployed, aged over 65 or sole parents tend to spend a larger proportion of their income on rent."<sup>7</sup>

Anglicare Australia's most recent Rental Affordability Snapshot also paints a dire picture of the state of housing affordability across the private rental market. Their 2022 snapshot included 45,992 rental listings across Australia on 19 March 2022. Out of these listings, Anglicare found only 8 rentals affordable for a single person on the JobSeeker payment, and only one listing (in a share house) affordable for a young person on Youth Allowance. For people whose primary income is derived from paid work, there was little difference in rental affordability. The report states:

"A single person working full-time on the minimum wage will find that 1.6 percent of rentals are affordable. Of all of the households featured in this Snapshot, families with two parents each earning a minimum wage stand the best chance of finding an affordable home. Even they will only be able to afford 15.3 percent of the rentals we surveyed."<sup>8</sup>

We note that this level of unaffordability is contributed to both by exorbitant private rental prices as well as structural concerns about adequate incomes for both employed and unemployed workers. This hinges on disparities between the national minimum wage and a sufficient living

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<sup>7</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf> p. 5, internal footnote 1: "In Australia, households are typically considered to be in 'rental stress' if they spend more than 30 per cent of their income on rent and are in the bottom two quintiles (40 per cent) of the income distribution — the '30/40 rule'."

<sup>8</sup> <https://www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf> p. 9

wage in the case of the former,<sup>9</sup> and long-standing concerns about the majority of social security payments sitting below the Henderson Poverty line in the case of the latter.<sup>10</sup>

## 2.2 Government and community housing

The Productivity Commission's review of the NHHA has identified the combination of an unaffordable private rental market and low vacancy rates as driving increased demand for homelessness services and social housing in Australia.<sup>11</sup> It is important here to clearly define 'social housing' given its ambiguous use in government housing policy at both the Commonwealth and State/Territory levels. 'Social housing' is an umbrella term used to refer to both public housing, a form of long-term housing owned and managed by State and Territory governments, and community housing, a similar but distinct tenure type to public housing which is owned and managed by private organizations. Public housing rental rates are set at 25% of a household's income, while community housing rental rates can either vary from 25-30% of a household's income, or in some instances are charged as a percentage of the market rate. Conflating the two tenancy types introduces ambiguity regarding the extent to which government is directly responsible for the provision of long-term, low-cost housing.

A national snapshot prepared by researchers at the University of New South Wales' City Futures Research Centre points to a widespread and growing number of Australia households whose housing needs are not being met. Housing need here was in this case estimated based on 2021 census data and categorized in terms of current homelessness, overcrowded homes, or expenditure of over 30% of income on rent. Researchers identified that on census night in 2021, housing needs were not being met for approximately 640,000 or one in fifteen households.<sup>12</sup> Based on projected household growth over the next few decades, this amount is set to increase to over 940,000 households with unmet housing needs in 2041.

While public housing wait lists do not necessarily provide a faithful representation of demand for social housing overall, their increasing length also gestures towards a significant and widespread need for more affordable tenures. The Australian Institute of Health and Welfare's latest 'Housing assistance in Australia' report identified that at June 2021, there were 163,500 households on public housing waiting lists across all States and Territories (up from 154,600 at

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<sup>9</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf>

<sup>10</sup> [https://melbourneinstitute.unimelb.edu.au/\\_data/assets/pdf\\_file/0007/4222195/Poverty-Lines-Australia-March-2022.pdf](https://melbourneinstitute.unimelb.edu.au/_data/assets/pdf_file/0007/4222195/Poverty-Lines-Australia-March-2022.pdf)

<sup>11</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf> p. 6, see also <https://www.ahuri.edu.au/research/brief/why-does-australia-have-rental-crisis-and-what-can-be-done-about-it>

<sup>12</sup> <https://cityfutures.adfa.unsw.edu.au/documents/699/CHIA-housing-need-national-snapshot-v1.0.pdf>

June 2014).<sup>13</sup> Of those households, 67,700 or over 41% were identified as greatest need, defined as households currently experiencing or at acute risk of homelessness (compared to 43,200 at June 2014). At June 2021, there were also 12,100 households on a waiting list for state owned and managed Indigenous housing (an increase from 8,000 at June 2014). Of these households, 6,500 or nearly 54% were identified as greatest need households (up from 3,800 at June 2014).

Often left out of the discussion about public housing wait times is the level of ‘churn’ in waiting lists, given unrealistic wait times. As noted by researchers from the University of New South Wales City Futures Research Centre:

“Social housing waiting lists now see high rates of ‘churn’, with the large cohort of applicants newly registering each year paralleled by substantial numbers exiting lists without being allocated a social housing tenancy. Unpublished statistics for NSW suggest that in 2020-21, over 6,000 registrations were cancelled or otherwise ended during the year, in addition to the 12,000 ended via a social housing tenancy allocation.”<sup>14</sup>

## 2.3 Systemic concerns

A key finding in the Productivity Commission’s review of the NHHA was the lack of coordinated, cooperative intergovernmental action on housing and homelessness in Australia. Reviewers described the NHHA as operating more as a “funding agreement for homelessness and housing services than an agreement for coordinated policy action,” highlighting the gulf between entrenched approaches to addressing housing provision in Australia and the need for sustainable and long-term initiatives aimed at reducing homelessness and housing insecurity.<sup>15</sup> With an increasing number of people seeking support from specialist homelessness services – and more people being turned away due to lack of service capacity – it is clearer than ever that Australia requires a robust and coordinated response to the housing crisis.<sup>16</sup> The Albanese government’s decision to take up the challenges identified in the NHHA review and other systemic assessments of housing affordability and stress in Australia is a crucial intervention but falls far short of what is required to ensure a long-term reduction in housing insecurity.

