



**TASMANIAN HOUSING STRATEGY DISCUSSION PAPER**  
**SHELTER TAS SUBMISSION, OCTOBER 2022**



GPO Box 848 Hobart Tasmania 7001 | [www.sheltertass.org.au](http://www.sheltertass.org.au)

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Shelter Tas welcomes and supports people of diverse genders and sexual orientations.

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# *Shelter Tas submission to the Tasmanian Housing Strategy Discussion Paper*

## **About Shelter Tas**

Shelter Tas is lutruwita/Tasmania's peak body for housing and homelessness services. We are a not-for-profit peak organisation representing the interests of low to moderate income housing consumers, Community Housing Providers and Specialist Homelessness Services across Tasmania. The sector we represent directly employs about 900 people. Shelter Tas provides an independent expert voice on housing rights and a link between the Tasmanian government and the community through consultation, research and policy advice. We work towards a fairer and more just housing system. Our vision is for affordable, appropriate, safe and secure housing for all Tasmanians and an end to homelessness. Shelter Tas is a member of National Shelter, and also represents the Community Industry Housing Association (CHIA) in Tasmania. All Tasmania's Specialist Homelessness Services and registered Community Housing Providers are members of Shelter Tas.

## **Our submission**

Thank you for the opportunity to provide feedback to the *Tasmanian Housing Strategy Discussion Paper*. The development of the *Tasmanian Housing Strategy* (the *Strategy*) is a significant opportunity to take a longer-term view of the well-documented and chronic shortage of affordable homes in Tasmania, that leads to many Tasmanians living in housing stress and crisis.<sup>1</sup> The development of the *Strategy* is also timely, as it coincides with opportunities to align with Federal directions (including the new *National Housing and Homelessness Plan* and new *Housing Accord*).<sup>2</sup>

As a peak body affiliated with several national organisations Shelter Tas sees it as being important to find consistencies between this *Strategy* and the opportunities to work in partnership with both the State and Federal Governments. Tasmania can show leadership as a state that has a well-developed housing assistance system (through Housing Connect 2.0) and a mature and expanding community housing sector, which manages the highest proportion of social housing of all States and Territories. For example, with the Federal Government's increased housing focus there may be opportunities to work in partnership to immediately extend NRAS subsidies in Tasmania, justified by population pressure and housing need. A further option is to provide capital funding to subsidise the purchase of NRAS properties by Community Housing Providers.

We appreciate that there will be further consultation on the *Strategy*, and we note that we have already provided substantial feedback to an earlier draft of the *Discussion Paper*.<sup>3</sup> Shelter Tas, as peak body for housing and homelessness, looks forward to assisting with the policy development and action plans that accompany the *Strategy*. We note also that there is significant opportunity to

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<sup>1</sup> Shelter Tas Submission to the State Budget Process 2021-22 <https://sheltertass.org.au/shelter-tas-submission-to-the-state-government-budget-process-2022-23/>

<sup>2</sup> [https://budget.gov.au/2022-23-october/content/factsheets/download/factsheet\\_housing.pdf](https://budget.gov.au/2022-23-october/content/factsheets/download/factsheet_housing.pdf)

<sup>3</sup> This earlier submission is included as an Appendix.



show leadership through the *Strategy* that aligns with the Federal Government agenda of a gender-responsive housing strategy, as outlined in the 25 October 2022 Federal Budget.<sup>4</sup>

The *Strategy* needs to outline a crisis response to address urgent housing need across Tasmania as well as setting medium and long-term goals, such as the pipeline of construction commencing in 2024. We also recommend an expert model and evaluation framework to review new programs and innovative models to avoid unintended consequences, unforeseen costs and to ensure quality outcomes for tenants.

## Methodology: Previous work and recent Consultation with our members and stakeholders

Shelter Tas' previous work includes submissions to State Budget Processes, consultations on the legislation for the new *Homes Tasmania*, our previous contribution to the *Draft Discussion Paper for the Tasmanian Housing Strategy*, submissions on the *Tasmanian Women's Strategy*, and numerous submissions on *Tasmania's Planning System*.<sup>5</sup>

In addition, as the peak body Shelter Tas has undertaken substantial recent consultation with the housing and homelessness sector in preparing this response to the *Tasmanian Housing Strategy Discussion Paper*. Our membership includes all the Specialist Homelessness Services and Community Housing Providers across all regions of Tasmania. Shelters, Community Housing Providers and Housing Connect services were all well represented in our consultations. We appreciate our members sharing their time and expertise to inform our consultation process. We also consulted with our network of state and national Shelter organisations, and held targeted consultation with our Policy Committee (where sixteen organisations are represented from all regions of the State) and with Community Housing Providers through our role as the Community Housing Industry Association (CHIA) Tasmania lead organisation.

