



**Council
to Homeless
Persons**

Submission

Response to City of
Melbourne Council Plan
2025-2029

19 SEPTEMBER 2025

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Introduction

Council to Homeless Persons (CHP) welcomes the opportunity to provide input to the City of Melbourne (CoM) draft 2050 Vision and Council Plan 2025-2029 (the Plan). The housing and homelessness crisis is the most important issue facing our state, and it is particularly acute in Melbourne. Efforts to address the issue require deliberate and coordinated effort between all levels of government, including local government.

As rents continue climbing and the housing affordability crisis worsens, more people will experience homelessness. CHP welcomes the commitments made in the draft Plan towards addressing homelessness. The draft 2050 Vision lays out strong principles, many of which relate to ending homelessness. What will now be key is backing up these principles with bold actions to support community members experiencing or at risk of homelessness, and to make the investments needed to end the crisis.

Despite recent investment, Victoria remains defined by long-term underinvestment in public and community housing, leaving it with the lowest share of social housing in the country. Thousands more homes are needed to end homelessness. As Victoria's capital city, Melbourne has an integral role in the long-term effort to build sufficient social housing. A relatively high number of people experiencing homelessness, including people sleeping rough, are in Melbourne. This means CoM is well placed to make a significant contribution, in collaboration with other levels of government, and has the responsibility to do so.

This submission focuses on three points, corresponding with the three priority responses needed in Victoria to end homelessness:

1. Expanding prevention and early intervention programs;
2. Improving crisis responses; and
3. Increasing social housing.

While not described as such, some activities outlined in the draft Plan would have a preventative effect, supporting people in housing stress to avoid homelessness. More could be done to leverage Council's position, though, and we outline these.

CHP welcomes the Plan's commitment to providing effective crisis responses for people sleeping rough. However, we are concerned about the proposed exploration of a 'No Second Night Out' model, which is ill-suited to the Melbourne context and inconsistent with a proven housing-led and people-centred approach.

Finally, we welcome the Council's commitment to social housing being an indicator of success of its "Building a city of people" priority but note the absence of any explicit Key Activities in the Plan to achieve this. Express references to social housing, and a social housing target for CoM, should be added to the Plan in order to properly address homelessness.

Recommendations

Expanding Prevention and Early Intervention

Recommendation 1: Create formal partnerships to refer users of food programs and other council services to rental support programs.

Recommendation 2: Establish a targeted apprenticeship/traineeship and employment program for people at risk of homelessness.

Improving Crisis Responses

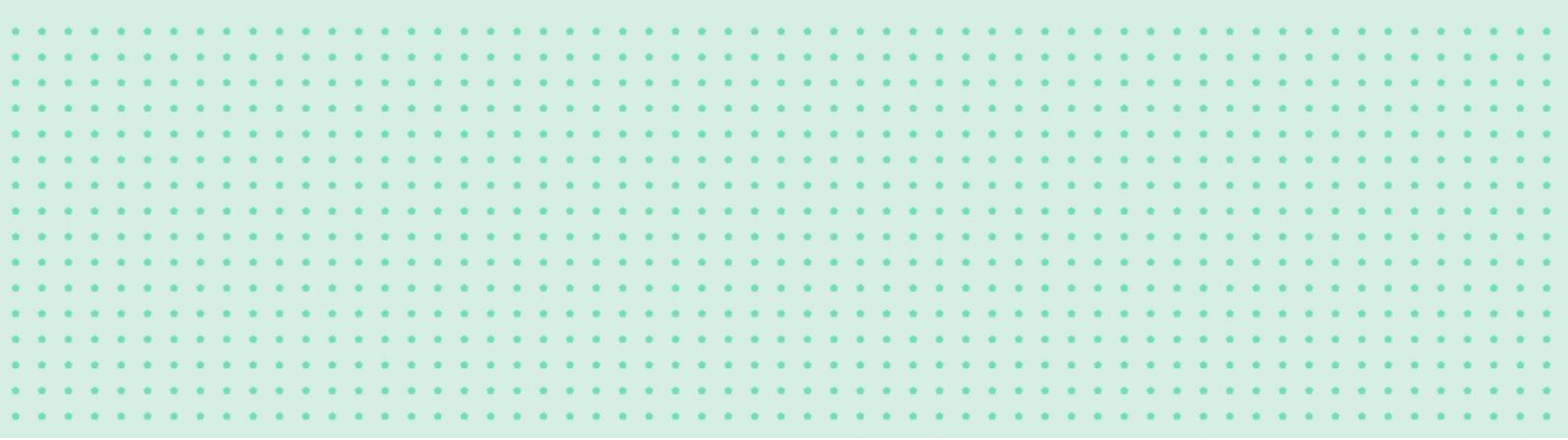
Recommendation 3: Remove intention to explore No Second Night Out model for the City of Melbourne.