## 3. Terminology and definitions

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<sup>13</sup> <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia/contents/households-and-waiting-lists#Waiting>

<sup>14</sup> [https://cityfutures.ad.unsw.edu.au/documents/685/Waithood\\_paper.pdf](https://cityfutures.ad.unsw.edu.au/documents/685/Waithood_paper.pdf) p. 1

<sup>15</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf> p. 9

<sup>16</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf> p. 6

The use of the phrase ‘social and affordable housing’ in the Housing Legislative Package is both vague and worrying, given its broad range of possible interpretations. This phrase does not signal that all housing built under the Package will be affordable and shies away from a clear statement of governmental responsibility to address housing insecurity (that is, via public housing). We are therefore concerned that the use of ‘social and affordable housing’ leaves significant room for government to divert resources away from a focus on public housing and towards community housing (with its associated higher and variable rental costs and arbitrary conditions for tenancy) under the ‘social’ housing umbrella. There are also issues with the use of the term ‘affordable’, given that while housing branded as such is notionally leased at below-market rates, these may still be well out of reach of low- to moderate-income earners. Concerns about the failure to adequately and consistently define terms related to housing in/security in intergovernmental initiatives have also been raised in the Productivity Commission's review of the NHHA, which drew attention to inconsistencies in the use ‘affordability’, ‘safety’ and ‘sustainability’ in relation to housing.<sup>17</sup>

While a definition for ‘affordable housing’ is included in the Explanatory Memorandum for the Housing Legislative Package, we are concerned that this unhelpfully combines notions of ‘housing affordability’ and ‘housing stress’. Housing affordability is described by the Australian Housing and Urban Research Institute as a general term referring to the relationship between housing costs and household incomes.<sup>18</sup> There are multiple approaches to measuring conditions of housing stress, but it is most commonly assessed based on the aforementioned ratio determining housing affordability, where conditions of stress are typically characterized by housing costs exceeding 30 per cent of household income. However, standard definitions of both housing affordability and housing stress do not necessarily account for intersecting concerns which augment the affordability and appropriateness of housing, risking the miscategorization of certain households as not experiencing significant *housing-related* stress. Stressors include the cost of utility bills for heating and cooling poorly insulated homes, as well as structural and/or maintenance issues leading to basic services being put out of commission for long periods of time. Other examples of housing-related stress include people with disability living in homes that do not meet their access needs while technically being affordable, or housing that costs below 30% of household income but with a trade-off in terms of proximity to employment, services and community.

#### **4. Establishment of the Housing Australia Future Fund (HAFF)**

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<sup>17</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf>

<sup>18</sup> <https://www.ahuri.edu.au/research/brief/what-difference-between-social-housing-and-affordable-housing-and-why-do-they-matter>



#### 4.1 Rationale

- The commitment to build 20,000 units of 'social housing' plus 10,000 units of 'affordable housing' in the first five years of the fund is grossly insufficient to meet current levels of housing need. The Australian Housing and Urban Research institute has projected that eliminating unmet need for social housing will instead require the provision of 727,300 additional dwellings by 2036.<sup>19</sup> Attempting to address this scale of housing insecurity off-budget is unrealistic and does not signal a serious government commitment to housing equity.
- We are concerned about an under-emphasis on needs-based assessment when this should be central to the provision of government housing support. For example, the Explanatory Memorandum makes no reference to lists of public housing already generated by States and Territories. Despite inadequacies in the current operation of public housing registers across States and Territories, failing to consider even this basic level of needs-based assessment to guide decision-making about the allocation of funds for housing development raises significant concerns about the ability of the Fund to alleviate housing insecurity for the most vulnerable members of the population.
- Per the October 2022-23 federal budget, government intends to extend the National Housing and Homelessness Agreement (a set of bilateral agreements between the Commonwealth government and State and Territory governments) until 30 June 2024 to allow for the development of a 10-year National Housing and Homelessness Plan, which is intended to replace the former arrangement.<sup>20</sup> Given the significance of the plan's mandate, that is, to provide targeted support to improve housing outcomes, particularly for those who are homeless or at risk of homelessness, the lack of clarity on how this proposed transition will occur and regarding the role and functions of the National Housing and Homelessness Plan in general is extremely concerning. The Explanatory Memorandum for the Housing Legislative Package includes a single reference to the National Housing and Homelessness Plan (on page 8 of the Explanatory Memorandum) and barring a general reference by Minister Collins in a September 2022 media release,<sup>21</sup> there is no indication that the development of the Plan will respond to the concerns outlined in the Productivity Commission's review of the National Housing and Homelessness Agreement.

