



**Victorian Legislative Council  
Legal and Social Issues Committee**

**Inquiry into the rental and housing  
affordability crisis in Victoria**

**Submission**

**July 2023**

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## 1 Executive summary

Councils from across Victoria are deeply concerned about the current housing crisis. They see and deal directly with the fallout from a lack of affordable homes in their communities. In addition to the deep personal cost to those affected directly, the housing crisis has broader economic costs. Lack of accommodation leads to a shortage of essential workers while housing insecurity and homelessness increases the need for support services.

The high cost of housing, particularly in the rental market, is largely caused by a complex intersection of federal and state government policy settings. Housing being treated primarily as an investment asset rather than a place to live is a root cause.

In Victoria in particular, policy changes are needed to respond to expected population increases and the changing nature of our households and families. Supply chain issues in the construction industry have exacerbated problems.

Urgent action is required, including:

- Increasing funding to achieve more social and affordable housing options
- Making renting an attractive alternative to home ownership
- Progressing or advocating for broader reforms at State and Commonwealth level that address the prioritisation of capital gains over providing shelter, including land-banking, capital gains tax discounts, and negative gearing
- Achieving sustainable wage growth balanced with income support
- Undertaking a stocktake to see where building approvals have been given but not acted upon, and the reason why this is occurring.

These initiatives require coordinated action by all levels of government. We welcome the attention being given to these issues by both the Federal and Victorian Governments.

We are very concerned, however, that the State Government considers it can increase supply and drive down prices by bypassing proper planning processes to fast-track development approvals. In fact, analysis of planning permit approvals since 2018 demonstrates that councils already facilitate tens of billions of dollars' worth of development every year while maintaining a high degree of community input.

Any hasty move to implement centralised decision-making and waive through development without proper assessments must be seen as a knee-jerk reaction. It will create legacy issues and higher costs for future generations to rectify. The market cannot be expected to solve these problems. We encourage the Committee to interrogate these issues and take a holistic approach to the factors that have led to the housing affordability crisis.

## **Recommendations:**

There are options which can be taken now to address insecurity, availability and affordability of housing for renters. The MAV's State Council, comprising representatives from all 79 Victorian councils, formally adopted recommendations to address social and affordable housing in May 2023 (set out below). We recommend the Committee examine these and advise on:

- Reforming the funding models for social and affordable housing and the planning system to ensure it consistently facilitates new social and affordable housing in new developments, including overcoming any legal barriers to requiring mandatory affordable housing contributions through the planning scheme, including tailored zones
- Establishing regional targets for the supply of social housing to better match the number of vulnerable households
- Expanding the Big Housing Build to ongoing funding commitments by the Victorian Government to further increase the supply of social and affordable housing
- Conducting an audit of state government land for social housing development opportunities
- Reviewing the private rental assistance programs as they are not currently supporting people to maintain tenancies
- Undertaking immediate legislative reform to strengthen minimum standards for rooming houses
- Recognising that private market mechanisms are not fit-for-purpose for many people experiencing homelessness to secure long-term private rental housing, explore innovative models to support people from rough sleeping into social and affordable housing
- Improving the homelessness service system to prevent people from experiencing acute homelessness by rolling out the Zero model across the state, supported by state government funding
- Having more effective and uniform State Government legislation in relation to short-stay accommodation, including AirBnB, to alleviate amenity impacts, and consideration of limiting the amount of time in a given year whereby dwellings can be rented out on a short-stay basis in areas where housing availability has been identified as a particular issue.

## 2 Introduction

The Municipal Association of Victoria (MAV) welcomes the opportunity to provide a submission to assist the Committee's Inquiry. The MAV is the peak representative and advocacy body for Victoria's 79 councils. The MAV was formed in 1879 and the *Municipal Association Act 1907* appointed MAV the official voice of local government in Victoria.

Councils have a range of interests in social and affordable housing outcomes, including developing and implementing local planning schemes, and designing and facilitating strategies and policies that respond to local homelessness and housing issues.

The MAV State Council, comprising representatives from each of Victoria's 79 councils, has considered the issues of social and affordable housing on multiple occasions. Its resolutions have informed the development of this submission.

The MAV has also made a number of submissions to various federal and state level inquiries in recent years. Links to these are provided below to assist the Committee's consideration of local government's perspective on regulatory and policy reform.

