

Submission

Victorian Public Tenants Association submission to:

Public Housing Renewal Standing Advisory Committee –

- Walker Street
Northcote.
- Tarakan and
Bellbardia Heidelberg
West.
- Gronn Place
Brunswick West.

Estate Renewals

Introduction

The Victorian Public Tenants Association (VPTA) assists thousands of public tenants each year. We are the peak body for public housing tenants in Victoria.

We are an incorporated not for profit organisation and we provide counselling, advice, referral, representation and advocacy for public housing tenants and those in need of housing. More broadly, we advocate for the provision of a sustainable and appropriate public housing system.

The VPTA has actively participated in the consultation process at each of the Northcote, Heidelberg West and Brunswick West Estates (the Estates). We have attended DHHS conducted consultation sessions and have consulted with tenants independently.

The views contained in this submission extend beyond the matters contained in the Public Housing Renewal Standing Advisory Committee's Terms of Reference.

We do this because we recognise that this may be our only opportunity to convey our thoughts in relation to important aspects of these projects. We apologise to the Committee for this and ask that they consider those matters enunciated below that do fall within their Terms of Reference.



Executive Summary

Many of the issues raised by tenants at consultation meetings and with us are common for all estates targeted for redevelopment.

The main issues are:

- Understanding when they will be required to move out, where they will go and when will they be able to return
- What the built form will actually look like
- A property that suits their individual and/or family needs
- Adequate provision/allocation of bedrooms
- Having the right to return
- No increase in rent
- No change to security of tenure
- Safety and security
- Ratio and mix of tenants (“salt and pepper”) – public and private
- Density and height impacts on lifestyle (also the major concern of many neighbours)
- Energy efficiency – heating and cooling
- Allocated secure car parking for tenants and visitors’ parking
- Traffic congestion
- Community and environmental impacts
- Redeveloped properties to remain as public housing managed by DHHS

The number of bedrooms is a critical factor. Without adequate provision for those wishing to return, the right to return cannot be guaranteed.

The minimum 10% uplift in tenancies is encouraging but of itself not sufficient to have a significant impact on the burgeoning waiting list for public housing which is of concern to the wider community, to tenants and to us.

In summary, we seek that:

- The existing walk-up flats and any other dwellings on these estates be demolished and replaced by high quality accommodation to be built on each site
- Existing tenants have the right to return to the new housing
- The developments contain sufficient larger apartments (4 bedrooms as a minimum) or with sufficient design flexibility to ensure that larger families can exercise their right to return



- Tenants be able to return to the Estate without rent being increased to more than 25% of household income
- Tenants be able to return to the Estate without any diminution of security of tenure
- There will be adequate provision for safe and secure allocated car parking for tenants, residents and visitors
- There will be adequate open space for active and passive recreational activities and attractive landscaping that retains as many important established trees as possible
- Each project ensures no net loss of usable open space
- The proportion of the new housing allocated to public housing be as high as possible with a no less than 10 % increase in public housing dwellings to be delivered on each site

We recognise that the decision to allow private housing on public housing land is a controversial one. Many housing advocates are opposing the redevelopment because they believe all of the housing delivered should remain as public housing and that this exercise is a sellout of public housing to the private sector. However, on a practical level, we know that if we wait for governments to invest billions of dollars to rebuild our crumbling public housing, we will be waiting forever. The last three decades of sustained and dispiriting neglect of public housing has taught us that.

Most tenants have indicated the estates in question are well past their use by date owing to the poor quality of living afforded.

Equally, the uncertainty about the future and lack of detail that is available is a major concern to tenants, neighbours and other stakeholders.

For elderly residents, those with disabilities, families with kids and others to routinely endure having to walk up flights of stairs is no longer acceptable.

Poor thermal efficiency and ever-increasing energy costs places an unfair burden on people with the least capacity to pay.

To pass up this opportunity to regenerate some 346 public housing homes across the three estates including a minimum 10% uplift would be negligent. In effect, we would be sentencing current and future tenants to endure sub-standard living conditions that should not be acceptable in modern Australia. Moreover, it would be those tenants, now and into the future, who would pay the price for our political squeamishness and neglect.

Town Planning

In this section, we respond to the Town Planning Report prepared by Message Consultants Australia for each of the sites in this submission.