#### 4.2 Operation

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<sup>19</sup> <https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI-Final-Report-306-Social-housing-as-infrastructure-an-investment-pathway.pdf> p. 63

<sup>20</sup> [https://budget.gov.au/2022-23-october/content/bp2/download/bp2\\_2022-23.pdf](https://budget.gov.au/2022-23-october/content/bp2/download/bp2_2022-23.pdf) p. 183

<sup>21</sup> <https://ministers.treasury.gov.au/ministers/julie-collins-2022/media-releases/productivity-commissions-review-national-housing-and>

- The Future Fund Management Agency's own reporting does not indicate optimism about returns on investment and future portfolio outcomes. The following quotes are drawn from the Agency's 2021-22 annual report, raising questions about the ability of the HAFF to generate adequate returns to fund the government's housing plan.
  - "...the supply shocks experienced over the past two years have accelerated these structural trends, leaving the world more divided than it has been in decades. The unwinding of globalisation and onshoring of critical supply chains, a re-tooling of electricity grids alongside the decarbonisation trend, and a more divided and adversarial global environment will be costly. It will likely lead to structurally higher inflation. As a result, we expect the policy backdrop to be more difficult for financial markets over coming years."<sup>22</sup>
  - "The current and near-future economic outlook is expected to remain volatile with ongoing rate rises both domestically and globally, and inflationary risk remaining prevalent."<sup>23</sup>
  - The Future Fund Management Agency's 2021-2022 report makes reference to currently operating within a "low-return environment."
  - "We seek genuine diversification that achieves greater balance in portfolio construction, while allocating risk in a flexible and dynamic manner. Our view is that the mix of growth and inflation is likely to be worse going forward (more inflation for each unit of growth) and key economic variables are likely to be more varied across regions and more volatile. We expect risk premia to be higher and expected real returns lower, relative to history."<sup>24</sup>
- Disbursements from the HAFF are to be made via the authority of the Housing Minister (in consultation with the Treasurer and Finance Minister), and on the basis of advice from the National Housing Supply and Affordability Council (the Council). In practice, this means that both the Housing Minister (and other relevant ministers) and the Council itself will have a significant amount of discretion in allocating funds. Additionally, there is no explicit provision in the Explanatory Memorandum that funding allocation will be clearly linked to a needs assessment or that special attention will be paid to the targeted provision and maintenance of public housing.
- We endorse the recommendation made in Anglicare's submission on the draft legislation to add "a clause to the Bill ensuring the Government meets its obligations to investors and

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<sup>22</sup> <https://www.transparency.gov.au/annual-reports/future-fund-management-agency/reporting-year/2021-22-78>

<sup>23</sup> <https://www.transparency.gov.au/annual-reports/future-fund-management-agency/reporting-year/2021-22-71>

<sup>24</sup> <https://www.transparency.gov.au/annual-reports/future-fund-management-agency/reporting-year/2021-22-33>

assuring the adequacy of returns,” as well as a clause “requiring that the Government at least maintain its value, and reinvest any surplus generated back into the Fund.”<sup>25</sup>

- We also wish to note that there are alternatives to generating government revenue that can more immediately begin meeting housing needs at a rate commensurate to the scale of the crisis. For example, winding back negative gearing and the capital gains tax discount will release significant resources,<sup>26</sup> which can then be re-invested in the building and maintenance of public housing as well as into front-line housing and homelessness supports. Such measures would begin to address not only acute housing needs via the increased availability of government revenue but would productively contribute to a structural transformation of a housing market which has become dominated by the private sector in part *because* of excessive tax incentives provided to investment property owners. The Treasury’s 2022-23 Tax Expenditures and Insights Statement reveals that the owner-occupier capital gains tax concession and discount in combination with landlord rental concessions (negative gearing) amounted to a total of \$72.4 billion in foregone revenue.<sup>27</sup>

## 5. Creation of the National Housing Supply and Affordability Council

### 5.1 Role and function

- The Council’s mandate is to deliver “independent advice to the Government on options to improve housing supply and affordability across the housing spectrum” (p. 2, Explanatory Memorandum). However, we are concerned about the independence of the Council given that the Deputy Secretary will be an employee of the Treasury Department.
- The Council’s mandate appears to be restricted to simply “monitoring conditions which impact housing supply and affordability” (p. 51, Explanatory Memorandum). In our view, this scope is far too narrow and does not logically connect to tangible, targeted initiatives to reduce housing insecurity. The Council should instead be tasked with advising government on actively reducing housing insecurity overall, paying specific attention to meeting levels of need for public housing provision and maintenance.
- The Explanatory Memorandum’s statement of compatibility with human rights includes the assertion that the Council’s work “supports and promotes the right to social services by ensuring the government is aware of housing conditions and can provide targeted social services on a needs basis” (p. 87). However, similar to our concern with the dissonance between monitoring housing security and proactively advocating to reduce it, there is no clear connection between the Council’s role and the government’s provision of social

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<sup>25</sup> [https://treasury.gov.au/sites/default/files/2023-02/c2022-343652-anglicare\\_australia.pdf](https://treasury.gov.au/sites/default/files/2023-02/c2022-343652-anglicare_australia.pdf) p. 4

<sup>26</sup> <https://grattan.edu.au/wp-content/uploads/2016/04/872-Hot-Property.pdf>

<sup>27</sup> <https://treasury.gov.au/sites/default/files/2023-02/p2023-370286-teis.pdf>

services. This claim of compatibility with the right to social services is especially disingenuous given that the Housing Legislative Package neglects to focus specific attention to the provision of public housing and state-delivered housing and homelessness support services.

