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Plan Melbourne Refresh
Via online submission

To whom it may concern

Housing Choices Australia is a Housing Association that provides affordable housing for people experiencing significant disadvantage in the housing market. HCA's vision is: All people affordably housed in neighbourhoods that support life opportunities. The HCA mission is to be a leading provider of affordable homes across Australia, working with partners to create resilient and inclusive neighbourhoods.

Housing Choices Australia looks forward to working in partnership with the State government and other partners to tackle the issue of housing affordability in Melbourne. We welcome an opportunity to take part in the current and future work that is underway and look forward to it translating into on-the-ground social and affordable housing outcomes.

HCA is pleased to provide a submission on the Plan Melbourne Refresh (see below).

Regards

Managing Director
Housing Choices Australia



Submission

Housing Choices Australia (HCA) welcomes the Plan Melbourne Refresh and the increased focus on affordable housing. The issue of housing affordability in Victoria has reached crisis point and is well documented. There is a high proportion of low-income earners experiencing housing stress and that proportion is increasing. There is a significant undersupply of affordable housing and there is no new investment in new social and affordable housing. Victoria has the lowest level of public housing in Australia and the proportion of social housing stock as a percentage of the total stock is declining.

Access to affordable housing has a direct impact on the productivity of cities, on community cohesion, and individual wellbeing. Rising housing costs can price a significant proportion of the labour market out of inner and middle ring suburbs thereby decreasing labour market efficiencies. Housing stress also decreases the amount of household income available for health, education, and discretionary spending. It hampers the economic development of neighbourhoods, cities, and regions.

However public policy for housing, economic development, and liveability are typically considered in isolation from each other and by separate government departments and agencies. Plan Melbourne should be a means by which government policy and commitments can be made transparent, coordinated, and monitored.

HCA is undertaking evidence based research on the Social Return on Investment for the funds we have invested in social housing. Early indications are that for every dollar invested in upgrading and refurbishing social housing, there is a return of approximately \$3. The return on providing even more people access to social housing (i.e. increased supply and increased access) is expected to be even higher.

Under supply and access to affordable housing

There is a chronic undersupply of affordable housing. To date there has largely been a reliance on increasing housing supply and encouraging a diversity of housing in terms of price points. However, the private housing market alone will not address the issue of housing stress for people on a low income. An increase in overall supply should be coupled with mechanisms to ensure that low income and vulnerable households can access that housing and not be priced out by the private market.

The existing Plan Melbourne places significant emphasis on increasing the supply of housing through the private housing market. The Ministerial Advisory Committee (2015) report makes the case for the need to link an increase in supply to an increase in access to affordable housing. The Plan Melbourne Refresh Discussion Document acknowledges the need to increase the focus on provision and access to affordable and social housing. However it proposes to limit its response primarily to land use planning levers.

The proposed planning interventions outlined in the Plan Melbourne Refresh will not, on their own, be sufficient to meet the task of ensuring that low incomes households can access affordable housing. Government must adopt policies right across its portfolio that increase supply and enable access to affordable housing. For example, the current policies around achieving financial return on the sale of government land need to be reviewed to see how the provision of social housing can be considered as part of the return on that land. Policies will also need to be supported and implemented through appropriate funding.

HCA recommends that the focus and solutions in Plan Melbourne are broadened from focusing only on overall supply of houses in the market, to also included mechanisms for targeted and sustained access to affordable housing.

Planning Scheme interventions

One of the opportunities for increasing the amount of social housing in Melbourne is through inclusionary zoning. The case for inclusionary zoning is well-made by the Ministerial Advisory Committee (2015). The economic and social consequences arising from lack of affordable housing provide a strong rationale for intervention through the land use planning system in the same way that a case has been made and is well accepted for the provision of public open space and infrastructure such as roads and drains to address the negative externalities generated by the land development process.

In the past, some Councils have tried to include a requirement for social and/or affordable housing as part of planning scheme amendments and have failed either due to a negative Panel Report or refusal from the Minister. In part, this stems from a view that there is insufficient authority in the Planning and Environment Act or support in the Victorian Planning Provisions for the conditions being applied. This therefore needs a firmer legislative and policy base.