The VPTA supports those planning control changes as detailed in the tables below.

To avoid delays in these three projects, it is important that the decision-making process be streamlined.



It is vital that all stakeholders be consulted, but there is an expectation by some stakeholders that they will have a right of veto, and that the project will be held up.

The need to modernise existing public housing and deliver additional public housing is so desperate that we cannot allow this to happen.

In relation to the amendment to add the Minister for Planning as responsible authority over these sites, **we strongly support the proposals.**

Gronn Place Planning Provisions

EXISTING PROVISIONS	PROPOSED CHANGES
General Residential Zone – Schedule 1	Mixed Use Zone
Development Contributions Plan Overlay - Schedule 1	Retain
	Development Plan Overlay
	Parking Overlay
Moreland City Council is the responsible authority for the site	Minister for Planning is the responsible authority in the Schedule to Clause 61.01
CHANGES TO THE LOCAL PLANNING PROVISIONS	
	Add a strategic direction for public housing sites in Clause 21.02-3 (Municipal Strategic Statement).
	Add a strategy for public housing sites in Clause 21.03-3 (Housing).
	Add a policy objective for public housing sites in Clause 22.01 (Neighbourhood Character).



Walker Street Planning provisions

EXISTING PROVISIONS	PROPOSED CHANGES
Neighbourhood Residential Zone - Schedule 1	Mixed Use Zone
Developer Contributions Plan Overlay - Schedule 1	Development Plan Overlay
Environmental Significance Overlay - Schedule 1	Retain
	Parking Overlay
Darebin City Council is the responsible authority for the site	Minister for Planning is the responsible authority in the Schedule to Clause 61.01
CHANGES TO THE LOCAL PLANNING PROVISIONS	
	Apply the 'Areas of Urban Intensification' designation on the Strategic Framework Plan in Clause 21.01-6.
	Change the designation on the Strategic Housing Framework Plan in Clause 21.03-1 from 'Minimal Housing Change Area' to 'Substantial Housing Change Area'.
	Add reference to the redevelopment of the Walker Street estate in Clause 22.05 (High Street Corridor Land Use and Urban Design)

Tarakan and BellBardia Planning provisions

EXISTING PROVISIONS	PROPOSED CHANGES
General Residential Zone - Schedule 1	Mixed Use Zone
Vegetation Protection Overlay	Retain
	Development Plan Overlay
Banyule Council is the responsible authority for the site	Minister for Planning as the responsible authority in the Schedule to Clause 61.01
CHANGES TO THE LOCAL PLANNING PROVISIONS	
	Changes the designation in Clause 21.06-2 (residential Areas Framework), including Residential Areas Framework Map, from 'Accessible Area' to Diversity Area'.



Design Considerations

Tenants have not yet seen detailed design concepts and drawings. Given the complexity and level of information which is primarily about planning matters, tenants and other stakeholders are not yet in a position to provide informed design feedback.

Public Land Assets

Part of the Design Framework is to maximise the social, economic and environmental 'return' of public land assets and ensure the economic viability of the project.

In our view, the projects should be able to proceed without the public land being permanently alienated.

We favour a direct development model, because this approach “on public land ensures that the assets themselves, and the uplift value that quality development brings, are retained for public benefit.” (House of Commons, Communities and Local Government Committee, Financing of New Housing Supply Report, 2012, p 87)

Sustainable Development

Deliver a sustainable and high quality development that contributes to the longevity of housing stock and minimising the cost of living.

Quality of housing stock built by the Office of Housing has been an issue in the past. We encourage the Government to take strong steps to ensure the built forms are fit for purpose and the build quality of the requisite standard throughout.

Given the complexity of the projects, we expect that technical personnel (including consultants, designers, traffic engineers, town planners, etc.) engaged throughout the planning and build phases have the requisite skills and expertise to deliver the best possible outcomes in contemporary large scale housing design and development.

Due to the very complex and diverse technical nature of the redevelopment projects tenants must, in good faith, rely on the fact that what is delivered is best practice and as far as possible meets their needs for the life expectancy of the buildings. Moreover, there must be sufficient design flexibility for upgrades to the buildings as the residents' needs become more defined.

