# T R A N S C R I P T

## LEGISLATIVE ASSEMBLY ENVIRONMENT AND PLANNING COMMITTEE

**Inquiry into Apartment Design Standards** 

Melbourne—Tuesday, 15 February 2022

### **MEMBERS**

Ms Sarah Connolly—Chair Mr David Morris—Deputy Chair Mr Will Fowles Ms Danielle Green Mr Paul Hamer Mr Tim McCurdy Ms Cindy McLeish

#### WITNESSES

Ms Danni Hunter, Victorian Executive Director, and

Mr Andrew Lowcock, Victorian Policy Manager, Property Council of Australia; and

Mr Daniel Dugina, General Manager Operations, Apartments, Development, Lendlease.

**The CHAIR**: I advise that the sessions today are being broadcast live on the Parliament's website. Rebroadcast of the hearing is only permitted in accordance with Legislative Assembly standing order 234.

Thank you, Andrew, Danni and Daniel, so much for joining us today to appear at this public hearing for the Inquiry into Apartment Design Standards. On behalf of the committee I acknowledge the traditional Aboriginal owners of this land, and we pay our respects to them, their culture, their elders past, present and future and elders from other communities who may be joining us here today. I again welcome any members of the public and media who are watching us this afternoon.

This is one of several public hearings that the Environment and Planning Committee is conducting to inform itself about the issues relevant to this inquiry. Before we begin there are a couple of things I need to tell you about. All evidence taken today will be recorded by Hansard, and it is protected by parliamentary privilege. What this means is that you can speak freely without fear of legal action in relation to the evidence that you give. However, it is very important to remember that parliamentary privilege does not apply to comments made outside this hearing, even if you are simply restating what you say here today. You will receive a draft transcript of your evidence in the next week or so to check and to approve, and corrected transcripts are published on the committee's website and may be quoted from in our final report.

So thank you again for taking the time to meet with the committee. I am Sarah Connolly. I am the Chair of the Environment and Planning Committee, and I am also the Member for Tarneit.

Mr MORRIS: I am David Morris, the Deputy Chair of the committee and the Member for Mornington.

Mr HAMER: I am Paul Hamer. I am the Member for Box Hill.

Ms GREEN: Danielle Green, Member for Yan Yean and Parliamentary Secretary for Regional Victoria and for sport.

The CHAIR: I am going to hand over to you, Danni. Can you just each, like I said, introduce yourselves and your position and then you can go into the opening statement.

Ms HUNTER: Not a problem. For broadcast purposes would you like me to remove my mask?

**The CHAIR**: You can do that. When you are speaking you are more than welcome to—you do not have to. And when you are not speaking, if you would not mind just popping it back on.

**Ms HUNTER**: Of course. Thank you so much for having us today. My name is Danni Hunter. I am the Victorian Executive Director here at the Property Council of Australia. With me is Andrew Lowcock, Policy Manager in the Victorian Division, and Daniel Dugina, national head of apartments at Lendlease and one of our expert members at the Property Council that we rely very heavily on. We will each make some contributions and hopefully be able to answer the questions that you have, but it would be wonderful if we could just start with a quick overview presentation just to bring up some of the issues that the Property Council have raised in our submission and also through the very meaningful consultation that we have had with government throughout the development of the Better Apartments Design Standards and the numerous iterations of consultation that we have gone through with them.

#### Visual presentation.

**Ms HUNTER**: So just for your information, the Property Council is the leading advocate for Australia's property industry. The property industry is the largest industry in Victoria. It pays 59 per cent of Victoria's tax revenue and employs one in four working Victorians across the sector. We have worked very closely with our

planning committee and expert members to bring together a response that we have put through in our submission, which has covered both the planning elements of the design guidelines but also their impact on apartments as a form of dwelling and new asset classes that are emerging in Victoria, including the build-to-rent sector. We hope you found it useful to read through our submission, and we have certainly endeavoured to cover off on the issues that are relevant to the terms of reference that you have before you.

Very quickly a little snapshot of Victoria's apartment sector. As you well know from the inquiry and as our industry certainly knows very well, apartments are a really vital mix of Victoria's housing market. With house prices and established house prices having increased so significantly in the last two years, apartments are now 46 per cent cheaper than median house prices here in Victoria, and they represent a very genuine affordable option for purchasers and renters.

