



Submission to the consultation on Racecourse Road, Flemington Housing

Housing for the Aged Action Group

For further information please contact:

Fiona York, Executive Officer

Email: fiona.york@oldertenants.org.au



About Housing for the Aged Action Group

Housing for the Aged Action Group (HAAG) is a member-based, community organisation specialising in the housing needs of older people. HAAG has over 1,000 members across the country actively working towards achieving housing justice. Established over 40 years ago as a grassroots movement, HAAG has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across Victoria and the country. During the 2024-25 financial year, HAAG supported over 2,600 older Victorians.

HAAG welcomes the opportunity to provide input into the consultation on the Racecourse Road, Flemington housing development. This submission is based on our experience delivering housing and related support services to older people, research, and the lived experiences of older people experiencing housing stress or homelessness in Victoria. It particularly draws on the contributions of residents being relocated as part of the Older Persons Housing Renewal program.

Older people are a significant cohort within the Flemington public housing community. Rates of homelessness and housing insecurity among older people are rapidly increasing, and public housing provides a secure, stable and affordable option for older people to age in place. Redevelopment decisions made now will shape residents' ability to age safely and independently in their communities for decades to come.

Our recommendations:

- 1. Maintain and expand dedicated 55+ housing within the redevelopment, ensuring at least one of the social housing buildings in the Flemington development is allocated to older people.**
- 2. Maintain 100% public ownership and management of public housing on public land.**
- 3. Ensure social and affordable housing delivered is genuinely affordable for older people on low and fixed incomes.**
- 4. Provide transparent, accessible and ongoing communication regarding relocation and construction impacts, before relocating residents sign any documents, and ensure the right to quiet enjoyment for existing residents.**
- 5. Ensure accessible parking is located close to entrances and lifts and plans are made for safe access during construction.**

6. **Deliver universal design and ageing-in-place features that exceed minimum compliance standards.**
7. **Protect relocating Flemington residents right of return.**

Maintain dedicated 55+ housing in Flemington

Victoria’s housing policy has long recognised the specific needs of older people - namely, security of tenure, affordability and accessibility. Public housing meets this need through long leases, rents capped at 25% of income and locations that are close to services, amenities, and support networks. Eligibility for public housing is unlikely to change for older people, as they are unlikely to increase their income. Safe, affordable and secure housing is essential for older people to age well.

According to AHURI research *Ageing Well in public housing*¹ “a majority of older people prefer to live in age-specific housing estates and buildings, noting differences in lifestyle habits of other age cohorts”. Older people report feeling safer in 55+ communities, and consistently report higher feelings of safety and “ontological security” (the feeling that one’s home is a stable, predictable base)².

Anecdotal evidence from HAAG’s Home at Last service supports this, where we consistently hear that older people prefer living in 55+ housing estates (public, community or retirement housing) and we often hear from tenants living in general housing stock who want to transfer to 55+ dedicated housing. As of June 2025, there were almost 6,000 older people on the 55+ priority housing category on the Victorian Housing Register³. This is in addition to older people in other categories, like homeless with support or those on the register of interest. Further, our research with Swinburne University⁴ identifies a cohort of older people in private rental on low incomes with less than \$35,000 in assets. Although eligible for public and community housing, 14% have not applied. This data is national, however, it is indicative of the clear need for dedicated older person’s public housing in Victoria.

² Australian Housing and Urban Research Institute, 2021, p.45,
https://www.ahuri.edu.au/sites/default/files/documents/2021-11/AHURI-Final-Report-369-Ageing-well-in-public-housing_0.pdf

³ Annual Report - Department of Families, Fairness and Housing, 2025,
<https://www.dffh.vic.gov.au/publications/annual-report>

⁴ Housing for the Aged Action Group & Swinburne University of Technology, 2024,
https://www.older tenants.org.au/sites/default/files/not_poor_enough_not_rich_enough.pdf

It is essential that Victoria retains and grows dedicated older person’s public and community housing, as the best option to support the growing numbers of older people living in unaffordable private rental, those waiting on the Victorian Housing Register, and those being relocated from existing 55+ public housing.

Recommendation 1: Maintain and expand dedicated 55+ housing within the redevelopment, ensuring at least one of the social housing buildings in the Flemington development is allocated to older people.

Maintain and grow public housing, and ensure social and affordable housing is affordable for low-income older people

HAAG welcomes the delivery of more than 400 social homes in Building 4CD. However, consistent with our previous submissions on the High-rise Redevelopment Program, we are concerned that there are no homes that will be genuine public housing but community housing managed by a community housing provider. Public housing remains the most secure and affordable tenure for older people on fixed incomes and must continue to form a central component of Victoria's social housing system⁵.

HAAG assists over 200 older people annually to secure public and community housing, and so we are uniquely placed to observe the difference between these housing types for older tenants. While HAAG supports “growth in both”⁶ public and community housing, redevelopments so far have resulted in a net reduction of public housing stock. According to Productivity Commission 2026, Victoria's total stock of public housing rose from 64,241 to 64,277—a net increase of exactly 36 dwellings in a decade,⁷.

Affordable housing on the site must be genuinely affordable for older people on low incomes. This could be a viable housing option for older people who are not eligible for public and community housing, due to having a small amount of assets, however current definitions of affordability mean that it is out of reach.

⁵ Ibid.