Many tenants have told us much of what has been presented to them confuses them. What they want to know is what their properties will look like, how many bedrooms they will have, and the ratio of private and public tenants/residents.

Height and density concerns are also major issues for tenants and neighbours who are directly impacted by the redevelopments. Concept sketches that show what the maximum heights might be (although no decision has been made) – are meaningless to tenants and neighbours alike and fuel greater concern.

We understand that in the early consultation phases detailed design information is not available. **Tenants want to see detailed design and concept drawings for their input. This should be done as soon as practicable as part of the ongoing tenant engagement and**



consultation process.

Some design related concerns have been raised by tenants – many of which have been captured in surveys conducted by KJA Consultants and are highlighted in the various engagement reports they have produced.

Tenant / Resident true salt and pepper mix – tenure blind

A true “salt and pepper” approach to mixing private and public housing will also assist in delivering high quality public housing. We do not believe this mix has been done successfully at any large scale in Australia and so getting the mix right will be very important. How this is achieved is of concern to tenants and prospective purchasers alike.

The “salt and pepper” mix notion has not been adequately addressed in tenant consultation meetings and tenants have no real insight as to what this might mean in terms of the configuration of their particular estate. This is a significant question that needs to be addressed as a priority. Most tenants seem to want a genuine mix of tenants throughout the estate.

Done well, these developments will set the benchmark for inclusive integrated communities and will help remove the stigma sometimes associated with public housing developments to everyone’s benefit. This is a significant opportunity for all Victorians and must be promoted as such.

There should be no visible or perceivable difference in the properties that will be available for public or private housing.

Safety

Create safe buildings and spaces throughout the site.

The engagement reports prepared by KJA Consultants demonstrate that for tenants, safety and security is high on the priority list.

Public tenants want building entry systems that will prevent unauthorised visitors from entering. This is one of the largest complaints about the current walk-up flats. The same technology should be used (i.e. swipe card) to regulate entry to carparks.

In terms of urban design, it is hoped that usable spaces will be created with appropriate levels of passive surveillance. The perception of safety will impact on how spaces are used, throughout the day and the night.

CCTV also has an important role to play. However, it is vital that the management of each estate is proactive in responding to issues that impact on the perception of safety.

Neighbourhood Contribution

The design of the buildings must be attractive and have wow factor so that they enhance the look and character of the area and offer a welcoming and attractive vista – a great place to live. Enhancing the public realm and existing networks and delivering ‘good neighbour’ outcomes will be critical to the success of the project.

Prioritise pedestrian and bicycle access within each site. Public tenants want a site that is safe for their children to ride bikes and to play, with vehicle movements carefully managed.



Social Integration and Design Opportunities

Foster social connections between residents and the wider community.

We strongly support this Principle. However, we feel that the focus in the discussion of fostering social connections is always on the public housing tenants. A vital aspect of fostering social connections will depend on the type of private housing that is delivered.

As has been seen elsewhere, such as in Carlton, if the private housing stock is targeted towards more transient types such as single persons and students, then opportunities for developing real connections and a strong sense of community will be reduced. However, if the focus includes families, then organic connections develop through social interaction between children and networks, such as school and sport, will develop. Children help create vibrant community connections. We need to accommodate a diversity of tenants and residents in these projects.

Many families are keen to return to the redeveloped Estate given their strong community connection to schools, etc. and they will require large properties to accommodate them.

Properties should be designed and built in such a way that they can be adapted in the future. This could be done by merging adjoining properties to provide more bedrooms. Larger properties will always be in demand and there must be adequate provision for this.

We strongly recommend that in the individual tenant consultation phase to be conducted by experienced Housing staff, a matrix of need is produced that can be factored into the design, based on bedroom allocation and demonstrated need. This must drive the design at least as it relates to the public housing component. It is imperative for those wanting to exercise their right of return to be able to have their needs accommodated.

First and foremost, we need to accommodate those tenants with the right to move back to the estate after it is redeveloped.

We recommend the following design principles should apply when thinking about the ratio of private to public dwellings:-

- 1. The 10% uplift (minimum) should be seen only as the starting point for the public housing component.**
- 2. Where larger dwellings are required to accommodate those public resident/tenants with the right to return – the number of private dwellings should be reduced, to provide more space for the larger public dwellings that are needed.**
- 3. Adaptable designs (as discussed previously) so that properties can be readily reconfigured as the demand changes over time.**
- 4. The design brief must be underwritten by these principles from the outset.**



Car Parking

Car parking is another area that should be adaptable. The car parks should be able to be adapted into homes if, in the future, the demand for on-site car parking reduces significantly.