Themes from our previous work and consultations are summarised below. In the remainder of this submission, we address relevant questions from the *Discussion Paper*.

## Themes from Shelter Tas Consultation

### Positive about the *Strategy* and new Supply

In general, the sector was positive about the development of the twenty-year *Tasmanian Housing Strategy*. The *Strategy* presents an important opportunity to make a real difference for Tasmanian households who are struggling in the current challenging housing environment. The sector welcomes the focus on building additional supply of new affordable and social housing, and the additional 10,000 affordable homes to be delivered (starting 2024). This will help address the chronic shortage of affordable rental options across Tasmania, as the private rental market is failing to deliver these much-needed homes. In addition, Tasmania needs to boost social housing supply to at least 10%

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<sup>4</sup> <https://shelertas.org.au/shelter-tas-submission-to-the-consultation-on-the-draft-housing-tasmania-bill-2022/>

<https://shelertas.org.au/shelter-tas-submission-to-the-draft-tasmanian-womens-strategy-april-2022/>

<sup>5</sup> <https://shelertas.org.au/resources/papers-and-reports-2/>



affordable and social housing to alleviate the housing crisis in Tasmania and meet current and emerging needs.

There is need, however, to address the current crisis as well as achieve long-term sustained increases in affordable housing supply. There is an urgent requirement for housing solutions, especially for Tasmanian renters and those at risk of homelessness in the short and medium term, while waiting for the pipeline of new construction to be delivered. Innovative options, including shop-top accommodation and vacant buildings (especially vacant residential premises), can help to address the current crisis by identifying and better using existing properties.

The combination of population growth, low vacancy rates and infrastructure programs in the pipeline requiring a workforce will all continue to impact the sustainability and availability of existing tenancies. Rising mortgage costs will also impact households with high levels of mortgage debt and low-middle incomes, and some very likely will fall out of home ownership.

Analysis by the Tenants' Union of Tasmania suggests that there are currently around 9,000 vacant properties across Tasmania that are potential homes for Tasmanians needing a place to rent.<sup>6</sup> There are opportunities to develop innovative ways to encourage owners to make these homes available for rent, especially for people on lower incomes who are priced out of the current competitive private rental market. Other methods are also required to address the needs of particular cohorts or particular locations. For example, there is an extreme shortage of larger family homes of 4-5 bedrooms available for rent. Our consultations around the state noted that when these homes cannot be found, families are left stranded in unsuitable accommodation or need to stay in shelters for extensive periods of time because there is nowhere else to go.

#### People who need support to obtain and sustain their housing

Support for people who need it is essential to achieve the outcomes from the *Strategy*. This was a major theme from our consultation with the housing and homelessness sector, alongside the need for capital investment to significantly increase the supply of new affordable rental homes. The support people need to obtain and maintain safe and secure affordable housing was identified as a gap in the *Discussion Paper* and **should have its own Focus Area in the *Strategy***. As the Productivity Commission's Report into the National Housing and Homelessness Agreement (*In Need of Repair*) notes:

Sustainability has a number of dimensions, including **to support people to maintain housing over time**, provide accessibility for people with disability and support social, and cultural and environmental wellbeing.<sup>7</sup>

There is currently an unprecedented level of demand for assistance from Specialist Homelessness Services and other support services providing wellbeing assistance (such as mental health services and family support services). Our consultation identified the critical importance of increasing the availability of intensive, ongoing support to households across all tenures to help them exit from homelessness and/or sustain their housing outcome. An immediate intensification of support

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<sup>6</sup> See Submission from the Tenants' Union of Tasmania to this consultation.

<sup>7</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness-overview.pdf> (P3 emphasis added)



services to sustain housing outcomes could improve continuity of care from homelessness to sustaining a tenancy. There is also a critical need to enhance the support system ahead of potential extreme weather events and other economic or social pressures so that vulnerable households can be identified and assisted proactively.

Some people only need assistance to access the bricks and mortar of a home, others need to develop skills or need ongoing or intermittent support to manage complex issues. Some older tenants may need assistance to remain at home, such as home modifications so they can age in place.

Support directed towards people exiting homelessness, escaping family violence, or being released or discharged from prison or hospital are particularly important; as are supports that improve housing sustainability in domains such as mental health, substance use, hoarding and squalor, complex family needs, community connection, economic participation and resolution of legal issues, including debt. In addition, providing support in existing social and affordable housing environments can reduce conflict and support social sustainability and harmony.

