

26 February 2026

The Committee Secretariat
Legislative Assembly Environment and Planning Committee
Parliament of Victoria



By email: raea@parliament.vic.gov.au

Submission to the Inquiry into renewable and affordable energy for apartments

Dear Committee members,

Tenants Victoria is the peak body for Victoria's 2 million renters, and the rental law specialist community legal centre in Victoria. Our vision is for safe, secure and affordable homes for Victorian renters in a fair housing system. We aim to empower all renters and make sure their voices are heard in our advocacy. We work in partnership with other community legal centres and housing sector organisations, and strategically with government to inform policy development and enhance service delivery.

Nearly half (48%) of Victoria's rental properties are either apartments, flats or semi-detached dwellings.¹ Given the affordability challenges renters are facing and the Victorian Government's renewable energy targets legislated in the *Renewable Energy (Jobs and Investment) Act 2017*, this Inquiry represents a significant opportunity for reform.² It is important that existing barriers are identified and removed so that all Victorian renters living in apartments can access the benefits of the renewable energy transition and associated increased energy efficiency.

We have reviewed and endorse the Victorian Public Tenants Association's (VPTA's) submission to the Inquiry into renewable and affordable energy for apartments. As the peak body representing public housing renters, VPTA's submission to the Inquiry focuses on the need for equal treatment of public renters regarding access to renewable energy programs and initiatives. Tenants Victoria supports the recommendations in VPTA's submission to the Inquiry, listed below:

Recommendation 1: That the Government ensure equal treatment for Public and Community Housing in any rooftop solar programs.

Recommendation 2: To bring Victoria in line with other jurisdictions the scope of the Energy Efficiency in Social Housing Program should immediately be expanded to include solar power for Public Housing.

¹ Commissioner for Residential Tenancies (2025). Renting in Victoria: 2024 Snapshot. [Weblink](#).

² SGS Economics & Planning (2025). Rental Affordability Index November 2025. [Weblink](#); Victoria State Government (2026). Victorian renewable energy and storage targets. [Weblink](#).



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Safe, secure and affordable homes

Recommendation 3: To bring Victoria in line with the achievements of the South Australian Housing Trust we should establish a network of rooftop solar panels and batteries to create a Virtual Power Plant where we have a cluster of multi-unit Public Housing locations, such as we see at Ashwood, Ashburton and Chadstone.

Recommendation 4: We recommend the establishment of a State Government Solar Public Housing Towers Initiative.

Recommendation 5: That embedded networks be banned at community housing developments that house Public Housing renters relocated from the high-rise towers. Where it is impossible to avoid embedded networks, that only the State Electricity Commission (SEC) should be engaged to supply electricity.

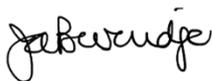
Around 90% of renters in Victoria are in the private market, and many renters live in apartments and units governed by the *Owners Corporations Act 2006* (OC Act).³ Currently, the OC Act only provides limited ways for renters to engage with owners corporations or participate in decision making that may impact their quality of life and finances such as decisions about energy. To thoroughly understand the barriers and inequities for renters in apartments regarding access to renewable energy and affordable electricity, the Inquiry needs to consider the OC Act.

Last year, the Department of Government Services conducted an Independent Review of the OC Act.⁴ Tenants Victoria made a submission to the Review, which highlighted how the OC Act should be reformed to increase renter representation and participation in decision making.⁵

Our submission also advocated for more flexible owners corporation rules to enable expedition of repairs or upgrades to individual lots. For example, the current process for installing an upgrade such as an air conditioner in a strata property involves waiting until the owners corporation's Annual General Meeting or paying over \$200 to initiate a postal ballot to request permission. Such inflexible processes represent another barrier to the goal of expanding access to energy upgrades for renters living in apartments. As such, we eagerly anticipate the release of the findings from the Independent Review of the OC Act.

Recommendation 6: Tenants Victoria recommends that the Committee have reference to the upcoming findings of the Independent Review of the *Owners Corporations Act 2006* to ensure systemic challenges are addressed and renters in strata properties are not missing out on energy efficiency upgrades.

