



National Housing and Homelessness Plan Issues Paper

Submission

October 2023

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The MAV is the statutory peak body for local government in Victoria. While this paper aims to broadly reflect the views of local government in Victoria, it does not purport to reflect the exact views of individual councils.

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1 Executive summary

The MAV welcomes this opportunity to contribute to the development of a National Housing and Homelessness Plan to help more Australians access safe and affordable housing.

An adequate supply of well-designed and well-located housing integrated into the local landscape supports improved life outcomes for all Australians, which in turn drives the prosperity of the nation. Recent serious flooding events across Australia, including in Victoria, are a salutary reminder of the need for housing to also be well located and designed to respond to local conditions, support environmental outcomes and withstand likely future climate scenarios.

Funding for social housing and providing access to a financing facility that can be accessed for housing projects should be the number one priority for the new Plan. Many small-scale and place-based projects have potential to make significant inroads to solving the housing shortage through their cumulative impact.

A serious examination of Commonwealth and State Government taxation policies is also required. Currently \$16.3 billion of Victorian Government revenue comes from property, land and development related taxes representing 46% of its total budgeted taxation revenue. Over the forward estimates these are expected to rise to \$19.0 billion collected in 2026-27. Councils' sole source of tax revenue (rates) is also property based – further incursions by state and Commonwealth Governments add pressure to its main funding base for local infrastructure and services.

Taxation reform is urgently required to address the significant investments in housing assets at the expense of other productive asset classes. At a time in which there is lagging productivity across the economy, relying on the multi-generational transmission of largely untaxed wealth from homes owned by older Australians serves to exacerbate generational and social inequity.

A national approach to taxation reform is essential, given the reliance of state and local government on property and land based revenue sources.

Partnerships are also key to addressing current challenges. Working through the Australian Local Government Association (ALGA), information flows to state local government associations and councils will link initiatives arising through the National Housing Accord with local place-based demand and business case development.

Joining up Commonwealth Government departments across Treasury, employment, immigration and social services will also enable scaling of multiple initiatives to generate outcomes at the local level.

Planning and leadership to assist riverine and coastal areas consider how they adjust to changing climatic conditions is also a vital program of work to be included in the 10-year Plan.

Introduction

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. We provide a Victorian local government perspective while recognising that councils operate differently across Australia.

Victorian councils are fundamentally concerned about the health and wellbeing of their communities. They play an important role in facilitating the development and location of housing, including developing and implementing local planning schemes, encouraging and facilitating social and affordable housing, and partnering to respond to local homelessness and housing issues. Councils are ideally placed to understand local conditions and optimal planning requirements which meet the needs of local communities.

The MAV State Council, comprising representatives from each of Victoria's 79 councils, has passed a number of resolutions on social and affordable housing and planning in recent years. These 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 National Plan Team understand the context of our response and Victorian councils' consistent calls for reform. These include:

- [MAV submission to the Federal Standing Committee on Tax and Revenue Inquiry into Housing Affordability and Supply in Australia \(Sep 2021\)](#)
- [MAV submission to the Interim Report of the Independent Review of Social Housing Regulation in Victoria \(Feb 2022\)](#)
- [Victorian Legislative Council Legal and Social Issues Committee Inquiry into the Rental and Housing Affordability Crisis in Victoria \(June 2023\)](#)
- [Social Housing and Funding for Local Services – MAV Issues paper \(July 2021\)](#)
- [MAV submission to the Victorian Legislative and Social Issues Committee Inquiry into Homelessness in Victoria \(June 2020\)](#)

2 What a National Housing and Homelessness Plan must achieve

The MAV congratulates the Commonwealth Government in initiating development of a national housing and homelessness Plan (“the National Plan”). A coordinated framework which drives policy responses and action across and within Australia’s different levels of government in the short to medium term has potential to make a significant impact to the provision of affordable housing where it is most needed.

Focussed well, a National Plan also has considerable potential to draw on the important interplay public, private and not-for-profit sectors can bring to tackling current and emerging housing challenges.

The framework must facilitate an integrated policy package that shifts the gears of Commonwealth controlled tax and financing policy and enables subsidiarity by supporting place based, locally driven responses. At the Commonwealth level, we would like to see consideration for how income support, immigration, employment, taxation and financial regulation policies can positively reduce lack of affordable housing and homelessness.