Previous MAV submissions and reports include:

- Independent Review Panel Social Housing Regulation [Review](#) (March 2022)
- Productivity Commission [Review](#) of the National Housing and Homelessness Agreement (MAV submission February 2022)
- Parliamentary inquiry into Victoria's Planning Framework ([MAV submission](#) February 2022)
- The Parliamentary [inquiry](#) into housing supply and affordability ([MAV submission](#) October 2021)
- MAV [issues paper](#) on funding of social housing (July 2021)
- House of Representatives Standing Committee on Social Policy and Legal Affairs [Inquiry](#) into Homelessness in Australia. ([MAV submission](#) June 2020)
- Ministerial Advisory Committee on Planning Mechanisms for Affordable Housing ([MAV submission](#) October 2019)

Extracts from the MAV's submission to the Senate inquiry into housing supply and affordability in 2021 have been replicated in Section 3 of this submission, as they continue to be of direct relevance to the issues being considered for this Inquiry.

### 3 Context - why housing is so important

The importance of housing should be self-evident. However, there is value in acknowledging the elements of housing and the specific impacts it has. Housing is a key social determinant of physical and mental health. There are three key elements of housing that affect health: suitability, affordability, and security of tenure.

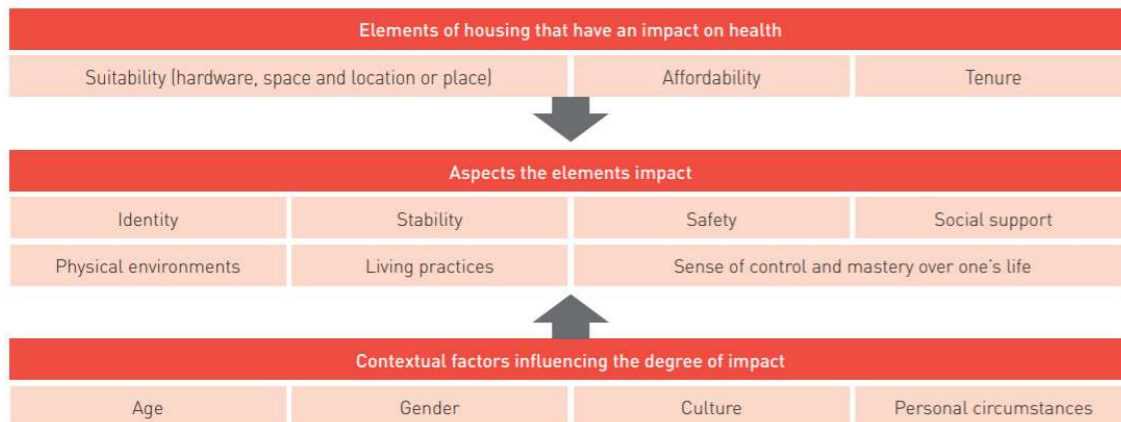


Figure 1 – Elements and impacts of housing. Source – VicHealth, 2011<sup>1</sup>

Access to suitable, affordable, and secure housing is a critical part of economic equality. Housing costs have contributed to widening wealth inequality<sup>2</sup>. Rental stress is much more prevalent among low-income households and is increasing faster. The need to keep pace with increasingly unaffordable rental costs means that marginal disposable incomes are even further reduced for low-income earners. Home ownership for young people is increasingly unrealistic, contributing to worsening inter-generational inequality. Housing costs are also exacerbating the geographic concentration of poverty in Australia, as people on lower incomes are forced to the fringe to find affordable housing.

The benefits to the whole of society of addressing inequality are well established. Higher levels of inequality negatively impact health, educational, and economic outcomes at a society-wide level, not just for disadvantaged individuals.