Yours sincerely,



Jennifer Beveridge,
Chief Executive Officer

³ Commissioner for Residential Tenancies (2025). Renting in Victoria: 2024 Snapshot. [Weblink](#).

⁴ Engage Victoria (2025). Review of the Owners Corporations Act 2006. [Weblink](#).

⁵ Tenants Victoria (2025). Submission to the Review of the Owners Corporations Act 2006 (Victoria). [Weblink](#).



VICTORIAN PUBLIC
TENANTS ASSOCIATION

Inquiry into renewable and affordable energy for apartments

JANUARY 2026



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Who We Are

The Victorian Public Tenants’ Association (VPTA) is the voice of public housing in Victoria.

As the peak body representing existing public housing renters and those on the waiting list, our goal is to provide advice to renters, and to improve and expand the public housing system in Victoria. Although not formally part of our role, we also assist community housing renters where possible. We believe all social housing renters deserve a representative voice, regardless of their specific tenure type.

While our work is in Victoria – we are the only peak body in Australia which exclusively represents public housing renters or people who live in social housing.

We undertake systemic advocacy and provide policy advice to the Victorian Department of Families, Fairness, and Housing (‘the Department’), undertake community engagement work and operate a free and confidential telephone advice service.

In the 2024-25 financial year we helped more than 1,600 residents and housing applicants. The VPTA’s workload doubled between 2020 and 2025. Demand continues to grow.

Terms of Reference

An inquiry into how best to expand access to renewable and affordable electricity for Victorians in apartments and other multi-unit dwellings, including consideration of:

- a. recent developments in energy supply and technology options for these dwellings over the last four years;
- b. barriers and inequities experienced by Victorians in such dwellings, including renters and¹ social housing tenants, when accessing renewable and affordable electricity compared with other households;
- c. options to increase access to renewable and affordable electricity for these dwellings, including shared rooftop solar, balcony or façade solar, community batteries and virtual power plants;
- d. the likely impacts of those options on different groups of Victorians, including by tenure type, income, housing type and location, on the type, affordability and reliability of energy they receive; and
- e. any legislative, regulatory, planning or market reforms that could support the implementation of options, consistent with Victoria’s legislated emissions reduction and renewable energy targets

to the Environment and Planning Standing Committee for consideration and report no later than 30 September 2026.

¹ The phraseology “renters and social housing tenants” may give rise to the misapprehension that public housing tenants don’t pay rent. Of course, public housing tenants do pay rent.

Barriers and Inequalities experienced by Public Housing Renters

When we look around at what is happening in public housing interstate and when we see what is happening in the broader Victorian community we are forced to ask; “Does the sun not shine on Public Housing in Victoria?”

We can see no logical reason or justification for the exclusion of public housing tenants from access to renewable energy programs.

In 2023, the VPTA surveyed social housing renters about their energy use and cost of living. Respondents² described what they do to get by:

"I'm not having shower every day - only sometimes, switching off everything also power points after I use it. Saving gas, electricity, water, no quality of life, no driving to save petrol, no going out, no socialising - too costly, no hairdresser, no new clothes, no orthopaedic shoes, no physiotherapy, no hydrotherapy, no holiday, no cultural outings, etc. No quality of life "

“Air conditioner use for 30 minutes to warm/cool area then turn off. Food - try to buy only what I absolutely need, no luxuries.”

In this context the importance of continuing investment and accelerated delivery of the Public Housing Cooling Program cannot be overstated. By providing more comfortable housing and reducing the need for residents to pay for additional cooling, Victorian Government is recognising and performing its role as a social landlord.

Victoria’s Housing Statement -The decade ahead 2024-34 (released on 23 September 2023) announced a program to demolish and redevelop all 44 public housing towers by beginning with those in Flemington, North Melbourne and Carlton. At the time of writing, no phasing or demolition schedule has been announced for the remaining towers.

Simon Newport, CEO of Homes Victoria, in evidence to the Legislative Council confirmed that the towers are very cold in winter and very hot in summer.³

Existing public housing renters remain the last group of Victorians without an opportunity to access assistance for the installation of solar panels on their homes, despite these homes being some of the least thermally efficient housing stock.⁴

² VPTA Survey – July 2023

³ Transcript of evidence, Legislative Council Committee on Social and Legal Affairs, 10 October, 2023, p 77.

