Submission to the inquiry into the redevelopment of Melbourne's public housing towers

Housing@RMIT

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Acknowledgement of Country

We acknowledge the people of the Woi wurrung and Boon wurrung language groups of the eastern Kulin Nation on whose unceded lands we conduct our work. We pay our respects to their Ancestors and Elders past and present who have cared for Country since time immemorial. We acknowledge the enduring connections of all First Peoples to culture, language, knowledge and Country. We understand and take seriously the role that colonisation has had and continues to play in disrupting First Peoples' ability to be at home on their sovereign territories.

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This submission draws together collective knowledge and insights from the research of members of RMIT's housing research network, Housing@RMIT. Housing@RMIT's membership includes academic and practitioner experts across the fields of social policy, geography, community development, urban planning, property, construction and project management, circular economy, retrofit and repurposing, architecture, engineering and environmental science. Contributors to this submission are affiliated with centres which are part of the Housing@RMIT network including the Centre for Urban Research, the Social Equity Research Centre, the Post-Carbon Research Centre, and CE Hub@RMIT. Our broad base of expertise provides a uniquely multidisciplinary approach to critical engagements with social policy initiatives.

Housing@RMIT welcomes the opportunity to provide expert guidance on recommendations included in this submission. For further information, please contact corresponding authors Professor Karien Dekker (karien.dekker@rmit.edu.au) and Dr Priya Kunjan (priya.kunjan2@rmit.edu.au).

Introduction

On the 20th of September 2023, the Victorian Government announced the release of 'Victoria's Housing Statement' (Premier of Victoria, 2023a), an ambitious package of reforms aimed at improving housing supply and affordability in the state. One of the key proposals in the statement was the decision to demolish and redevelop all 44 of Melbourne's remaining high-rise public housing towers by 2051, 42 of which were tenanted at the time of the announcement. The first tranche of towers slated for redevelopment are 12 Holland Court and 120 Racecourse Road in Flemington, 33 Alfred Street in North Melbourne, and the already-decanted 20 Elgin Street and 141 Nicholson Street buildings in Carlton.

While the government has stated that the decision to redevelop Melbourne's tower estates is based on evidence that the buildings are no longer being fit for purpose and unsuitable for refurbishment, none of this evidence has been publicly released for independent review. Given the government's stated commitments to sustainability, minimizing the environmental impacts of construction, and implementing statewide circular economy initiatives, significant justification is required to proceed with a program of mass demolition and new-build construction. Concerningly, the announcement of plans to demolish the towers came as a shock to high-rise public tenants, who had not been afforded the opportunity to engage in open dialogue with the government in advance of the decision. Academic research conducted by members of Housing@RMIT has found that there has been little transparency and information about the government's decision to demolish the public housing towers, and a pattern of poor tenant engagement that has led to widespread distress among high-rise residents.

In the absence of supporting data and justification for the government's decision to form the basis of a robust independent review, it is not possible to provide an adequate response to the Terms of Reference (ToRs) as written. Many of the ToRs are framed in a way that suggests publicly available information exists to inform a comprehensive assessment of the government's plan. This is not the case. In fact, for much of the tower redevelopment plan, not only is there a lack of information about the government's decision-making process, but there is also no indication of how key steps in the plan will be delivered. Missing are crucial pieces of information including cost-modelling, plans for tenant relocation and attendant stock acquisition to make up for demolished dwellings while fulfilling obligations to fairly manage the Victorian Housing Register, the proposed leasing or ownership model of high-rise estate land, and the tenure type/s that redeveloped dwellings will be leased under. This data and more must be provided to enable any meaningful public engagement with the plan.

In addition to our concerns about the framing of ToRs given a dearth of available information to assess the plan, we also found it striking that the ToRs do not refer directly to the impact that the plan has had on high-rise public housing residents' wellbeing, security, or right to freedom from arbitrary or unlawful interference with their homes. Asking for an assessment of the findings and adequacy of resident consultations (ToR c(ii)) proceeds from the assumption that such consultations have occurred at all. Research by Housing@RMIT members clearly demonstrates that no consultations were held prior to the plan's announcement. Because of this, and with little empirical evidence made public about the government's reasoning behind the demolition decision, there has been an erosion of trust and increase in disillusionment among residents about the prospect of both current and future engagements with government. Opposition to the plan within high-rise tenant communities has been evidenced by tenant resistance including the current class action lawsuit against Homes Victoria before Victoria's Supreme Court.

A failure to include the redevelopment decision's impacts on residents in the inquiry's terms of reference means that the subjects who will be most affected by this plan are categorically excluded from the decision-making frame. Despite their lives, wellbeing, connection to communities of place, and livelihoods being at stake, there has been a failure to meaningfully engage tenants and to implement a human-centered approach to housing policy in Victoria. The fairness and equity of the redevelopment plan can only be assessed when there is a focus on the residents, who have already been significantly impacted by the announcement's delivery in an information vacuum.

