



Tasmanian Council of Social Service Inc.

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# Tasmanian Housing Strategy Exposure Draft

*July 2023*



**INTEGRITY  
COMPASSION  
INFLUENCE**

## About TasCOSS

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TasCOSS's vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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## Introduction

Thank you for the opportunity to provide feedback on the Tasmanian Housing Strategy Exposure Draft ('the Draft Strategy'). TasCOSS contributed a submission to the Discussion Paper that informed the Draft Strategy and we are pleased to see our and other stakeholders' views incorporated, albeit at a high-level. We also commend the Draft Strategy for including links to stakeholder feedback on the Discussion Paper, the outcomes of the lived experience consultation, and a document outlining how the Draft Strategy will respond to the needs of priority groups. This is important for two reasons. First, making stakeholder feedback on the Discussion Paper publicly available increases confidence that the Draft Strategy reflects the expertise and perspectives of the people and organisations consulted. Second, putting this information in the public sphere means it can be used to inform members of the public and organisations about key issues in housing, as well as informing subsequent submissions and feedback.

This submission has been informed by TasCOSS members and other stakeholders with knowledge of the housing and homelessness systems, as well as assessing the Draft Strategy against [TasCOSS's submission](#) to the Discussion Paper in 2022 (refer to Appendix A).

## Key Issues

The overarching feedback from TasCOSS Members and other stakeholders is there is little to object to in the high-level themes and objectives of the Tasmanian Housing Strategy ('the Strategy'). Stakeholders observed, however, the Draft Strategy positions itself more as an aspirational discussion paper than a strategy document, which would have set out specific goals or objectives and a coordinated set of actions to achieve them. We also note the Draft Strategy refers to the development of action plans, but members and stakeholders expressed concern that developing these will delay the action needed to support thousands of Tasmanians in housing stress and/or crisis. We urge the Tasmanian Government and Homes Tasmania to do more to address the immediate housing needs of Tasmanians who cannot wait until the Strategy is finalised and action plans developed. We reiterate our calls for the Tasmanian Government to immediately introduce a cap on rents — possibly adopting the Australian Capital Territory (ACT) model<sup>1</sup> — and to legislate to allow greater regulation of short-stay accommodation (see comment under 'Theme Four: Local prosperity').

### **'Our Vision'**

Every Tasmanian has the right to adequate housing and this must be reflected in the Strategy vision. The Strategy vision of 'A well-functioning, viable housing system that provides safe, appropriate and affordable housing for all Tasmanians' should be amended to include a focus on achieving every Tasmanian's right to housing.<sup>2</sup>

We agree that without the required action in the short-, medium- and long-term, Tasmania and Tasmanians will experience a range of adverse outcomes including increased homelessness, increased financial stress and difficulty attracting and retaining essential workers across a range of essential

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<sup>1</sup> [Rent increases — ACAT \(act.gov.au\)](#).

<sup>2</sup> Tasmanian Government, *Tasmanian Housing Strategy Exposure Draft*, p. 8, [Tasmanian Housing Strategy Draft — March 2023 \(amazonaws.com\)](#).

services and industries such as health, education, early childhood and social services. Each of these outcomes is of deep concern but will also have cumulative impacts. There is therefore no time to waste in addressing the critical failure of Tasmania's housing system.

TasCOSS shares our members' concerns that the vision does not recognise that governments need to play more of a role in delivering housing for Tasmanians on low incomes: 'while state and local governments will play a role in future housing supply, the majority will be delivered by private industry, community housing providers and the wider not-for-profit sector.'<sup>3</sup> For various reasons, the private and not-for-profit sectors have not been able to keep up with demand for social and affordable housing and there is little evidence they can address the backlog and meet forecast need. Experts agree that a major program of social housing construction is needed and governments must play a significant role.<sup>4</sup> We therefore recommend the Strategy acknowledge this role and commit to meeting the inevitable shortfall the private and not-for-profit sectors cannot deliver.