Victoria has delivered about 158 000 apartments since 2009, and that has had an incredible impact on the Victorian economy but has also proven to be the housing affordability release valve that particularly established Melbourne has needed to keep our housing affordability at manageable levels in relation to, say, Sydney— although we are seeing that certainly get away from us at the moment. The Property Council and the industry certainly are concerned, however, about the lack of supply in the pipeline for apartments. With having decreased in terms of the planning approvals and development approvals in the pipeline significantly, we are looking at dropping by more than \$1 billion in value over 2020 to 2024, which equates to 6000 fewer jobs generated in Melbourne alone simply because we are not going to be building the same number of apartments as we have done when we were at the peak. The Property Council and Urbis have done a significant piece of research on that topic, and it has been included as an attachment to our submission.

We are very confident though that the demand for apartments is very fundamental to the housing mix and to the housing sector, and as family types change and we see more families accept and be interested in apartment products, particularly where housing in established areas is becoming unaffordable, we have seen a real shift away from investment cohorts being the primary purchasers of apartments and more families, baby boomers, downsizers and rightsizers looking at apartments as a very amenable housing product for their needs.

When it comes to the better apartments standards we have, as I said, engaged with government through the process, and it is wonderful to be here today to give you the Property Council's perspective on how the *Better Apartments Design Standards* in the apartment market are operating. As the standards were introduced in 2017, with some iterations made just as recently as a year ago, what we have actually seen is that they have not yet flowed through to the construction of new apartments in a very meaningful way. It takes about a year and a half on average to even build an apartment let alone go through the planning development approval rezoning process that often takes up to six to seven years. So what we are seeing at the moment is just the early start of the construction phase of these newly designed and constructed apartments under the building design standards.

Daniel will shortly take you through Lendlease's pipeline as an example, but it has a current pipeline of around 1460 apartments which are approved, but only 663 of those have been approved under the BADS, which means prior to the BADS being introduced the majority of their pipeline has gone through the process and will actually be the products that are constructed.

Now, the point of shining some light on this is to help you understand that the BADS have a little bit of time needed to really be able to be seen. So the issues that are being addressed by the committee are issues that the BADS seek to also respond to, but the way that the planning and development process works and the time it takes to get those approvals into actual construction means we have not seen a huge number of apartments designed under the building and design standards built yet.

We are very passionate about the fact that the design standards should support quality residential experiences while also not imposing significant burdens on future development prospects and supply. Now, this is very important in the context of that real cliff that we have seen in the future supply of apartment stock and the impact that might have—and will likely have—on Melbourne's overall affordability. Essentially, we need a solid supply of apartment stock and we need them to be well designed and well responding to consumer preferences. The BADS certainly assist and certainly work with industry—and industry works with them—to be able to deliver high-quality, well-designed apartment products. What we advocate for is that those standards empower and amplify the great work that the industry does do in regard to apartment design and responding to the consumer sector.

So, it is very important we have a strong supply of apartments, it is very important that the building and design standards enable the industry to deliver that standard and it is really important for the overall affordability of Melbourne's entire housing sector that the apartment supply pipeline remains strong and that apartments remain affordable.

The CHAIR: Thank you, Danni. Did we want to go to Daniel? Do you want to talk about Lendlease and what you have got coming through your pipeline?

Mr DUGINA: Yes. Okay. Lendlease has delivered about 6000 apartments in the last six years, 3000 of those in Victoria.

I will just reiterate the key points of what Danni was mentioning. We are flushing through the BADS. They were approved in, I think, April 2017. Minimum approval time for a reasonable-scale building is, like, 12 to 18 months, so you are talking at least April 2018 before those permits submitted are post BADS that are being approved and then another two years to delivery. So there has only been a small window of time for those properties delivered under that BADS planning framework to take effect. We did some numbers through Charter Keck Cramer. It is an estimate. It is definitely less than 0.5 per cent of their property stock that has been delivered in Melbourne in the last 20 years. So it is a very small number of apartments. Therefore there seems to be a lot of overlap with the terms of reference for this inquiry and what has happened with the BADS. Those standards went through extensive industry consultation to come up with what is a balanced approach to try to make sure that development is economical but provides a high quality of living, and as Danni said, they have gone through a recent update in 2021. There are good and bad things about the BADS. One of the limitations of the guidelines when they are put in place is they can often be enforced as a mandatory standard when there should be a little bit more flexibility to allow innovation and creativity. Sometimes when the standards are not applied in the right way you can end up just adding costs. It puts more pressure on the affordability of apartments for users.