<sup>1</sup> [Housing and health: research summary](#), VicHealth, 2011 -

<sup>2</sup> [Housing Affordability- Re-imagining the Australian Dream](#), Grattan Institute, 2018

## Health and social problems are worse in more unequal countries

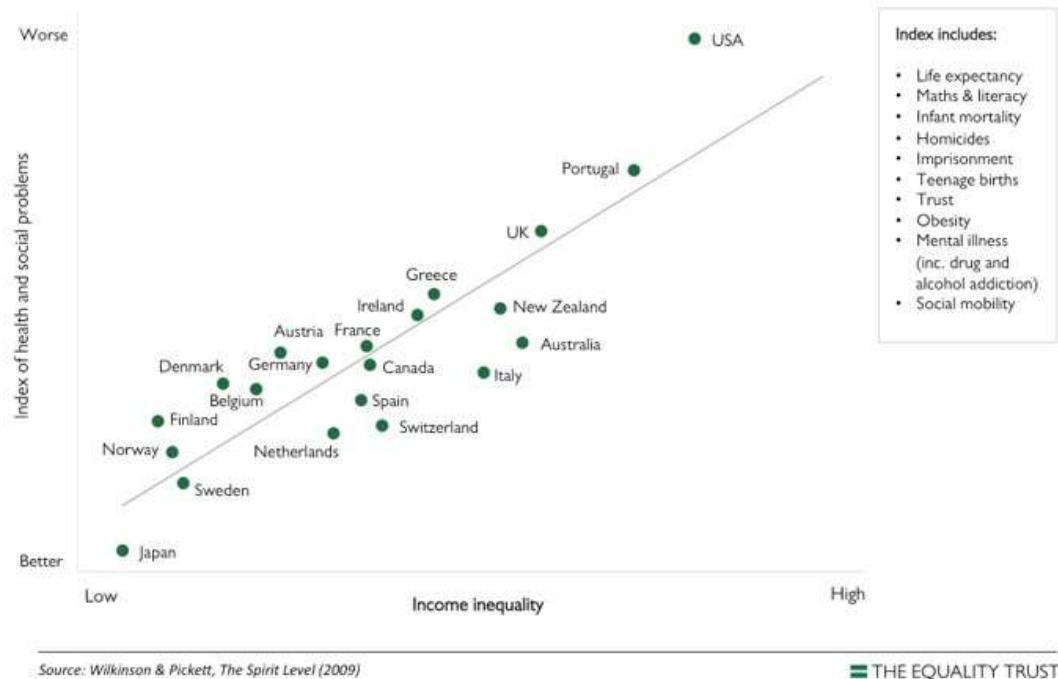


Figure 2 – Health and social outcomes by inequality

Poor access to housing also has more immediate and local economic impacts. Key workers have been priced out of several regions due to the failure of the market to deliver suitable housing options. In Victoria's Great South-West and Barwon regions 4,000 key workers employed within the region live outside of it. This is despite high rates of unoccupied dwellings (75% in Lorne). The combination of holiday homes and short-stay accommodation drives some market demand for high-end housing, but leaves workers in the public sector (health, education, municipal staff), tourism sector, and other local industries with few options.<sup>3</sup>

<sup>3</sup> [Key and essential worker housing supply action plan](#), Victorian Planning Authority and six regional councils, 2020



### **3.1 The politics of housing affordability**

For home ownership to become more affordable, property prices need to fall (or grow slower than wages). Given for most voters their largest asset by far is their home (or portfolio of investment properties), this prospect is treated with extreme caution by our politicians<sup>4</sup>.

Gurran and Phibbs<sup>5</sup> explored this through the lens of policy capture, that is the capacity of special interests to direct policy makers away from decision making in the public good. They note the success of both the development industry and certain think tanks in establishing a land supply problem as the dominant narrative of housing affordability in Australia.

Inflating demand through grant schemes and loosening regulation are fundamentally flawed approaches. Grant programs have popular appeal; however, the beneficiaries have primarily been sellers not buyers. Recipients of first home buyer grants and similar programs must compete against other recipients and investors, further inflating the price a seller receives.

Discarding the value that planning and building regulation provides risks building substandard homes in communities with poor access to vital infrastructure.

Developers will continue to drip-feed supply onto the market to maximise their profits and the value of their land bank on their balance sheets. Even in the total absence of planning constraints, it is likely developers would continue to act as a handbrake on supply because it is not in their interest to flood the market and reduce the value of the significant assets they hold in undeveloped land<sup>6</sup>.

### **3.2 Negative gearing and capital gains tax**

The application of negative gearing and capital gains tax discounts to the housing market must be central to any discussion of housing affordability in Australia.