It is essential that inclusionary zoning opportunities are able to be maximised in the short term rather than waiting for a whole-of-Melbourne or legislative response.

There are significant parcels of private land in Metropolitan Melbourne that will go through a rezoning process over the next 3 years to facilitate a change from industrial to residential or mixed use. Councils are continuing to undertake significant strategic planning work and associated planning scheme amendments to create vibrant, sustainable Activity Centres. There are also large-scale National Employment Cluster Framework Plans being developed by the MPA that will result in planning scheme amendments.

To ensure that this pipeline of planning scheme amendments are able to include provisions for social and affordable housing, the Minister for Planning, and the Department Environment, Land, Water and Planning should release a Practice Note or Advisory Note setting out the importance and application of Clause 16.01-5 of the Victorian Planning Provisions. This will enable Councils, land owners, and Planning Panels can give greater weight to the provision of social housing.

In parallel, the Department should quickly review and strengthen the Planning and Environment Act and Victorian Planning Provisions so that they require and enable the provision of social and affordable housing.

The planning mechanisms could include standard development contribution provisions to help capture some of the uplift from smaller infill developments; an Overlay that Councils could use in specific areas in their city that are well-located for social housing; and provisions that can be easily incorporated into planning scheme amendments for specific sites.

In addition to the mechanisms that can be put in place under existing legislation, HCA is keen to see the exploration of “conditional zoning” where the actual zoning would not come into legal effect until the condition relating to the provision of social housing and had been appropriately satisfied either through a contractual arrangement, a bond, or a financial contribution.

HCA recommends that the Minister and the Department release a Practice Note or Advisory Note setting out the importance of requiring social housing and application of Clause 16.01-5 so that social housing provisions can be included in upcoming Planning Scheme Amendments.

HCA recommends that in parallel to this short-term measure (above), the Department reviews and strengthens the Planning and Environment Act and the Victorian Planning Provisions so that rezoning proposals and new developments are required to contribute to the funding and/or development of new social housing.

Capturing uplift from rezoning

HCA supports the use of planning provisions that require the development of or contribution to social housing as part of a rezoning process.

Consideration will need to be given to how the benefit can be secured. Even in councils where there is already some requirement or request for social housing there is often difficulty in working out how and when that contribution is made. There is a risk that the social housing contribution is left to the end of the development and may not happen at all if the developer decides not to proceed with the full proposal. Changes to legislation, planning provisions, and the development process should maximise the enforceability of the delivery of social housing outcomes.

HCA recommends that in addition to planning scheme provisions, other mechanisms are explored and explained so that councils or other responsible authorities can guarantee the contribution of a rezoning.

Monitoring and implementation of whole-of-government response

HCA acknowledges that a Metropolitan or State-wide Housing Strategy and Implementation Plan may be the best place to pull together the different streams of work that are underway. The success of such a Strategy and Plan relies on the documents being supported by appropriate resourcing and authority to make the significant changes that are required. Part of the success of the Metropolitan Planning Authority (MPA) has been its ability to make decisions and work across the whole-of-government in relation to strategic land use planning and infrastructure investment.

HCA recommends that Plan Melbourne is specific about which Government Department or Agency will be responsible for monitoring and implementing the land use planning and other housing affordability levers. It could be the MPA in the first instance.

HCA also recommends that funding for implementation of the Strategy is included in the annual State government budget process.

Attached below is a table with a detailed response to the discussion document.