The National Plan must recognise that market driven approaches alone will not meet the needs of the most vulnerable and confirm the role government intervention and support has in ensuring that people get housing they need. This goes beyond income support to enabling people to compete in the market. It extends to the design and development of public housing, its location and support for public housing tenants.

As we have acknowledged in previous submissions, current problems are intractable and complex. It is not just about land supply, as is often asserted, although better land use policies are needed and currently being worked on in Victoria. It is also not about more centralised planning, although planning reform is also needed.

The National Plan needs to be sustainable over the long term, with government policies having regard for their impact on housing supply. Inflating demand through time limited grant schemes and loosening regulation are fundamentally flawed approaches that to date have not worked sufficiently to meet demand.

This submission is presented in the final stages of Victoria’s Big Housing Build initiative introduced in 2020, and the [Housing Statement](#) being announced by the Victorian Government on 20 September 2023. Fast-tracking development approvals is a core feature of the current approach to improving supply, even though supply chain problems, construction costs and access to skilled workers continue to present impediments to new dwellings being built. Currently in Victoria councils have approved 120,000 developments, but these are not translating into housing builds.

Rushing to generate supply by focussing on development approvals without addressing other levers to unlock the other blockages risks creating a significant increase in value to developers at the expense of the community.

We welcome new Commonwealth funding via the Housing Australia Future Fund and Housing Accord which will support the momentum for change in Victoria.

We hope that the National Plan process will stimulate completion of the next Victorian Ten Year Social and Affordable Housing Strategy that was promised in 2020.

2.1 The role of Commonwealth, state and local governments

- *Key considerations:*
 - *Confirm existing Commonwealth and State Government accountabilities and responsibilities for housing*
 - *Encourages planning reform that maintains capacity for people to have a say in the communities in which they live and drives social housing growth through the development process*
 - *Requires states through the NHHA to establish regional targets and inclusionary zoning policies jointly with councils to enable the supply of social housing to better match the number of vulnerable households.*

We welcome the intention of the National Plan to “... set out a shared vision across all levels of government to inform future housing and homelessness policy in Australia, and key short, medium and longer-term reforms needed to address housing and homelessness challenges”. We look forward to working through ALGA regarding the input from the local government sector.

We note that the roles of the three levels of government are defined in the National Housing and Homelessness Agreement (NHHA). These roles are broadly reflected in the Issues Paper and continue to be appropriate. The NHHA makes it clear that the Commonwealth and States are responsible for leadership for housing and homelessness policy, and funding and maintaining adequate supply of social housing, and that local government’s responsibilities are for building approval processes, local urban planning and development processes, and rates and charges that influence housing affordability.

The NHHA requires each state to have publicly available housing and homelessness strategies¹ that include demand and expected levels of supply of social housing, priority homelessness cohorts and priority policy reform areas

¹ [National Housing and Homelessness Agreement, part 2, 17 \(a\) and \(b\)](#)

A key gap in the current NHHA however, is the lack of obligation for the states to properly involve councils in the development of their housing strategies. This is despite councils being referenced in the NHAA, and their role being critical to not only the building of new dwellings, but also in providing fit-for-purpose local infrastructure and adequate levels of local services people rely on in their daily lives.

All state governments being obligated to have inclusionary zoning policies would also assist councils require provision of social and affordable housing in new developments.

For context, currently there is no statewide inclusionary zoning provision operating in Victoria. Councils instead have to rely on developing complex agreements with developers on a case-by-case basis to ensure provision of social and affordable housing. These are both costly and time-consuming to arrange. They also vary across municipalities, which in turn generates greater complexity for developers.

A consistent and mandatory requirement to contribute to vital social and affordable housing would be a simpler and more effective method.

2.2 Commonwealth and state taxation policies

- *Key consideration:*
 - *Include a detailed analysis of the impact of Commonwealth and State taxes on housing supply and demand, and strategies to mitigate the negative short and long term impact of housing related taxes.*

Tax settings that impact housing must be fully considered in the development of the Plan. The treatment of housing as an investment rather than vital shelter is a major contributor to the housing crisis.

