

17<sup>th</sup> March 2017

City of Melbourne  
120 Swanston Street  
Melbourne, Victoria

**TO: City of Melbourne**  
**RE: Proposed Activities (Public Amenity and Security) Local Law 2017**  
**FROM: Transforming Housing**

Thank you for the opportunity to provide feedback on proposed amendments the Activities (Public Amenity and Security) Local Law 2017.

Transforming Housing oppose the proposed amendments based on their impact on people experiencing homelessness in Melbourne, their ineffectiveness and the messaging these amendments send to other stakeholders.

As outlined in a [recent report, The case for investing in last resort housing, by SGS Economics and Planning and the University of Melbourne](#), homelessness is now at emergency levels. Key causes are the unaffordability of housing, domestic violence and a structural lack of social housing. In addition, there has been a reduction in the supply of “last resort housing” such as rooming and boarding houses and emergency accommodation.

The ABC Homeless Australian Fact File (2016) reveals a growth in the numbers of homeless not only in the inner suburbs but across the metropolitan area. However, this increase is most noticeable in inner city areas.

Transforming Housing believes that people experiencing homelessness are some of the most vulnerable people in our society. They stand to be further marginalised by proposals to broaden the ban on camping in the city, allow for the confiscation of items and impose fines for leaving items unattended.

Transforming Housing opposes the amendments based on the following reasons:

- Impact on people who are experiencing homelessness
- Inefficiency of the proposal
- Poor leadership and messaging from the City of Melbourne

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**Transforming Housing**

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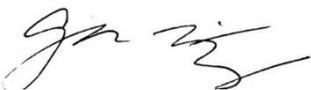
The proposed changes risk simply displacing people into nearby municipalities and further isolating them from services and support. Similarly, imposing fines on people without the capacity to pay them creates additional stress for people experiencing homelessness and the stakeholders that support them.

In addition to unfairly targeting vulnerable members of society, we also oppose the amendment as it is an inefficient and ineffectual mechanism for dealing with homelessness. As *The case for investing in last resort housing* (Witte, 2017) states, it is cheaper to provide last resort housing to homeless people than to leave them sleeping rough. Governments and society benefit more than they spend by providing last resort housing to homeless individuals. This is mainly through reduced healthcare costs, reduced crime, and helping people get back into employment or education. For every \$1 invested in last resort beds to address the homelessness crisis, \$2.70 worth of benefits are generated for the community (over 20 years) (Witte, 2017).

Finally, the City of Melbourne has a stated goal to “be inclusive - respect, hear, welcome and include those who are homeless in our services, activities and events” (City of Melbourne, 2014, p. 3). Similarly, the recently adopted Future Melbourne 2026 includes Goal 2: A City for People. Within this Goal, *Priority 2.4 Affordable for All to Live* states that “Melbourne will provide affordable options for accommodation, food and services. It will offer a mix of housing, facilities and recreation to support a diverse and inclusive community.” *Priority 2.9 Support the Homeless* states “there will be accessible, safe and supportive services and spaces for homeless people and effective pathways out of homelessness” (City of Melbourne, 2016, p. 12). Forcing people experiencing homelessness out of the CBD is a direct contradiction to these goal and sends an unhelpful message to other government agencies, businesses and community members.

For these reasons, Transforming Housing strongly opposes changes to the Activities (Public Amenity and Security) Local Law 2017. We strongly encourage the City of Melbourne to work with State Government, philanthropies and social housing providers to seek more inclusive and just ways of dealing with rising levels of homelessness in Melbourne. In particular, we advocate for use of local government land, and pursuing partnerships like Common Ground as an efficient use of government resources and a humane way to support Melbourne’s most vulnerable people.

Sincerely,



Professor Carolyn Whitzman  
Professor of Urban Planning  
Lead Researcher, Transforming Housing research network



## References

- ABC. (2016). Without a Home Fact File. Retrieved from <http://www.abc.net.au/interactives/homeless/>
- City of Melbourne. (2014). *PATHWAYS: HOMELESSNESS STRATEGY 2014–17*. Melbourne.
- City of Melbourne. (2016). *Future Melbourne 2026*. Melbourne.
- Witte, E. (2017). *The case for investing in last resort housing, MSSl Issues Paper No. 10*. Melbourne Sustainable Society Institute, The University of Melbourne.

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