Attachment 1 Detailed submission points

Section	Content	Page	Submission
Executive Summary Key Points			
2 Growth challenges, fundamental principles and key concepts	<ul style="list-style-type: none"> Climate change, housing affordability and the importance of people, place and identity should be better explained and given greater prominence. 	4	Support increased prominence and clarity for affordable housing.
5 Housing	<ul style="list-style-type: none"> Plan Melbourne 2016 needs to articulate long-term land use policies and reforms to meet forecast housing needs and expand housing choice and affordability. The MAC (2015) report proposes a large number of initiatives relating to housing supply, diversity and affordability. 	5	Support. However across the whole of government there needs to be a focus on ensuring access to affordable housing, not just increasing supply.
	<ul style="list-style-type: none"> As a growing city Melbourne needs to facilitate the mobility, education and economic opportunities of its households. Boosting housing choice for all households will have significant social and economic benefits for individuals and all Victorians. 	5	Support. There is a strong link between safe affordable housing and people's ability to undertake education and/or participate in the workforce.
	<ul style="list-style-type: none"> Options canvass actions that will establish new housing development goals, increase certainty for housing development, facilitate housing supply in Melbourne's established areas and develop comprehensive data and strategies to better guide housing planning. 	5	Support. However across whole-of-government there also needs to be a focus on ensuring access to affordable housing, not just increasing supply.

Section	Content	Page	Submission
	<ul style="list-style-type: none"> Further initiatives to support housing diversity including social and affordable housing initiatives are advocated and discussed. 	5	Support.
1 Scope of Options for Discussion Aligning with other strategies and policy reviews	<p>Housing</p> <ul style="list-style-type: none"> Review of Housing Affordability in Victoria The development of a strategy to improve the response to Victorians' in housing crisis Review of <i>Residential Tenancies Act 1997</i> Accessible Housing 'Better Apartments' review of development requirements Review of the implementation of Reformed Residential Zones 	11	<p>HCA is pleased to see a list in the Plan Melbourne Refresh of other "housing" work that is underway across the Government.</p> <p>Plan Melbourne focuses primarily on increasing market supply of housing.</p> <p>Recommend that Plan Melbourne identifies the provision of social and affordable housing as a requirement in government planning projects and infrastructure projects.</p> <p>This will provide the impetus for the MPA to address this issue within their own planning projects and allow them to champion the matter with other agencies and organisations for infrastructure projects.</p>
2 Growth challenges, fundamental principles and key concepts Box 1	<p>Housing affordability</p> <p>House prices and rents have increased, particularly in well serviced inner and middle suburbs with good access to jobs. This is generating inequality and will negatively impact on Melbourne's liveability and productivity. We need to ensure there is more affordable housing.</p>	16	Support. However across whole-of-government there also needs to be a focus on ensuring access to affordable housing, not just increasing supply.

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	<p>Low suburban density</p> <p>Melbourne’s urban footprint is one of the largest in the world. To accommodate the significant population growth forecast for the years ahead, Melbourne’s strategy needs to encourage higher urban densities and foster more housing diversity and choice close to public transport and jobs.</p>	16	<p>Support. For people on lower incomes being close to public transport and jobs is essential to being able to participate in the workforce and in the community and for them to access services. It is essential that renewal and investment in inner and middle ring suburbs includes the provision of and ongoing access to affordable housing for those who need it, particularly for specific cohorts based on demand (e.g. aging, disability). There is a risk that investment in an area leads to gentrification and pushing out people who most need to live close to services.</p>
2.5 Shaping the City	<p>Supporting the development of a polycentric city</p> <p>...a polycentric city will provide more jobs in the suburbs at designated locations, such as in employment clusters. This will reduce the need for long trips and use existing infrastructure more efficiently by encouraging outbound or against- peak commuting to clusters and activity centres. It will also improve access to jobs and services for people living beyond inner Melbourne.</p>	20	<p>Support. For people on lower incomes being close to public transport and jobs is essential to being able to participate in the workforce and in the community and for them to access services.</p>