Currently there are significant imbalances in the current taxation mix across Australia that impact housing supply. These have been illustrated in the recent [Intergenerational Report](#), which shows the impact of the significant and increasing reliance on income taxes at a time when the dependency ratio (ie, working age people to recipients of government support) is expected to increase. Without taxation reform, access to owner-occupier housing will increasingly be due to inheritance from the multi-generational transmission of largely untaxed wealth.

This 10-year National Plan must consider the generational issues arising from younger age cohorts not being able to access housing near employment sources. It is inappropriate that these structural issues continue to not be acted on with a disproportionate share of the tax burden being used to support the services to the beneficiaries of largely untaxed wealth.

Negative gearing and capital gains tax discounts attract investors to the market, where they outcompete prospective owner-occupiers. Investor money largely goes to established dwellings rather than new builds, so rather than investment increasing supply it is inflating demand.

The ability to leverage through a mortgage makes housing an attractive option for many investors. For a small-scale investor with \$200,000, they could choose to put that in the stock market or other investments, or they could use it to borrow and purchase a residential property worth \$1 million. If rates of return are the same across the two investment options, the house will generate five times the actual capital gain.

The availability of finance, and favourable tax treatments such as negative gearing and capital gains tax discounts, mean prospective owner-occupiers are at a large disadvantage when trying to buy property. In some cases they may instead end up paying off the mortgage of the very investors that outbid them.

Most investor lending goes to already-established dwellings, not the construction of new stock. Rather than increasing the supply of housing, we inflate the demand for it. This further increases the quantum of capital gains, reinforcing the cycle anew.

The level of capital gain on offer also influences landlord behaviour. Capital gains can far exceed potential rental revenue, and losses can be deducted from other income streams. An investor is less worried about their reputation and treatment of their tenants than their ability to sell and realise a capital gain at a time that suits them.

In addition to the effects on the housing market, less investment money is available for productive enterprises such as new or expanding businesses, or developing infrastructure.

Care also needs to be taken with regard to state responsibilities to provide social housing being pushed to local government to fund. Analysis undertaken by the MAV showed that a proposal to make council rate exemptions mandatory for social and affordable housing dwellings would have cost nearly \$140 million per annum in revenue foregone if it had been implemented on the number of state and community owned social housing in 2021.

This proposal was fundamentally inequitable and especially onerous on communities with high proportions of social housing. These communities in fact require more infrastructure and higher levels of service provision than locations with fewer social housing dwellings. They were also more likely to have housing where landowners were also enduring mortgage stress.

In Victoria councils are also rate-capped, which exacerbates the funding predicament facing council service provision². In the scheme of taxation burden, council rates nation-wide represent just 3% of the overall tax collected.

Even considering solely land-based taxes, Victorian state revenue from property-based taxes far exceeds council rates. In financial year 2023-24 alone, the Victorian Government was budgeted to collect \$8.4 billion in immovable property taxes, and \$7.3 billion in land transfer duties³. Council rates and charges for the same period are projected to total \$7.3 billion⁴.

3 Response to issues identified in the discussion paper

This section responds to the specific topics outlined in the discussion paper.

3.1 Homelessness and homelessness service provision

- *Key considerations:*
 - Promotes the [Functional Zero homelessness model](#) and incentivise states to roll out the model in association with assertive outreach and rapid re-housing
 - Includes a specific homelessness prevention objective and make funds available, including to local governments, through the NHHA for locally focussed initiatives.

The Issues Paper states that the Plan will ‘help address homelessness’ (p.9 - purpose). We would urge a more ambitious and directed mission – the Plan should seek to end homelessness and prevent it from occurring in the first place.

The paper also makes the point that homelessness can affect anyone and, while this is true, it is also true that, where there is an adequate housing and support system homelessness does not need to affect anyone.

3.1.1 Crisis accommodation and assertive outreach – towards Zero homelessness

There is a desperate need for more crisis accommodation and linked assertive outreach. Across Victoria there are only 423 crisis beds available for people experiencing homelessness or family violence⁵. Rural and regional councils in Victoria are particularly desperate. The Horsham Entry Point, which covers Ararat,

² MAV Issues Paper [Social Housing and Funding for Council Services](#), July 2021

³ Victorian 2023-24 Budget Paper No 5, p18

⁴ 2022-23 adopted budgets of Victorian councils

⁵ Northwestern Homelessness Network [A crisis in crisis](#), 2020

Horsham and Stawell saw 825 presentations for crisis accommodation last year. They have started providing tents, swags and sleeping bags as there is no accommodation available.⁶ There is no assertive outreach capacity in the region.