In our submission, Housing@RMIT members highlight serious concerns regarding the Victorian Government's plan to redevelop the 44 high-rise public housing towers. We emphasize the need for transparency, accountability, independent evaluation and consultation with key stakeholders before proceeding with demolitions. Acknowledging the aforementioned challenges in responding to the ToRs as framed, **our submission addresses ToRs a, b, c(i) and (ii), e, f and h.** We urge the government to engage with our recommendations to fulfil its commitment to acting on reducing housing insecurity in Victoria. The current plan to redevelop Melbourne's high-rise public housing estates, as far as it can be interpreted from available information, risks undermining this goal from the start with an attack on some of the state's most structurally marginalized residents.

Recommendations

(a) the rationale and cost modelling for the decision to demolish and redevelop the 44 high-rise public housing buildings and associated sites ('the plan'), including alternatives to demolition, such as refurbishment and renovation	RECOMMENDATION 1: That the Department of Families, Fairness and Housing provide full disclosure of modelling and assumptions that informed the decision to demolish and redevelop the 44 high-rise public housing buildings and associated sites, including comparison with alternative delivery models. RECOMMENDATION 2: That the Victorian Government undertake a triple bottom line (TBL) analysis of refurbishment, renovation and redevelopment options to understand the full impacts (including total lifecycle costs) to identify the most feasible and sustainable approach.
(b) the impact of the plan, including the compulsory relocation and displacement of public housing residents on the future net availability of public community housing and the existing decanting plans and the department estimates on the number of people who will permanently leave the area being developed	RECOMMENDATION 3: That DFFH and Homes Victoria engage resident communities in exploring options that enable residents to remain on-site or nearby during estate refurbishment or redevelopment to minimize disruption to residents' everyday lives and maintain community connections. RECOMMENDATION 4: That DFFH and Homes Victoria commission an urgent independent investigation into the impact of public housing tower demolition and resident relocation on people with disabilities, including comparative analysis of the impacts on people with disabilities of public housing tower renovation and refurbishment approaches.
(c) the findings and adequacy of consultations with: (i) public housing tower residents and their representatives	RECOMMENDATION 5: That DFFH and Homes Victoria make a genuine and timely effort to consult affected public housing communities regarding future estate redevelopment plans. These consultations must be: • Open and transparent about current plans and anticipated impacts upon residents, • Supported by interpreters and information resources in languages of resident communities, and • Meaningfully engage residents so that future plans for the housing estate and resident relocations are informed by residents' perspectives and needs.
(c) the findings and adequacy of consultations with: (ii) relevant local stakeholders, such as	RECOMMENDATION 6: That DFFH and Homes Victoria undertake extensive consultations with affected local service organisations and businesses to explore approaches that mitigate and reduce the impacts of resident relocation on these entities.

health, community and education service providers, residents and councils	RECOMMENDATION 7: That DFFH and Homes Victoria include robust assessment of the social impacts of relocation on residents in its TBL modelling, including the impacts of loss of access to essential and community services. RECOMMENDATION 8: That if people are temporarily re-housed, the financial impacts on community organisations is considered and bolstered in such a way that residents can return to an environment that is as well equipped to supporting their needs as the environment which they are forced to leave behind.
(d) the efficacy of the proposed financial, legal and project delivery models (including the ground lease model) to be used for the plan, versus alternative models to improve and increase the number of public and community homes on the sites in question and in Victoria	RECOMMENDATION 9: That any public housing high-rise tower renewals be undertaken with either capital funding or under a Ground Lease Model, which will ensure maximal housing benefit without the loss of valuable public land. RECOMMENDATION 10: That the details of the leasehold granted by the state government to facilitate high-rise estate redevelopment be publicly disclosed in full to enable critical independent assessment of the value of rights transferred.
(e) building standards for the developments, including whether there will be the same standards for public, community and private housing	RECOMMENDATION 11: That DFFH implement Recommendation 2.1 of the Social Housing Regulation Review in establishing common performance standards for public and community housing, encompassing both high building standards and standards related to governance and tenancy.
(f) how different development and ownership models will be integrated within each site to enhance community integration and achieve a diversity of tenants	RECOMMENDATION 12: That DFFH and Homes Victoria abandon estate redevelopment via social mix as a single-model 'solution' to address broader pressures on the housing system, and instead resource community-led urban repair efforts and visions that avoid displacement and increased downstream housing insecurity for public tenants.
(h) any other related matters	RECOMMENDATION 13: That DFFH and Homes Victoria investigate the opportunity to establish a chain

	letting/swaps platform to promote tenant choice and mobility between public housing properties. RECOMMENDATION 14: That DFFH and Homes Victoria utilise a leasehold model with strong emphasis on quality design and construction in preference to public ownership of build-to-sell apartments of lower construction quality. RECOMMENDATION 15: That in the high-rise redevelopment planning phase an assessment of the ability to recover construction and demolition materials be undertaken to determine the construction management entity's readiness to manage emerging waste materials. RECOMMENDATION 16: That Homes Victoria collaborate with other relevant agencies such as the Environment Protection Authority Victoria (EPA), Sustainability Victoria, and Recycling Victoria to evaluate the feasibility of on-site recycling of materials during estate redevelopment and its potential impact on local residents. RECOMMENDATION 17: That any public housing site redevelopment plans be required to incorporate circularity by integrating products with recycled content into the project development and where possible reuse or upcycle materials recovered from the existing site. This requires careful deconstruction, rather than demolishing the building on site.

