



Building for the Future

VCOSS submission to Infrastructure Victoria on updating Victoria's 30 year infrastructure strategy

4 June 2023

VCOSS is the peak body for Victoria's social and community sector, and the state's premier social advocacy body.

We work towards a Victoria free from poverty and disadvantage, where all people and communities are supported to thrive. We champion wellbeing and inclusive growth. VCOSS supports and advocates on behalf of its members.

We respect the unique perspectives of people with experience of poverty or inequality, and seek to strengthen and elevate their voices.

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VCOSS acknowledges the Traditional Owners of Country and pays respects to Elders past and present, and to emerging leaders.

This document was prepared on the on sovereign, unceded lands of the Kulin Nation.







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Introduction

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to contribute to Infrastructure Victoria's refresh of their advice to the Victorian Government on Victoria's 30-year infrastructure strategy.

VCOSS is the peak body for Victoria's social and community sector, and the state's premier social advocacy body. We work towards a Victoria free from poverty and disadvantage, where all people and communities experience genuine wellbeing.

Like Infrastructure Victoria, we recognise that:

Infrastructure is more than roads, bridges, hospitals, and schools. It underpins Victoria's economic productivity, social equity and connectedness, and ecological impact. It can help reduce social disadvantage.¹

As VCOSS noted in our response to the draft strategy in 2021, too often infrastructure development has focused on narrow economic benefits and ignored the potential to develop a fairer Victoria. We commend Infrastructure Victoria for its role in changing the conversation. Through community consultation and engagement with a more diverse array of stakeholders, Infrastructure Victoria is helping to give voice to new ideas about how different types of infrastructure can support equity, inclusion, and wellbeing.

VCOSS has a number of strategic reflections and specific recommendations we would like to see further explored in this strategy refresh. We focus on areas where VCOSS considers there is still an urgent need for investment in infrastructure or policy change to manage demand for infrastructure, and where we have identified new evidence, insights or priorities. VCOSS looks forward to ongoing engagement with Infrastructure Victoria on the further development of this refresh.

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¹ Infrastructure Victoria, *Victoria's infrastructure strategy 2021-2051*, August 2021, p.6.

Strategic scoping and sense-making

VCOSS continues to support the 10 objectives that Infrastructure Victoria set out for the 2021-2051 Strategy, and the critical role infrastructure plays in achieving these objectives.

However, we note that:

- The current strategy was developed in a period of significant uncertainty, with the
 effects of the COVID-19 pandemic only just emerging, alongside challenges such as
 technological disruption, climate change and a growing and ageing Victorian
 population.
- This refresh takes place in the context of additional uncertainty. Changed and changing global economic conditions are impacting government budgets and households are grappling with significant cost-of-living pressures.
- Delivering high-quality infrastructure and integrated services is getting more expensive, with ongoing labour shortages and rising material costs.
- Governments today and in the future will likely face increasing constraints in delivering infrastructure and services.

As such, we understand why Infrastructure Victoria has asked stakeholders to engage with the theme "doing more with less" as part of consultation for the strategy refresh.

From a VCOSS perspective, the refreshed strategy should highlight the opportunity to manage demand through smart policy reform and strategic investment in services, particularly early intervention. For example, changes to bail laws can reduce demand for Corrections infrastructure, while raising the age of criminal responsibility to at least age 14 and making a concurrent investment in trauma-informed, healing-oriented therapeutic supports can reduce the need for Youth Justice facilities and stop the trajectory of children and young people into the adult system.

VCOSS acknowledges the important role Infrastructure Victoria plays in making the case for these policy reforms across government.

We also see a key role for Infrastructure Victoria in measuring and reporting on the social value and impact of infrastructure, and policies in place to manage demand.

Core strengths in current strategy

As Infrastructure Victoria undertakes a refresh of its current strategy, VCOSS advocates for the retention of the following elements.

Set a target to grow social housing stock

RECOMMENDATION

Maintain the recommendation to set a target to grow social housing, with the target revised to reflect the latest indicators of demand.