### **'The Housing System'**

TasCOSS considers *Figure 1: The Housing System* is misrepresentative for two reasons — it suggests that homelessness is an embedded or inevitable part of the housing system (which conflicts with the vision and points to a critical failure of policy); and it reflects what is often referred to as the 'housing continuum.' We therefore recommend changing the title of *Figure 1* to reflect this.

It is also unclear whether *Figure 1* depicts the Government's vision or in fact represents the status quo. Given rough sleeping is grouped under 'Temporary options,' we suggest it depicts the status quo and should either be moved to a different section, or alternatively it be replaced with a different diagram that accurately reflects the Government's vision, including its aim to introduce a Housing First approach. We also recommend including explicit reference to the homelessness and housing support systems in the narrative around the vision.

### **Priority Outcomes and Themes**

TasCOSS supports the priority outcomes outlined in 'Our way forward' and identification of the key themes that emerged from consultations.<sup>5</sup> We encourage the adoption of the themes as 'pillars' or 'key principles' (or similar term) to convey the fundamental elements upon which the Strategy is built and supported, with clear alignment of goals and actions under each pillar that will support the achievement of the priority outcomes.

### **Theme One: More homes, built faster**

TasCOSS agrees that more supply is urgently needed to rectify the failure of the housing market in balancing supply with demand in Tasmania. We also agree that a 'diverse private market' must provide

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<sup>3</sup> Ibid., p. 8.

<sup>4</sup> Lawson, J et al. 2018, 'Australia needs to triple its social housing by 2036. This is the best way to do it.' *The Conversation*, November 15, [Australia needs to triple its social housing by 2036. This is the best way to do it \(theconversation.com\)](https://theconversation.com/australia-needs-to-triple-its-social-housing-by-2036-this-is-the-best-way-to-do-it).

<sup>5</sup> Ibid., pp. 10-13.

some of this supply including infill developments and ‘medium-to-higher density housing developments.’<sup>6</sup>

We are concerned about the following passage:

We are committed to delivering 10,000 social and affordable homes by 2032, primarily through the construction of new residential dwellings or prefabricated modular homes, **but also through land release and the conversion of existing dwellings into affordable residential homes.**<sup>7</sup>

Our understanding of the Government’s commitment is the construction of 10,000 new homes to be used as social and affordable housing. However, we are concerned the Draft Strategy indicates this number may include lots of land or the conversion of existing properties. While we are supportive of these measures, we do not expect them to substitute for the construction of the 10,000 new dwellings to address Tasmania’s urgent housing crisis.

The Draft Strategy must therefore be explicit that the commitment to 10,000 homes is new or additional social and affordable dwellings/stock and not inclusive of lots of land, acquisition and conversion of existing dwellings. We also seek a commitment to the publication of details in relation to the projected number of dwellings vs lots, acquisitions and conversions.

Under ‘Property upgrades’ we also seek clarification that where social housing titles are transferred to affordable home ownership, that housing will be replaced.<sup>8</sup> If not, Tasmania will continue to see a reduction in its total social housing stock. We also seek clarification about the anticipated condition of the transferred properties — if they are being transferred because they are older and poor quality, they are unlikely to be affordable once they have been upgraded to a habitable condition.

We are otherwise broadly in agreement with the objectives under Theme One.<sup>9</sup>

### **Theme Two: Affordability in the private market**

While TasCOSS broadly agrees with the objectives and ideas outlined in this section, more clarity is needed in relation to particular policies or concepts.

We agree that ‘Government policy levers, such as taxes and subsidies, should promote housing affordability’.<sup>10</sup> The Draft Strategy does not go on to list or detail which taxes, subsidies or proposals should be supported — we strongly recommend the Government commit to working with local councils to introduce a vacant property/disused building/vacant residential land tax/rates levy.

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<sup>6</sup> Ibid., p. 22.

<sup>7</sup> Ibid., p. 23 (emphasis added).

<sup>8</sup> Ibid., p. 23.

<sup>9</sup> Ibid., p. 26.