(a) the rationale and cost modelling for the decision to demolish and redevelop the 44 high-rise public housing buildings and associated sites ('the plan'), including alternatives to demolition, such as refurbishment and renovation

The financial management of public housing in Victoria has been subject to significant critique over the past decade, with particular emphasis on a lack of transparency and accountability from the Department of Families, Fairness and Housing (DFFH) and Homes Victoria. As noted by the Victorian Auditor-General's Office (2017) and reiterated in the final report of the Social Housing Regulation Review (Hayward, Holst and Cousins, 2022) DFFH and Homes Victoria have been plagued by issues of financial sustainability, inadequate accountability mechanisms, and poor data collection and integration on the condition of public housing properties (Hayward, Holst and Cousins, 2022, p. 58).

Decades of financial neglect have resulted in a massive backlog of maintenance and huge renewal liability (Sharam et al., 2021). Many properties do not meet the standards established in Victoria's *Residential Tenancies Act* 1997. The decision to demolish rather than retrofit is driven by financial considerations, primarily the unwillingness of government to adequately fund public housing and an illogical position of rejecting public borrowing. Instead, it is using a type of public-private partnership to obtain capital investment. The cost/benefit analysis of this arrangement is not public. Australia has a long history of costly public-private partnerships failing to deliver public benefits that justify the public expenditure involved, a situation enabled by extensive secrecy.

In the post-pandemic period construction costs have greatly increased. Materials costs are stabilising (although much higher than in 2019) however labour shortages are still problematic. Apartment construction has slowed dramatically because of high costs. It can be assumed that the end cost of any new development will be far higher than budgeted. In the face of these trends, retrofits are lower risk. Existing maintenance contractors would have the systems in place (often economies of scale for material supply and labour) to deliver. Packaging this work as part of existing contracts would provide the opportunity to drive down the cost of maintenance contracts (Sharam et al., 2021).

The Victorian Government's lack of transparency regarding the rationale for demolition raises concerns about other factors motivating the choice to redevelop the tower estates. Refurbishment and renovation of public buildings are often overlooked in favour of new construction projects due to political factors, such as short-term political gains associated with new construction and ribbon cutting syndrome; social factors, such as public appeal and media attention to new projects, and; psychological factors, including a tendency to take the service of existing facilities for granted. As public funds are used for such projects, governments need to robustly consider the most desirable method of spending to achieve

the final aim of housing more people while accounting for indirect impacts of these projects. The narrow financial assessments underpinning the decision to demolish and rebuild are based on the current linear economic consideration of 'make, use and throw' rather than circular economy considerations of closing loops – examining how materials already in the system may be used repeatedly. Examples of how buildings may be retrofitted, extending their existing life spans, supporting materials through multiple lives and designing for circularity are part of the 10 Whole Life Cycle Recommendations for the Buildings Breakthrough (One Planet Network, n.d.). Best practice examples associated with preserving buildings and retrofitting them using reused building materials have been demonstrated in other parts of the world (see KA13 where the building regulations were changed to facilitate reuse of 80% of the building materials) (One Planet Network, 2024). It is difficult to find examples or evidence of optimizing circular solutions across the full building life cycle, but the momentum has begun (Iyer-Raniga, 2019).

A best practice approach to determining how to improve housing conditions on the tower estates would necessarily involve a genuine comparison of refurbishment, renovation and redevelopment before choosing a course of action.[i] Such an assessment would ideally be an integrated consideration of the triple bottom line (TBL) of economic, social and environmental aspects of each option, conducted with respect to all stakeholders (van Bueren et al. 2022; van Bueren et al., 2023). Research has shown that TBL costs could account for up to 25-30% of the financial cost of a project (Gajanayake, Khan and Zhang, 2021). This substantial cost illustrates that incorporating TBL impacts on decision-making is vital when selecting different options. Unfortunately, Homes Victoria has not made public any cost modelling or comparative analysis underpinning the decision to proceed with redevelopment.

The choice to demolish and redevelop rather than refurbish the towers also signals a potential missed opportunity for workforce development in Victoria. Refurbishment and rehabilitation of buildings have been found to generate 4-5 times more employment than redevelopment projects in Hong Kong (Wong et al., 2010) while infrastructure maintenance generates twice as many direct jobs in contrast to new infrastructure works. Repair and refurbishment in the construction sector has a bigger economic impact on state economies rather than development, with every $1 in government spending on such projects having a $1.34 increase to the state economy (Teo et al., 2022).