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	<p>20-minute neighbourhood</p> <ul style="list-style-type: none"> • Better sense of place and the encouragement of vibrant, convenient and safe neighbourhoods • Population growth is accommodated with more housing choice in locations with better access to services • Enhanced community and social equity benefits such as better design for the elderly, the young and parents, and more interactions living and meeting locally. 	21	Support. For people on lower incomes being able to easily access services is essential. It is also important that people can remain close to services they already use and support networks that they have already formed. Design outcomes that allow for more interaction and a mix of residents is also important to avoid creating neighbourhoods of disadvantage.
	<p>How should the 20-minute neighbourhood be defined?</p> <p><i>The ability to meet your everyday (non-work) needs locally, primarily within a 20-minute walk.</i></p>	22	Support this definition.
	<p>Neighbourhood centre policy</p> <p>... neighbourhood centres as well as major centres and the CBD will grow so people can live close to the local services they need.</p>	23	Support. Recommend that there is an explicit emphasis on affordable and social housing as part of that growth.
	<p>Housing policy</p> <p>Encouraging higher urban densities close to neighbourhood centres as contextually appropriate. Housing densities will increase as appropriate to reflect the range and scale of activity centres and their walkable/rollable catchments throughout Melbourne.</p>	23	Support. Recommend that there is an explicit emphasis on affordable housing as part of that increased density with mechanisms for funding and an enforceable contribution from developers / land owners including publicly owned land such as VicTrack.

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2.6 Housing	<p>11 Strengthen housing affordability and choice as a key concept and better explain the key linkages throughout Plan Melbourne 2016.</p>	23	<p>Support. However across whole-of-government there also needs to be a focus on ensuring access to affordable housing, not just increasing supply or choice. Need to recognise the benefit of providing mixed tenure developments and social housing close to key infrastructure.</p>
	<p>A key focus of the Plan Melbourne refresh is to address housing affordability through strategic planning. While Plan Melbourne 2014 recognises the role of planning in providing social and affordable housing and proposes actions to increase supply, Plan Melbourne 2016 needs a stronger focus, particularly on how the planning system might facilitate the supply of social and affordable housing. Plan Melbourne 2016 should strengthen the importance of housing choice and affordability in its key concepts.</p>	23	<p>Support. However across whole-of-government there also needs to be a focus on ensuring access to affordable housing, not just increasing supply or choice.</p> <p>Recommend That Plan Melbourne includes objectives that relate to more than just the planning system.</p> <p>Recommend that Plan Melbourne identifies the provision of affordable and social housing as a requirement in government planning projects and infrastructure projects.</p> <p>This will provide the impetus for the MPA to address the issue of affordable housing within their own planning projects and allow them to champion the matter with other agencies and organisations for infrastructure projects.</p>

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3 Delivering Jobs and Investment	3.1 National Employment Clusters and Innovation	32	<p>Currently there is little emphasis on the link between employment clusters and providing affordable housing within them. For example there is no mention of affordable housing in Newsletters 56 and 57 from the MPA even though the newsletters discuss significant new developments. Initial work on the National Employment Cluster Framework Plans appears to have treated housing as simply a matter of densities and market supply. The NECs are significant areas both in terms of size and economic contribution and the MPA is investing significant resource in preparing the Framework Plans which will form the basis for Planning Scheme Amendments.</p> <p>Recommend a much stronger emphasis on the provision of and/or requirement for social and affordable housing in the preparation of the NEC Framework Plans and subsequent Planning Scheme Amendments.</p>
4 A More Connected Melbourne	<p>4.1 Updating Transport Commitments</p> <ul style="list-style-type: none"> • Use existing transport assets efficiently, with system improvements and support for more development near existing public transport corridors and key nodes 	40	<p>Support.</p> <p>Recommend that Plan Melbourne identifies the provision of social and affordable housing as a requirement in government infrastructure projects.</p> <p>This will provide the impetus for the MPA to champion the issue with other agencies and organisations as part of infrastructure projects. It will also help ensure that the opportunities to provide social and affordable housing are maximised and realised rather than being considered as an afterthought.</p>