<sup>10</sup> Ibid., p. 28.

When considering any policy lever, incentive or initiative designed to provide greater options for ‘affordable housing,’ the focus must be on the needs of low income Tasmanians and population groups that experience marginalisation from mainstream housing initiatives or services.

TasCOSS agrees that a ‘sustainable vacancy rate’ should help to stabilise rents and reduce pressure on household budgets — but there is no qualification of what a ‘sustainable’ vacancy rate is. Housing experts regard a 2.5%-3% vacancy rate as one that strikes the balance between rental returns that provide an incentive to invest, but that also ensures enough supply to keep rents at affordable rates.<sup>11</sup> We recommend the Tasmanian Government work with the housing and homelessness sector, housing experts and other key stakeholders to develop a target for the vacancy rate (either a figure or a range) which guides its interventions (much as the Reserve Bank of Australia has an inflation target that guides its interventions). It should also work with these stakeholders to explore whether targets should be set at regional or local government area level, and assess the vacancy rate for social and affordable housing to support locally-driven responses to house people on low incomes.

TasCOSS supports the objective of bringing more private rentals into the rental market and giving tenants more security and strengthening their rights. We also welcome the review of the *Residential Tenancy Act 1997*, to consider strengthening the rights of renters.<sup>12</sup> We consider this review should be prioritised and undertaken immediately, rather than as a future Strategy action.

The review of the *Residential Tenancy Act* should extend to all legislation governing tenancy in the private rental market and review issues including (but not limited to) the following:

- Security and length of tenure;
- Rent controls;
- Addressing the specific needs of family violence survivors;
- Telecommunications connection;
- Standard Forms and Lease Agreements;
- Laws relating to pets;
- Introduction of alternative dispute resolution pathways for simple tenancy disputes;
- Legislated support for tenancy advocacy services (including sufficient funding for legal representation and casework); and
- Minimum energy efficiency standards.

While we agree affordability in the private rental market is a key issue, we believe there are other barriers to an equal and inclusive private rental market which should be addressed. We are particularly concerned about ongoing discrimination in the private rental market (particularly of groups already experiencing marginalisation). As per our feedback to the Discussion Paper, we strongly recommend the Government also introduce measures to promote inclusive and non-discriminatory practices by landlords and/or private real estate agents — this could include standardised compliance mechanisms

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<sup>11</sup> AHURI is conducting research on the methodology for determining rental vacancy rates and how they can be used to inform policy. For more information, see [AHURI NHRP 2024 Research Agenda](#).

<sup>12</sup> *Tasmanian Housing Strategy Exposure Draft*, p. 30.

for real estate agencies and database operators, the development and delivery of cultural awareness training for the sector, and targeted programs to train and recruit property managers from diverse backgrounds.

### **Theme Three: People at the centre**

TasCOSS endorses the objectives under this theme, particularly:

- Committing to a Housing First approach to homelessness;
- A focus on the housing and homelessness workforce;
- The acknowledgement of the importance of social and affordable housing as essential social infrastructure;
- Recognition of the need to embed the voices of lived experience in housing system design and delivery; and
- The recognition of the particular housing needs of some population groups, as well as additional barriers to safe, secure and affordable housing they may face.

TasCOSS believes the population groups with particular housing needs (identified via a weblink in the Draft Strategy) should be included in the final Strategy main document, and specific reference should be made to the safety needs of unaccompanied homeless children and young people. This will ensure the needs of those in the most vulnerable housing circumstances remain a focus of the Strategy.

We also recommend the Strategy refer to the importance of expert system advocates such as Shelter Tasmania, which as the peak body for housing and homelessness services provide an essential voice for the sector and advise Government with expert-informed policy and implementation advice.

Regarding the focus on the housing and homelessness workforce, we recommend the Strategy and action plans also address vicarious trauma. There is emerging evidence of the pervasive impacts of vicarious trauma for frontline workers, which not only affects individual wellbeing and performance, but also has significant impacts on organisations as a whole, including the ability to attract and retain staff.<sup>13</sup>

### **Theme Four: Local prosperity**

TasCOSS welcomes the Draft Strategy's acknowledgment of housing needs in Tasmania's regions.