## 5.2 Composition

- There are significant concerns about the proposed composition of the Council, especially given its influential role in advising the Housing Minister in relation to the disbursement of funds from the HAFF. Subsection 22(2) of the Housing Council Bill specifies that appointees to the council must have “substantial expertise and standing in at least one of a number of fields including the housing needs of Aboriginal persons and Torres Strait Islanders, economics, planning, development, residential construction, demography, social housing, social policy, housing and homelessness policy, and regulation, taxation or government policy related to housing” (pp. 47-48, Explanatory Memorandum). However, this avoids any requirement that the Council include people with lived experience of housing insecurity or relevant representative groups, such as tenant unions or grassroots housing advocacy groups.
- As identified by the National Aboriginal and Torres Strait Islander Housing Association in their submission to this inquiry (number 13), there appears to be no requirement in the current Housing Legislative Package for specific representation of Aboriginal and Torres Strait Islander peoples, nor is there a requirement for representation of people with disability.
- Interim council members have already been appointed in December 2022, with a term from 1 January 2023 until the permanent establishment of the council with the passing of the Housing Legislative Package. The composition of the interim council reflects the concerns raised above, with no Aboriginal and Torres Strait Islander representatives, no representatives from the disability sector, and no representation from tenant advocacy or other housing and homelessness peer advocacy groups.
- Finally, considering the responsibilities of the Council, restricting its membership to between 7-10 members (4-7 non-officeholders) seems antithetical to developing robust advice on addressing concerns about housing affordability and insecurity that genuinely attempts to balance a range of different perspectives and stakeholder interests.

## 6. Conclusion and Recommendations

This submission began by briefly outlining the scale of widespread and rising housing insecurity in Australia, highlighting the systemic nature of concerns about housing affordability and supply and emphasizing that this can only be addressed with systemic solutions. Australia’s housing crisis speaks to decades of government failure at both the Commonwealth and State and

Territory levels to engage in coordinated and integrated action on housing, and instead progressively divesting from responsibilities to provide secure and affordable tenures via public housing. This has been accompanied by the increasing financialization of Australia's housing market, which serves to further diminish the right to housing for at least one third of the population. These issues intersect with and are uniquely inflected by the phenomenon of ongoing colonization and its specific negative consequences for the housing security of Aboriginal and Torres Strait Islander peoples. Housing insecurity is also compounded for a significant proportion of the population due to the grossly inadequate rate of social security payments, which continue to fall below the Henderson poverty line. With this range of issues in mind, it is clear that seeking to address the housing crisis with strategies that are deferred, off-budget, non-representative of the stakeholders that are most affected, and without explicitly addressing the features of Australia's taxation system that incentivize the production of housing insecurity is simply not good enough.

**Recommendation 1: Focus on the provision of social housing as social infrastructure.** We refer you to the Australian Housing and Urban Research Institutes' *Social housing as infrastructure* research report, a thoroughly evidenced review of investment pathways for the future provision of social housing in Australia.<sup>28</sup> The report articulates the scale, type and location of need for current and future provision, and accurately details the cost of procuring appropriate dwellings in strategic locations. Five alternative pathways involving a range of debt, efficient financing and capital grant strategies have been modelled to assess their relative costs to government. The research examines five investment pathways and shows that the 'capital grant' model, supplemented by efficient financing, provides the most cost-effective pathway for Australia – put simply, direct cash investment by federal government for state housing authorities to build public housing. Conversely, the most cost ineffective model is the 'no capital grant, commercial financing operating subsidy' model. The findings of the research, grounded in empirical evidence, point to a number of key recommendations:

- for a shift to thinking about social housing as a social infrastructure akin to schools and hospitals;
- to introduce a needs-based framework for allocating funds that demonstrates transparent costings based upon up-to-date evaluations; and
- to adequately assess the scale and spatiality of deficit and need through appropriate research that can inform the right pathway for investment – identified in 2018, as an urgent need for 730,000 new social dwellings over the next 20 years. 100 new dwellings, per day, for 20 years.

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<sup>28</sup> <https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI-Final-Report-306-Social-housing-as-infrastructure-an-investment-pathway.pdf>

This is the most comprehensive, empirically informed and real-world tested analysis of applicable and viable funding pathways for the current need and future demand of public/social housing in Australia.

**Recommendation 2: Establish clear, unambiguous definitions of ‘affordable housing’, ‘housing affordability’, and ‘housing stress’.** Definitions should be developed in consultation with relevant experts including but not limited to tenants’ unions and grassroots housing advocacy groups, housing researchers and housing and homelessness sector service providers. These definitions should be consistent across the portfolios of Housing, Treasury, Finance, Social Services, Prime Minister and Cabinet, and any other portfolios whose responsibilities relate to the resourcing, coordination, provision or maintenance of housing in Australia, or to the provision of homelessness and housing services.

**Recommendation 3: In addition to submissions made to this inquiry, the Committee must engage with submissions made by tenants’ unions and grassroots housing advocates made to the inquiry currently being undertaken by the Select Committee on the Cost of Living to inform a more holistic assessment of the Housing Legislative Package.** Given the lack of adequate time provided for stakeholder feedback in the present inquiry, the issues detailed by these particular groups in relation to both Commonwealth and State and Territory approaches to housing policy included in submission to the Cost of Living Inquiry must be considered an essential supplement to the Committee’s deliberation on the Housing Legislative Package.

## Submission to the Victorian Parliament Inquiry into the rental and housing affordability crisis – July 2023

### Affordability and access

Homes Victoria's Rental Report for the March quarter 2023 constructs a dire image of the housing crisis in Victoria, in particular the rate at which private rental unaffordability is increasing in the state. The report notes that not only has the Melbourne Rent Index increased by 5.2% in the March quarter, but that it increased by 14.6% in the twelve months to March 2023.<sup>1</sup> This represents the highest annual increase since the beginning of the Rental Report series in 2000, eclipsing the 4.0% rate of change in the 12 months to March 2022 and the average annual increase over the past 10 years of 2.4%.

Affordability is the primary factor affecting the growth of housing inadequacy in Victoria. Whilst affordability stress is expanding to envelop more people, the effects are most acutely felt by people on low and very low incomes (bottom two quintiles of income distribution). Homes Victoria defines low-income households as those whose primary income consists of social security payments, with a benchmark for housing affordability set at no more than 30% of gross income spent on rent. Their March 2023 report showed a decline in the proportion of new lettings in the state affordable to low-income households to 8.8%, the lowest since the beginning of the series, and at a time when rent and housing stress is on the rise.