I think if you looked at the Property Council submission, there is a piece in there about build-to-rent. I think you are looking at having some interest in what happens in other jurisdictions, but in New South Wales there is bit more flexibility with build-to-rent developments in the application of those guidelines. One of the criticisms of SEPP 65, the equivalent of our BADS in Victoria, is exactly what I said before about the BADS: they are applied very literally, even though they are made as a guideline, because it is how the responsible authorities apply their approvals. It is actually written into the build-to-rent planning regulatory amendment that went through last year that there should be more flexibility, particularly around certain areas, because build-to-rent developments are providing more common area and public open space or communal space. So they are not having to imply that those standards are relevant for the apartments because they are considering the project as a whole. I hope that makes sense.

The CHAIR: I am interested to know: when do you think the BADS should be reviewed? If you think it is too closely aligned with the terms of reference of this committee's inquiry, when would you suggest that they should be reviewed if they are working?

**Mr DUGINA**: Well, so far BADS have been reviewed every four years, implemented in 2017, reviewed again in 2021. 2021 updated some of the parts of what was in the 2017 version but then also looked to focus on outside of the building rather than just inside of the building—so it has applied a slightly different lens to it—an expansion. Four years is probably appropriate.

If you look at building codes, building codes are updating about every three years, and there is a lot of crossover between living standards and building codes. If you look at the latest round of what is proposed in the 2022 BCA, it talks about having 100 per cent of dwellings at an LHA—Livable Housing Australia—silver standard. That is something that will update design standards and will come in through planning approvals and building permits in time to come. If building code is updating every three years and we are looking at planning standards on design every four years, for me that feels about right. But others might have a different view.

Ms HUNTER: No, that would be our view.

**The CHAIR**: I just want to take you back to when you talked about—and we heard from witnesses earlier today talking about—the need not to be mandating standards and standard design but keeping them as guidelines so industry can, I guess, innovate and improve. Are you confident that the industry would do that?

There is a lot of talk in Victoria about people living in dog boxes, and a lot of light has been shone on the apartment design standards and the way in which people are living in current apartments that the market has gone ahead and designed and built—that people are living in—that affects their quality of life and standard of living. COVID has really exacerbated that. What do you say to that?

**Ms HUNTER**: Well, I guess those criticisms were a large part of why the better apartment design guidelines were developed and established in consultation with the sector and with people who live in apartments. Our argument is that they have not yet had enough time to flow through to the construction of newly constructed apartments.

**The CHAIR**: Can I just jump in, Danni? Let me just say it more bluntly. Why wasn't the industry doing it before? Why has it taken a pandemic? Why has it taken regulation to try and get the industry up to a standard that, quite frankly, I think the public is asking for?

Mr DUGINA: Do you want me to take that one?

**Ms HUNTER:** I will make one comment. The thing about apartments is that they have to be pre-sold to be able to be built. So there is an argument that there was market acceptance of the design standards that were in place prior to the pandemic. There was also a very strong investor influence and drive during the peak of apartment construction here in Melbourne, which was great and is great for the supply of rental stock of apartments but definitely drove a different set of expectations to what we are seeing now in our current apartment market, when you are seeing a lot more owner-occupiers looking at the apartment strategy. These market dynamics have been very much at play not just from the developer's perspective but from the purchaser's perspective and the investor's perspective. Do you want to add to that, Daniel, with your comments?

Mr DUGINA: Yes. There are certain aspects of minimum standards that could be merited because they do lift the bottom of the industry up. For a business like Lendlease or some of the other Property Council members, we have our own design standards well before the BADS were introduced, because we stand behind the brand and we want to make sure that we have repeat business. With the way that the BADS have come out there are mandatory components—I mean, the objective—and then there are standards that is the guaranteed way of achieving the objective. If design does not meet the standard, you have to come up with a performance solution that is satisfactory to the responsible authority. I just think if there is more guidance around that flexibility of the standard, not treating it as absolutely mandatory, it will help the industry in general.

Most developers want all developers to do well in the sense that we do not want the bad news stories that happen. We do not want the Opal Towers, we want the whole industry to lift, and then apartment living in Melbourne will probably catch up to where Sydney is. There is a much greater proportion of the population in Sydney that has adapted to apartment living. I think Melbourne is on that trajectory, but it does not help us when we have media about poor events or issues with buildings.