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	<p>Rail and road projects</p> <ul style="list-style-type: none"> The Cranbourne Pakenham Rail Upgrade, which includes removing all level crossings between Dandenong and Caulfield allowing more frequent services and relieving congestion. The enhanced network will better support the Monash National Employment Cluster and land development along the rail corridor 	41	<p>Recommend that Plan Melbourne identifies the provision of social and affordable housing as a requirement in government infrastructure projects.</p> <p>This will provide the impetus for the MPA to champion the issue with other agencies and organisations as part of infrastructure projects. It will also help ensure that the opportunities to provide affordable housing are maximised and realised rather than being considered as an afterthought.</p>
5 Housing			
5.1 The Balance Between Established and Growth Area Development	<p>A 70/30 target</p> <p>...introduce a target to deliver 70 per cent of new housing in Melbourne's established areas and 30 per cent in greenfield growth areas – the 70/30 target....</p>	47	<p>Support. For people on lower incomes being close to public transport and jobs is essential to being able to participate in the workforce and in the community and for them to access services. It is essential that renewal and investment in inner and middle ring suburbs includes the provision of and ongoing access to affordable housing for those who need it. Without regulatory requirements for affordable and social housing, there is a risk that investment in an established area will lead to gentrification and push out people who most need to live close to services. This would negatively affect the diversity of the area.</p>

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	<p>Increasing the number of new households closer to existing jobs, services and transport infrastructure How can government implement a 70/30 target?</p> <ul style="list-style-type: none"> Focusing metropolitan planning efforts towards unlocking housing supply in established areas, particularly within areas specifically targeted for growth and intensification <p>Introducing planning reforms and new tools to support the ongoing renewal of established areas. This could include lot consolidation incentives, reforms to the planning scheme amendment process and codified planning processes.</p>	48	<p>Support. However across whole-of-government there also needs to be a focus on ensuring access to affordable housing, not just increasing supply or choice.</p> <p>Recommend That Plan Melbourne sets affordable housing objectives that are broader than just how the planning system can help facilitate supply. This will ensure that whole-of-government housing affordability objectives are captured and monitored.</p> <p>Recommend that Plan Melbourne identifies the provision of social and affordable housing as a requirement in government planning projects and infrastructure projects.</p>
	<p>Housing Targets</p> <ul style="list-style-type: none"> The targets would define a range of housing outcomes including aggregate housing supply, the mix of housing types needed and preferred housing affordability outcomes. 	50	<p>Support. However across whole-of-government there also needs to be a focus on ensuring access to social affordable housing, not just increasing supply or choice. The targets may vary depending on land values, demand profiles, and proximity to services.</p>

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5.2 Population Growth and Housing	<p>Communicating long-term housing needs</p> <p>...the development of a metropolitan Housing Strategy that includes a Housing Plan. As an alternative to targets, a Housing Strategy might provide detailed housing information and include preferred housing scenarios for sub-regions and for the sub-region’s activity centres and National Employment Clusters. This strategy may appropriately be state-wide.</p>	51	<p>Support the preparation of a Housing Strategy and Housing Plan. This should be a whole-of-government plan and include levers to increase housing supply and ongoing access to affordable housing. There is a risk that there won’t be strong ownership of the Plan by Departments or Agencies who do not see housing as their core business. A Strategy and Plan will need to be supported by a structure (perhaps similar to the MPA or as part of the MPA) that has the authority and capacity to successfully deliver the actions in the plan. This will require a shift in thinking and prioritise for many Departments and Agencies. It is likely that a consolidation of Agencies around a consistent strategy will be required.</p>
	<p>Plan Melbourne 2016 might clarify development expectations by:</p> <p>Confirming that population, housing and employment densities in defined locations will increase and that the balance of planning controls should generally favour change and increased densities in these locations. The local and broader benefits of increased densities in these locations should also be identified and communicated as part of the implementation of Plan Melbourne. Some of these defined locations may, however, include heritage precincts or other existing values that require planning protection</p>	52	<p>Support. Note that many people have their own definition or expectation of “other existing values that require planning protection”. Often, one of those values is density which lay-people sometimes describe as “neighbourhood character” – a term that is also used by land use planners but usually in a different way. Plan Melbourne needs to be bold and clear in relation to this issue. Language like “other existing values” could creating expectations that existing suburbs may be protected due to their “character” / density.</p> <p>A mechanism for the provision of affordable housing based on specific demand requirements could assist in depoliticising the perceived impact of increased densities.</p>