The 2021 – 2051 Strategy recommends government set targets to grow social housing (recommendation 68). VCOSS continues to support the use of targets to guide long-term investment.

The urgent need to set a target to grow social housing over the long term remains, given the proportion of \$5.3b for new community housing under the Big Housing Build has all been acquitted and the private rental market constraints that Infrastructure Victoria identified in the 2021-2051 Strategy have only worsened (indicated by a 1% vacancy rate in Melbourne in March 2023, a 40% decline in overall rental availability, only 2% of listings affordable for households living on income support, and an increase in the number of people experiencing homelessness between 2016 to 2021, to 30,660).

Establishing targets will drive accountability, by providing a measure by which to monitor progress and assess performance. This should be achieved by collecting and publishing consistent and meaningful data sets that measure the impact of investment on current and projected demand for social housing.

This data should include:

- Numbers of public, community and affordable housing built.
- Wait list and allocations data from the Vicorian Housing Register, including key demographic and vulnerability indicators.

We note that the Victorian Government canvassed the idea of establishing a target and a strategy to deliver a pipeline of new social housing over 10 years in public consultation for the *Ten-Year Strategy for Social and Affordable Housing*, and that this received significant community sector support. VCOSS eagerly awaits the document's release.

The Victorian Government will need to consider additional revenue streams to fund new social housing. VCOSS recommends the government introduce a mechanism for big developer contributions. This secure revenue stream would help create a pipeline of new community and public housing beyond 2024, and enable a focus on groups who have historically been locked out or under-serviced, such as young people. The new mechanism would need to be developed with the development industry and other stakeholders, including the community sector. Legislating the mechanism would provide certainty to all parties

Improve social equity and household wellbeing during the energy transition

RECOMMENDATION

Continue to recommend actions that can improve the liveability and energy efficiency of Victoria's housing stock, using refreshed data and other new evidence to build further momentum.

Infrastructure Victoria highlighted the policy challenge of navigating the energy transition in its 2021 Strategy. VCOSS particularly notes – and continues to support – an emphasis on the ongoing and systemic changes needed to drive urgent and wide-ranging improvements in the livability and energy efficiency of Victoria's housing stock.

Lifting the general standards for all residential homes has a huge impact for households with low-incomes and/or experiencing other forms of relative disadvantage, because the costs and burdens of living in poor quality homes – with limited real choice or control over these issues – can have a profound and compounding negative impact on health and wellbeing.

Specifically, VCOSS would endorse a refreshed analysis of the ongoing importance of Infrastructure Victoria's recommendations five, six, and seven on (in summary): increasing the energy performance of new homes; mandating home energy disclosure schemes for property sales and rental properties; and strengthening the minimum energy efficiency standards for rented homes.

Since 2021, important progress has been made on the first half of recommendation six, with the Victorian and other Australian governments agreeing to a 7-star standard under the National Construction Code 2022. Given the likelihood of even higher demands in future on the thermal performance and climate resilience of our homes, it is important that governments continue to raise the bar on new builds.

Consequently, VCOSS continues to support Infrastructure Victoria's recommendation on Victoria moving to an 8-star (or equivalent) standard in coming years.

VCOSS also notes that while building and rental standards, including ratings systems, are foundational components of improving household wellbeing during the energy transition, targeted and tailored upgrades for low-income households are also vital – and would have substantial multiple benefits, as demonstrated by both economic impact and randomised control trial studies.²

Sustainability Victoria's Healthy Homes project

Over a three year period (2018-21), Sustainability Victoria worked with multiple partners to deliver and assess the impact of thermal comfort and energy efficiency upgrades in 1000 homes of low-income Victorians with a health or social care need. By delivering these upgrades in two tranches, with pre/post winter cohorts, the research has demonstrated that relatively minor upgrades (average \$2,809) have wideranging benefits, including a net saving of \$4,783 over 10 years across both energy and avoided healthcare costs.