The significant post pandemic increase in the number of people who are sleeping rough in growth corridor and rural and remote locations in Victoria is both a downstream effect from the housing crisis and exacerbated by the reduction of funding for widely supported Homelessness to a Home program in 2022.

Flexible surge funding models like Victoria's successful Homelessness to Home program are needed to respond rapidly to rapid increases in the number of people who sleep rough. Capacity for this kind of funding response needs to be included in the NHHA and allocated in consultation with councils.

In regional and rural areas of Victoria assertive outreach services need to address the needs of dispersed populations of rough sleepers across large areas, often in the absence of readily available crisis housing. The Plan should encourage investment in councils and council supported partnerships.

Councils and coalitions of community organisations need resources and support to enable them to rapidly design, develop and operate the [Functional Zero](#) model in high need areas. Preventing homelessness from occurring in the first place

The national Plan should include a specific homelessness prevention objective and make funds available, including to local governments, through the NHHA for locally focussed initiatives.

Victorian councils are actively engaged in community-level prevention strategies to improve the social environments for residents with the aim of reducing future health and social problems. Councils are well placed to influence community attitudes and behaviours as service providers, local employers and municipal leaders. Under the *Victorian Public Health and Wellbeing Act, 2008* Victorian councils prepare a Municipal Public Health and Wellbeing Plan every four years, many of which call for increased social and affordable housing.

Victorian councils are also a key partner in the prevention of family violence and all forms of violence against women, the main reason women become homeless. As part of this work, the MAV has worked with partners to produce a [local government guide to preventing violence against women](#).

Precarious housing, because it is unsuitable (eg, it is overcrowded or in poor condition), unaffordable or insecure, is inadequate housing.⁷ The current definition of

⁶ [Adam Liversage, Senior Manager Homelessness, Uniting Barwon and Western region \(2023\) Homelessness in Regional Australia](#)

⁷ Vichealth (2011), [Housing and health research summary](#)

severe overcrowding within the definition of homelessness should remain in place (see Discussion Paper pp 27-28). The NHHA should support service provision to severely overcrowded households, particularly in rural and remote areas. Timely support to people in overcrowded households can help them maintain housing and prevent homelessness.

3.2 Social Housing

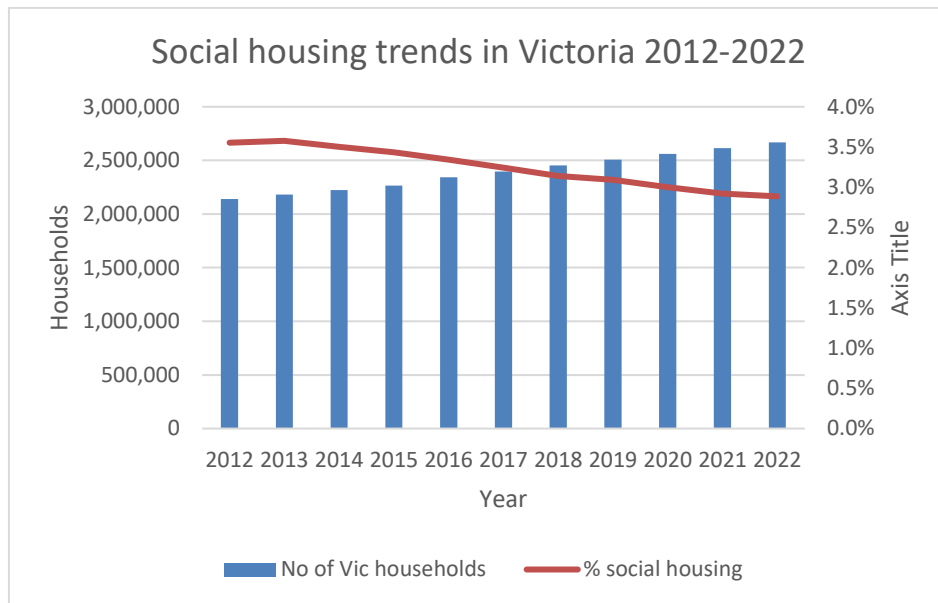
- *Key considerations:*
 - *Confirm the commitment from the Commonwealth and State Governments to fully and sustainably fund, develop and deliver social housing*
 - *Retain focus on tackling the significant funding investments required*
 - *Acknowledge the broad and vital role of local government and its connection to community by partnering and funding councils to develop place-based partnerships which respond to local need.*
 - *Recognise that amenity and local infrastructure is necessary to ensure that housing is located in thriving and well-connected communities.*