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5.3 Clarify Locations That Support Population Growth And New Housing	<p>What is the role of the Reformed Residential Zones in delivering diversity?</p> <ul style="list-style-type: none"> The MAC (2015) report advocates greater development and choice in Melbourne’s established areas, particularly in Melbourne’s middle suburbs. 	56	Support. Note that the term “housing diversity” is often used to imply increased housing density. Plan Melbourne should be clear about increased density, not just increased diversity.
5.4 Housing Diversity	<p>Greyfield renewal</p> <p>41 Introduce a policy statement in Plan Melbourne 2016 supporting greyfield renewal and investigate planning scheme mechanisms to achieve coordinated and sustainable renewal of established suburbs.</p>	57	Support. There are examples where planning scheme provisions have facilitated / required lot consolidation to enable better development outcomes (design and density). There are also examples where the market is driving lot consolidation and development. Allowing for a strategic planning approach to greyfield developments will provide greater certainty and should lead to better outcomes.
5.5 Affordable Housing	<p>How can Plan Melbourne 2016 improve housing affordability?</p> <p>Improving housing affordability may also benefit from a whole-of-government approach and the MAC (2015) report recommends the broad actions required to tackle housing affordability should be coordinated through a Housing Strategy that includes a Housing Plan for Melbourne.</p> <p>These issues are beyond the scope of this refresh and will be considered by several government initiatives across different policy areas relating to affordable and social housing.¹</p>	59	<p>Recommend that Plan Melbourne include specific actions, outcomes, and timeframes in relation to Housing reform even where that work falls outside the realm of land use planning.</p> <p>While regulatory controls provide one of the critical mechanisms for funding social and affordable housing, there is a risk that there will be a disjointed response to the different elements of housing affordability and/or that due to the complexity of the issues and the solutions that there will be limited progress. Having specific recommendations in Plan Melbourne will increase monitoring and accountability across the whole of government and with different levels of government. It will also encourage strong partnerships with non-government agencies.</p>

¹ These include: The Review of the Residential Tenancies Act; the Future Industries Fund Construction Technologies consultation. In May the government announced that it will undertake a broader review of current policies affecting housing affordability, including taxation, regulatory settings and the suite of grants and concessions available to different categories of property

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	<p>Facilitating social and affordable housing</p> <p>In the MAC (2015) report, it is the view that Plan Melbourne 2014 places too high a reliance on increasing housing supply to tackle affordability problems.</p> <p>Boosting the supply of market-rate housing alone will not improve housing affordability for low-income households in the private rental market who require decent low-cost rental housing. Increasing the supply of social and affordable housing managed by not-for-profit providers is part of the solution.</p>	60	<p>Agree with the comments in MAC (2015) that supply is not the only issue. Support the need to increase social and affordable housing by not-for-profit providers.</p> <p>Registered Housing Associations such as HCA can provide integrated social housing where residents are not congregated in a high density of disadvantage. It is vital that the solution is about tackling the full spectrum of housing stress, not just homelessness.</p>
	<p>Just maintaining Victoria's current proportion in the context of a rapidly growing population means Melbourne needs around another 1,600 social housing homes each year.²</p> <p>This is far greater supply than achieved in recent years and regulatory reform and new funding sources are needed and new strategies for meeting demand by other means.</p>	60	<p>Support the need for regulatory reform and new funding sources.</p> <p>Housing Associations are building their capacity to deliver new housing projects. There is a need for Government to support new and innovative solutions on a case study basis so that councils, government departments, developers, and housing associations gain confidence in different ways of delivering affordable housing. One of the biggest barriers at the moment is the reluctance to be the first to risk money and reputation on a new approach.</p>

purchasers. The review will be completed in early 2016 and will guide future reforms. The government is also consulting with stakeholders from the community housing sector to discuss how they can partner with government in the renewal and growth of social housing.