Essentially, public housing tenants have been told that;

- *car parking will be limited and the ratio of carparks to tenants will be different from public to private*
- *competition for parking spaces will likely grow depending on the tenant/resident mix*
- *the number of available spaces may decrease over time*
- *on street parking will be restricted*

Appropriate security measures need to be in place to ensure that only public tenants, private residents and bona fide visitors have access to on-site parking. Tenants and residents could be provided with a swipe card that could regulate foyer, residential and garage door entry.

For many women on the estates it is also vital that parking spaces are safe. Women have said that they often return to the Estate late at night after weddings or religious observances. The concept of multi-level car parks makes them feel vulnerable. It is important that safety features are built in to these structures and that the features are co-designed with public housing tenants.

Larger families also have specific needs when it comes to transport. In relation to parking, larger families have spoken with us about the importance of allocated parking spots, close to where they live. In addition, larger families often require more than one parking space. Allocation of parking based on need should reflect this demand.

How safety and security of carparks will be policed is a major concern to tenants as it is a significant ongoing issue and a source of much conflict in public housing generally.

Enforcement should also address an ongoing issue of immobile vehicles taking up valuable parking space.

There must be a system to ensure that all parking spaces are allocated based on need.

Given that parking will be at a premium after the redevelopment, the potential for parking disputes is high. A system of allocation based on need and on proximity to residences will reduce this level of disputation.

Need for Action

From an infrastructure perspective, the walk-up flats on the Estate have reached the end of their usefulness. From a design perspective, they are no longer fit-for-purpose; indeed, it is unlikely that they ever were. From a condition perspective, many of the apartments are uninhabitable.

This public housing must be replaced as a matter of urgency. In our view, it is not possible or cost effective to merely refurbish, renovate or retrofit the flats; it is necessary to demolish and to start again. Most tenants living on the estates agree with this.

The necessity of replacing obsolete public housing such as the walk-up flats has been well known for many years.



In 2004, the Office of Housing (OoH) released the 'Sustaining Our Housing' report. The report noted that;

"Most inner city high rise and walk-up estates have reached the age at which they require major capital investment."

In September 2010, the Family and Community Development Committee of the Victorian Parliament released a major report on public housing that stated, "Underinvestment has created issues relating to the quality of the housing stock and the services that administer it."

In June 2017 the Victorian Auditor-General's Report '*Managing Victoria's Public Housing*' said at page 14;

"In 2016, the average age of Victoria's public housing stock was 35 years old, just above the median age of 32 years. In total, 60 per cent of public housing stock is over 30 years old - an increase of 18 per cent in the four years since the previous audit."

One of the key deficiencies of the walk-up flats is that they are inaccessible for many Victorians.

For the disabled, the elderly and the infirm, the mere factor that there are stairs linking their front door with the outside world is a huge barrier.

Whether it is carrying shopping, carrying children, moving furniture or visiting the doctor, many tenants in the walk-up flats face a daily battle in their everyday lives.

Ownership and Management

Decisions in relation to who owns the land and who manages the public housing are going to have far-reaching implications.

Currently, the State Government owns the land on which the Estates stand.

In our view, the project should be able to proceed without the public land being permanently alienated. We favour a direct development model, because this approach "on public land ensures that the assets themselves, and the uplift value that quality development brings, are retained for public benefit." (House of Commons, Communities and Local Government Committee, Financing of New Housing Supply Report, 2012, p 87)

The Government has promised that an increased number of units will replace the existing dwellings that will be lost when the properties are demolished. In our view, it is vital that these units remain as public housing. **We do not support a project that will deliver a reduction in public housing overall. Proposals that would result in any proportion of these replacement units being owned by community housing organisations are not supported by the VPTA.**

In terms of management, there are various issues to consider.

The most important issue from our perspective is the management of the replacement public housing units. We seek that the Office of Housing continues to manage them.

Tenants will have endured the inconvenience of the construction project over a number of years -, they do not need the further disruption of a change in their housing management.