Anglicare Victoria defines low-income households as those whose primary income consists of social security payments and/or minimum wage.<sup>2</sup> They categorise rental costs as affordable if they fall below 30% of total household income, noting that "above 30 per cent is commonly considered to indicate housing stress for low-income households." Anglicare Victoria's 2023 rental affordability snapshot identified less than 1% of 11,687 private rental listings as suitable for households living on income support payments.<sup>3</sup> Anglicare's report also found that only a quarter of assessed properties were suitable (affordable and appropriate) for households living on the minimum wage.

The ABS' latest census data showed that across occupied private dwellings in 2021, 30.9% of Victorian renter households had rental costs greater than 30% of household income, a total of 210,437 households.<sup>4</sup> We note with concern the relationship between this ABS analysis and the Australian Council of Social Services' findings regarding poverty and tenure type in Australia. ACOSS' 2023 *Poverty in Australia* report revealed that "in 2019-20 the risk of poverty was twice as great (20% or 1,238,000 people) for people in households renting privately than for home purchasers (10% or 492,000 people) and homeowners (8% or 1,004,000 people), reflecting the higher cost and/or lower incomes of people in private rental housing."<sup>5</sup>

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<sup>1</sup> Homes Victoria Rental Report – March quarter 2023, p. 4 <https://www.dffh.vic.gov.au/publications/rental-report>

<sup>2</sup> <https://www.anglicarevic.org.au/wp-content/uploads/2023/04/Victorian-Rental-Affordability-Snapshot-2023.pdf> p. 31

<sup>3</sup> <https://www.anglicarevic.org.au/wp-content/uploads/2023/04/Victorian-Rental-Affordability-Snapshot-2023.pdf> p. 5

<sup>4</sup> <https://abs.gov.au/census/find-census-data/quickstats/2021/2>

<sup>5</sup> [https://povertyandinequality.acoss.org.au/wp-content/uploads/2023/03/Poverty-in-Australia-2023\\_Who-is-affected\\_screen.pdf](https://povertyandinequality.acoss.org.au/wp-content/uploads/2023/03/Poverty-in-Australia-2023_Who-is-affected_screen.pdf) p. 60

The relationship between tenure type and risk of poverty also sits in tension with the Victorian government's Affordable Housing Rental Scheme. While ostensibly leased at a lower cost than private rental properties, housing provided within this scheme is still extremely unaffordable for people on the lowest incomes. Instead, these properties are targeted at households with low to moderate incomes,<sup>6</sup> under the assumption that public and community housing stock is at present meeting the needs of very low-income households. Under this scheme, "rents in metropolitan Melbourne are set at least 10 per cent below the area's median market rent, with the added protection of a cap set at 30 per cent of the median income."<sup>7</sup>

### *Digital rights and privacy concerns*

We are concerned about the increasing use of data collection platforms like Snug by landlords and real estate agencies. These platforms opaquely aggregate tenant applicant data to build digital suitability profiles from a variety of third-party sites, with data collection reliant on a lack of both regulatory protections and choice for renters in the private market.<sup>8</sup>

It is additionally concerning that Homes Victoria's choice to allocate affordable housing by ballot relies on the Snug platform to host affordable housing listings curated by the Victorian Affordable Rentals Consortium.<sup>9</sup>

Allocating affordable housing by ballot goes against stated commitment to fairness and transparency in announcement of the Victorian Affordable Housing Program in the Victorian Government Gazette: "By Homes Victoria (or its nominee) to satisfy the eligibility criteria of the Affordable Housing Rental Scheme while also promoting fairness and transparency in the selection process."<sup>10</sup>

### Stress

In their analysis of 2021 census data, researchers at UNSW's City Futures Research Centre identified over 640,000 households across the country whose housing needs were not being met.<sup>11</sup> Unmet need was captured by identifying households in private rentals within the lowest income quintile who were paying over 30% of their income in rent. In Victoria, unmet need was identified for 6% or 109,800 households in metropolitan Melbourne, while in the state's regions, 5.7% or 36,300 households experienced unmet need in 2021. In order to meet the needs of these households, researchers identified the importance of "a steady supply of non-market housing, including social and affordable housing."<sup>12</sup> They emphasised that "a striking feature of our times is that pressure to obtain or retain a safe, secure, and affordable rental

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<sup>6</sup> <https://www.gazette.vic.gov.au/gazette/Gazettes2023/GG2023G004.pdf#page=15> pp. 79-81

<sup>7</sup> <https://www.premier.vic.gov.au/providing-affordable-housing-more-victorians>

<sup>8</sup> <https://www.theguardian.com/australia-news/2022/nov/17/imperfect-match-australian-renters-in-the-dark-over-use-of-data-by-tech-company-snug>

<sup>9</sup> <https://app.snug.com/apply/varc>, <https://www.theguardian.com/australia-news/2023/feb/20/its-worrying-victorias-affordable-rental-housing-to-be-allocated-by-ballot-rather-than-need>

<sup>10</sup> <https://www.gazette.vic.gov.au/gazette/Gazettes2023/GG2023G004.pdf#page=15> p. 81

<sup>11</sup> <https://cityfutures.adu.unsw.edu.au/documents/699/CHIA-housing-need-national-snapshot-v1.0.pdf>

<sup>12</sup> <https://cityfutures.adu.unsw.edu.au/documents/699/CHIA-housing-need-national-snapshot-v1.0.pdf>



home has spread from lower income groups and tenants facing precarity linked to multiple disadvantages to people in the 'middle', holding jobs and with long histories as private renters."<sup>13</sup> Significant in this analysis is an emphasis on the increasing prevalence of housing stress among previously more insulated segments of the population, which is occurring alongside a continued failure by state and federal governments to meet the needs of those experiencing the greatest levels of vulnerability.