² These calculations are based on the assumption that Melbourne currently has about 55,000 social housing dwellings and that household growth will accord with Victoria in Future projections.

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	<p>Should there be incentives or requirements to include affordable housing in new development?</p> <p>It recommends considering inclusionary zoning and/or incentive zoning for all designated urban renewal precincts and areas undergoing significant change and investigating the costs, benefits and opportunities of how planning incentives could facilitate more social housing in strategic urban renewal precincts and other areas experiencing significant change (Recommendation 25).</p>	60	Support inclusionary and incentive zoning. This will need to go hand-in-hand with mechanisms that enable low income earners to access social and affordable housing now and into the future.
	<p>Planning mechanisms also need to be accompanied by adequate funding and coordination of social housing agencies so they can take on new housing stock at the same time as developments proceed. Ongoing operating funding will also be required to meet the costs of managing housing and providing the required support for those households in social housing with complex needs.</p>	61	Support comments regarding funding and capacity. Agree that ongoing funding is required to provide support services to people with complex needs who are in social housing. Note that ongoing maintenance costs can often be funded by rent income (including Commonwealth Rent Assistance) if there is the right balance of social, affordable, and private market dwellings.

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	<p>Should development approval processes be expedited to increase viability of social housing proposals?</p> <p>The MAC (2015) report recommends shortened and guaranteed time frames for assessing planning permit applications for some affordable and/or social housing developments as well as limiting and even removing third-party appeal rights to minimise decision delays and provide greater project certainty.</p>	61	<p>Generally support the removal of third-party appeal rights as it would significantly reduce the risks and holding costs for developers. Provisions may need to be strengthened in relation to design outcomes to ensure good quality outcomes.</p>
	<p>Can regulatory reform increase social and affordable housing?</p> <p>The MAC (2015) report recommends identifying provisions in Victoria's current permit approval system that could be waived to facilitate more social and affordable housing.</p> <p>The MAC (2015) report also suggests that consideration be given to the range of planning provisions incentives to provide social and affordable housing through private development. In particular they believe there is merit in the concept of 'incentive zoning' such as Floor Space Ratio bonuses.</p>	61	<p>Support reduced car parking requirements for social housing developments.</p> <p>Support incentive zoning provided good design outcomes are achieved.</p> <p>Require infrastructure projects (e.g. level crossing removals) and strategic planning processes (e.g. NEC Framework Plans) to include social and affordable housing.</p> <p>Develop social and affordable housing targets based on demand.</p> <p>Calculate Social Return on Investment for government projects and funding.</p>

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	<ul style="list-style-type: none"> • Support, enhance and facilitate growth of National Employment and Innovation Clusters (Recommendation 7). The MAC indicates that existing zones (such as the Capital City Zone) do not provide an effective planning framework for these areas to preserve growth opportunities in health, education, research and innovation over and above other competing uses • Apply a new zone (and policy) to designated urban renewal precincts of metropolitan significance (Recommendation 20) <p>Replace ResCode with a new code assess approach (which would embrace good building design and urban design) for new multi dwelling developments (Recommendation 18)</p>	84	<p>Support the growth of NECs provided affordable housing and social housing forms part of that growth in areas close to public transport and services.</p> <p>Neutral on whether a new zone is required or whether existing zones can be tailored to deliver the desired outcomes. Note that creating a new zone may expedite the development but it may reduce the potential for tailoring provisions for example through a Development Plan, and may not create the best outcomes.</p> <p>Support the replacement of ResCode provided it helps deliver good design outcomes, increases certainty, and does not stifle innovation.</p>
7 New Planning Tools	<ul style="list-style-type: none"> • Provide planning incentives to facilitate social housing development in strategic urban renewal precincts and other significant change areas (Recommendation 25). This recommendation is addressed in Chapter 3. 	84	Support. See our previous comments in this submission.