**Ms HUNTER**: Interestingly, in the context of Melbourne's rising house prices and established house prices, there are more apartment projects and more townhouse projects, for example, within our inner suburbs than there were 10 years ago. Primarily the apartment market was concentrated in the CBD 10 years ago. But as apartment living is becoming a much more accepted and desired form of dwelling that owner-occupier expectation is really driving those design standards even higher than the BADS.

What I would say is that Melbourne's apartment market has only existed for 20 years. It is quite immature. It has a lot of maturing to go, and there have definitely been lessons learned by the industry across the board in terms of the design standards that people expect longer term. That is why the BADS are a really good thing both for the industry and also for apartment occupants and for the overall confidence and desirability of apartment living in Melbourne, which is a global city and needs to have a really strong and desirable apartment market as a very important form of housing.

#### The CHAIR: David.

**Mr MORRIS**: Thanks, Sarah. We have sort of done this to death, but I did just want to pick up on one thing. Everything I am going to ask about comes out of the submission, but there is a line in the submission that

says, 'While we welcome the committee's decision to examine design standards', and you talk about the reason why, I just want to make it clear it was not the committee's decision to investigate this; it was a motion introduced by the government in the Legislative Assembly. Whatever their agenda is, and I am not privy to it—and I do not think anyone else sitting at this table is either—it has come from the government, so it may well be premature. I just want to make it clear it is not the committee off on a frolic of its own, thinking, 'Oh, we've got to fix this'. It is in that context.

Ms HUNTER: Thank you for that clarification.

**Mr MORRIS**: Page 6 of the submission is on build-to-rent, and you talk about reducing car parking requirements, you talk about balconies and then, over the page, storage areas and so on. I raised these issues with some local government witnesses this morning, and the immediate response, and I am paraphrasing, was essentially, 'Why should rental standards be different to the standards for purchases?'. That was my immediate reaction too to reading the submission. I think, Daniel, you mentioned the New South Wales guidelines and that they are different for the BTR market. Can you just give us a bit of background or more depth in your thinking behind that, given that obvious reaction?

Mr DUGINA: Do you want me to do it?

Ms HUNTER: I do, but can you also go to the differences between private rental and the build-to-rent model as a dwelling type?

**Mr DUGINA**: Yes, of course. Obviously this inquiry is about design standards—that is in the terms of reference—but living standards in apartment buildings are probably three things that are interrelated: there is design up front; there is construction and quality, and design and construction are very much related; and then you have also got the operational side of things. It is very different for someone living subject to the *Residential Tenancies Act* and owners corporation laws than for someone living in a professionally managed institutional-grade building. So if you look at build-to-rent, it is an asset class that is emerging. There is a lot of media about it at the moment—there is a little bit coming through in the pipeline. It is an enormous asset class over in the States—it is a bigger asset class than industrial and commercial buildings combined. I think it is on the way. It has floundered in Australia because of our tax regimes. It is not viable at the moment, although it is emerging. The tax regimes in the US and UK are a lot more favourable to doing build-to-rent development.

Now, if you are a tenant renting one of those buildings, you are expecting a much better experience. Some people pay a premium to rent, and that build-to-rent premium is based on the nature of the operator in the US, because they know they are going to be looked after. You have got more flexibility with what you do in an apartment. You can hang a picture on the wall without having to contact the property manager. There is onsite caretaking to take care of your defects and your issues. That whole build-to-rent philosophy is intended to sort of raise the whole class of being a residential tenant, of not owning your own property.

I think with your question, 'Should it be any different if you are a renter or a purchaser?', ultimately no, it is just that with the asset class of build-to-rent the model is providing a lot more common area. It is considering the project as a whole because you are trying to balance up what is in the apartment and what is also within the development but outside your apartment. The build-to-rent asset class has a whole social program, a whole social overlay into bringing residents together in community events and things like that. To try and boil it down into a really simple example, BADS mandate balconies in apartments, which is fine, but if you are in an apartment building that is up against a freeway, a balcony in your apartment might not be the best thing, but sharing a communal space with a lot of others might be a better thing. That sort of flexibility does not sit within the BADS at the moment. I think I have answered the question, but it is considering it as a whole.