In the context of housing, negative gearing refers to the use of net losses associated with rental properties as a deduction against taxable income from other streams (such as employment income). If the costs associated with a rental property (including management costs, interest payments, rates and land taxes, repairs, and insurance) exceed the rental income, this loss reduces the property owner's taxable income.

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<sup>4</sup> [The budget's affordability measures won't lower Australia's house prices. They weren't designed to](#), Dennis, R, 2021

<sup>5</sup> [Are governments really interested in fixing the housing problem? Policy capture and busy work in Australia](#), Gurran, N & Phibbs, P, 2015

<sup>6</sup> [Time is money: How landbanking constrains housing supply](#), Murray, C, 2020

When an asset is sold for a profit the capital gain is treated as income for tax purposes. If the asset had been held for more than 12 months, a capital gains tax discount of 50% is applied, meaning only half of the capital gain is assessed as taxable income.

Both negative gearing and the capital gains discount apply to other types of assets, however they have a unique distortionary effect on housing. They create an environment that encourages chasing capital gains over rental income. This shifts the role of private landlords from providers of a housing service to speculators. This can be observed in the shift towards net rental income remaining at a loss since the introduction of the capital gains tax discount in 1999.

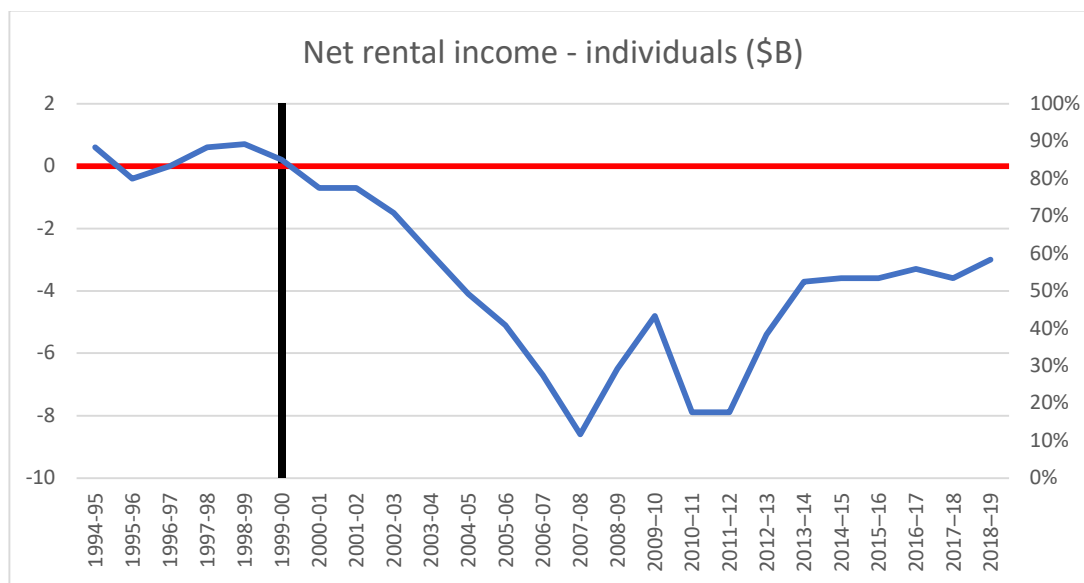


Figure 3 – Net rental income. Data Source: ATO<sup>7</sup>

Through negative gearing and the capital gains tax discount, taxpayers are subsidising property investors to outcompete prospective owner-occupiers at auction. This is exacerbated by the fact that only a small portion of investor lending goes to new dwellings. ABS data has only reported lending for new vs established dwellings for investors since July 2019, however in that time the proportion of new dwelling lending has dropped from 20% to under 14% in July 2021.