⁴ Australian Housing and Urban Research Institute, ‘War, cool and energy-affordable housing policy solution for low income renters’,2020, p. 5.

Further, people who live in public housing spend more on energy than other Victorian households while also being the most at risk of experiencing energy hardship. A 2021 survey conducted on behalf of the Independent Social Housing Regulatory Review found that public housing participants ranked the cost of heating and cooling their homes as one of the most important features of a property and over 90% of those surveyed said their energy bills were one of their top three expenses.

In our 2023 survey we asked respondents what they would do with savings from their energy bills, if they had solar panels installed:

"Heat my home in winter - have a test to find my biological family."

"Spend it on better quality food and take my children out occasionally. "

"Have better quality food and buy other essentials like clothes. In winter my heater is on 24/7 due to my health and summer, the air conditioner is on most of the time during the day. Plus I have an air purifier that needs to be on 24/7 and running am an air compressor 24/7"

"Buy replacements for items I really need."

"I would love to have solar panels. The commission has built three units with them up the road. I would probably put it to food and utilities."

We estimate that there are 23,461 existing public housing properties that are suitable for installation of rooftop solar panels, which could save each household up to \$535.49 per year in lower energy bills. If fully implemented, we expect that this would create 1,118 jobs.

Community Housing Program, Solar Victoria

The "Community Housing Program, Solar Victoria" allows Not-for-profit community housing organisations (CHO's) to apply for a rebate of up to \$1400 per tenancy on behalf of their renters to install solar panels (PV) on the properties they manage.

This is a fantastic program for Victorians living in Community Housing. See an example below from the SouthEast Housing Cooperative.

Retiree Shirley has lived in Cranbourne in Melbourne's south east since 2008. In January 2019, nine solar panels were installed on her roof. She was delighted to find out her housing cooperative was going to receive rebates for solar panels to be installed on her home.

"It's great, I'm expecting to save around \$800 a year thanks to the solar panels," Shirley said.

Shirley's home is managed by the SouthEast Housing Cooperative, which has installed solar panels on the rooftops of 162 homes.



Further good news stories can be found here;

<https://www.solar.vic.gov.au/community-housing-saves>

<https://chiavic.com.au/wp-content/uploads/2021/06/11787-CHIA-Case-Studies-UNISON.pdf>

<https://chiavic.com.au/wp-content/uploads/2021/06/11787-CHIA-Case-Studies-HOUSING-CHOICES-AUSTRALIA.pdf>

<https://chiavic.com.au/wp-content/uploads/2021/06/11787-CHIA-Case-Studies-UNITED.pdf>

However, Public Housing renters are excluded from the program and there is no matching program for Public Housing. It is difficult for public housing tenants to understand why the Government would provide funding to put solar panels on someone else's roof but not on their own.

Government policy has recently encouraged cooperation and consistency between Public Housing and Community Housing, under the umbrella term

“Social Housing”. For example, The Victorian Housing Register is where you can apply for social housing in Victoria. This means you can apply for both Public and Community Housing at the same time.

The VPTA strongly supports a strengthened and ongoing Social Housing Solar Panel Program with equal treatment for Public and Community Housing.



Recommendation 1

That the Government ensure equal treatment for Public and Community Housing in any roof top solar programs.

About the Energy Efficiency in Social Housing Program (EESHP)

This \$209.4 million program aims to improve the energy efficiency and liveability of social housing properties across Victoria. In Phase 2, instead of a single upgrade, eligible homes will receive a package of upgrades to significantly improve their energy efficiency. Solar panels are not included in the program.

The Victorian Program is jointly funded with the Commonwealth, under the Federal Social Housing Energy Performance Initiative (SHEPI).⁵

In New South Wales, the equivalent program does include funding for solar power.