Recommendation 4: End the community safety officer program in its current coercive approach

Growing Social Housing

Recommendation 5: Amend references to “affordable housing” in the Plan to “social and affordable housing”.

Recommendation 6: Amend the Plan’s actions to include setting a social housing target for CoM.



Expanding Prevention and Early Intervention

Addressing Rental Stress

The housing crisis is forcing an increasing number of Melbournians into rental stress. Without adequate support and significant structural changes to the housing market, these renters may experience acute homelessness in the future. The draft Council Plan notes the extreme number of people experiencing rental stress: 30% of all renters in CoM¹. This alarming figure is compounded by the extremely low availability of rental properties: the vacancy rate was just 2.8% in August 2025.² The tight market drives up prices and limits renters' options.

CHP welcomes the Plan's commitment to supporting residents to deal with food insecurity. These programs also present excellent communications opportunities to aid homelessness prevention. Some people accessing food programs are likely to also benefit from targeted housing support to maintain their current rental. Existing programs, such as tenancy support provided by community legal centres and the state government's Private Rental Assistance Program (PRAP), Aboriginal Private Rental Assistance Program (APRAP) and TenancyPlus, provide vital assistance prevent people experiencing rental stress from losing their home. CHP recommends including information about these rental protection programs as part of delivery of these food programs, and providing warm referrals for residents.

These referrals could also be integrated into other council services such as libraries, maternal and child health services, community centres, and childcare services. Through partnerships with other institutions, information could be provided at university counselling services, student unions, emergency and relief agencies, and schools. Timely access to housing support programs before a housing situation becomes untenable is vital and can make a significant positive change for people in rental stress.

A lot of people feel anxious, people experiencing rent stress are not going to express it until it gets to that stage where they're just about out that door, because of that stigma. We need to destigmatise it so they can reach out earlier to services that can assist. Keep the information casual and palatable.

Goodie, lived experience advocate

People are proud and they don't want to ask for help, and they don't know how to ask for help because they don't know what's available. What could be really beneficial is giving people that knowledge of where to get that help and having the right people to support them and have those conversations... Knowledge is power, so we need to get the resources out.

Jess, lived experience advocate

Recommendation 1: Create formal partnerships to refer users of food programs and other council services to rental support programs.

Targeted Traineeships and Employment Programs

The draft Plan aims to leverage the city's extensive economic strengths. In particular, the Plan sets out a pathway to ensure that "everyone [can] participate and benefit from our shared prosperity".³ However, very few, if any, of the proposed key activities or proposed deliverables will increase economic inclusion for Melbourne's most vulnerable residents.

Startups, the tourist economy, and the 'made in Melbourne' brand are important activities to supporting Melbourne's broader economy, but the benefits are unlikely to reach people in rental stress. To advance this strategic priority, CoM could use existing Council resources to provide targeted support to people at risk of homelessness like a targeted apprenticeship/traineeship and employment program. The program would support people at risk of homelessness with on-the-job training and long-term secure employment. The program could involve formal partnerships with existing homelessness services to provide wraparound support to participants. The program could also partner with registered training organisations (RTOs) and community-based employment support programs to upskill people for new industries.