VCOSS also highlights our continued support for Recommendation 94 (make social housing suitable for changing climates).

² Deloitte Access Economics, *The economic impacts of the National Low-Income Energy Productivity Program*, October 2021 (prepared for the Australian Council of Social Service), available online at:

https://www.acoss.org.au/media_release/deloitte-report-strong-economic-benefits-from-energy-efficiency-retrofits-for-low-income-homes/; Sustainability Victoria,

The Victorian Healthy Homes Program Research Findings, September 2022, available online at: https://www.sustainability.vic.gov.au/research-data-and-insights/research-reports/the-victorian-healthy-homes-program-research-findings

All new social housing in Victoria should be built to high efficiency standards and built without gas supply. This will future-proof social housing properties, and avoid the need to return to properties in the future to improve energy efficiency and remove gas infrastructure.

New social housing in Victoria should also be built with on-site renewables to reduce electricity costs for residents.

Help people keep safe from extreme weather events

RECOMMENDATION

Maintain the recommendation to create climate-adapted facilities for rural communities.

In 2021, the Strategy committed to establishing a network of climate-adapted facilities across Victoria to help people shelter from extreme heat and bushfire smoke (recommendation 90). This remains crucial as climate change continues to increase the severity and frequency of natural disasters.

VCOSS continues to support this recommendation because people experiencing disadvantage are less able to keep safe from extreme weather at home. This includes poorquality housing becoming dangerously hot during heatwaves due to low energy efficiency and letting in smoke during bushfires due to draughts.

VCOSS also supports this recommendation because the public facilities people currently use to shelter from extreme heat and bushfire smoke are not fit-for-purpose. This includes shopping centres and libraries that have limited opening hours and may evict people using the space to rest.

Feeling the Heat³

VCOSS interviewed people around Victoria about their experiences on hot days in 2020. People's physical and mental health were harmed by not having a home or public place to take shelter.

"We grew up in a dingy house and did the best we could to survive. In heatwaves, you'd feel like the walls are closing in on you. It was hotter inside than outside."

"I fainted because of the heat when I was pregnant. I felt numb, dizzy and like I was going to vomit. All I could do was have a cold shower and drink lots of water."

"I've lived in Mildura all my life and it's really hot. Inside the house it can get over 50 because of the heat. With three kids under three and no air-con, it's really hard. It makes you not want to do anything. When you're hot and bothered, you can't be bothered doing anything."

"On pay day we'd always go to the shopping centre to get out of the heat for a few hours. But then there was that painful thing of coming home. I'd wish we could stay there all day out of the heat but staying there can be so expensive."

"I get sick every single summer. Sick to the stomach. If it gets too hot, I feel like I need to throw up. The heat is a horrible thing. I've got severe anaemia and it's a really hard thing to deal with. I'm always tired but it's so much worse in the heat."

"I stay in the shopping centre just to stay cool. I spend the whole day there."

³ VCOSS, Feeling the Heat, May 2021. Available from: vcoss.org.au/climate-change-environment/2021/06/feelingtheheat

VCOSS welcomes the Infrastructure Victoria's recommendation that new facilities be accessible. VCOSS notes that, in order to be fully accessible, facilities would need to consider a diverse range of access across different user groups. For example, universal design to assure access for people with mobility needs, as well as design features that support cultural safety and safety for victim survivors of family violence. Another key accessibility feature would be paid staffing by community sector workers. These elements should be reinforced in the Strategy refresh.

The network of refuges proposed by Infrastructure Victoria in rural communities could be a promising pilot for expansion. For example, the refreshed Strategy could recommend including the establishment of facilities in metropolitan Melbourne, installing solar panels, batteries and back-up generators, and considering how the hubs could be used during other disasters such as bushfire and flood.

Finally, as noted in our 2021 submission, we support extending Melbourne's green spaces and urban tree canopy. This aligns with Recommendation 37 of the current Strategy, and we support its retention in the refreshed advice to the Victorian Government. Future investment should be particularly focused on low socio-economic areas of Melbourne.