#### Early Intervention and Prevention

Prevention of homelessness and early intervention to keep people safely housed are cost-effective interventions, as well as enabling people to maintain wellbeing, social participation and the ability to avoid the shock and trauma of homelessness and housing stress.

Prevention of homelessness and early intervention includes the necessary support that will mean people do not end up homeless either by losing their home (for example, because rent becomes unaffordable) or because there is nowhere to go when they leave an institution such as hospital, prison or out of home care.

Early intervention can prevent surging demand for crisis support by working with people to sustainably exit homelessness, and to stabilise the circumstances of people whose housing is at risk of failure. A major goal is to ensure that people with tenancies and housing do sustain that housing.<sup>8</sup> This will improve wellbeing for people and reduce demand on crisis and emergency services.

#### Quality, amenity and liveability of homes

The quality and liveability of new homes is important, especially for people living on low incomes, because for many households energy costs are second only to the cost of renting. The Discussion Paper notes that new homes need to be resilient to changing environments and must incorporate energy efficiency standards. The consultations by Shelter Tas echoed and reinforced this consideration about the quality of buildings, and included considerations such as adequate storage within homes and using trauma-informed design principles to ensure homes are safe for women and children who are escaping from family and domestic violence. Digital inclusion was also raised, noting that NBN connection could be a standard part of new builds (just the same as electricity connection).

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<sup>8</sup> See discussion above of the need to include support as a Focus Area in the *Strategy*.



### Inclusive development and social license

Resolving Tasmania's housing crisis will take a whole of community response. In our consultations two themes were identified:

- (1) *The potential to build longer term community assets as part of the social value of major infrastructure projects.* Large employers for specific infrastructure projects - such as the Bridgewater Bridge, windfarms and hospital redevelopments - and proposals such as the mooted UTAS relocation in Hobart, along with large scale tourism projects, can place high demand on local housing. Sector experts identified opportunities to encourage or require developers and large employers to contribute to addressing Tasmania's housing crisis. It was noted that organisations with large amounts of previously public land, such as UTAS, need to make a fair contribution to addressing housing need. Development of for-profit housing on previously public land, which yields a financial windfall, needs to be balanced with the social licence for the organisation to operate in a community where the housing need is dire.
- (2) *Addressing community attitudes to housing diversity and density.* There is increasing awareness in the community about the housing crisis as it affects more and more Tasmanians. It is timely for the *Strategy* to initiate a community education program to support better housing outcomes for all Tasmanians and address outdated NIMBY objections.<sup>9</sup> Changing the NIMBY (Not in My Backyard) mindset to YIMBY (Yes in My Backyard) requires a positive campaign to showcase the benefits of an inclusive community where people from all walks of life can share a healthy vibrant neighbourhood. Shelter Tas recommends committing resources to form a consortium of key agencies to work on building community support for housing diversity, including higher density development, social and affordable housing.

### The Housing and Homelessness Workforce

To ensure the *Strategy* is successful there is a need to develop a Workforce Growth Strategy for the essential frontline workers who support Tasmanians across the whole scope of housing and homelessness services. The *Strategy* Discussion Paper currently overlooks this area, and we provide more detail in our response to question 2 '*Are there important issues not covered by the focus areas*'. The work of the sector includes engaging with Tasmanians experiencing or at risk of homelessness, tenancy management, specialised support and the Community Housing workforce, as well as the delivery of housing programs and all Housing Connect programs. These workers perform vital roles in keeping all Tasmanians safely and affordably housed. It will be necessary to attract, retain and support workers to build sector capacity for the housing and homelessness workforce throughout the twenty-year life of the *Strategy*, and especially with the growth of the Community Housing sector. Support for capacity building and tailored workforce development (including Shelter Tas' Workforce Development Program) for these specialised skilled workers is essential.

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<sup>9</sup> The *Shelter Tas Submission to the State Budget Process 2022-23* contains a proposal for a grass roots program to change the conversation from NIMBY to YIMBY. <https://shelbertas.org.au/shelter-tas-submission-to-the-state-government-budget-process-2022-23/>



### Regular updating and monitoring of the *Strategy* to maintain relevance and responsiveness

Throughout the life of the *Strategy* ongoing evaluation and continuous improvement will be essential to maintain relevance and responsiveness. This will include independent evaluation and input from housing and homelessness sector experts, people with lived experience, plus desktop data and evidence. Issues will continue to emerge; for example, in recent years Tasmania has experienced population increase beyond what was forecast, unforeseen impacts of short-stay accommodation, increasing inflation and cost of living pressures, and the impacts of the COVID-19 pandemic. The *Strategy* needs to have a systematic 3-5 yearly review to check it is still evidence-based, and to ensure timely responses to emerging issues.