Research shows that a steady income is a priority in preventing and ending cycles of homelessness.⁴ This form of social procurement would create significant social value for the people involved and prevent long-term impacts involved in homelessness. CoM itself employs 1,826 people (June 2024) and indirectly employs thousands more staff through outsourcing contracts. These workers are spread across a wide range of sectors. Even if only a small portion of these positions were filled by people at risk of homelessness, it would contribute significantly to preventing homelessness from occurring in the first place.

Recommendation 2: Establish a targeted apprenticeship/traineeship and employment program for people at risk of homelessness.

Improving Crisis Responses

No Second Night Out

CHP welcomes CoM's commitment to supporting all people forced to sleep rough, signalled in the draft Plan. However, we are concerned about aspects of the proposed approach.

Firstly, CHP urges CoM to reframe existing language in the draft Council Plan that has a deliverable focussed on "eliminating" rough sleeping. This frames people experiencing homelessness as the problem to be fixed, rather than street homelessness as a systemic failure. The word 'eliminating' can be interpreted as stigmatising, potentially undermining the Council's commitment to inclusion, outlined in the M2050 Vision and the strategic priority of 'Building a city for the people.'⁵ More appropriate language would focus on a commitment to ensuring all people experiencing rough sleeping have access to housing and support.

Secondly, and more substantially, CHP is concerned with the proposed exploration of a "No Second Night Out" policy to address the issue of rough sleeping. Rather than importing a solution from a vastly different context, CHP urges CoM to take a housing-led approach which supports all people and is closely and directly informed by local realities and the existing service landscape.

No Second Night Out (NSNO) was established in the City of London in 2011 in the context of that city's ongoing housing crisis, coupled with a sudden increase in people elsewhere in Europe migrating to the United Kingdom and experiencing homelessness in London.⁶ This context has shaped the principles and practices of NSNO in ways which are inappropriate for City of Melbourne.

A core principle of NSNO is to ascertain the origin of people sleeping rough, specifically whether they are "from another area or country", with the aim of returning the person there to seek support.⁷ This principle is framed around connecting people with support in their own community, but it ignores legitimate reasons why people may travel when experiencing homelessness. There may be localised housing affordability issues in their hometown, the person may have experienced family violence or other relationship breakdown making them feel unsafe in their former community, or people may elect to move to Melbourne to access a wider range of homelessness and other services not available in their home area.

Reconnecting people as proposed in NSNO requires significant resources and infrastructure, including formal partnerships with specialist homelessness services across the state and, potentially, interstate. This kind of network does not yet exist in Melbourne. Reconnecting people to different communities also requires a nuanced, patient, and persistent approach, which appears antithetical to the NSNO model. Existing urban crisis services have reported to CHP that they have difficulty connecting with services elsewhere in the state, and this experience is likely to be mirrored if CoM pursued a NSNO model.

Furthermore, the eligibility criteria for NSNO is deliberately narrow, reflecting the model's interest in supporting first time rough sleepers.⁸ The program is only available to people who are new to rough

sleeping, have had no prior contact by assertive outreach workers, and who do not appear on the consolidated multi-agency data base CHAIN (the likes of which does not currently exist in the Melbourne service context).⁹ The intention of NSNO's limited eligibility is to prioritise timely interventions to prevent people experiencing long-term homelessness. This approach recognises that the longer people experience rough sleeping, the more complex it becomes to support them back into housing.

It would be important to establish whether there is evidence of such sufficient 'first time' rough sleepers in Melbourne to justify introducing a new program focussed on this. Evidence suggests people who gravitate to large cities have been homeless for some time and are drawn to the city for a range of reasons including the concentration of high-profile support services and crisis accommodation, and the relative anonymity afforded to them in the high-density environment. The support needs of people sleeping rough in central Melbourne are also likely to reflect the accumulation over time of disadvantage, physical hardships and ill health during prolonged homelessness. The narrow criteria of NSNO means that most rough sleepers within CoM would not be eligible for such an initiative.