Make policy changes to better manage demand on courts and corrections

RECOMMENDATION

Maintain recommendations for policy changes to better manage demand for courts and corrections infrastructure.

In 2021, the Strategy highlighted ever-increasing demand for courts and corrections infrastructure and integrated services, which also impacts the timeliness of justice and quality of service delivery (recommendations 26 and 71).

VCOSS continues to support Infrastructure Victoria's recommendation that a key priority for managing demand on courts and corrections is to make changes to policy and invest in community services to prevents people from needing to come into contact with tribunals and courts and corrections at all.

For example, in 2022 there were 22,462 residential tenancy dispute matters pending at the Victorian Civil and Administrative Tribunal.

Many of these matters are non-urgent compensation, bond and repairs matters, which would be better addressed with a more timely alternative dispute resolution service, such as a Housing Ombudsman. Other matters could also be prevented from escalating into disputes in the first place with strong monitoring and enforcement of the Residential Tenancies Act by Consumer Affairs Victoria.

Changes to criminal law and diverting funds from the justice system into community services would also assist with managing demand on Victoria's youth justice and prison infrastructure. This should include, as a matter of priority, major changes to bail laws and raising the age of criminal responsibility to at least 14 in all circumstances. VCOSS continues to advocate for investment in community-based alcohol and other drugs services, specialist family violence and sexual assault services and other health, wellbeing and social support services that can prevent people from becoming justice-involved in the first place.

The impact of infrastructure relies on integrated support. For example, the new Specialist Family Violence Courts rely on the delivery of integrated legal services for success. We are pleased funding for these services has just been announced in the 2023-24 Budget.

Generate energy savings in existing owned and leased Victorian Government buildings

RECOMMENDATION

Retain the recommendation to make Victorian Government buildings more energy efficient (Recommendation 8).

The refreshed strategy should continue to prioritise energy efficiency improvements to government-owned buildings, including public schools, social housing, and government-owned facilities that are tenanted by community sector organisations (CSOs).

Upgrading government-owned facilities in the near-term demonstrates leadership on climate action by government and makes an early contribution towards emissions reduction in Victoria, which has greater cumulative effects than delayed action.

Prioritising public schools, social housing, and government-owned buildings occupied by CSOs ensures that the vulnerable cohorts occupying these facilities are protected from the adverse health and comfort impacts of climate change, and enables CSOs to continue core service delivery.

Stretch areas

As Infrastructure Victoria undertakes a refresh of its current strategy, VCOSS notes a number of areas that could be more ambitious.

Pace with prudence and equity on electrification of households

VCOSS has consistently recognised that Victoria's transition to a more just and cleaner energy future will require detailed and technical deliberation on topics such as infrastructure economics, energy market design, and technological innovation, including interdependencies. Our fundamental position, however, is a simple one: fossil gas is yesterday's fuel, and our societal response to energy inequity and climate change must be urgent, comprehensive, and fair. Importantly, "fairness" in this response means putting the people, communities and organisations that are hardest hit by energy costs and climate change consequences at the forefront of decision-making, planning, funding, and delivery.

Since the current 30-year Strategy was published in 2021, both public and policy momentum on the rapid renewable electrification of residential energy needs has increased.

The Victorian Government's *Gas Substitution Roadmap* is the start of an ongoing process of responding to, guiding and enabling this complex systems change. However, the long-tail of existing gas infrastructure, along with emerging trends in informed consumer choice and overarching climate change considerations, will mean that the household electrification component of the broader energy transition is likely to occur unevenly.

Although trending down, a substantial majority of Victorian households currently have a connection to the fossil gas distribution network (2019-20 data, released in July 2022, reports that 79% of Victorian households have mains gas).⁴ While the household-level technology and building design expertise already exists to safely, efficiently and sustainably "go all-electric", the simple reality remains that both low-income households and those experiencing one or more forms of social disadvantage are more likely to have less control (if renting) or capacity to afford upgrades (if in their own homes).