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	<p>Planning tools for National Employment Clusters and strategic urban renewal areas</p> <p>Effective planning process and tools for these types of areas need to address a wide range of factors, such as:</p> <ul style="list-style-type: none"> • Pre-planning to identify key strategic planning issues, development opportunities and constraints. This may facilitate capturing part of the value uplift for the benefit of the community • A planning framework that sets out a vision and the desired land use, built form and public realm outcomes. It should address access to services, transport, jobs, recreation facilities, the provision of social and physical infrastructure and development sequencing • Planning for an appropriate mix of uses, including vertical arrangements within buildings, to create vibrant precincts and to derive optimal use of the scarce land resource • Effective community and stakeholder consultation balanced with efficient processes to create certainty for development. It may be reasonable to modify third-party notice and appeal rights where a properly consulted Framework Plan provides certainty for stakeholders and community. 	85	<p>Recommend that for point two the words “the provision of social and affordable housing” are added so it reads:</p> <p>“It should address access to services, transport, jobs, recreation facilities, <i>the provision of social and affordable housing</i> and the provision of social and physical infrastructure and development sequencing</p>

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	<p>A long-term land use strategy with a separate implementation plan with a shorter time frame could create a more enduring strategy....</p> <p>An implementation plan provides opportunity to clarify the roles of government departments and agencies in implementation (lead and contributing) and to particularly recognise and reinforce the role of local governments in delivering Plan Melbourne 2016, and to align their actions with Victorian Government efforts.</p>	91	<p>Support the preparation and monitoring of an implementation plan.</p> <p>Recommend that the implementation plan include specific actions, outcomes, and timeframes in relation to Housing reform even where that work falls outside the realm of land use planning.</p> <p>This will enable not-for-profit and other organisations allocate and prioritise their resources to the many different requests for information and input they receive each year.</p>
8 Implementation 8.2 Implementation Plan			
Glossary		95	Recommend include a definition of social housing in addition to affordable housing.

Background about Housing Choices Australia

Housing Choices Australia Limited (Housing Choices) began operating in mid-March 2008 following the merger of four social housing organisations with 20 year's experience in the provision of affordable housing for people experiencing significant disadvantage in the housing market. Housing Choices is a Housing Association under the Housing Act 1983 (Victoria). The organisation has grown rapidly through property development, property purchasing and transfer of properties from the State Government and other organisations.

Housing Choices is a leading national community housing provider dedicated to creating and managing safe, quality, affordable housing for people who are struggling to find a home in Australia's challenging private rental market.

Housing Choices presently consists of five companies:

- Housing Choices Australia Limited (Parent)
- Housing Choices Tasmania Limited (Subsidiary)
- Common Ground Adelaide Limited (Subsidiary)
- Disability Housing Limited
- Singleton Equity Housing Limited

Housing Choices has a robust governance structure comprising an independent, skills-based Board of Directors, clearly articulated policies and procedures and professional management.

Key information about the organisation includes:

- Nine offices in Victoria, Tasmania and South Australia
- Joint Venture with Unity Housing in Northern Territory
- 105 staff
- 60 Support Agency Partnerships
- Over 800 new dwellings constructed in the last seven years
- \$50 million of debt facilities in Victoria with NAB and Westpac
- Security Trust in place
- Over 3,400 properties across three States
- 25% of Victorian properties dedicated to people with disabilities
- Over 86% satisfaction rating with our services this year
- Tenancy rental arrears in Victoria - 0.75%, and in Tasmania - 0.5%

In our 20 years of experience we have developed and maintained strong relationships with 49 support agencies in Victoria that provide much needed support to our residents to sustain their tenancies. Support services provided by our support agencies are varied and include services to residents with mental health, intellectual disabilities and physical disabilities.

Additional service areas include homelessness, health services, aged care and acquired brain injury.

Housing Choices is committed to developing sustainable, diverse and inclusive communities. Our developments are indistinguishable from neighbouring properties and are of a high quality that ensures residents can live safe, secure and sustainable lives. We endeavour to implement a mixed tenure throughout our developments, including key workers, residents on Centrelink income, private rental residents and private owners.