In the 2021 census, Victoria reported the highest rate of homelessness after the Northern Territory, with 47.1 per 10,000 people reported as homeless on census night (563.6 per 10,000 people in the Northern Territory).<sup>14</sup> Victoria also saw both a real increase in the number of Aboriginal and Torres Strait Islander peoples experiencing homelessness between 2016 and 2021 as well as a relative increase compared to non-Indigenous people experiencing homelessness in the state over this period.<sup>15</sup> The AIHW also reported that the rate of Indigenous people seeking assistance from specialist homelessness services in Victoria increased from 1703.2 per 10,000 in 2020-2021 to 1769.0 per 10,000 in 2021-2022.<sup>16</sup> Additionally, in Victoria between 2021-2022, the AIHW found that "one in 64 people received homelessness assistance, higher than the national rate (one in 94). The top 3 reasons for clients seeking assistance were:

- Financial difficulties (46%, compared with 39% nationally)
- Family and domestic violence (44%, compared with 37%)
- Housing crisis (34%, compared with 37%)."<sup>17</sup>

The Productivity Commission's 2022 report on the National Housing and Homelessness Agreement identified that the unaffordability of private rentals combined with low vacancy rates are driving an increased demand for NHHF-funded homelessness support services and for public and community housing.<sup>18</sup> However, unaffordability and low vacancy rates also work to undermine the cost and effectiveness of NHHF-funded services, given that pathways out of crisis and transitional accommodation have become over-reliant on available private rental properties. This results in increasing numbers of homeless and at risk of homeless households cycling through the homelessness services sector. This is due to the chronic and systemic lack of exits from the system which is the direct result of inadequate government investment in the building and maintenance of public housing, a tenure that affords longer-term rental security and greater affordability for those in greatest housing need.

## Dwelling adequacy

Despite the introduction of a suite of rental tenancy protections introduced in 2021, renters in Victoria still face considerable barriers to enforcing their housing rights. For example, and as outlined in Tenants Victoria's report on mould in Victorian rental properties, renters across private, public and community

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<sup>13</sup> <https://tenantsvic.org.au/articles/files/submissions/Senate-Community-Affairs-References-Committee-Poverty-Inquiry-February-2023.pdf> p.2

<sup>14</sup> 20490DO001\_2021 Estimating homelessness: Census, 2021, Table 1.1

<sup>15</sup> 20490DO001\_2021 Estimating homelessness: Census, 2021, Tables 1.3 and 1.5

<sup>16</sup> [https://www.aihw.gov.au/getmedia/5b974c8a-85d2-4f3e-8573-c14deec7a559/HOU331\\_Factsheet\\_Vic.pdf.aspx](https://www.aihw.gov.au/getmedia/5b974c8a-85d2-4f3e-8573-c14deec7a559/HOU331_Factsheet_Vic.pdf.aspx)

<sup>17</sup> [https://www.aihw.gov.au/getmedia/5b974c8a-85d2-4f3e-8573-c14deec7a559/HOU331\\_Factsheet\\_Vic.pdf.aspx](https://www.aihw.gov.au/getmedia/5b974c8a-85d2-4f3e-8573-c14deec7a559/HOU331_Factsheet_Vic.pdf.aspx)

<sup>18</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf> p. 6

housing have been forced to endure conditions that pose significant risks to their health.<sup>19</sup> Equally serious is the potential that some of the properties discussed may be structurally compromised due to the presence of large quantities of mould. The report outlined that:

In Victoria, mould is an ‘urgent repair’ and should be fixed by a landlord as soon as possible. But is this really happening? Strikingly, 32 landlords involved in complaints to the Mould Clinic in winter last year explicitly refused requests for repairs and a further 57 landlords prevaricated: that is, they delayed the mould repairs or did not respond to the renters’ requests for repairs.<sup>20</sup>

We also wish to draw the Committee’s attention to the mismatch between social housing minimum standards and those applied to private residential tenancies. This is an area where government can play a significant role in improving the dwelling conditions of renters across all property types, and we would appreciate the opportunity to provide the Committee with further information on this issue as our current research progresses.

Sweltering Cities, a national campaign group that works at the intersection of climate justice, inequality and health, identified that tenants still face considerable hurdles to enforcing rental protections introduced in 2021, particularly in relation to heat stress. The prevalence of poor-quality inadequate dwellings in Victoria has meant that tenants are forced to endure unsafe housing, for fear that raising concerns will lead to termination of tenancy or other punitive actions from landlords. Thermal minimum standards across that are standardised across tenancy types are currently absent in the Victorian legislative framework. A lack of adequate provision of heating and cooling infrastructure in houses is a serious concern when considering the increasingly extreme annual temperature fluctuations due to climate change.