⁴ Australian Bureau of Statistics, 'Household sources of energy and water', *Housing Mobility and Conditions*, 2019-20 data released in July 2022; available online at: https://www.abs.gov.au/statistics/people/housing/housing-mobility-and-conditions/2019-20#household-sources-of-energy-and-water

As highlighted by Energy Consumers Australia's rolling energy consumer sentiment and behavior surveys, the energy equity divide is growing in Australia, with half of all households paying less than 3% of their income on electricity costs, while the remaining half pay from 3% to upwards of 12% of their income.⁵

VCOSS has made a number of specific recommendations on short-term government action that could be reinforced in Infrastructure Victoria's refreshed advice to the Victorian Government, including:

RECOMMENDATIONS:

Targeted investment to improve the energy efficiency of poor-quality homes. Measures would include grants of \$5,000 – targeted to community housing providers and low-income households – to help bridge the financial gap between existing schemes (such as the Victorian Energy Upgrades program) and upgrades that save the most energy but are still too expensive for people on the lowest incomes.

Direct subsidies, rebates and no-interest loans to enable low-income households to replace gas appliances with electric models, and abolition of gas disconnection penalties.

A Default Offer for gas, to help regulate household costs in the short term while Victoria transitions away from gas. This would be similar to the Victorian Default Offer (VDO) which currently exists for electricity.

Re-launch the Home Heating and Cooling Upgrades program, with revisions that enable eligible applicants to not need to provide a copayment.

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⁵ Lynne Gallagher [Energy Consumers Australia], 'Blind spots in energy policy', *Buildings and Cities*, 13 March 2023; available online at: https://www.buildingsandcities.org/insights/commentaries/blind-spots-energy-policy.html

VCOSS recognises the scale, cost and capacity challenges involved in this long-term transition, and that the Victorian Government has committed to continue to engage and collaborate with the community and industry through an annual update on the Roadmap.

Given both the urgency and complexities of the energy transition, VCOSS recommends that Infrastructure Victoria revisit existing recommendations with a view to exploring how the Victorian Government – which has shown leadership in this space – can move forward even faster, while focusing on fairness and feasibility.

Prioritise and invest in accessible transport

VCOSS continues to support the significant focus on planning for and funding public transport accessibility, including tram stop upgrades (Recommendation 44) in the current 30-year Strategy.

This is crucial. Since the publication of the Strategy in 2021, Victoria has not met its legislative requirements under the Disability Discrimination Act (1992) for all infrastructure to be fully compliant with the Standards for Accessible Public Transport 2002 (DSAPT) by 31 December 2022.

Most of Victoria's transport network remains inadequate and inaccessible to meet the needs of people with disability in metropolitan, regional, and rural areas.

Without accessible transport, people with disability don't have the agency to get where they need to go and, as such, are unable to connect and engage with work, education, healthcare, and their communities.

As Victoria recovers from the impacts of COVID-19, it is imperative that this recovery is fully inclusive, and that people with disability can enjoy full social, civic and economic participation.

This review presents a timely opportunity for the strategy to expand on and strengthen its recommendations on accessible transport.

RECOMMENDATIONS:

VCOSS calls for the refreshed strategy to:

Include concrete timelines and publicise plans to increase access to public transport.

Prioritise the establishment of an accessible transport infrastructure blitz fund so Victoria can make immediate headway in meeting our legislative requirements.

Commit to all transport services having at least one accessible carriage.

Commit to delivering 100% universal access within the next four years.

Conduct comprehensive economic modelling to reflect the social and economic benefits of accessible transport, as was done proceeding the level crossing works.

To complement this, we continue to support Recommendation 50 that some free parking spots continue to be reserved for people with disability who are using public transport.