While commitment to timely support is welcome, this should not come at the expense of other people in different circumstances. The implementation of NSNO in London shows that there is a risk that the program could inadvertently swallow a large portion of dedicated homelessness funding, leaving other programs that provide flexible support to all people with increasingly limited resources. Twelve years after the establishment of the program in London in 2011, nearly three-quarters of the City of London's expenditure on homelessness was dedicated to NSNO in 2023.¹⁰ This is despite the program deliberately excluding the vast majority of rough sleepers and, in doing so, "dividing London's homeless into those who can be helped and those who are deemed to be beyond help".¹¹

Timely intervention is a great thing, but a lot of the time people are unaware of the services that are out there. If we're going to have a program to get them as soon as they can, but there's no knowledge out there of how to support them... A lot of people have been sleeping rough for more than one night and generally when they seek support, it's not on their first night because they carry a lot of shame. They try to figure things out for themselves and they're not aware of what's out there to support them.

Jess, lived experience advocate

Trying to get someone on their first night is really hard. There's stigma, and they will try to protect themselves. If someone's out on the street, it's the very last thing that has happened to them. We can't find them all because they'll hide. I can't see the difference between someone's first night and someone in their third year – they all need help.

Goodie, lived experience advocate (and assertive outreach worker)

Practice guidance for NSNO outlines that housing workers offer a Single Support Offer (SSO) to rough sleepers,¹² which is contrary to Housing First principles of choice and self-determination and undermines an

effective and flexible crisis response. Effective crisis response involves assertive outreach to people to meet them where they are. Everybody experiencing homelessness has a different set of circumstances, and support models need to be flexible and nuanced to respond. With the NSNO model, there is a significant risk that people will receive a single offer which is inappropriate, discouraging them from seeking support again. This would further entrench homelessness for people, especially those with complex needs.

There are existing program models in CoM that support people sleeping rough, with broader eligibility criteria than NSNO and the flexibility to support people with complex needs. Rather than introducing a new and narrow model, providing greater support to these existing programs would be more effective.

Programs such as Homes First, Melbourne Street to Home, the Make Room initiative and the vital service co-ordination capability of the By Name List provide valuable support to people experiencing homelessness in CoM, but their success is significantly limited by the lack of suitable housing.¹³ Building on these service models towards a Housing First approach is the most effective way to address chronic homelessness, including rough sleeping.

The model of Housing First involves providing safe, affordable and permanent housing without preconditions. Residents are offered flexible, person-centred, and non-mandatory support for as long as it is needed.¹⁴ Evidence from around the globe is that this model results in substantially better outcomes for participants and significant economic return on investment.¹⁵ While some existing service models reflect elements of Housing First principles (Journey to Social Inclusion, Homes First, and Melbourne Street to Home), extremely limited access to appropriate housing undermines a core element of the Housing First approach. Addressing this severe bottleneck in available housing is addressed in the following section about increasing social housing.

We don't have any housing, so it's kind of pointless. We need housing before we can support these people who are struggling, sleeping rough, or about to be sleeping rough, or about to lose their home. ...[Otherwise] we'll just end up in a cycle.

Jess, lived experience advocate

Recommendation 3: Remove intention to explore No Second Night Out model for the City of Melbourne.

Person-Centred and Trauma-Informed Engagement

CHP is gravely concerned with the proposed expansion of the community safety officer program, especially in light of surrounding comments by the Lord Mayor in the media focussing on such officers carrying handcuffs and having arrest powers.

The punitive, coercive emphasis of this approach reinforces stigma by framing people experiencing homelessness as the problem to be solved, rather than the flawed system which has precipitated their trauma.

Taking a securitised approach to community safety is counterproductive and will only further marginalise vulnerable people. The program creates a hierarchy of safety, where the appearance of order is preferred over the wellbeing of marginalised people. Rough sleepers have reported being harassed by community safety officers, a practice which directly undermines efforts elsewhere to support these same people.