<sup>7</sup> [Taxation Statistics](#), Australian Taxation Office

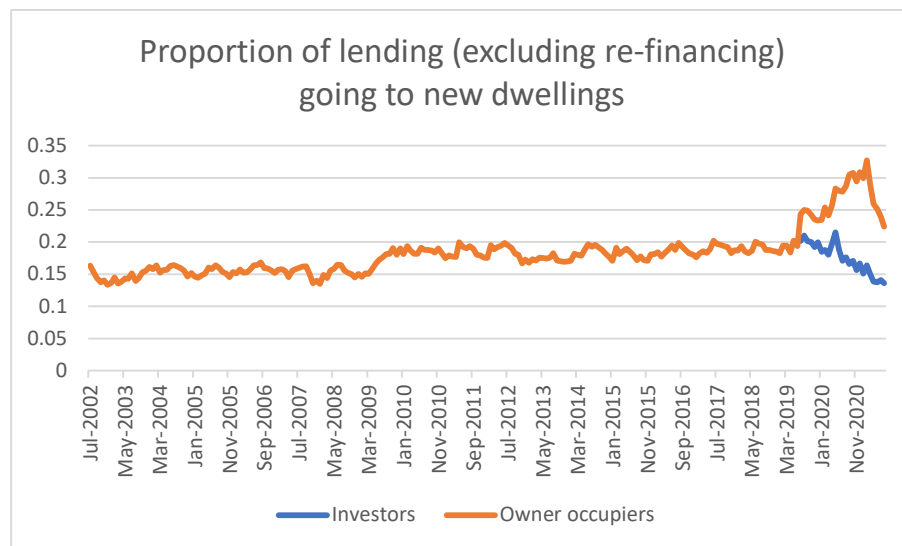


Figure 4 – Proportion of lending to new dwellings. Data source: ABS<sup>8</sup>

The appeal of high property price growth, combined with the propensity to invest in established dwellings creates additional problems for housing affordability. As noted earlier, affordability is a product of both housing costs and income. The nexus of capital gains tax discount and negative gearing incentivises investment into unproductive assets such as established housing<sup>9</sup>. The effect of this investment being effectively parked rather than generating productive economic activity through investing in businesses is a further drag on wage growth.

### 3.3 Right to invest vs right to a home

One of the most frequent arguments against meaningful reform to address housing affordability is that the departure of property investors from the market would jeopardise the rental market. Renting is and should be an important part of the housing market. Renting should exist as a true alternative to home ownership. However currently prospective owner-occupiers are being outbid by investors. In addition to buying largely established dwellings, rental stock reflects owner occupier stock in Australia to a far greater degree than other countries<sup>10</sup>, indicating that investors and prospective owner-occupiers are competing for the same types of properties.

<sup>8</sup> [Lending Indicators](#), Australian Bureau of Statistics

<sup>9</sup> [Governance of the nation: A blueprint for growth 2017](#), Australian Institute of Company Directors

<sup>10</sup> [The changing institutions of private rental housing: an international review](#), Australian Housing and Urban Research Institute, 2018

Across all age groups, most people that rent would prefer to be owner occupiers but aren't able to enter the market. For each of these households, if they replaced an investor in owning a property both the supply and demand for rental properties would reduce, meaning no shortfall is created.

Reason to rent	18-24	25-34	35-44	45-54	55-64	65+
I can't afford to buy anything appropriate	20%	19%	22%	23%	26%	29%
I have no other option	16%	14%	19%	26%	34%	43%
I want to own but I don't have enough for a deposit	19%	25%	24%	20%	17%	8%
<b>Forced to rent</b>	<b>55%</b>	<b>58%</b>	<b>65%</b>	<b>69%</b>	<b>77%</b>	<b>80%</b>
I prefer renting at the moment	24%	21%	19%	18%	15%	14%
I want to retain the flexibility to move quickly	9%	11%	8%	7%	4%	3%
I can afford to buy but I am not ready to do so yet	12%	10%	9%	7%	4%	3%
<b>Choose to rent</b>	<b>45%</b>	<b>42%</b>	<b>36%</b>	<b>32%</b>	<b>23%</b>	<b>20%</b>

*Table 1 – Reasons to rent. Source: Bankwest Curtin Economics Centre<sup>11</sup>*

One likely reason that most renters would prefer to own, is that Australia has comparatively weak protections for renters. Our laws in many respects value the right of a landlord over their investment higher than the right of a tenant to their home. Australia is significantly out of step with other similarly wealthy countries, particularly when it comes to no-grounds eviction.