Improve fairer access to infrastructure

Through the current 'Inclusive Victoria' State Disability Plan 2022-2026, the Victorian Government has signalled its commitment to embedding universal design principles across a variety of infrastructure projects including in parks, sport and recreation facilities, social and affordable housing, health facilities, creative and cultural facilities, and transport.⁶

Inaccessibly built environments are a major barrier to people with disability participating in economic, social, and civic life. Ensuring accessibility and inclusion are considered in the development of new public spaces and services is imperative in improving social equity. It is especially important that all government services are located in places and spaces that can be used by all Victorians.

⁶ Department of Families, Fairness and Housing, Inclusive Victoria: State Disability Plan (2022-2026), March 2022.

As such, VCOSS continues to support the current 30-year Strategy's focus on accessibility upgrades for public places (Recommendation 56) and the requirement for all Victorian Government provided and funded services to be delivered from premises that meet contemporary accessibility standards (Recommendation 54).

RECOMMENDATIONS:

VCOSS calls for the refreshed strategy to add recommendations that the Victorian Government:

Provide continued funding through grants and incentives for small businesses, such as cafes and shops, to improve access to their premises.

Make a stronger commitment to improving the accessibility of existing public infrastructure.

Lift the bar on co-design, with measurable commitments to engage people with disabilities in the planning and development of all accessibility upgrades or new development of public spaces.

Prioritise climate mitigation and adaptation through Victoria's infrastructure

Focusing on climate mitigation and adaptation through infrastructure in Victoria is critical to reduce the state's contribution to climate change, and to enable Victorians to cope with climate impacts. Certain measures, like energy efficiency improvements to buildings, contribute towards mitigation of climate change (through reducing energy consumption and related emissions) and adaptation to climate change (through improving the health and comfort of building occupants, even with rising average temperatures).7

Adaptation of Victorian infrastructure is particularly important, as climate change impacts will occur in Victoria regardless of how much we mitigate our emissions.

⁷ Goldman, S., Ungar, L., Capanna, S., and Simchak, T., *Energy efficiency: a tool for climate change adaptation*, February 2012.

Recommendation 12 of the current 30-year Strategy calls for the Victorian Government to:

"Strategically review climate consequences for infrastructure Strategically review the climate change consequences for Victoria's infrastructure needs and priorities, beginning in November 2021 after delivering the adaptation plans under the Climate Change Act 2017."

VCOSS notes that the Victoria seven sectoral adaptation action plans were released in 2022, and that this should be reflected in the refreshed strategy. These now require dedicated funding to support their implementation and this should be reflected in the updated strategy. Community sector organisations play a key role in supporting Victorians in a warming world but their ability to do so is currently a concern for many CSOs due to resource constraints.8 Their role and capacity should also be a focus of the refreshed Strategy.

RECOMMENDATIONS

Update the 30-year Strategy to:

Reflect the seven sectoral adaptation action plans released in 2022 and the investment required to support their implementation.

Articulate the role of community sector organisations in supporting Victorians in a warming world and recommend that they are supported by the Victorian Government to develop and implement their own adaptation action plans.

8 Victorian Council of Social Service, Survey report: resilience – summary of a survey about the resilience of the community sector, April 2019, p.5.

Build back better after disasters

RECOMMENDATION

Strengthen the recommendation to build public infrastructure back better by including social housing.

The current Strategy commits to investigating policy changes and funding mechanisms to make high priority public infrastructure less vulnerable to future emergencies, after it is damaged by a disaster (Recommendation 19). This includes rebuilding the infrastructure more resiliently or moving it to a less risky location.

VCOSS supports this recommendation because the changing climate will continue making disasters more severe and more frequent. Victorian infrastructure will need to withstand these compounding risks, and building back better after emergencies is an effective way to achieve this.

This recommendation could be improved, however, by expanding the definition of 'high priority public infrastructure' to include social housing. The 2022 floods in Victoria displaced hundreds of families and increased Victoria's social housing waitlist, but damaged properties mean there are fewer viable homes to take the pressure off.