“This new initiative will support a range of energy performance upgrades in homes that will help social housing tenants reduce their energy bills, and keep their homes cooler in summer and warmer in winter. These energy efficiency upgrades could include solar systems, reverse-cycle air conditioners, heat pump hot water systems, LED lighting, ceiling fans, window shading, insulation and draught proofing.”⁶

Looking at other Australian jurisdictions, we see a far more advanced approach to solar power on Public Housing.

Western Australia.

In December 2020 the West Australian Government announced it would install \$6 million worth of solar panels at 500 social housing properties as part of the WA Recovery Plan's \$66.3 million renewable energy technologies package.

South Australia

South Australia's Virtual Power Plant (SA VPP) is Australia's largest virtual power plant. Forming a network of solar panels and Tesla Powerwall battery systems installed on thousands of SA Housing Trust homes, eligible households are guaranteed access to the lowest residential electricity rate in South Australia. Plus, the Tesla Powerwall installed on Public Housing properties provides a power backup during an outage.

SA Housing Trust households have access to more affordable, reliable, and secure electricity, all while increasing visibility into energy usage.

Queensland

⁵ <https://www.dcceew.gov.au/energy/programs/social-housing>

⁶ <https://www.energy.nsw.gov.au/government-and-local-organisations/programs-grants-and-schemes/shepi>

The Thermal Comfort Program and broader Social Housing Energy Performance Initiative include a range of improvements in social housing such as solar for crisis accommodation properties.

Northern Territory

Jacana Energy, in conjunction with the Northern Territory Department of Territory Families, Housing and Communities (TFHC) and the Office of Sustainable Energy (OSE), are evaluating the costs and benefits of installing rooftop solar on social housing. As part of the Solar for Social Housing Trial 30 TFHC-owned houses across the Darwin-Palmerston and Tennant Creek regions had rooftop solar installed in 2024.

Canberra – ACT

“Up to 7,500 households in the nation’s capital will benefit from bill busting energy upgrades, with the Albanese Government investing \$12.9 million for rooftop solar and batteries across social housing in the ACT.

The program will bring down energy bills for good using Virtual Power Plants (VPP) to connect and combine renewable energy resources. By joining a VPP, households with solar panels and batteries can access savings on their energy bills.

This is lasting cost of living relief by ensuring some of the most vulnerable households are better insulated from bill shock, with homes that are fitted out to stay cool in the summer and warm in the cold Canberra winters.

The ACT Government will provide a greater weighting through the procurement process for products that are Australian made.

The new funding is part of the Commonwealth’s \$500 million expansion of the Social Housing Energy Performance Initiative (SHEPI) and will enable more than 100,000 social housing properties across Australia – almost 25% of the country’s social housing stock – to save on energy bills and reduce emissions.

Upgrades delivered under the Social Housing Energy Performance Initiative could save tenants around \$1,800 on their energy bills each year.”⁷



Recommendation 2

To bring Victoria in line with other jurisdictions the scope of the Energy Efficiency in Social Housing Program should immediately be expanded to include solar power for Public Housing.

⁷ <https://minister.dcceew.gov.au/bowen/media-releases/joint-media-release-bill-busting-upgrades-canberras-social-housing-residents>

Local Focus – Chadstone Ashwood and Ashburton

The local Ashburton, Ashwood and Chadstone Public Tenants Group took a look around their neighbourhood to see what opportunities existed to expand access to renewable and affordable electricity for Victorians in public housing apartments and other multi-unit dwellings.

What they found in one afternoon was a list of opportunities to generate clean energy through roof top solar panels and to assist with cost of living pressure on public housing renters.

Some of these opportunities are detailed below.

27 Power Ave, Ashwood: 2 (redbrick) blocks with shared roofs. 16 units



What we can see from the air is the two red roofs of the Power Ave public housing apartments in the top right of the picture. To the right is a private home with solar panels.

The building at the top left of the photo is 90 community housing apartments at 4 Power Ave. The Ashwood Chadstone Gateway project was built on a site that previously had been public housing walk-up flats. The community housing project was completed in August 2013 and it benefits from clean and affordable energy generated by the roof top solar panels that have been installed.