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<sup>11</sup> [The private rental sector in Australia – Public perceptions of quality and affordability](#), Bankwest Curtin Economics Centre, 2018

	Minimum fixed lease	Cost controls	Eviction
Australia <i>(Noting that recent legislation in Victoria have strengthened the rights of renters, including some limits on no-grounds eviction)</i>	Generally six months or a year, but leases can be shorter	None for private housing. Landlords can charge as much as they like	No reason required. Regulations allow 'no-grounds' evictions for tenants on periodical leases (except in Tasmania)
Netherlands	Renters can stay indefinitely, even if the property is sold	Rents and rent increases are limited by government regulation	Only permitted in certain circumstances listed in the Dutch civil code
Germany	Renters can stay indefinitely, even if the property is sold	Rents and rent increases are limited by government regulation	Not permitted unless the tenant violates the terms of the lease
Denmark	In most cases renters can stay indefinitely	Rent controls apply to most of the rental housing stock	Only permitted under a limited range of circumstances
Ireland	Four years	None for private housing. Landlords can charge as much as they like	Only permitted during the first six months unless the tenant violates the lease, or use of the dwelling changes
France	Three years	Rent increases cannot exceed the 'reference rent index'	Not permitted unless the tenant violates the lease, the property is sold or the landlord intends to move in

Table 2 – Comparison of rental laws. Source: Choice<sup>12</sup>

Our current system not only frequently prices prospective owner-occupiers out of the market, it also frequently prices many tenants out of the type of rental properties they need. Despite the increased flexibility and responsiveness to changing circumstances that renting should offer, households in the private rental system consistently have higher rates of housing that doesn't meet their needs than owner occupiers.

<sup>12</sup> [Rental Rights](#), Choice, 2014

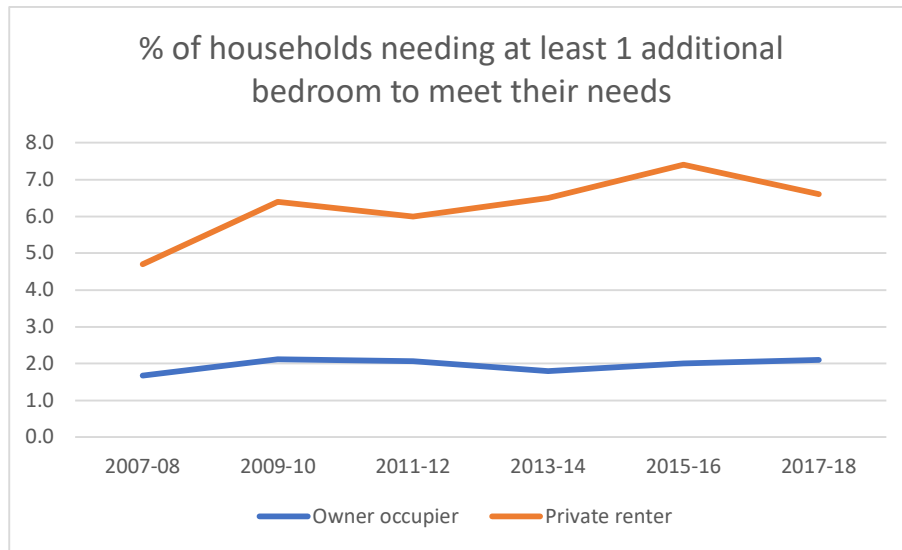


Figure 5 – Housing utilisation. Data source: ABS<sup>13</sup>

### 3.4 Regulation impact on housing affordability

The development industry frequently claims that every planning permit required, every infrastructure contribution levied, and every building inspection conducted results in direct costs passed on to homebuyers. This is inconsistent with the economics of development, however.

Developers are ultimately price takers, not price makers. As an example, consider infrastructure contributions. If the cost of contributions were passed directly on to homebuyers, the inverse should also hold. If infrastructure contributions were to disappear tomorrow developers would not discount home prices at tens of thousands of dollars below market value. Yet it is exactly this logic that these claims rely on.

Where is the money from infrastructure contributions coming from? They impact the residual land value of potential development sites. Residual land value is the maximum price a developer is willing to pay to obtain a development site. Residual land value can be found by taking the eventual price the property will sell for and subtracting all the costs of getting the land to that point.