⁶ Victorian Public Tenants Association’s Response to the 10 year Social and Affordable Housing Strategy Discussion Paper, 2021, p.6, <https://vpta.org.au/wp-content/uploads/2021/04/VPTA-response-to-10-Year-Social-and-Affordable-Housing-Strategy-discussion-paper-2021.pdf>

⁷ Productivity Commission 2026, ‘Report on Government Services 2026’
<https://www.pc.gov.au/ongoing/report-on-government-services/housing-homelessness/housing>.



Homes Victoria should strive for more transparency about what tenure types will be delivered, what rent-setting arrangements will apply, and what protections older residents moving to the precinct will have.

Recommendation 2: Maintain 100% public ownership and management of public housing on public land.

Recommendation 3: Ensure social and affordable housing delivered is genuinely affordable for older people on low and fixed incomes.

Communicate clearly and transparently with residents living in and relocating to the estate

The proposed construction at the Flemington estate is occurring in the context of redevelopment of seven Older Person's High Rises, whose residents are at the beginning of the process of relocation. Many residents are managing health conditions, language barriers, or limited digital literacy.

HAAG regularly hears from older residents who feel confused and uncertain about redevelopment processes, about their housing options, and a lack of clarity regarding relocation arrangements and their right to return.

It is vital that relocating residents are provided with clear information about the anticipated duration of construction works, likely impacts on noise, access, community facilities and outdoor spaces, and measures that will be put in place to minimise disruption for relocating residents. Where construction is expected to affect access to services, transport connections, communal facilities or outdoor areas, residents should be informed prior to relocation to enable people to make informed decisions.

Communication must therefore be proactive, accessible and tailored to residents' needs, and provided well before any relocation decisions or moving plans are made.

Existing residents on the estate should be consulted on the impact of construction over several years, and measures put in place to ensure their right to quiet enjoyment.

Recommendation 4: Provide transparent, accessible and ongoing communication regarding relocation and construction impacts, before relocating residents sign any documents, and ensure the right of quiet enjoyment for existing residents.

Ensure car park accessibility for older people

The proposal provides 261 resident car parking spaces across both buildings. Accessible car parking spaces must be located as close as possible to lifts and building entrances, to accommodate older residents and their carers. In our consultations with OPHR residents, they have expressed concern that some redevelopment designs require long walking distances between parking areas and building entrances, creating barriers for older people. Residents have also highlighted the importance of ensuring carers, family members and support workers can access buildings safely and conveniently when providing assistance (such as carrying shopping). Homes Victoria should ensure that accessible parking spaces are suitable and well located, with direct access to entrances, adequate lighting, and sufficient space for mobility aids.

Consideration should be given to the impact on accessibility for people with mobility issues when planning the demolition and construction process across the estate.

Recommendation 5: Ensure accessible parking is located close to entrances and lifts and plans are made for safe access during construction.

Ensure buildings are designed for older people to age in place

The accessibility reports provided by Homes Victoria show that Building 4CD will deliver a minimum of 5% of social housing dwellings as fully accessible and 100% meeting the Livable Housing Design Standard. This is a good baseline, but HAAG urges Homes Victoria to consider whether these proportions are adequate given that a significant number of older people who may have low or no mobility issues now, but whose needs will change over time. Accessible dwellings should be distributed across a range of bedroom sizes, including larger dwellings that can accommodate older people with family members or carers. Mobility device storage and charging, step-free shower access, lever tapware, and reinforced bathroom walls should be standard across all social housing dwellings, not just the minimum required percentage.

HAAG urges Homes Victoria to ensure that all dwellings in the social housing buildings are fitted with door peepholes or video intercom systems. Residents in comparable buildings have raised concerns about feeling unsafe when people knock on their doors at night, and



peepholes have been a specific and recurring request from older public housing tenants during OPHR consultations. Relatedly, entry doors to individual dwellings must be light enough to operate without significant upper body strength.

HAAG understands that consideration is being given to limiting floor access to residents for safety reasons. There are concerns that this may prevent residents in one floor from maintaining connections with others on different floors. Thus, floor-access security systems must not prevent welfare checks by neighbours or support workers. This has been a documented safety concern at other sites in the OPHR program. HAAG also urges Homes Victoria to consult directly with prospective residents and 55+ housing advocates on dwelling design details before plans are finalised, to ensure the new homes genuinely reflect the needs of the people who will live in them.

The proposed podium rooftop communal gardens and open spaces are welcome. The accessibility reports confirm that open spaces are intended to be inclusive and accessible for people with disability. HAAG urges Homes Victoria to consult older residents to ensure they feel comfortable, safe, and welcomed in shared spaces

Recommendation 6: Deliver universal design and ageing-in-place features that exceed minimum compliance standards.

Ensure the right of return for Flemington residents

Residents who are relocated from public housing buildings on the Flemington estate should have the right of return to any building in this precinct, that is, the buildings that are the subject of this consultation, in addition to any housing replacing 120 Racecourse Road and 12 Holland Court. Residents have been told that they have the right of return “if eligibility and needs are the same and the new homes are suitable for them”.

Older tenants eligibility for public housing is unlikely to change, and this qualification is causing unnecessary uncertainty and anxiety about whether or not they will be able to return to the neighbourhood. The right of return should also include certainty that they will remain public housing tenants, and that rents and security of tenure will remain the same as their current public housing tenancies.

Recommendation 7: Protect relocating Flemington residents right of return