So in this one corner of Ashwood, we see three housing types, public, private and community. The only housing type that is not benefitting from clean and affordable energy generated by roof top solar panels is the public housing.

16 Allambi St, Ashwood: 3 blocks with shared roofs. 24 units



From the air.



Tenant voice:Debbie's story

Debbie, Public Housing Tenant:

“

We would love the opportunity to have cheaper solar power. We hear about everyone else being able to use appliances or charge up devices in the middle of the day when the sun is out and save a bit of money - and we think well, why can't we do that?

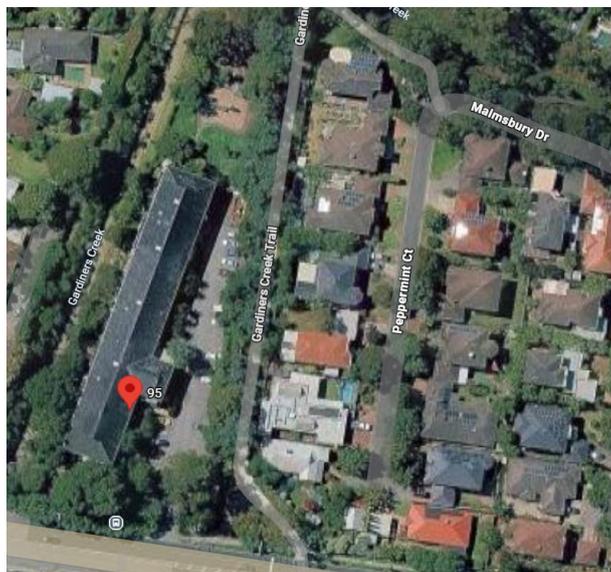
We all want to do our bit for the environment. It seems such a waste to have our roof just sitting here with no panels on it.

”



Debbie pictured outside her home

95 High St, Ashwood: Shared roof. 25 units



37-39 Batesford Rd, Chadstone: 2 blocks with shared roof. 16 units.



32 Gloucester Road Ashburton: 2 blocks.



Recommendation 3

To bring Victoria in line with the achievements of the South Australian Housing Trust we should establish a network of roof top solar panels and batteries to create a Virtual Power Plant where we have a cluster of multi-unit Public Housing locations, such as we see at Ashwood, Ashburton and Chadstone.

Public Housing Towers

The Government announced its intention to progressively ‘retire’ and ‘redevelop’ Melbourne’s 44 high-rise public housing towers. The first towers to be redeveloped are in Carlton, Flemington and North Melbourne, known as Tranche 1 of the program. In September 2024, the Victorian Government announced the redevelopment of towers and walk-ups in South Yarra and Richmond, known as Tranche 2. The figure below demonstrates sites included in the first 2 announcements (blue dots) and those yet to commence (red dots).



On Thursday 29 January the Government released details of a further 7 towers slated for demolition. All of the 7 towers are dedicated Older Persons Housing.

The towers in what is being called Tranche 3 are –

- 150 Victoria Avenue, Albert Park
- 29 Crown Street, Flemington
- 94 Ormond Street, Kensington
- 159 Melrose Street, North Melbourne

- 25 and 27 King Street, Prahran
- 150 Inkerman Street (Inkerman Heights), St Kilda

That leaves 25 towers which may house public housing renters for as much as another 25 years. It is our view that those renters should have equal access to renewable and affordable electricity.

In part this is due to the fact that each of these renters will soon have access to air conditioning, which may result in higher energy bills.

The 2023-24 Budget capital investment Cooling our public housing towers (metropolitan), committed an investment of \$135.8 million to install air conditioners across high-rise towers.⁸

This program is very important for public housing residents. Eligibility for public housing is tightly rationed and public housing residents are sicker, poorer, and more vulnerable than most Victorians. This increases their reliance on and the importance of a comfortable stable home that they can afford to heat and cool within limited means.