**Ms HUNTER**: The point about car parking, for example, is a build-to-rent project might offer its residents the use of a suite of scooters—they are a bit controversial at the moment, but another form of transport as an alternative mode to people having a car park attached to the apartment that they are living in. So what we are saying is that the BADS, with respect to build-to-rent and even some other planning controls and requirements, have not married up with the market thinking around what this model is going to look like for consumers. Now, Melbourne will deliver about 6000 build-to-rent apartments over the next two or three years, so it is delivering the majority of Australia's build-to-rent projects, and we have got the first two or three coming online in

Melbourne over the next couple of months. So the market acceptance and the knowledge about the build-to-rent living model will certainly become more pervasive in the Victorian community.

**Mr MORRIS**: I guess the points about balconies et cetera, et cetera, I think that is fairly clear. If the guidelines are effectively it would not matter what the purpose of the building was if those facilities were there, then that flexibility should be there, from my perspective.

But, Danni, going back to parking. Under normal circumstances, if you are considering a development application, you are not considering the tenure model, you are just looking at what is there and what is permitted. So I guess what I am thinking is two things regarding car parking. First of all, if it is inner city and there is easy access to public transport et cetera, et cetera, then there is obvious justification for flexibility in what is required regardless of the tenure arrangements. But if you are saying, 'All right, we're moving away from that and we're saying the tenure determines the car parking', what is the guarantee that the tenure will last beyond three years, five years? In other words, are you going to have a building that is constructed to be let under one model and then five years down the track the model is different, the supporting services that were provided are no longer there and it is a more conventional arrangement? What protects that?

**Ms HUNTER**: It is a very good question, David. I guess I will let Daniel speak to the commercial model around build-to-rent, but build-to-rent as institutional capital projects are attractive investments for this kind of capital because they are going to be there for 30 to 50 years—for the life cycle of the building essentially. Now, the Victorian government's tax changes that it introduced and the tax concessions around build-to-rent reflect that. They have got a 30-year time horizon because they reflect that the nature of this capital is incredibly patient. It pays for the construction of an entire building upfront, with no pre-sales. Now, what would that be? Millions and millions of dollars, so its return on investment is modelled so that it will be there for 30 to 50 years within that form of tenure. Do you want to speak further to that?

**Mr DUGINA**: David, I might ask if you can clarify the question. Is it the concern that there will not be enough car parking for residents who would like to live in that building in the future?

**Mr MORRIS**: No. It is effectively saying: if you are dealing with a conventional planning permit, it runs for the land, not with whoever is running at the time. What I am thinking in this case is—notwithstanding what Danni said—the investor goes broke, the property is sold, the tenure model then becomes different. It is either strataed or rented out on a different model. You may well find a situation where the parking is suddenly insufficient because the services that were previously available are no longer available. It is just that distinction between normally a permit would run with the land and this model seems to be quite different.

Mr DUGINA: The only thing I would say to that is eventually the market would self adjust.

There might be a situation where it ends up being strataed, but people are well aware if it is going to be sold off—a build-to-rent asset well down the track into the future—and people are accepting of what is in it at the moment because of the product that exists in the building at the time. So if it does not have a balcony but it has got more communal space, that is what they are buying. If there is a dwelling without a car space, then that is what they are going into eyes wide open. I mean, car parking is probably one that is a whole other discussion when you consider trends such as decreasing rates of car parking over time. I think to a certain extent the market forces will determine that, and I do not think there will be any negative, unintended consequences because of that.

**Mr MORRIS**: Yes. I think the points you make are reasonable points, but it is just perhaps what is not clear in the submission is the second half of it, with the support services that justify the variation.

**Ms HUNTER**: The design of build-to-rent buildings, for example, will have different waste management services. They will have different electricity networks in the building. They will have collective utilities, for example, because they will all be managed by one organisation. So car parking would probably be the least of the building's worries if it was ever sold off in strata, but what that means is that in a healthy, established build-to-rent sector, as it will inevitably emerge in Victoria, that building would likely be onsold to an institutional investor, because that is the product. It is very different.

Mr MORRIS: Yes. And I think that is the point. Thanks for that.

**Mr DUGINA**: If I could add to that by saying I am assuming if it does convert to strata, they would have to go through a planning permit to subdivide the apartments at a point in the future. So it would go through a further round of design amendments and approvals, not dissimilar to a commercial building if there is a change of use or a change of fit-out. Like you would have to redo the design of the project.

Mr MORRIS: Yes. That is a good point.

**Ms HUNTER**: And the cohort and customer base of the build-to-rent market is quite different. They are a much younger cohort, highly mobile, often moving around cities. Part of the build-to-rent model in the US is that there are sort of chains of build-to-rent apartments, and if you live six months in New York, you can just go and live six months in Toronto or San Francisco or whatever with the same organisation. So it is responding to different lifestyle patterns and different trends. It is really exciting, actually, the build-to-rent sector.