The floods also revealed barriers to building back better – for example, insurance agencies refusing to bring damaged homes up to a higher standard than pre-disaster and opting for repairs rather than rebuilds. This creates the conditions for these homes to be inundated again in the future. The refreshed Infrastructure Victoria Strategy could help prevent this, by supporting policy reform.

New realities and emerging horizons

This section of VCOSS's submission highlights emerging horizons that Infrastructure Victorian should explore in its strategy refresh.

Ensure emergency accommodation after disasters is fit for purpose

RECOMMENDATION

The updated Strategy should include a recommendation that the Victorian Government establish a fleet of high-quality modular homes to deploy after disasters.

Motel rooms and caravans were the primary source of emergency housing for people displaced by the 2022 floods in Victoria. Residents included homeowners waiting for insurance agencies to help rebuild their home, private and social housing renters looking for an alternative property or for their housing provider to undertake repairs, and rough sleepers who may wish to transition to a long-term housing option.

But motel rooms and caravans can be overcrowded, are not equipped with cooking and laundry facilities, and may not be safe for family violence survivors. Motel room availability is also subject to competing demands such as holiday periods and seasonal work, while caravans are often inaccessible for people with mobility restrictions and are poorly insulated for winter and summer.

Although motel rooms and caravans are inappropriate and uncomfortable for extended periods of time, however, people can be displaced for years.

This is due to insurance delays, under- and non-insurance, denial of building permits, shortages of building contractors and materials, and high competition for unscathed rental properties.

2022 Victorian Floods

VCOSS consulted with community service organisations affected by the 2022 Victorian floods and held a Listening Tour event with Echuca residents. The discussions revealed the importance of stable housing for people's recovery journeys and the difficulty of living in caravans or motels for months due to low housing supply.

"People were already finding it impossible to find a place to live. It's so expensive to rent here. There's hardly anything on the market. And the places that are up for rent are such bad quality."

"I'm burnt out. I feel upside down. I've been living in a caravan park for six months and have no idea where I'll go."

"There was a housing crisis before the flood and it's only been compounded."

"The water hung around for so long. The walls are cracking and the house is damaged. Insurance people keep coming through but they never follow up, they never bring what they need. Flood insurance will be unaffordable from now on anyway. My home's worth nothing now."

The refreshed Strategy should therefore include a recommendation under Section 1.3 ('Embed resilience') to invest in a fleet of high-quality modular homes that can be deployed to areas affected by disasters.

The design and use of this fleet should be well regulated including:

- A standard for these modular homes to be accessible, well-insulated and thermally comfortable, and the public amenity that will be provided when these homes are deployed in mass use situations.
- A framework for their use in emergency and other surge situations, including specifying consumer rights for users and the support provided to transition from temporary to long-term housing.

Plan and deliver an increased supply of Wheelchair Accessible Taxis

Victorians with a disability who cannot access trains or trams are often left with no choice but to call a local taxi, which can be costly. Given there are very few accessible taxi services, especially in regional or remote areas, many people are often left stranded or have to face long delays as part of their whole journey. Additionally, we know that there is often discrimination and refusal to take on passengers with assistance animals.

It is important that the refreshed Strategy is adapted to include plans for, and a commitment to, invest in increasing the number of Wheelchair Accessible Taxis available to people with disabilities (especially in rural or remote areas).

Improving social equity through accessible transport means looking at journeys as a whole, from beginning to end, with better connections and integration between services. The revised 30-year Strategy should also look to explore an expansion of community transport options, especially where public transport options are narrow.

Consider the implications of emerging transport technologies on people with disabilities

Infrastructure Victoria's current 30-year Strategy recommends preparing for a growing trend of increasingly automated vehicle fleets. It mentions that automated vehicle technology has the potential to significantly change our transport system and deliver considerable benefits.

There is no doubt that a growing number of automated vehicles will bring about both opportunities and barriers for people with disabilities. Infrastructure Victoria should expand its focus on these vehicles to include some exploration, analysis and planning around how emerging transport technologies will impact people with disabilities.