<sup>13</sup> [Housing Occupancy and Costs](#), Australian Bureau of Statistics

## 4 Issues for consideration

This submission focusses on the following Terms of Reference (ToR):

- factors leading to low availability and high cost of rental properties (ToR1),
- options to address insecurity, availability, and affordability issues (ToR2)
- impact of short-stay accommodation (ToR3)
- other matters (ToR4) – building for the future, and increased support for social and affordable housing tenants.

### 4.1 The factors leading to low availability and high costs of rental properties

In addition to the structural issues outlined in Section 3 above, changes in housing choice for both location and size are also occurring apace. Increased use of working-from-home arrangements is leading to a preference for dwellings with more rooms. Societal trends to lower occupancy rates per dwelling are likely to continue. The resumption of high immigration levels will also continue to exacerbate the mismatch between housing supply and demand in Victoria.

Planning approvals and rezoning are often asserted as being a contributing cause to having sufficient supply of dwellings, both owner-occupied and those available for long-term rental. Contrary to this assertion, however, analysis of planning permit approvals show that councils have facilitated tens of billions of dollars' worth of development every year while maintaining a high degree of community input. Since 2018 council-led planning processes across metropolitan Melbourne have approved 96% of multi-unit applications to a value of over \$7 billion.

For example, a recent Prosper Australia report investigating nine major master planned housing projects found that after an average of 9.5 years, more than three quarters of the available land had been released for housing.<sup>14</sup> However, of the three Victorian examples provided, an average of 63% of housing lots remained vacant after nine years. This sort of land banking has not only occurred on Melbourne's urban fringe, inner-city brownfield sites are also vacant, with developers holding onto vacant land or permit-approved developments to await more ideal market conditions.

Migration to regional areas of Victoria has exacerbated underlying shortages in housing and poor housing mix in many rural councils. The shortage of appropriate and affordable housing in rural and regional areas is significantly impacting economic growth in many towns. Funding programs through Regional Development Victoria are providing local solutions to some of these issues, but a long term and sustainable strategy for rural and regional housing and workforce development is now overdue.

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<sup>14</sup> [Prosper Australia \(2022\) Staged releases, peering behind the land supply chain.](#)

## **4.2 Options to address insecurity, availability and affordability**

### **4.2.1 Investing in homelessness prevention programs**

Urgent investment in homelessness prevention programs is needed while longer term solutions take effect. Precarious housing, because it is unsuitable (e.g. it is overcrowded or in poor condition), unaffordable or insecure, is inadequate housing.<sup>15</sup>

Continued and sustained investment in specialist services for people who are homeless is needed. Homelessness in Victoria has increased more than four times the national average since the last census. In some areas the increase has been much higher, including a 465% increase in Barwon southwest and a 134% increase in Melton. Despite some further investment through the 2023 Victorian Budget, most of Victoria's homelessness services are delivered in 6-12 week periods of support.

More investment is needed in longer term and fully transitional programs such as Housing First and Permanent Supportive Housing models. Placed based approaches such as the [Community of Schools and Services \(CoSS\)](#) model can focus local services on prevention and identify and respond to disadvantage and family violence while keeping young people connected to school and community.

### **4.2.2 Increasing the supply of social and affordable housing**

To meet Australia's social and affordable housing needs there needs to be a combination of direct investment by government, and ongoing contributions from development through the planning system. The MAV has argued strongly for Victoria's planning system to adopt mandatory social and affordable housing contributions.

### **4.2.3 Making renting a competitive alternative to home ownership**

Making renting a more attractive prospect would take heat out of the property market.

Stronger laws protecting tenants' rights would give tenants increased security of tenure and make them more likely to consider renting as a true alternative, rather than a last resort.

Currently many landlords see themselves in the business of making capital gains, not providing housing. If tax settings were adjusted to encourage investment based on rental return this may move the rental market more to institutional landlords or more active smaller landlords. This shift, if well regulated, would see a greater proportion of landlords committed to providing a high-quality rental product.

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<sup>15</sup> Vichealth (2011), [Housing and health research summary](#)



Initiatives encouraging build-to-rent models, such as those being pursued by the Victorian Government, could be a valuable part of this shift in the rental market.

#### 4.2.4 Curbing property speculation

Addressing tax concessions that advantage investors over owner-occupiers at auction would make a significant contribution to housing affordability. Revisiting prudential lending standards with regards to both investors and interest-only loans is another option that would help even the scales for prospective owner-occupiers.