We note that the Government has announced its intention to transfer the management of 4,000 public housing units to the community housing sector without any details or a factual business case being provided as to how this benefits public housing or the Victorian community overall.

The Government asserts that the transfer of management to the community housing sector will:

- Allow community housing organisations to increase the total amount of social housing
- Improve tenancy management and services for tenants through local services.
- Improve tenant access to local support services networks.
- Support tenants to engage socially and in education and employment.
- Develop more safe housing

We believe that all of these benefits for tenants can be captured within existing DHHS Housing Office networks and we are not convinced that any material benefit for tenants would flow from transferring management to community housing, if this is in fact what is being proposed for the newly developed estates.

With a true “salt and pepper mix”, responsibility of the estate will be significantly more complex. These complexities are capable of being worked through, with the Office of Housing as the property manager for the public housing within a Body Corporate structure for each building or cluster.

Tenant Rights

Through the redevelopment process, tenants should be confident that they will not be worse off in terms of the way their rent is calculated, their security of tenure or their connection with their community.

The overwhelming message we have received from tenants is that they wish to be involved in the project at each stage.

We strongly recommend that a Tenant Engagement Committee be formed for each estate/ site so that there is a clear line of communication between the project and public tenants.

During the Carlton and Kensington redevelopments, committees were formed and were thought to have been beneficial.

The model that we recommend for a Tenant Engagement Committee is that it be limited to public housing tenants who have been relocated and intend returning. This structure will ensure that the Committee focuses on the tenant experience.

Right of Return

In our discussions with tenants in the walk-up flats, the right to return to the Estate is often identified as their major concern. Tenants are worried that they will be shunted to a new part of town, isolated from their existing networks and that once they move they will be stuck where they are.

Initially, when tenants have asked DHHS about the right of return, they were told that returns will be decided “depending on need” or “you can return if there is a suitable dwelling and if you meet the eligibility requirements.”



Clearly, this created a lack of certainty. This is particularly the case for larger families. Many larger families are living throughout the Estate, generally in very overcrowded conditions.

At numerous briefing sessions, DHHS staff have told tenants “Every resident will have the opportunity to return to the estate after construction has finished.”

When tenants are relocated to allow the development to proceed, they should not be forced to nominate whether or not they wish to return. They should only be asked to make that decision at a point close to the new accommodation being ready for occupation.

This will allow tenants the chance to judge the suitability of their relocation home compared with the new housing being constructed.

We want to see robust DHHS practice and policy underwriting the right of return which has been pledged by Government.

Rent calculations

Rent for tenants is currently calculated as a proportion of their income, with tenants who earn more paying more. The standard of a maximum of 25% of income being charged in rent has been applied for many years.

The VPTA is aware that some have suggested that rents will be increased for tenants in the new housing. The example of community housing on Brunswick Street Fitzroy has been referenced. Community housing was built on the Atherton Gardens Estate, on the site of an open-air carpark. Tenants there have their rent calculated at a maximum of 30% of their income.

The Government has pledged that a maximum of 25% of household income is maintained as rent. We recognise that for those tenants on market rent, properties will be revalued after the project. The rules applying in these circumstances must remain as they are in public housing – that tenants pay no more in rent than 25% of household income, or rebated market rent – whichever is the lesser.

Security of Tenure

'Security of tenure' refers to how secure a person feels about their renting situation. High security of tenure generally means a person can afford their rent, has the choice to stay or leave, and knows that there are legal protections over their tenancy agreement.

Currently the tenancy agreement for Victorian public housing indicates that tenants can stay in public housing as long as they do what the tenancy agreement states. Tenancy agreements/leases are not time limited and must remain so as far as redevelopments are concerned.

Other matters

Tenants have raised numerous other issues with us over the past few months.

- Most tenants are keen to move away from the communal laundry design, and would prefer to have “European laundries” within each dwelling.



- Tenants are keen to have homes that are spacious and well designed, reasonably soundproof and with solar power.
- Reverse cycle air-conditioning must be a standard feature, along with active and passive solar design principles to be applied as much as possible to cut down energy costs.
- Some tenants are keen to have balconies but tenants with small children are strongly against this.
- Many tenants, particularly those from large families, want toilets that are separate from bathing facilities.