We also support the Draft Strategy's commitment to explore how to better balance the benefits and impacts of short-stay accommodation. However, given the critical lack of affordable housing, TasCOSS believes the Strategy should include stronger commitments to immediate actions. We reiterate our calls for the Tasmanian Government to take urgent action to address the harmful impacts of short-stay accommodation on housing availability and affordability. These actions could include amending the State Planning Provisions to make visitor accommodation a 'discretionary use' in residential zones to prevent more whole homes from leaving the private rental market for the short-stay accommodation sector, as well as introducing a cap on the number of nights and occupancy taxes on short-term rentals.

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<sup>13</sup> [AHURI NHRP 2024 Research Agenda](#); Robinson, C 2022, *Bigger, Better Stronger: Responding to the Mental Health Care Needs of Unaccompanied Homeless Children in Tasmania*, Anglicare Tasmania, pp. 60-63.

We also believe establishing a target vacancy rate (described above) would help the Government to determine how to more effectively balance the benefits of short-stay accommodation with community needs, which may fluctuate with other factors (for example, tighter controls of short-stay accommodation may be required when the vacancy rate is less than 2.5%).

### **Implementation**

TasCOSS agrees the Strategy must be ‘monitored and reported on publicly.’<sup>14</sup> The Draft Strategy also states the Strategy will be ‘re-issued’ to ensure it is informed by the most up-to-date data. We also agree a ‘robust reporting and governance process’ is needed to oversee the implementation of the Strategy. We believe some of this detail should have appeared in the Strategy and therefore recommend the inclusion of the following:

- The governance framework;
- A mechanism (possibly the governance framework) to ensure the Strategy is truly embedded across every agency, and every relevant agency contributes to the delivery of the Strategy by considering housing in policy development;
- Reporting mechanisms and timeframes; and
- How often the data will be reviewed and the Strategy re-issued.

TasCOSS would also like to see the inclusion of concrete timeframes for the development of action plans, as well as detailed information about how the community services industry — identified in the Draft Strategy as a key partner in the delivery of the Strategy — will be engaged in the development of these plans.

### **Related initiatives**

TasCOSS recommends the following documents be included as related initiatives:

- Housing Connect reform;
- U16 Youth Homelessness Framework;
- Whole of Government LGTBIQA+ Framework and Action Plan (both under development);
- Youth Justice Blueprint;
- Tasmanian Planning Scheme; and
- Changes to the Tasmanian Planning Scheme.

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<sup>14</sup> *Tasmanian Housing Strategy Exposure Draft*, p. 38.



## Recommendations

1. The Strategy makes explicit:
  - The delivery of 10,000 social and affordable homes is new dwelling/housing stock and does not include lots of lands and/or acquisition and conversion of existing dwellings;
  - The projected contribution to each category of dwellings, lots, acquisition and conversions; and
  - Whether social housing stock transferred to private ownership will be replaced and the anticipated condition of the transferred stock.
2. The Strategy Vision acknowledges the rights of all Tasmanian to adequate housing.
3. The Strategy Vision includes explicit reference to the homelessness and housing support system.
4. The Strategy acknowledges the key role of government in meeting the social and affordable housing supply shortfall.
5. The title of *Figure 1: The Housing System* is changed to 'The Housing Continuum' and moved to a more appropriate section of the Strategy.
6. Key themes are adopted as 'Pillars', with goals and actions under each pillar clearly aligned to the priority outcomes.
7. Tasmanian Government commits to work with local councils to introduce a vacant property/disused building/vacant residential land tax/levy.
8. Policy levers, incentives or initiatives designed to provide greater options for affordable housing are focused on the needs of low income Tasmanians and population groups experiencing marginalisation from mainstream housing initiatives or services.
9. Tasmanian Government work with the housing and homelessness sector, housing experts and other key stakeholders to develop a rental vacancy target to guide Strategy actions, and explore whether targets should also be developed at regional or local government area.
10. The review of the *Residential Tenancy Act 1997* be prioritised and undertaken immediately.
11. Tasmanian Government introduce measures to promote inclusive and non-discriminatory practices by landlords and/or private real estate agents in the private rental market.
12. The Strategy includes discussion of the population groups requiring additional support to access and maintain housing and include reference to the safety needs of unaccompanied homeless children and young people.