The adequacy of public housing units over time in Victoria is a particular area of concern. In 2012, the Victorian Auditor General’s Office report (Access to Public Housing) described the situation for public housing in Victoria as “critical” and that the “long-term provision of this vital public service is at risk”. The report is a searing indictment on the operating model of the Victorian Housing Authority, citing a lack of overarching direction, and absence of a strategic, long-term and comprehensive approach to managing its portfolio. It cited multiple instances since 2006, where Departments and Ministers were made aware of the deterioration of public housing, yet no action was taken. Asset management strategies have not been reviewed or updated in time and that there is modest existing data on the condition and occupancy of stock, resulting in rising maintenance costs, and ineffective communication with regional offices and residents. It recommended that the government:

- develop a long-term plan for public housing with clear objectives
- develop a comprehensive asset management strategy and vigorously monitor performance
- update and strengthen property condition data across the portfolio
- apply relevant data and medium- and longer-term forecasts to asset management strategies

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<sup>19</sup> <https://tenantsvic.org.au/articles/files/reports/The-Mould-Report-A-Renter-Snapshot-May-2023.pdf>

<sup>20</sup> <https://tenantsvic.org.au/articles/files/reports/The-Mould-Report-A-Renter-Snapshot-May-2023.pdf> p. 5

Public housing in Victoria has been affected by a policy of ‘managed decline’ that has been in place for at least the last three decades.<sup>21</sup> Successive governments have been fully aware of the deterioration of the public stock portfolio, which has in turn been used as a rationale for the privatization (in part) of the portfolio. The proportion of Victorian public housing dwellings that were at acceptable living standards (with at least four working facilities and not more than two major structural problems) has declined from 83.7% in 2014 to 73.6% in 2021.<sup>22</sup>

## Availability

Homes Victoria’s March quarter 2023 Rental Report identified a drop in total number of new dwellings across the previous 12 months, with listings falling by 14.7% to 61,150 since the March quarter 2022.<sup>23</sup> This reflected decreases over the period in both metropolitan Melbourne (by 16.7%) and in regional Victoria (by 1.8%). Anglicare Victoria’s rental affordability snapshot for 2023 alternatively identified a 44% reduction in the number of affordable rental properties in metropolitan Melbourne over the previous year, falling from 17,511 to 9,852.<sup>24</sup>

Supply-side proposals to tackle the housing crisis generally advocate for an increase in housing stock as a solution for housing unaffordability. These proposals largely focus on an increase in private housing stock, whether this is via build-to-rent initiatives or housing complexes intended for private purchase. However, we argue that housing affordability and availability issues cannot solely be solved by supply-side changes.

A recent AHURI report outlines that assumptions underpinning proposals for filtering as a source of affordable housing are misplaced: “there is little corresponding evidence that these age-related price dynamics are sufficient to generate a supply of affordable housing for low-income households. Under the prevailing housing market and planning conditions, the evidence does not support relying on filtering as a substitute for the non-market provision of affordable housing for low-income households.”<sup>25</sup>

We argue that rather than the housing system suffering from a lack of *availability*, the rates of housing insecurity reported both in Victoria and across the country are due to a problem with *distribution*. Policy incentives encourage and accelerate the supply of ‘asset housing’ which positions private rental as a passive income vehicle that seeks the highest possible rent. When the asset can no longer maximise rent due to cost neutral/prohibitive factors such as repairs and maintenance, equity growth of the asset offsets potential rent thus incentivising vacancy.

The current housing system in Victoria a massive undersupply of non-market housing. Recent research states that the unmet need for non-market housing in Victoria will grow to at least 727,300 properties

<sup>21</sup> <https://cur.org.au/cms/wp-content/uploads/2019/05/understanding-the-impacts-of-phrp-final-5-6-19.pdf>

<sup>22</sup> <https://www.pc.gov.au/ongoing/report-on-government-services/2023/housing-and-homelessness/housing>

<sup>23</sup> Homes Victoria Rental Report – March quarter 2023 p. 4

<sup>24</sup> <https://www.anglicarevic.org.au/wp-content/uploads/2023/04/Victorian-Rental-Affordability-Snapshot-2023.pdf> p. 5

<sup>25</sup> <https://www.ahuri.edu.au/sites/default/files/documents/2022-09/AHURI-Final-Report-387-Filtering-as-a-source-of-low-income-housing-in-Australia-conceptualisation-and-testing.pdf> p. 1

over the next 15 years<sup>26</sup>. Without a significant rise in social security payments and corresponding real wage growth to match increased housing costs, it is unlikely that an increase in housing supply inattentive to the type of housing stock being generated will improve the dwelling conditions of low-income households.

Both new applications and transfer applications for public housing on the Victorian Housing Register increased in the 12 months to March 2023.

**Table 1. Applications by type — new applications only<sup>27</sup>**

	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23
<b>Priority</b>	30,669	30,766	31,079	30,915	31,158
<b>Register of interest</b>	24,428	24,277	25,064	26,757	26,973
<b>Total</b>	55,097	55,043	56,143	57,672	58,131

**Table 2. Applications by type — total applications<sup>28</sup>**

	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23
<b>Priority</b>	36,237	36,223	36,448	36,459	37,079
<b>Register of interest</b>	28,067	27,945	28,862	30,661	30,906
<b>Total</b>	64,304	64,168	65,310	67,120	67,985

The Victorian state government has a crucial role to play in providing non-market housing to address the housing crisis. The Productivity Commission's 2019 *Vulnerable private renters* report included a critical appraisal of the relationship between private investment and the provision of affordable housing that bolsters this assertion. The report noted that it is unclear "that institutional investment provides an avenue for more affordable housing in particular. So far, most of Australia's pioneering build-to-rent projects have targeted the premium segment of the rental market (for example, see Mirvac 2018). Private investors will not provide accommodation below market rents without ongoing government subsidies, and the experience with the National Rental Affordability Scheme is that the subsidies required are large