A National Plan must ensure sustainable social housing growth is continued to be delivered by all state and territory governments. Achieving consistency in key definitions, such as what is considered “affordable” housing, would also be useful.

3.2.1 Sustainable social housing growth and delivery

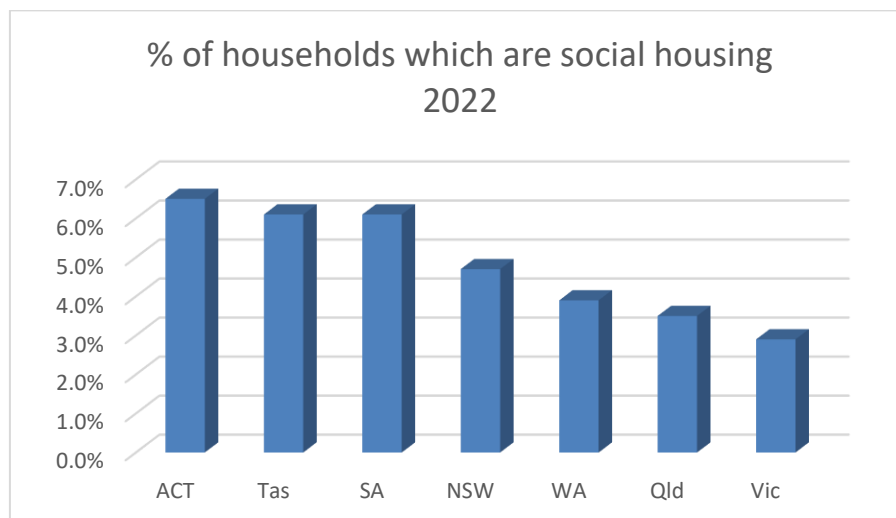
The National Plan should confirm the responsibilities of the Commonwealth and States to fully and sustainably fund, develop and deliver social housing and provide a mechanism to ensure that there is sustainable growth in funding for social housing.

There is a significant and urgent shortfall in social housing in Victoria, which given the population numbers involved mean this issue has significant national impact. The rate of social housing in Victoria has declined in the last 10 years. If Victoria had maintained its rate of social housing from 2012, another 18,000 dwellings would be available today, with associated reductions in waiting lists, as the following diagram shows.



Source: Australian Institute of Health and Welfare [Housing Assistance in Australia](#)

Victoria is also clearly providing the lowest proportion per total population of social housing dwellings in Australia:



Source: Australian Institute of Health and Welfare [Housing Assistance in Australia](#)

Looking forward 10 years to 2032, the need for increased uplift in social housing dwellings in Victoria is significant. Waiting lists are already growing in Victoria, with a 6% increase in the number of applicants to the [Victorian Housing Register](#) in the 12 months to March 2023 (67,985 applicants last March). If acquisitions were to occur at the same rate as NSW, Victoria needs to add 17,000 public housing dwellings each year, over the next 10 years.

The Community Housing Industry Association (CHIA Victoria) has also undertaken similar analysis, identifying that to bring the proportion of social housing in Victoria up to the national average of 4.5%, Victoria needs to acquire an additional 6,000 dwellings a year for the next 10 years.⁸ Rental options are limited and expensive, given the current lack of affordable rental properties across metropolitan Melbourne and regional cities and towns.

The NHAA needs to be clear about the level of social housing provision being funded by the states.

Clear and agreed social and affordable housing targets also need to be developed, and states held accountable to delivering them. These targets should be established jointly with councils to target acquisitions to where they are most needed.