13. The Strategy references the essential role of expert system advocates in design and delivery of housing in Tasmania.
14. The Strategy include reference to housing and homelessness workforce needs around vicarious trauma.
15. Tasmanian Government amend the State Planning Provisions to make visitor accommodation a 'discretionary use' in residential zones and a cap on the number of nights and occupancy taxes on visitor accommodation.
16. The Strategy includes:
  - The governance framework;
  - A mechanism (possibly the governance framework) to ensure government agencies contribute to the delivery of the Strategy by considering housing in policy development;
  - Reporting mechanisms and timeframes;
  - How often the data will be reviewed and the Strategy re-issued.
17. The 'Related initiatives' includes:
  - Housing Connect reform;
  - the U16 Youth Homelessness Framework;
  - Whole of Government LGTBIQA+ Framework and Action Plan (both under development);
  - Youth Justice Blueprint; and
  - Changes to the Tasmanian Planning Scheme.

## Appendix A

### Comparative analysis of the Draft Strategy and TasCOSS's Submission on Tasmanian Housing Strategy Discussion Paper

General	
<p><b>Includes measures to meet the needs of the homelessness and housing support sectors.</b></p>	<p>The Draft Strategy highlights the need for 'an appropriately trained and resourced housing and homelessness sector workforce and wrap around services'.<sup>15</sup> It acknowledges there is an increased demand for homelessness and housing support services, and the Government commits to supporting organisations, 'to attract and retain a skilled housing and homelessness sector workforce'.<sup>16</sup> The Draft Strategy also recognises the need to address housing to also support further needs of individuals and communities — for example, in relation to health and wellbeing, the Draft notes that, '[h]igh-quality, well-located housing can improve the health and wellbeing of Tasmanians and results in lower costs to the community and reduced government health and community services expenditure.'<sup>17</sup></p>
<p><b>Refers to a 'housing system' rather than a 'housing market'</b></p>	<p>The Draft Strategy refers to both the 'housing market' and the 'housing system'</p>
<p><b>Refers to housing market 'failure' rather than housing market 'challenges'</b></p>	<p>The Draft Strategy does not use the term 'failure' or recognise that the current housing crisis represents a failure of multiple intersecting systems (including the housing system) to adequately meet the needs of Tasmanians.</p>
<p><b>Makes clear how progress is to be monitored, measured and reported, with clear actions, targets, and timeframes</b></p>	<p>Although the Draft Strategy states progress on the Strategy will be 'monitored and reported on publicly',<sup>18</sup> and that the Government will set 'ambitious targets',<sup>19</sup> the Draft Strategy doesn't contain any detail about actions, targets or timeframes. We assume these will be included in the action plans to be developed once the Strategy is finalised.</p>

<sup>15</sup> p. 16.

<sup>16</sup> p. 33.

<sup>17</sup> p. 18.

<sup>18</sup> P. 38.

<sup>19</sup> p. 38.

<p><b>A medium-term target is set for 10% of residential dwellings in Tasmania to be social housing</b></p>	<p>Although the Draft Strategy recognises increased demand for social housing,<sup>20</sup> there are no specific targets included. TasCOSS would like to clarify that the promised 10,000 social and affordable homes (to be delivered by 2032) will be new construction — the Draft Strategy refers to other strategies such as land release, the conversion of existing dwellings and property upgrades in relation to existing social housing stock.<sup>21</sup> While some of these initiatives are welcome, we also stress the importance of continuing to replace existing social housing stock and ensuring that there is adequate supply of social housing to meet demand.</p>
<p><b>Includes references to other government agencies, strategies and frameworks that impact on the housing system</b></p>	<p>The Draft Strategy includes a list of both related initiatives<sup>22</sup> and further coordinated strategies<sup>23</sup> — this should also include the LGBTIQ+ Action Plan, the Youth Justice Blueprint and the Tasmanian Planning Scheme</p>

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<sup>20</sup> For example, see p. 15.