<sup>26</sup> <https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI-Final-Report-306-Social-housing-as-infrastructure-an-investment-pathway.pdf>

<sup>27</sup> <https://www.homes.vic.gov.au/applications-victorian-housing-register-vhr>

<sup>28</sup> <https://www.homes.vic.gov.au/applications-victorian-housing-register-vhr>

and difficult to target well (box 5.1).”<sup>29</sup>

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<sup>29</sup> <https://www.pc.gov.au/research/completed/renters/private-renters.pdf> p. 106

## Recommendations

Area	Recommendation
1. First Nations housing equity	1.1 Include housing and access to Country as integral to Treaty negotiations
	1.2 Fully implement the recommendations of the Victorian Aboriginal Housing and Homelessness Framework. <sup>30</sup>
	1.3 Institute a moratorium on the sale of public land during Treaty negotiations
2. Housing availability and affordability (across all forms of tenancy)	2.1 Include the right to adequate housing as a standalone right within the Victorian Charter of Human Rights and Responsibilities.
	2.2 Establish an independent Victorian rent guidelines board <sup>31</sup> to provide oversight over proposed or actual rent adjustments, with board membership comprised of at least 50 per cent Victorian tenants.
	<p>2.3 Legislate stricter regulations around rental increases, including but not limited to:</p> <ul style="list-style-type: none"> <li>- Immediately introducing a cap on rent increases to a maximum of 5% of current rent.</li> <li>- Reversing rent increases that have occurred since January 2022 and are in excess of 5% of the previous rent price.</li> <li>- Standardising the frequency of rent increases across private rentals to a maximum of one increase per 12 months for both periodic and fixed-term tenancies, including those commencing prior to 19 June 2019. This should apply both within and across tenancies such that rent increases can only be proposed for a property once every 12 months of dwelling, to prevent more frequent rent increases between consecutive tenancies in the same property.</li> <li>- Increasing the minimum notice period for a rent increase from 60 to 120 days.</li> </ul>
	2.4 Increase and expand the application of vacant residential land tax, including but not limited to the following actions:

<sup>30</sup> [https://www.vahhf.org.au/cms\\_uploads/docs/victorian-aboriginal-housing-and-homelessness-framework\\_complete\\_26\\_02\\_20.pdf](https://www.vahhf.org.au/cms_uploads/docs/victorian-aboriginal-housing-and-homelessness-framework_complete_26_02_20.pdf) pp. 90-91

<sup>31</sup> An example of this model is the City of New York's Rent Guidelines Board.  
<https://rentguidelinesboard.cityofnewyork.us/>

	<ul style="list-style-type: none"> <li>- Changing the classification of a vacant residential property to one that has not been lived in for more than three months in the preceding calendar year.</li> <li>- Implementing a 5% yearly increase to the tax, applied from the second consecutive year that the property is classified vacant.</li> <li>- Imposing a maximum limit for a property to be owned and kept vacant under the definition outlined above, after which the property should become eligible for compulsory acquisition by the Minister or the responsible authority under section 172 of the Planning and Environment Act 1987. At least 90% of appropriated properties should be incorporated into the state's public housing stock and made available for lease as soon as practicable, pending any repairs or maintenance issues.</li> </ul>
	2.5 Introduce mandatory inclusionary zoning for all new housing projects, where 35% of all dwellings must fall under the category of 'affordable housing' specified in the Planning and Environment Act 1987.
	2.6 Broaden eligibility criteria and funding provision to Aboriginal community-controlled organisations to become registered housing providers
3. Dwelling conditions (across all forms of tenancy)	<p>3.1 Expand minimum standards for liveability in all existing and new rental properties, including strengthened energy efficiency and ventilation standards</p> <p>3.2 Increase penalties for landlord failure to comply with minimum standards</p> <p>3.3 Establish and adequately resource a dedicated funding stream under the Victorian Community Legal Services Program to cover the provision of residential tenancy support to Victorian renters.</p> <p>3.4 Increase funding to Consumer Affairs Victoria to expand voluntary dispute resolution services for rental tenancy disputes.</p> <p>3.5 Increase funding to VCAT to resource greater administrative capacity to clear backlog and improve processing of tenancy dispute cases.</p> <p>3.6 Increase funding to VCAT to implement an automatic waiver of fees for tenancy dispute cases brought by renters (all tenancy types).</p> <p>3.7 Require that any public housing dwelling included in a renewal scheme to be first assessed for a repair and reinvestment option as to feasibility and cost effectiveness</p>

4. Public and community housing	4.1 Fully implement recommendations in the Victorian Ombudsman's report on investigation into complaints handling in the Victorian social housing sector
	4.2 Establish a requirement for the Department of Families, Fairness and Housing to include a breakdown of public and community housing dwellings, occupancy and vacancy in annual reporting on both the total number of social housing dwellings and dwellings acquired during the preceding year. This requirement should apply retroactively to all previous reporting on number of social housing dwellings where such a breakdown exists, with figures to be published on the DFFH website.
	4.3 Require all surplus land held by government departments or agencies to be independently assessed for use as public housing prior to any decision to sell
5. Other relevant matters	5.1 Introduce a Victorian landlord registration scheme to improve transparency and accountability to renters in the private rental market.
	5.2 Issue a government response into the 2019 inquiry into homelessness and fully implement recommendations
	5.3 Increase transparency around the work of the Commissioner for Residential Tenancies by introducing regular (at least annual) public reporting requirements, including statements of progress on key areas of concern.
	5.4 Demand that the Commonwealth Government to increase social security payments above the Henderson poverty line and raise minimum wage accordingly.