Installation of cooling has been completed in 10 towers:

	150 Victoria Avenue (Layfield Court), Albert Park  Future redevelopment	>		150 Inkerman Street (Inkerman Heights), St Kilda  Future redevelopment	>
	25 King Street, Prahran  Future redevelopment	>		27 King Street, Prahran  Future redevelopment	>
	229 Hoddle Street, Collingwood  Future redevelopment	>		240 Wellington Street, Collingwood  Future redevelopment	>
	480 Lygon Street, Carlton  Future redevelopment	>		510 Lygon Street, Carlton  Future redevelopment	>
	530 Lygon Street, Carlton  Future redevelopment	>		2 Simmons Street, South Yarra  Future redevelopment	>

⁸ Department of Treasury and Finance, Budget Paper No. 4: 2023–24, p.128; Department of Treasury and Finance, Budget Paper No. 3: 2023–24, p.50.

Going Beyond Roof-top Solar – the Hypothecated Solar Farm

Clearly, options for roof top solar are limited on our public housing towers. For that reason we think we should emulate the solution that has been put in place for Melbourne’s iconic tram network.

Melbourne’s trams are linked to renewable energy generated at two Victorian solar farms as part of the State Government’s Solar Trams Initiative.

A State Government’s Solar Public Housing Towers Initiative could extend beyond mere energy supply and could link tower residents with training and employment opportunities in establishing solar farms dedicated specifically for public housing residents.



Recommendation 4

We recommend the establishment of a State Government Solar Public Housing Towers Initiative.

Embedded Networks

In 2018, the Victorian Government announced an election commitment to ban embedded networks in new residential apartment buildings, allowing limited exceptions. This was in response to concerns that embedded network customers:

- pay higher prices
- have fewer consumer protections
- have difficulty accessing renewable energy; and
- face barriers to choosing their own retailer to access better offers.

Case Study Source; Embedded Networks Review, Final Recommendations Report January 2022.

Case study 1 (conceptual): The Panel's vision for LES customers

It is 2028, and Joanna has recently moved into a new apartment with assistance from a community housing provider, after years of experiencing bouts of homelessness and a lack of access to affordable housing. Her apartment complex has solar panels on the roof and battery storage in the basement.

Joanna received her first energy bill and was pleased to learn that concessions had been applied and bill repayments would be made automatically via Centrepay, along with her rent. Joanna was also able to easily see from her bill that she'd received clean energy benefits from the solar panels and battery storage in her apartment building. Not only was there a reduction in the amount she had to pay, she could feel satisfied that she was contributing to lower carbon emissions by getting her energy from renewable sources.

Joanna's new energy provider was very different to her previous one, as it was a new class of energy provider called a 'Local Energy Service' (LES). Within the last 5 years, LES providers had become popular, particularly for people living in apartments. An LES site enabled residents to take advantage of reduced energy prices through bulk purchasing and clean energy technologies, whilst the site remained connected to the local distribution network service provider. There were different LES providers offering different options – some ensured all buildings offered solar, others focused on the most efficient building materials and most took advantage of affordable renewable technology offerings.

To ensure a safe and efficient supply of electricity and as a condition for providing an essential service, a LES is required to obtain a licence from the ESC. This means that all the consumer protections applicable to on-market retailers also apply to LES customers. LES providers must also ensure that benefits from clean energy technologies and bulk purchasing flow on to customers. Whilst Joanna is satisfied with her current LES, she takes satisfaction in the knowledge that she can switch electricity retailer at any time if she wants to do so.

However, what we are seeing with tenants who are relocating from high rise Public Housing to newly built community housing (such as at Elizabeth St Richmond) is that the new locations have embedded networks. For all of the reasons outlined in the Government's policy announcement in 2018, renters are experiencing sub-optimal outcomes.



Recommendation 5

That embedded networks be banned at community housing developments that house Public Housing renters relocated from the high rise towers. Where it is impossible to avoid embedded networks, that only the SEC should be engaged to supply electricity.

VICTORIAN PUBLIC TENANTS ASSOCIATION

Acknowledgment of Country .
This submission was prepared at the
VPTA office, on the lands of the
Wurundjeri people in Na'arm.
The VPTA team is privileged to work
across Victoria. In all places, we
acknowledge the Traditional Owners of
Country. We offer our respect to Elders
and their ancestors who have cared for
the land, sky, and waters for tens of
thousands of years.