<sup>21</sup> p. 23.

<sup>22</sup> P. 40.

<sup>23</sup> p. 42.

Affordability	
<p><b>Defines affordable housing and social housing, and uses the terms appropriately throughout the Strategy and in all associated documents and communications</b></p>	<p>Although the Draft Strategy includes a definition of both these terms,<sup>24</sup> it doesn't contain a nuanced exploration of what 'affordable housing' means (defined as 'housing designed to cater for people of all ages and abilities.')</p> <p>As outlined above, the Draft Strategy also seems to distinguish between 'social housing' and 'affordable housing' in relation to some of the proposed initiatives — for example, upgrades to existing 'social housing' stock to create more 'affordable home ownership opportunities,' without specifying whether these opportunities will be targeted towards those on low incomes. We recommend that any incentives or initiatives designed to provide greater options for 'affordable housing' focus on the needs of low income Tasmanians, or groups who are currently experiencing marginalisation from mainstream housing initiatives or services.</p>
<p><b>Includes an explicit focus on those groups who are currently unable to have their housing needs met, and/or whose housing needs are most acute</b></p>	<p>The key provisions in the Draft Strategy addressing those with acute or unmet housing needs is the 'Housing First' approach, explained as 'a guiding principle that responds to homelessness by providing housing that is not conditional on addressing a person's social, health and wellbeing issues... [building] on the legislative principle that housing is a fundamental right.'<sup>25</sup> The objectives for the theme 'People at the Centre' also highlight the need to focus on those who are experiencing (or most likely to be experiencing) housing vulnerability, with '[p]rioritising delivery of and access to housing for Tasmanians who need support' listed as an objective.<sup>26</sup></p> <p>The Draft Strategy refers to the Homes Tasmania document <a href="#">Housing Support for</a></p>

<sup>24</sup> Glossary at 44-47.

<sup>25</sup> p. 10.

<sup>26</sup> p. 35.

	<p><a href="#"><u>Tasmanians in Need</u></a> to outline measures for specific cohorts who experience unique barriers to housing. TasCOSS welcome this focus.</p>
<p><b>Includes measures to prevent homelessness and to attain and retain secure, safe and affordable housing</b></p>	<p>The Draft Strategy acknowledges the need for programs/initiatives to prevent homelessness in a wide range of circumstances, and to prioritise early intervention.<sup>27</sup> No initiatives or programs are mentioned other than the Housing First approach (as outlined above), although the Government does also confirm the need for an adequately resourced, trained and staffed homelessness support sector (which should also include community organisations more broadly). Presumably other actions will be included in the subsequent action plans.</p>
<p><b>Endorses a 50% increase in Commonwealth Rent Assistance (CRA) and addresses cost-shifting resulting from inadequate federal funding</b></p>	<p>The Draft Strategy states that the Tasmanian Government ‘will continue to work with the Australian Government to provide appropriate levels of rent assistance for those who need it most, and to consider national taxation settings that affect housing.’ There is no explicit mention of the Tasmanian Government advocating for or endorsing an increase to CRA, increased federal funding (for example, for relevant community organisations), or federal policies such as negative gearing.</p>
<p><b>Outlines sustained investments in new social housing to achieve 10% target</b></p>	<p>Increasing private investment (including in social housing) is a priority outcome in the Draft Strategy, which also acknowledges it is likely that ‘demand for social housing will continue to grow unless the private sector is encouraged to invest in and deliver quality housing supply, including affordable dwellings, long-term private rentals and medium-density ‘missing middle’ infill development that maximises our existing social and economic infrastructure.’ The Draft Strategy also lists ‘diverse types of housing’ and ‘new housing models’ as priority outcomes,<sup>28</sup> which could — we say <i>should</i> — include models for social housing. However, no</p>

<sup>27</sup> p. 16.