The lack of clarity about the number of social and affordable housing dwellings resulting from the recent Victoria's Housing Statement underscores this need. The Statement promises over 800,000 homes in the next ten years, but is unclear about the number of social, affordable and private market homes will be delivered.

CHIA Victoria has suggested an alternative commissioning approach that is worth considering. Based on the Homes England model, it requires state governments to identify a region and delivery target and community housing organisations, or consortia of organisations would bid in a plan of how they would deliver those homes, and at what price over a given period

Regardless of the mechanism, delivery methods need to be tailored to local needs and economy. In some areas community housing associations may be best placed, in other areas state owned public housing or private development may achieve better results.

Funding levels need to consider the higher costs of developing and delivering social housing in rural and regional areas. The capacity of the community housing sector to deliver in rural and regional areas needs to be realistically appraised and supported. State governments have an important role to play in areas where community housing providers are absent or where it is not financially feasible for them to invest.

The centralisation of community housing into larger and larger corporate development companies can weaken local connection and local communities. Councils can provide local knowledge and can assist community housing associations to strengthen local connections. The important partnership between councils and community housing associations should be supported.

The MAV has worked closely with CHIA Vic to develop [resources](#) to support social housing development in local areas.

⁸ [Community Housing Industry Association, Victoria \(2022\) *Beyond the Big Housing Build*](#)

3.2.2 Nationally consistent definitions based on need and level of support, supporting high quality and transparent data

The National Plan should establish agreed definitions of social and affordable housing that clearly mark the distinction between supported housing for people on very low incomes and housing that is affordable for people on medium incomes, such as key workers.

Current definitions do not sufficiently distinguish between social and affordable housing and don't provide sufficient guidance around 'affordability'. The Victorian Planning and Environment Act states that affordable housing includes social housing (i.e., public housing and community housing), and housing for people on moderate incomes. This allows developers and others to argue, for example, that housing at 'below market value' is affordable.

Clear, agreed, and legislated definitions can assist councils in their negotiations with developers and facilitate much needed national data sets that allow comparison of need and supply and allow progress towards targets to be measured. Data used in the NHFIC 'State of the Nation's Housing report' should be made available at the local government area level of analysis.

3.3 The Impact of climate change and disasters on housing security, sustainability and health

The financial and planning impacts of natural disasters on housing will continue to grow, rapidly, as the world warms. Where we live, how we live will and what kind of housing we need will change as the climate warms. Councils are essential players in disaster planning, response and recovery and are best placed to foster resilience and guide environmental and behavioural change to support adaptation.

In Victoria, at least 63 of 79 councils have been recently flood-affected, and the damage to essential public infrastructure is significant. Under Victoria's application the Disaster Recovery and Funding Arrangements (DRFA), State and Federal funding is provided to councils to reinstate eligible infrastructure to their pre-disaster condition. Should councils wish to improve the infrastructure through more modern or disaster-resilient solutions, councils must fund the improvements in full. The MAV and councils have repeatedly called for betterment to be permitted under the DRFA and for this to be supported by a betterment fund, similar to the model applied in Queensland.

Planning is critical to mitigate climate impacts in different locations and the risk of disaster should be included in all state planning schemes. In Victoria existing planning scheme protections for bushfire risk should be extended to other hazards, including food and coastal inundation.

Councils also need to be closely engaged in planning for emergency accommodation and short-term solutions, building on assertive outreach responses mentioned earlier in this submission.

3.4 Planning, zoning and development

- *Key consideration:*
 - *Establish agreed definitions of social and affordable housing that clearly mark the distinction between supported housing for people on very low incomes and housing that is affordable for people on medium incomes, such as key workers.*

We need our planning systems to be a driver of ongoing and sustainable supply of social and affordable housing. In Victoria the normal budget processes have clearly failed to meet our needs. Mandatory contributions levied through the planning system are a vital tool going forward.

More broadly, the national Plan must recognise that while planning can prescribe the type and location of housing permitted, delivery is ultimately up to the market.

The development industry has repeatedly claimed planning is the primary blocker of housing supply as part of its deregulatory agenda. In the City of Melbourne alone 20,000 potential dwellings have planning approval but have not commenced construction⁹. Working with other councils, the MAV has identified a further 10,000 dwelling approvals not acted upon across just four middle and inner-ring municipalities.