RECOMMENDATION 1: That the Department of Families, Fairness and Housing provide full disclosure of modelling and assumptions that informed the decision to demolish and redevelop the 44 high-rise public housing buildings and associated sites, including comparison with alternative delivery models.

RECOMMENDATION 2: That the Victorian Government undertake a triple bottom line (TBL) analysis of refurbishment, renovation and redevelopment options to understand the full impacts (including total lifecycle costs) to identify the most feasible and sustainable approach.

(b) the impact of the plan, including the compulsory relocation and displacement of public housing residents on the future net availability of public community housing and the existing decanting plans and the department estimates on the number of people who will permanently leave the area being developed;

General impacts on high-rise tenants

The impact on current residents and future net availability of public community housing is an extremely important consideration both in relation to the proposed approach of demolition and redevelopment - which would involve extensive relocation and displacement of residents - and in weighing this approach against less disruptive options of refurbishment or renovation, though insufficient information is publicly available on compulsory relocation and displacement plans to provide informed comment on impacts of the proposed approach.

For public housing tenants, relocation out of the towers means the dismantling of whole communities and what has been termed 'communicide' (Morris, 2019). Even if tenants ever get back to the site after redevelopment, the community as they know it is already gone. Personal connections and informal support systems are essential among public housing tenants who often lack other formal support, and such networks get lost if tenants are relocated elsewhere (Porter et al., 2023, p. 61). Many tenants have been living in the towers for decades and are very well established in the community. They rely on local services, such as health services and shops, and dismantling these communities have a significant negative impact on both local businesses and services and friendship and support networks. Many tenants also work locally, including in community organisations primarily servicing tower residents, such that relocation out of area due to redevelopment may also lead to loss of employment. Demolishing the towers and rebuilding new social housing estates will take many years, and so reestablishing communities can take decades.

The Carlton estate redevelopment, which 'only' involved the redevelopment of walk-up properties, has resulted in former tenants waiting between five to eight years to return to the new building (Levin, Arthurson and Ziersch, 2018). In this process, many tenants lost touch with their neighbours once they moved out and did not know where these tenants had moved to. Moreover, in Carlton, many tenants decided not to go back to the redeveloped building because when they were offered a unit in the new building, they realised they would get a smaller number of bedrooms than the three-bedroom unit they had left. This is because they were reassessed by the Department and were deemed ineligible for a bigger unit. This happened to many single tenants who wanted at least a two-bedroom unit but had

been allocated only a one-bedroom unit, including single tenants with disabilities who needed a live-in carer.

RECOMMENDATION 3: That DFFH and Homes Victoria engage resident communities in exploring options that enable residents to remain on-site or nearby during estate refurbishment or redevelopment to minimize disruption to residents' everyday lives and maintain community connections.

Impacts on people with disabilities

The World Health Organization's (n.d.) International Classification of Functioning, Disability, and Health (ICF) provides a comprehensive framework for understanding disability and the environmental factors that influence it. It points to health outcomes and overall well-being as shaped by complex interactions between social structures, services, policies, and housing. Within a social determinants of health framework, housing is a critical environmental factor affecting the social and economic participation, health, and well-being of people with disabilities (Emerson et al., 2021). People who live in neighbourhoods with strong social networks, accessible services, reliable support systems, and public transport have better health outcomes (Giles-Corti et al., 2016). The planned demolition of Victoria's 44 inner city public housing towers and subsequent relocation of tenants will significantly impact people with disabilities, who make up 39% of public housing households.

Urban displacement of people from low-income communities severs connection with essential support systems—including from family, friends, medical care, and community services—while relocation to outer metropolitan areas with limited public transport reduces independence and quality of life (Watt and Morris, 2024). For people with disability, these challenges heighten the risk of poor health outcomes including isolation, premature placement in residential aged care or institutional housing, denying people with disabilities the chance to remain in their communities or age in place within familiar environments.

Research and consultation with people with disabilities currently living in public housing towers is essential to understanding the full impact of this relocation and exploring viable alternatives. Studies on the forced relocation of public housing tenants have documented the consequences of relocation which include extreme stress and anxiety (Watt and Morris, 2024) and worsened health outcomes, such as increased mortality rates among older people (Danermark, Ekström and Bodin, 1996). Evidence from Australian public housing redevelopments indicates that most displaced tenants do not return to their original estates,

with people often experiencing multiple relocations before securing permanent housing (Levin, Arthurson and Ziersch, 2018). As noted by Emerson et al. (2021, p. 48), "inappropriate housing can represent a major barrier to independent living and social inclusion, with consequences to health and well-being." Ensuring that public housing policies consider these impacts is critical to upholding the rights of people with disabilities.

RECOMMENDATION 4: That DFFH and Homes Victoria commission an urgent independent investigation into the impact of public housing tower demolition and resident relocation on people with disabilities, including comparative analysis of the impacts on people with disabilities of public housing tower renovation and refurbishment approaches.