<sup>28</sup> p. 13.

	concrete targets are included in the Draft Strategy.
<b>Considers an affordable private rental incentive scheme</b>	'Investigating new ways to increase affordable rental opportunities' is one of the objectives outlined in the Draft Strategy (which could include an affordable private rental incentive scheme). <sup>29</sup>
<b>Government and the home finance sector work with people experiencing barriers to home ownership to design more affordable home lending products</b>	Although 'affordability in the private market' is one of the key themes of the Draft Strategy, <sup>30</sup> collaborative projects or initiatives to promote or increase home ownership are not included in the Draft Strategy.
<b>Grants of suitably-located public land or financial co-contributions for the additional social housing dwellings</b>	The 'strategic release of land for development' is mentioned throughout the Draft Strategy, <sup>31</sup> and '[f]acilitating opportunities for faster release of land by Government and the private sector for residential development' is one of the objectives. <sup>32</sup> Initiatives involving financial co-contributions are not included in the Draft Strategy, although 'more private investment' is one of the priority outcomes. <sup>33</sup>
<b>Regulates rent increases</b>	This is not explicitly explored in the Draft Strategy, although consideration of rent caps could potentially be included in the proposed review of the <i>Residential Tenancy Act 1997</i> ('the RTA'), as outlined further below.
<b>Ceases the use of first home owner grants and stamp duty concessions</b>	Apart from a reference to 'land tax and stamp duty reforms' in the introduction from the Premier, <sup>34</sup> these are not explored in the Draft Strategy (and no further detail is provided in relation to any proposed reforms).
<b>Tasmanian Government takes responsibility for identifying and enforcing breaches of the <i>Residential Tenancy Act 1997</i> at least until the rental market eases</b>	This is not explored in the Draft Strategy, although it does refer to reviewing the RTA.

<sup>29</sup> p. 30.

<sup>30</sup> p. 28.

<sup>31</sup> p. 8, 13, 23 and 26.

<sup>32</sup> p. 26.

<sup>33</sup> p. 12.

<sup>34</sup> p. 6.

<p><b>A comprehensive review of the <i>Residential Tenancy Act 1997</i> is undertaken</b></p>	<p>The Government has committed to reviewing the RTA in the Draft Strategy.<sup>35</sup> Whilst TasCOSS strongly supports this view, we seek further clarification or details in relation to how the review be centred and conducted to ‘strengthen the rights of renters’ and create ‘improvements for social housing tenants,’ as outlined.</p>
<p><b>Expands the power of the Residential Tenancy Commissioner to conduct mediation or conciliation of disputes for residential tenants</b></p>	<p>This is not explicitly considered in the Draft Strategy. As mentioned above, the Draft Strategy does recognise the need for legislative review, but doesn’t include specific information/recommendations about what changes are likely to be needed. The role of the Residential Tenancy Commissioner is governed by provisions in the RTA so a comprehensive review of that legislation could also include a review of the powers of the Commissioner.</p>
<p><b>Measures to reduce discrimination in the private rental market</b></p>	<p>Although ‘reducing rental vulnerability’ is identified as a priority outcome,<sup>36</sup> increasing fairness and transparency in relation to the rental market is not outlined as an objective (and discrimination in rental applications/experience of renting is not acknowledged). The term ‘rental vulnerability’ seems to refer only to financial vulnerability in this instance without including broader considerations of who may be vulnerable in the rental market and why.</p>

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<sup>35</sup> p. 13.

<sup>36</sup> p. 13.