If planning were the obstacle it is claimed to be, these approvals would be jumped on. This is a longstanding problem and cannot be explained away by the acute challenges facing the construction industry currently. Developers have no reason to flood the market with supply and devalue their own holdings in doing so.

Good planning processes ensure that the pursuit of profit through development does not compromise the broader public good. Combustible cladding, faulty waterproofing, unstable balconies, ineffective fire safety measures and major structural defects. These are some of the symptoms of a building regulatory system that was undermined, purportedly in the name of more efficient approval processes. These should serve as cautionary tales when considering claims of “red tape” in planning.

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.

⁹ [Herald Sun 5/9/2023](#)

Victoria's Housing Statement confirms and extends the states intention and capacity to increase supply and drive down prices by bypassing proper planning processes to fast-track development approvals. However, analysis of planning permit approvals since 2018 demonstrates that councils facilitate tens of billions of dollars' worth of development every year while maintaining a high degree of community input. In addition, an MAV survey of council planning departments found almost 120,000 dwellings have received planning approval but are yet to commence construction. This data clearly shows that any issue with councils sitting on planning applications pales in comparison to the number inactive permits across Melbourne and Victoria.

There are a number of planning reforms that councils and the state could partner that would result in better and more affordable homes including:

- Pursuing mandatory social and affordable housing contributions from developers, supported by mechanisms to ensure their tenure as social or affordable is permanent.
- Empowering councils' strategic planning. Reducing unexplained delays in the Minister's office when assessing planning scheme amendments would speed up rezoning proposals. Allowing councils to implement more prescriptive controls through planning scheme amendments would give greater certainty to both developers and the community and reduce the level of discretion necessary on individual permit applications.
- Working with councils to identify types of low-risk activity that should not be dealt with through a planning application to begin with.
- 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.
- Appropriately resourcing the planning system, both within councils as well as the Victorian Civil and Administrative Tribunal and referral authorities.
- Implementing both facilitative and punitive measures to ensure that approvals through the planning system result in housing supply in a timely manner. Facilitative measures could include the quicker provision of infrastructure by both public and private sector bodies. Punitive measures could see developers held more stringently to the time limits on planning permits and increasing the tax burden of holding onto vacant or underutilised land.

There is a role for the Federal Government to set parameters to ensure that planning systems meeting national objectives and promote models that work well, like inclusionary zoning, with state governments.

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.

3.5 Aboriginal and Torres Strait Islander Housing

Aboriginal people are disproportionately impacted by housing stress and homelessness. One in six Aboriginal Victorians need homelessness assistance and Aboriginal Victorians are 10 times more likely to depend on social housing than other Victorians. They are also 25 per cent less likely to purchase their own home¹⁰.

The Victorian Government leads the provision and support for housing for Aboriginal Victorians. The [Mana-na woorn-tyeen maar-takoort - the Victorian Aboriginal Housing and Homelessness Framework](#) developed by Aboriginal Housing Victoria recognises that local government can support Aboriginal housing in Victoria and provides a solid foundation for the development of partnerships between Aboriginal organisations and councils.

Aboriginal Housing Victoria (AHV)– the primary provider of housing for Aboriginal people in Victoria – and MAV are currently partnering to engage councils to improve access for Aboriginal and Torres Strait Islander people. AHV is engaging directly with councils with high proportions of Aboriginal housing to explore the availability of housing stock, rates exemptions and other ways that councils can support renters' wellbeing, community participation and inclusion. An [MOU](#) developed with Darebin City Council provides a useful case-study for how councils can work with local Aboriginal housing providers.

We hope that the National Plan can work to strengthen productive partnerships between the Aboriginal Housing sector and all levels of government.

3.6 Housing Costs, home ownership and the rental market in Australia

In our response to the [Victorian Legislative Council Legal and Social Issues Committee Inquiry into the Rental and Housing Affordability Crisis in Victoria](#), the MAV submitted that 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.

¹⁰ Mana-na worn-tyeen maar-takoort, p8

We have re-iterated several aspects of this call to action in this submission. Its recommendations and supporting research touch on some important issues, such as the impact of short-term rental accommodation on available housing in popular tourist locations.

4 Further information

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