(c) the findings and adequacy of consultations with:

(i) public housing tower residents and their representatives;

The Victorian Government's decision to demolish and redevelop Melbourne's public housing towers and its announcement of this plan demonstrate a concerning lack of institutional learning from previous engagements with public tenants, including tenants specifically affected by the first tranche of the renewal plan. The Social Housing Regulation Review's final consultation report identifies that in order to minimise poor tenant outcomes, "registered agencies should work closely with affected tenants throughout any development or renewal process, to ensure the plans consider tenants' individual needs and views, and they are not forcibly displaced from their homes, support networks, and communities" (Hayward, Holst and Cousins, 2022, p. 151).

The DFFH's own public housing relocation guidelines for estate renewal specify that residents must find out about renewal decisions in writing from the department first, rather than as part of a broad public release (Department of Health and Human Services, 2018a). In the public housing towers demolition case, some tenants have learnt they are moving out of the towers only through the media and only after the government had announced the plan (September 2023). This has led to many tenants, many of whom are of refugee backgrounds who have experienced trauma and displacement before moving into the public housing towers, reexperiencing uncertainty and trauma all over again.

Consultations and engagement with affected tenants about relocation are extremely important, but this has not been meaningfully done in the case of the plan for the public housing towers outlined in Victoria's Housing Statement. This is despite previous experience from which Homes Victoria could have learnt, such as the case of the Carlton estate redevelopment (Arthurson, Levin and Ziersch, 2015; Nygaard et al., 2021). In Carlton, consultations were minimal and tokenistic, without any real impact on decision making, taking the form of information sessions rather than real empowerment of tenants and communities (Arnstein, 2019). Additionally, in the period after the 2020 COVID-19 hard lockdowns of the Flemington and North Melbourne tower estates, the DFFH (2023) developed a 'Paving the Way Forward' plan for both sites that emphasised residents' concern about a lack of government transparency and accountability towards tenants, compromising trust. Both Paving the Way Forward plans do not appear to have informed the Victorian Government's approach in 2023, further undermining estate communities trust in government.

There are additional concerns about the adequacy of post-hoc engagement of the DFFH and Homes Victoria with public tenants in the tower estates, with early interactions in the days and weeks after the release of Victoria's Housing Statement creating further confusion and distress for tenants. This included DFFH and Homes Victoria representatives being unable to answer basic questions from tenants at the Carlton, North Melbourne and Flemington estates about why their homes were being demolished, when this would occur, their right of return to the estates, whether the estates were being developed as public or community housing (as well as what proportion of the estates would remain social housing), and what would happen to estate-based community networks. It is unclear, for example, why demolition of the Carlton towers is proposed when significant renovation was conducted on the high-rise buildings during the redevelopment of co-located walk-ups on the estate from 2008-2019.

In at least one case at the 33 Alfred Street tower, Homes Victoria staff arrived without translated materials or interpreters on the first day of a half-week presence to engage with residents, with these resources only provided from their second day on site. Residents also report being asked to sign relocation agreements without a clear understanding of the paperwork and the implications of signing, sometimes also in the absence of qualified interpreters. This raises significant legal concerns regarding tenants' ability to freely exercise agency in deciding on their housing circumstances.

RECOMMENDATION 5: That DFFH and Homes Victoria make a genuine and timely effort to consult affected public housing communities regarding future estate redevelopment plans. These consultations must be:

- Open and transparent about current plans and anticipated impacts upon residents,
- Supported by interpreters and information resources in languages of resident communities, and
- Meaningfully engage residents so that future plans for the housing estate and resident relocations are informed by residents' perspectives and needs.

(ii) relevant local stakeholders, such as health, community and education service providers, residents and councils;

The public housing towers are situated in a larger services landscape that has taken shape to support public housing residents. This landscape includes intricate networks of organisations that have the health and wellbeing of public housing residents as their core focus, and mainstream organisations such as community health organisations, community

centres, neighbourhood houses, community legal services, early childhood centres, schools, recreation centres and public libraries that have adjusted their programming to meet the needs of residents.

The planned re-development of the public housing towers will have immediate impacts on those organisations and their ability to support residents. For example, the temporary absence of residents will affect the financial health of organisations as organisations will likely see a temporary exodus of clients and students whose attendance directly informs funding. For example, the redevelopment of the Flemington towers forced community centres in the area to change their organisational focus away from serving public housing residents, because they saw a substantial drop in attendees and thus in funding (van Holstein, 2025). During the redevelopment of the Carlton towers, community organisations were not informed on relocations, which meant that they had limited capacity to conduct welfare checks on residents (Dulfer, van Holstein and Smith, forthcoming).

RECOMMENDATION 6: That DFFH and Homes Victoria undertake extensive consultations with affected local service organisations and businesses to explore approaches that mitigate and reduce the impacts of resident relocation on these entities.
RECOMMENDATION 7: That DFFH and Homes Victoria include robust assessment of the social impacts of relocation on residents in its TBL modelling, including the impacts of loss of access to essential and community services.
RECOMMENDATION 8: That if people are temporarily re-housed, the financial impacts on community organisations is considered and bolstered in such a way that residents can return to an environment that is as well equipped to supporting their needs as the environment which they are forced to leave behind.