<b>Supply</b>	
<b>Considers an ‘empty homes tax’</b>	This is not explored in the Draft Strategy.
<b>Limits on whole homes on the short-stay accommodation market</b>	The Draft Strategy recognises ‘the importance of ongoing monitoring and exploring options’ to balance the impact of the short-stay accommodation market on the housing system, <sup>37</sup> but does not include any information about which options the Government will be considering.
<b>Introduces inclusionary zoning</b>	This is not explored in the Draft Strategy.
<b>Incentives to end land banking</b>	Apart from a reference to ‘land tax’ in the introduction from the Premier, <sup>38</sup> incentives to discourage the purchase and/or retention of land for investment is not explored in the Draft Strategy.
<b>Incorporates planning principles outlined in the Planning Institute of Australia’s national guide to planning, Healthy Spaces and Places</b>	Some of the planning principles we outlined in our submission have been referenced in the Draft Strategy — for example, the Draft Strategy recognises that ‘transport has a substantial impact on liveability and affordability’, <sup>39</sup> and ‘has flow-on effects to other social factors, such as community participation and the ability of households to maintain active lifestyles of housing.’ <sup>40</sup> Liveability is also defined in the Draft Strategy and included as a priority, with the Draft Strategy recommending ‘higher density living in our cities, community centres and along public transport corridors that increase affordable housing close to services, community infrastructure, utilities and employment.’ ‘Social infrastructure’ is also included as a priority outcome. <sup>41</sup>
<b>Accelerates re-zoning for affordable and social housing alongside community education about the benefits of mixed housing developments</b>	The Draft Strategy acknowledges the Government should play a role in developing and maintaining inclusive communities (defined in the Draft Strategy as communities that are, ‘welcoming to diverse groups of people,

<sup>37</sup> p. 36.

<sup>38</sup> p. 6.

<sup>39</sup> p. 18.

<sup>40</sup> p. 19.

<sup>41</sup> p. 34.

	<p>including, but not limited to, seniors, youth, children, Aboriginal Peoples, immigrants and newcomers, persons with disabilities, people experiencing mental health challenges, and low income populations’.)<sup>42</sup> The planned action plans will need to include targets and actions relating to community education and funding organisations to develop/deliver programs or campaigns. The ‘increased pace of rezoning’ is mentioned as a strategy for regional Tasmania in the section relating to ‘local prosperity,’ although no detail is included.<sup>43</sup></p>
<p><b>Government works with relevant sectors to better plan housing responses to increased migration</b></p>	<p>Although population increases are explicitly acknowledged in the Draft Strategy,<sup>44</sup> there is no reference to any plans or initiatives to respond to the diverse needs created through increased migration (both domestic and international).</p>

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<sup>42</sup> p. 45.

<sup>43</sup> p. 36.

<sup>44</sup> p. 14.

<b>Sustainability</b>	
<b>Apply principles of universal design, liveable housing design and community co-design to new and existing housing supply</b>	These principles are not explicitly explored in the Draft Strategy, although innovative design, high-quality housing and new housing models are recommended throughout. <sup>45</sup>
<b>Improves energy efficiency of new and existing homes by investing in household energy efficiency upgrades, adopting 7-star energy ratings for new housing by 2023 and introducing mandatory minimum efficiency standards for rental properties</b>	The Draft Strategy acknowledges the need for housing stock to be energy efficient, <sup>46</sup> which includes upgrades to existing properties. <sup>47</sup> We will call on the action plans to include concrete actions and targets in relation to energy efficiency, for new builds and renovations/upgrades.
<b>Investments to improve disaster and climate resilience</b>	Although disaster resilience is not explicitly mentioned, the Draft Strategy does highlight the need for ‘increased quality, higher performance and greater housing diversity and resilient settlements that resist and respond to extreme events,’ <sup>48</sup> and ‘housing that is responsive to the impacts of climate change.’ <sup>49</sup>
<b>Develops policies and measures to support people to adapt, cope and recover from disasters and extreme weather events.</b>	This is not explicitly explored in the Draft Strategy.

<sup>45</sup> For example, see p. 12, 13 and 24.

<sup>46</sup> p. 13.

<sup>47</sup> p. 23.

<sup>48</sup> p. 24.

<sup>49</sup> p. 19.