Land taxes are another potential lever to discourage speculation, although for household investors the presence of negative gearing moderates their impact as any additional tax burden can be claimed as a deduction against other income.

Of Melbourne's 9 interface councils<sup>16</sup> that span the greenfield growth areas, five levy a higher differential rate on vacant land ranging from 1.4 to 2.4 times the general residential rate in the dollar.

In each case where vacant land is levied at a higher rate, council rating strategies describe encouraging timely development as a key reason behind the policy. Even the highest of these rates for vacant land represents \$0.0064 for every dollar in capital improved value. The quantum of council rating makes it difficult for differential rating alone to counteract the gains developers accrue in restricting supply. It is likely that a state-levied tax on developable land would be required to provide enough disincentive to affect landbanking behaviour.

### 4.3 **Impact of short-stay accommodation**

The proliferation of Short-Term Rental Accommodation (STRA) presents a difficult policy and regulatory conundrum for government and communities. While STRA can play a role in enabling and driving tourism activity in an area, it can also result in fewer long-term rentals. In turn this reduced supply drives increasing long-term rentals becoming unaffordable for locals and low-income workers. This is particularly the case in popular tourist destinations, especially coastal and alpine holiday areas, as well as Melbourne's inner suburbs.

Many states have commenced regulatory reform. New South Wales has recently restricted non-hosted STRA to a maximum of 180 days per year in Sydney and some regional areas. Western Australia and Tasmania are in the process of introducing STRA registration schemes as part of a suite of other policy changes.

Many councils have also initiated local policy responses. The City of Hobart has sought to amend the Hobart Planning Scheme (PSA 22-1) to prohibit whole-house STRA letting from Hobart's residential zones. Byron Shire Council has pursued

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<sup>16</sup> [Victorian Local Government Comparator Groups](#), Local Government Victoria

changes to its local environment plan to limit the number of days a STRA property can be rented.

In Victoria, the Victorian Government has indicated it is developing policy changes as part of a wider housing reform program that could introduce new taxes for STRA accommodation. Priority actions councils support include Victoria following the lead of NSW, WA and Tasmania in legislating a mandatory STRA register.

An evidence-based analysis of the incidence of STRA in Victoria is also needed to inform the extent of intervention that might be required.

#### **4.4 Other matters - building for the future**

New development that is inclusive, vibrant, and well-designed does not happen by accident, and through the planning system future residents expect homes that are well built, feature high-quality design, and are well serviced by local infrastructure.

The increasing pressure to deliver new homes should not come at the expense of good design and well-located development. We recognise that the planning system can be complex, however it has unfairly become the scapegoat for a 'quick fix' to broader problems in Australia's housing system.

As councils process the vast majority of planning applications lodged in Victoria, they have a deep understanding of how the planning system can be improved to supply new homes while ensuring new communities are housed in quality environments.

There are a number of planning reforms that councils and the state could partner on to deliver better and more affordable homes including:

- Pursuing mandatory social and affordable housing contributions in new developments, supported by mechanisms to ensure their tenure as social or affordable is permanent.
- Making it easier for councils to pursue planning scheme amendments. Reducing delays at the authorisation and final approval stages of an amendment will speed up rezoning and address resource burdens councils face in developing and implementing local policy, including housing policy.
- Requiring high-quality and complete planning applications that conform to the planning scheme. This will reduce further information requests and excess negotiation and mediation on poorly conceived applications.
- Resourcing councils to pursue enforcement action, and that penalties are sufficient to act as a real deterrent to breaching the planning scheme, will also give greater confidence that new development meets planning and building approvals.

#### **4.5 Increased support for social and affordable housing tenants**

There is considerable scope for a greater focus on tenants dependent on social housing and service delivery. Clear, accessible, and enforceable standards for both public and community housing are an essential foundation for a fair and effective housing response. We encourage the Committee to inquire about the status of implementation of the recommendations by the Social Housing Regulation Review Panel in 2022 commissioned by the Victorian,

Councils having the ability to provide the necessary local services is also necessary. We encourage the Committee to consider how councils with high numbers of social housing dwellings can be supported to enable them respond to their needs, such as access to quality maternal and child health services, connections to local groups and the many other local activities councils provide.