(d) the efficacy of the proposed financial, legal and project delivery models (including the ground lease model) to be used for the plan, versus alternative models to improve and increase the number of public and community homes on the sites in question and in Victoria;

Estate renewal models

It is not possible to independently evaluate the efficacy of the proposed financial, legal and project delivery models to be used for the plan to redevelop Melbourne's public housing

towers, as this information has not been made publicly available. In the absence of this information, we provide a brief overview of three approaches to estate renewal which have been used in Victoria in recent years.

Capital grant funding

Ahead of the Victorian State Governments Housing Statement, the demolition and redevelopment of two towers – the 'red brick' towers at the corner of Nicholson Street and Elgin Street in Carlton – was announced. These two towers will be rebuilt via a capital funding model, with support from the Commonwealth Government through the Social Housing Accelerator program (Premier of Victoria, 2023b). This redevelopment model will see 196 dwellings, across the two towers, replaced with 248 dwellings – an increase of 25%. Importantly, all land will be retained, preserving future redevelopment when the towers reach the end of their serviceable life. Capital grant funding has been identified as the most effective method of delivering social housing (Lawson et al., 2018).

Public-private partnership redevelopments

Public-private partnerships have been widely used for estate redevelopment across Australia and Victoria. The mechanics may differ from project to project, but the underlying principles remain the sale: a private sector development partner is commissioned to redevelop a public housing estate, with sales of dwellings used to off-set the costs of providing public housing. The Carlton Estate Redevelopment program is a pertinent example of this approach, running between 2008 and 2020. The Carlton Estate Redevelopment saw 192 public dwellings (in 'walk-up flats) demolished, with 246 social dwellings and around 847 private dwellings rebuilt – an increase of 28% – but with around 75% of the land being transferred from public to private ownership (Department of Health and Human Services, 2018b). While this method of redevelopment can have lower costs than other methods, it leads to poor outcomes for tenants and has also been found to be a less efficient means of redevelopment, with very high opportunity cost due to loss of land. Importantly, it is not a repeatable strategy, as once the land is lost, so too is future redevelopment of that land (Davies and Engels, 2021; Levin, Arthurson and Ziersch, 2018).

Ground Lease Model

A new model for redeveloping public housing estates – the Ground Lease Model (GLM) – was announced in 2021. GLM involves the redevelopment of three housing estates, with a total of 1,084 dwellings being built, of which 619 are social. Under the GLM the sites are made

available to a private sector consortium to redevelop, with all dwellings under management of a community housing organization for 40-years, after which the site and all dwellings are returned to the State Government (Homes Victoria, 2024a). In 2023 a second GLM was announced across four sites, involving 1,370 dwellings, with 659 being social housing dwellings (Homes Victoria, 2024b).

Table 1. Ground Lease Model 1[ii]

Site	Social	Affordable	Market	Total
New Street, Brighton	151	–	140	291
Victoria Street, Flemington	240	119	–	359
Bangs Street, Prahran	228	–	206	434
Total	619	119	346	1,084

Table 2. Ground Lease Model 2[iii]

Site	Social	Affordable	Market	SDA	Total
Simmons Street, South Yarra	273	53	178	18	522
Essex Street, Prahran	86	15	47	7	155
Bluff Road, Hampton East	170	32	69	14	285
Barak Beacon Port Melbourne	130	82	179	17	408
Total	659	182	473	56	1,370

GLM differs from capital grants and public private partnership models above in several key ways:

- The model involves a mixture of public and private dwellings, but all are rented, with any surplus in private rent being used to cross-subsidize social dwellings.
- The GLM is similar to an availability contract public-private partnership (PPP) model – the same type of PPP which is often used to deliver infrastructure projects, such as Peninsula Link Freeway (Department of Treasury and Finance, 2024) – as the State pays regular payments over the 40-years.
- All dwellings return to State ownership after 40-years (like a traditional Build Own Operate Transfer PPP).

These differences mean that the GLM has several advantages over the PPP model previously used in redevelopments such as Carlton. While the project involves private rental dwellings, there are no sale of dwellings into the private market, which means no loss or sale of government land. It also has all 2,450 dwellings returned to the State in 2060, which means they could then be used as social housing, providing a second uplift in stock. It also establishes a model for cross-subsidy and broad-based public housing. However, the GLM is rather costly. Over the length of the contract GLM will cost $638 million[iv] while GLM will cost $1,600 million.[v]

Of the three models used recently, the capital grant model is the most cost effective, but has the highest upfront cost. The GLM has lower upfront cost, but higher ongoing costs. The PPP model, as used at Carlton, has lower financial costs, but very high opportunity cost, is not a workable and repeatable model, and should therefore be avoided.

RECOMMENDATION 9: That any public housing high-rise tower renewals be undertaken with either capital funding or under a Ground Lease Model, which will ensure maximal housing benefit without the loss of valuable public land.