To address rough sleeping, CoM must take a unified, person-centred, and trauma-informed approach. If the program is implemented, it must be closely coordinated with Council support responses for rough sleepers to avoid counterproductive impacts.

Recommendation 4: End the community safety officer program in its current coercive approach.

Growing Social Housing

Social housing is essential to ending homelessness, because there is a significant portion of the population who are not properly served by the private housing market. The national housing crisis is particularly acute in Victoria, because of the state's relative dearth of social housing. Victoria has approximately 90,400 social housing dwellings, which represents only 3% of all dwellings in the state.¹⁶ This ratio is the lowest of all states and territories, and below the national average of 4.1%. To bring Victoria up to meet the national average would require building 80,000 new dwellings over the next 10 years (though this would still not be sufficient to meet actual need).¹⁷

The draft Council Plan shows how the population will grow significantly over the coming years, putting additional strain on the housing market. Without targeted investment in increasing the number of social housing dwellings in CoM, the proportion of social housing to private housing will contribute to decline, leaving a significant portion of the community unable to access a secure home. To maintain the current level of social housing and to increase the proportion to meet demand, CoM must collaborate with other levels of government and community housing providers to significantly increase the number of dwellings.

No housing out there for people who don't have a home, and there's no housing available for people on a minimum wage either. Without housing, you'll have people on the streets, people suffering mental health issues, people suffering increased family violence, there'll be kids going without, health issues that aren't getting looked at, more deaths, more demand in crisis centres, more demand in everything.

Goodie, lived experience advocate

If the crisis gets worse it will continue to impact the commercial properties, retail, a tourism problem. The risk is that they will try to push it under the carpet, out into the suburbs, out of our jurisdiction so we don't have to deal with it. Without social housing, that's what will happen.

Goodie, lived experience advocate

The draft Council Plan includes actions to "increase access to affordable housing" and to respond to "inclusionary zoning to deliver affordable housing".¹⁸ It is important the Plan specify the definition of "affordable housing" being used, and ensure that social housing is encompassed by these deliverables. The Planning and Environment Act 1987 (Vic)'s definition of "affordable housing" includes social housing¹⁹, but "affordable housing" has several different definitions in various schemes across the housing sector – many of which do not include social housing. Elsewhere in the Council's Plan, social housing and affordable housing are identified as distinct - such as the Indicator "Number of social and affordable housing dwellings secured through planning mechanisms and/or on Council land" under the "Building A City For People" priority. The omission of reference to social housing in the stated Deliverables therefore creates doubt whether they include social housing.

This must be corrected, as there are significant challenges with the model of affordable housing, as the term is commonly used, which makes it ineffective in addressing homelessness. Rents in affordable housing projects are calculated as a percentage of the market rent, rather than a proportion of income like in social housing. Even affordable housing, set at 80% of market rent, is unaffordable for people experiencing homelessness. In short, affordable housing is not a homelessness response. Unlike affordable housing, social housing is regulated and intended to directly support people who experiencing homelessness.

The actions proposed in the current draft Council Plan should clarify that they include increasing the number of social housing dwellings in the CoM. CHP also recommends CoM set a social housing target within CoM to create momentum and accountability for the list in social housing needed to end homelessness within the City.

Recommendation 5: Amend references to “affordable housing” in the Plan to “social and affordable housing”.

Recommendation 6: Amend the Plan’s actions to include setting a social housing target for CoM.

Conclusion

For Melbourne to truly be the best and fairest city, it must boldly confront its biggest challenge: the housing and homelessness crisis. Melbourne is not alone in experiencing severe housing unaffordability issues and an increasing number of people experiencing homelessness. These issues are playing out across the state and, indeed, across the country. As the Victorian capital, Melbourne has a responsibility to be part of the solution. The solutions to the homelessness crisis are clear and achievable:

1. Expanding Prevention and Early Intervention
2. Improving Crisis Responses
3. Growing Social Housing

The City of Melbourne is well placed to act on all three parts of this solution. Doing so would make a significant contribution to ending homelessness and make Melbourne truly a city for all its residents.

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