During the relocation process

Many tenants are understandably concerned about having to leave their homes. We are in constant contact with tenants and DHHS about this issue, so we will not canvass all issues here.

However, it is worthwhile noting views from the ACT, who have conducted major relocation processes in recent years.

The ACT Auditor-General's Report – 'Public Housing Renewal Program Report No. 7 / 2017' contains the following Plan:

"The Tenant Relocation Project Plan identifies several guiding principles for the Tenant Relocation Project as follows:

Transforming the city/maintaining communities

- *Tenants will be supported to maintain and build community and individual supports where possible, and to make new connections.*

People and properties

- *We will work with people in recognition that they are part of the local community and as such have developed strong social links within the area.*

Opportunity not imposition

- *Change creates opportunity. Through change, people have the capacity to create benefits for themselves, and be empowered as individuals as well as communities.*
- *We will work with people and communities to generate opportunity, and not impose an outcome.*

People have capacity to successfully transition to new homes, through:

- *Timeframes that respect tenants as community members and allows them to process change.*
- *Clear, accessible information provided in a range of ways and formats.*
- *Support to move and remain linked into community.*
- *A personal investment in the outcome of an individual and community level.*

Individual and community needs to be heard and addressed

- *We will consult effectively with both communities and individual residents residing in sites*



identified for renewal to understand their support needs and concerns in connecting to communities.

Learn from previous processes

- *We will draw on accumulated expertise as well as people's life experience.*
- *We will continuously learn to strengthen our own practices, integrate new insights, to adapt and learn in order to apply now and into the future.*
- *We will seek evidence-based knowledge to support the way we work."*

Larger Families Right of Return

The new public housing that is delivered on the Estate must cater for the needs of larger families. If it fails to, then the promises of "A right of return" will have been broken.

Families are seeing the messages that the current housing supply does not match the increasing demand for smaller dwellings. Rumors are circulating that the new housing will only include one and two bedroom flats.

We seek that larger families are reassured that there will be a place for them to come back to. Information on this should be prepared in the appropriate languages to ensure that the stress that tenants are currently experiencing is minimised.

Larger families drive demand for services such as childcare, outdoor play space, sports facilities, homework clubs, after school programs and community development.

Having larger families on the Estate will foster social connections between residents of the Estate and the wider community. We also feel that planning for the needs of larger families will assist in delivering a development that is flexible over the long-term.

Many larger families have told us they would like to move out in groups to maintain their existing community network and eventually all return to the redeveloped estates. **The opportunity for tenants to move out in groups and return in groups must be an important consideration in the application of relocation policy.**

We note too that there should be scope for larger families to live in the private housing that will be delivered as part of the redevelopment.

Response to overcrowding

Overcrowding is a significant issue in Victorian public housing. In basic terms, overcrowding occurs when the dwelling is too small for the size and composition of the household living in it. A dwelling requiring at least one additional bedroom is deemed as 'overcrowded' in Australia.

As at 30 June 2016, the Northern Territory had the highest proportion of public housing households living in overcrowded dwellings (8%), followed by Victoria (5%). (Housing assistance in Australia 2017 Report, Australian Institute of Health and Welfare, July 2017)

So while it is correct to say that current housing supply does not match the increasing demand for smaller dwellings, it must also be recognised that current housing supply does not match the needs of one in twenty households who are experiencing overcrowding.



Balancing the immediate and long term needs of tenants against allocation policy

Many tenants are aging in place. While now they may only be entitled to a one bedroom property, it is foreseeable that they may need a live in carer at a future date.

Similarly, most tenants have family members and friends who from time to time visit and may need to stay over.

We know that many tenants are unable to share a bedroom for medical and other legitimate reasons.

In these circumstances, it makes sense to consider 1.5 and 2 bedroom options as the standard, particularly as it provides for much more flexibility in how properties are utilised.

We must plan not only for the tenants we have today, but also for the tenants that we are likely to have in ten or twenty years.

Project Success Criteria

What are the success criteria for redevelopment projects overall and for each phase from consultation to commissioning?

Success Criteria and performance measures need to be developed and disseminated as a matter of urgency now and for every stage of the project. We need to learn from experience and apply the lessons to generate ongoing improvements.