Leasehold initiatives

Leasehold initiatives are a tried and tested way of providing entitlements to use land (French, 2008). Australian leasehold interest laws are based on the United Kingdom systems that have operated for centuries. As such providing a leasehold interest to parties has a strong precedent.

The key elements of a leasehold agreement are:

- The term of the lease.
- The initial rental amount, whether it is considered a market rate or not.
- The frequency of the payment of that rent.
- The frequency and way in which rental will be reviewed.
- The details of what is to be handed back to the owner of the land at the termination of the lease.
- The appropriate capitalization rate or discount rate for application to the leasehold cashflows.

RECOMMENDATION 10: That the details of the leasehold granted by the state government to facilitate high-rise estate redevelopment be publicly disclosed in full to enable critical independent assessment of the value of rights transferred.

(e) building standards for the developments, including whether there will be the same standards for public, community and private housing;

Social housing should be of a higher standard than private housing. Wear and tear are typically higher in social housing and thus maintenance costs are higher, and upgrades are required more often (Sharam et al., 2021). These costs can be mitigated through robust construction methods, materials, appliances and fittings. Higher quality build and design can also contribute to improved health (e.g. minimising heat stress) and wellbeing (e.g. provision of quality communal spaces and shared facilities), reduced living costs (e.g. lower electricity bills), and avoided carbon emissions.

Recommendation 2.1 of the Social Housing Regulation Review urged the Victorian Government to establish common performance standards for public and community housing. The Review noted that this should occur "through a consultative process with stakeholders" and that "standards should include governance, tenancy management, allocations practices, dwelling standards, safety, cultural safety and asset management" (Hayward, Holst and Cousins, 2022, p. 18). A tenant centred system of provision would involve tenants as key stakeholders in the development of these plans. User engagement with such plans is regarded as best practice asset management.[vi]

RECOMMENDATION 11: That DFFH implement Recommendation 2.1 of the Social Housing Regulation Review in establishing common performance standards for public and community housing, encompassing both high building standards and standards related to governance and tenancy.

(f) how different development and ownership models will be integrated within each site to enhance community integration and achieve a diversity of tenants

Victoria's Housing Statement includes an intention to change the tenure configuration (and thus social composition) and density of dwellings at redeveloped tower estates. Specifically, it asserts that redevelopment will "boost the overall number of social homes across these sites by 10 per cent, while also boosting the number of affordable and market homes across

the sites" (State Government of Victoria, 2024). This stated intent raises several concerns about the incongruity between promise and practice in public housing redevelopment that aims to offset costs to government by augmenting the proportion of different tenancies on formerly wholly public estates.

Public housing estate redevelopment in post-welfare contexts such as Australia, Canada, The Netherlands and the United Kingdom, incorporate 'social mix' as a core part of their rationale. Social mix refers to a diversity of demographic indicators within a defined geography. It is erroneously used in policy literature as a shorthand for tenure diversity, and deployed in redevelopment programs as a method for: 1) dispersing and displacing populations who are experiencing socio-economic disadvantage, 2) introducing market housing to dilute the share of social housing on estates, and 3) is based on the faulty notion that somehow middle income households will teach lower income households how to become middle income earners through education and work. There is no evidence from overseas that supports these intended effects of social mixing.

In the Australian context, post-war housing policies incorporated social mix strategies to promote redevelopment, however these policies often led to the marginalisation of low-income groups and did not achieve the intended social integration. International research on social mix policies cite evidence of:

- Permanent loss of public land
- Low yields of affordable housing
- Displacement and further segregation of residents
- Homogenisation of populations at the neighbourhood level

Studies carried out in the last five years on social mix in urban redevelopment reveal complex outcomes and challenges. While social mix policies promote the aim to deconcentrate disadvantage and enhance inclusion, they often fail to achieve meaningful interaction between diverse groups (Casarin, MacLeavy and Manley, 2023; Levin, Santiago and Arthurson, 2021). Research shows that estate renewals decrease social mix at the neighbourhood-level (Capp, Porter and Kelly, 2021 andexacerbate internal socio-residential differentiation (Lelévrier, 2021).Denmark highlight evolving spatial strategies to facilitate the disintegration of racialised communities through 'social mix' policies (Risager, 2022), while research in the Netherlands demonstrates how social mixing interventions can create "arrhythmias" that reinforce social divisions (Meij, Haartsen and Meijering, 2021).

Research suggests that social mix policies, as implemented through tenure-mixed redevelopment, may not effectively address issues of concentrated disadvantage. Research into the Victorian Public Housing Renewal Program (PHRP) found that the program's emphasis on a 70:30 ratio of private to social housing is primarily driven by real estate value calculations rather than evidence-based social policy (Kelly and Porter, 2019).

RECOMMENDATION 12: That DFFH and Homes Victoria abandon estate redevelopment via social mix as a single-model 'solution' to address broader pressures on the housing system, and instead resource community-led urban repair efforts and visions that avoid displacement and increased downstream housing insecurity for public tenants.

(h) any other related matters.