The 30-year Strategy should be refreshed to take into consideration new research and guideline development work taking place currently. This will ensure the needs of people with disabilities are at the forefront of any thinking and planning to do with emerging transport technologies.

For example, new research undertaken by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts in partnership with LaTrobe University and the iMOVE Cooperative Research Centre identifies vehicle design, monitoring and direct assistance, human machine interface and operations as four key areas to explore when thinking about accessibility and automated vehicles⁹

Leverage Commonwealth Games 2026 investment to increase social housing in Regional Victoria

RECOMMENDATIONS

The refreshed Strategy should help to ensure planning and delivery of the 2026 Commonwealth Games delivers a positive infrastructure legacy for the state, by recommending that:

Thirty (30) per cent of all Commonwealth Games athlete village accommodation built should be made available as permanent social housing, with these end-use arrangements already agreed at the contracting phase.

The housing delivered for the athlete villages meets community and neighbourhood expectations and standards for permanent social housing that meets the needs of prospective renters.

The 2021-51 Strategy recommended expansion of social housing in regional centres, in locations with good access (Recommendation 93).

Investment to deliver the Commonwealth Games in five regional host cities (Geelong, Ballarat, Bendigo, Gippsland and Shepparton) can be leveraged to achieve this aim.

Athlete accommodation will be built as part of this investment. The Victorian Government has already committed that a proportion of the Victoria 2026 athlete villages will be made into affordable housing.

⁹ Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Australia's Disability Standards for Accessible Public Transport and Connected and Automated Vehicles – Main Report, 2023 p.5

Given the need to grow Victoria's social housing stock, including targeted growth in regional centres, and the emerging need for governments to do more with less, it is our position that the Victorian Government should further commit to making a portion of the athletes villages accommodation available as **social** housing. Given the level of existing need, that figure should be at least 30 per cent.

To leverage investment and ensure the athlete's villages to deliver a long-term social benefit, these properties should be high quality, with their end use as permanent social housing agreed at the contracting phase and built according to relevant standards for social housing.

This should include building the homes with high energy-efficiency standards and providing for disability access. Consideration should also be given to turning multi-dwelling athlete accommodation into permanent social housing for very large families, for whom there is currently a dearth of social housing stock.

Manage surges in demand for regional housing

RECOMMENDATIONS

The refreshed strategy should recommend that the Victorian Government:

Build at least 500 new dwellings across the Commonwealth Games host cities, which can be used for the crisis transitional housing management program during the Games, and for permanent social housing after the Games end.

Invest in a fleet of high-quality modular homes that can be deployed to areas affected by disasters. This design and use of this fleet should be well regulated, including:

- A standard for these modular homes to be accessible, well-insulated and thermally comfortable, and the public amenity that will be provided when these homes are deployed in mass use situations.
- A framework for their use in emergency and other surge situations, including specifying consumer rights for users and the support provided to transition from temporary to long-term housing.

Victoria's regional centres already face significant rental market constraints. Population growth, migration and supply that has not kept pace with demand has led to high competition and ever-increasing rental costs.

Major construction projects building and upgrading the venues in which the Games will take place will only add to the existing rental crisis in regional Victoria. Other waves of demand will occur as workers, visitors and the participants themselves attend ahead of the games.

Without targeted protections, renters will also face being priced out of the market as investment property owners make their properties available for Commonwealth Games attendees. Data showed that during the London 2012 Olympics, private rents increased as much as fourfold, with gentrification leaving a lasting rental price boost ten years on.

Regional Victoria currently has very few formal crisis accommodation facilities for people experiencing homelessness, almost completely reliant on privately owned temporary accommodation, such as hotels and caravan parks.

The Victorian Government will need to consider targeted protections for renters to prevent evictions into homelessness, while also investing in a range of accommodation options to manage surges in demand for events like the Commonwealth Games, major infrastructure projects and emergencies.