Mr MORRIS: It is an interesting concept, yes.

**Ms HUNTER**: But what it says to us in the Victorian context is not that the BADS will not allow great design in a build-to-rent context but the BADS need to consider flexibility in how we actually deliver build-to-rent, particularly if we are going to compete with Sydney in this market. Yes, Melbourne is ahead in build-to-rent, and we are going to have some really great products and really great rental supply, but Sydney will fast catch up, and—

Mr MORRIS: We want to stay in front.

Ms HUNTER: we want to stay in front. That is exactly right. Thank you.

Mr MORRIS: Thanks for that. I would like to come back to something else if there is time.

**The CHAIR**: Okay. I am just conscious of time, because I know that we are about to go over, which is completely fine, just as long as members know if you have got a question. We have got Paul and then Danielle.

**Mr HAMER**: Yes. Thank you. You talked quite a lot in your submission about the New South Wales standards and I guess in large part not wanting to replicate that. And just putting aside the issue that you brought up about the time that it has taken, that we probably have not really seen the full effect of BADS yet, the New South Wales standards have been in for 20-odd years, and I am just wondering from your perspective how that has actually affected the apartment market there. Certainly from my observation—and I am obviously not in the industry, but I have done a lot of research in that area—it has seemed to be a continually stronger apartment market and industry. Now, there are a number of factors underlining that, but I am just wondering whether those standards have really made such an impact in terms of bringing that supply to the market and, I guess, on the flipside, actually providing an overall better product to consumers at the end of the day. I do not know if you have any thoughts on that.

Ms HUNTER: I will let Daniel take that one in his national capacity.

**Mr DUGINA**: It is hard to say. I mean, it is hard to say that because the standards are applied rigidly in New South Wales and there are more onerous requirements that it has created a stronger apartment market.

I should say, that in the Victorian guidelines in some areas, the Victorian standards are a little bit more onerous.

It is hard to say whether that has improved the apartment market or whether it has created more demand for that product. I think it is a hard one to answer, but it certainly has in some ways added to the cost of delivering a dwelling in Sydney. There are things that we think are a little bit less reasonable in NSW. There should be some more flexibility around those—I kind of touched on that before—and it certainly raises the cost of delivering a dwelling, and that cost is in one way, shape or form passed on to the end user in terms of the purchase price. I will leave it at that.

The CHAIR: Danielle, do you have a question?

**Ms GREEN**: Mine is just a really quick question. I probably should know this, or I could ask the department, but in terms of build-to-rent, how is the usage classified—you know, the nesting within the scheme, so accommodation—and then what is it called? I am just trying to think where it is allowed.

Ms HUNTER: I do not know.

**Mr DUGINA**: It is a technical planning question. I actually do not think there is a definition of build-to-rent. There is in New South Wales, but I do not think there is one in Victoria. It is certainly understood, and there was a committee set up to assist build-to-rent planning approvals coming through, but I do not think that there is anything in the planning framework at the moment.

Ms HUNTER: Unless it is under the residential tenancies—

Mr DUGINA: It is really a technical planning question, that one.

Ms GREEN: No, because I am just looking at the accommodation group now and I am thinking, 'Is it group accommodation? Is it a residential building?'.

Ms HUNTER: It is a residential building.

Ms GREEN: Is it a residential village? Could it be that too?

Ms HUNTER: I would expect it is a residential building.

**Mr DUGINA**: Yes. I just know of others that have applied 'residential village' to achieve certain planning outcomes. So build-to-rent has not been set up with its own definition—that is probably the best way of saying it—in the Victorian planning framework at the moment to my knowledge.

Ms HUNTER: Yes. And this is something that we are talking with the department about separately, not just in the context of design standards but also in the context of the planning process, particularly where we want to encourage and fast-track build-to-rent products and that supply of affordable rental housing.

Ms GREEN: I am just trying to think what the guidelines would be for local government.

**The CHAIR**: Okay. We might leave it there. Thank you very much. That is some really interesting information that you have conveyed today.

Ms HUNTER: Thank you for the opportunity to come and speak with you.

Mr DUGINA: Thanks.

The CHAIR: . That build-to-rent we will be talking about for some time.

Ms HUNTER: Yes. Absolutely.

Witnesses withdrew.