Chain-letting swaps – creating an efficient system for relocations

A major constraint for public housing renewal projects is the lack of alternate housing options, with vacancies and new supply providing a very limited source of homes for displaced tenants. This means tenant choice is limited and thus relocations can take an inordinate amount of time. A tenant holding out adds greatly to the cost of redevelopment, but this may be an inadvertent consequence of attempting to embark on a mass renewal project amid historically low rates of affordable rental availability in Victoria. Chain-letting (which has occurred in the UK for 20 years) is a mechanism that encourages tenant mobility thus in this way increases (Sharam and Faulkner, 2024). Case studies already exist to demonstrate the value of swaps and chain-letting in social housing and should be seriously considered in the process of evaluating best practice in housing re/allocation.[vii]

RECOMMENDATION 13: That DFFH and Homes Victoria investigate the opportunity to establish a chain letting/swaps platform to promote tenant choice and mobility between public housing properties.

Relationship to other policy

Victoria's Housing Statement states the Government will purchase off-the plan apartments in build-to-sell developments to boost stock (State Government of Victoria, 2024). Whilst it has not been explicitly stated, this action is likely to relate to the need to rehouse displaced tower tenants. Build-to-sell apartments are typically low quality and poor design. Lack of robust construction, fittings and appliances will result in higher maintenance costs than for purpose built public housing (Sharam et al., 2021). As these buildings will be strata titled each social rental apartment will attract Owners Corporation fees further increasing the cost of provision.

RECOMMENDATION 14: That DFFH and Homes Victoria utilise a leasehold model with strong emphasis on quality design and construction in preference to public ownership of build-to-sell apartments of lower construction quality (Vij et al., 2024).

Construction and demolition waste

Planned demolition of the high-rise public housing towers is expected to generate a substantial volume of construction and demolition (C&D) waste. There has been a lack of discussion on how to manage it effectively and responsibly. The C&D waste stream is the largest contributor to waste generation in Victoria. There are currently 49 waste and resource recovery facilities in Victoria that accept C&D waste materials for processing (Recycling Victoria, 2024). Despite their presence, these facilities have not successfully diverted all C&D waste away from landfills, leading to adverse social, environmental, and economic consequences for the state (Pickin and Macklin, 2025). The recent Victorian Recycling Infrastructure Plan 2024 has projected that, in the future, all seven regions of Victoria will face an inadequate capacity to process C&D waste resources (Recycling Victoria, 2024).

While the recovery rate in this waste stream has been improved, along with the national trends, there is still room for further improvements. According to the latest data released in the National waste and resource recovery report 2024, about 1,270 million tonnes of these resources were landfilled in Victoria in 2023 (Pickin and Macklin, 2025). Furthermore, the projections by the state government revealed that with current trends Victoria will start to run out of approved landfill capacity in the mid-2030's (State Government of Victoria, 2025). Hence, there is a risk that waste from demolition of the public housing towers will further contribute to C&D waste to landfill if not adequately managed. Waste management solutions in this project should be aligned with Recycling Victoria strategy's circular economy objectives to maximise material recycling and re-use (Recycling Victoria, 2020).

Regardless of whether Victoria or neighbouring states can process this waste stream, a key opportunity lies in utilising processed C&D waste within the development project or other state-wide projects. Integrating products with recycled content (PwRC) can significantly advance the circular economy in the state's housing sector. This approach is gaining momentum and is increasingly being adopted in construction projects across the country (Shooshtarian et al., 2024). The recently published National Framework for Circular Economy by the Department of Climate Change, Energy, the Environment and Water (2024) also emphasises the use of PwRC, alongside refurbishment and adaptive reuse, as a priority for transitioning the built environment sector towards circularity. Leveraging

these resources can enhance the sector's environmental, social, and economic sustainability.

RECOMMENDATION 15: That in the high-rise redevelopment planning phase an assessment of the ability to recover C&D materials be undertaken to determine the construction management entity's readiness to manage emerging waste materials.
RECOMMENDATION 16: That Homes Victoria collaborate with other relevant agencies such as the Environment Protection Authority Victoria (EPA), Sustainability Victoria, and Recycling Victoria to evaluate the feasibility of on-site recycling of materials during estate redevelopment and its potential impact on local residents.
RECOMMENDATION 17: That any public housing site redevelopment plans be required to incorporate circularity by integrating products with recycled content into the project development and where possible reuse or upcycle materials recovered from the existing site. This requires careful deconstruction, rather than demolishing the site.

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[i] Proceeding, for example, via a basic Multi Criteria Decision Analysis to create a general overview aiding more comprehensive comparison.
[ii] Table developed with data from Homes Victoria (2024a).
[iii]Table developed with data from Homes Victoria (2024b).
[iv] See https://www.tenders.vic.gov.au/contract/view?id=193453.
[v] See https://www.tenders.vic.gov.au/contract/view?id=211654.
[vi] See https://www.theahi.com.au/resources.
[vii] See, for example, https://www.youtube.com/watch?v=CHz1VkmNqzE.