## Detailed Responses to selected *Discussion Paper* Questions

### ❖ Question 1: Should the vision for the *Strategy* include other factors?

The proposed vision is that ***Every Tasmanian has access to safe, secure and affordable housing.***

Shelter Tas recommends that the vision for the *Strategy* also includes reference to housing that meets peoples' needs. The proposed vision does not cover considerations of physical accessibility to and within the home, location, size of home appropriate to household and/or care needs, or proximity to services, transport, education, employment and other social needs.

Suggested wording: ***Every Tasmanian has access to safe, secure, affordable and appropriate housing.***

**OR**

***Every Tasmanian has access to safe, secure and affordable housing that meets their needs.***

### ❖ Question 2: Are there important issues not covered by the focus areas?

***There are a number of important issues not covered by the focus areas.***

The Discussion Paper does not address how the *Strategy* will interact with other government strategies and initiatives at local, state and national levels.

Shelter Tas has long contended that the Tasmanian Government needs to adopt a 'Housing in all Policies' approach so that all major strategies and initiatives are viewed through a housing lens. Policies such as population, and the employment and recruitment of workers in regional areas, clearly have the potential for substantial impacts on housing demand. Major infrastructure developments can create additional demand for homes in the local area from interstate labour or Tasmanians moving to live near the work opportunities. It was suggested that as big projects are planned and designed a 'housing legacy' could be part of the design so that there is worker housing for the construction phase, and the homes remain for other people to use in the long term.<sup>10</sup>

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<sup>10</sup> For a model, see the QShelter *Go for Gold* report on a housing legacy from the upcoming Brisbane Olympic Games <https://thedeck.org.au/wp-content/uploads/2022/07/Go-for-Gold-Legacy-Report-Q-Shelter.pdf>



A housing impact analysis should be undertaken to support the outcomes of strategic State Government initiatives, including:

- Population Strategy
- Tasmanian Women’s Strategy
- Tasmanian Child and Youth Wellbeing Strategy – It Takes a Tasmanian Village
- Child and Student Wellbeing Strategy
- Family and Sexual Violence Action Plan
- Tasmanian Drug Strategy
- Healthy Tasmania Five-Year Strategic Plan
- Tasmanian Planning System Reform Agenda
- Tasmanian Active Aging Strategy
- Mental Health Strategy – Rethink 2020
- Tasmanian Multicultural Policy – Our Multicultural Island Action Plan.

As noted above, there are significant opportunities to find alignment with the *Tasmanian Housing Strategy* and the proposed *National Housing and Homelessness Plan*.<sup>11</sup>

Other important issues not covered by the focus areas include workforce, a gendered analysis of housing need in Tasmania, and the full range of advocacy roles (including peer support and consumer advocacy). Shelter Tas recommends an additional focus area for the housing and homelessness sector workforce, and for advocacy roles.

#### **Housing and Homelessness Workforce:**

As noted by Shelter Tas in our submission to the draft Discussion Paper in July 2022:

The *Tasmanian Housing Strategy* needs to recognise the importance of the workforce providing emergency accommodation, support and tenancy services across the range of housing assistance programs. While this is a smaller sector, the work is as essential as building and construction, and needs specific recognition in the *Discussion Paper* so that it can effectively “outline the strategic direction to address housing-related issues into the future and guide the work of the new Housing Authority.”<sup>12</sup> A professional and trauma-informed workforce to support people who may have experienced family violence and other challenges is a critical part of the successful implementation of the *Strategy*.

The current housing and homelessness sector employs almost 900 people statewide and manages over 9,000 tenancies and approximately 50 specialist homelessness services. In addition, the expansion of the social housing sector by an additional 10,000 dwellings over 20 years will mean expansion of the skilled and professional workforce to support and sustain these tenancies.<sup>13</sup>

The essential frontline workers who support Tasmanians across the whole scope of housing and homelessness services underpin the success of the *Tasmanian Housing Strategy*. The Discussion

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<sup>11</sup> [https://budget.gov.au/2022-23-october/content/factsheets/download/factsheet\\_housing.pdf](https://budget.gov.au/2022-23-october/content/factsheets/download/factsheet_housing.pdf)

<sup>12</sup> *Discussion Paper* p3

<sup>13</sup> <https://shelbertas.org.au/shelter-tas-submission-to-the-consultation-on-the-draft-housing-tasmania-bill-2022/>



Paper currently overlooks this area. The workers in housing and homelessness services deal directly with Tasmanians experiencing or at risk of homelessness, tenancy management and specialised support and the Community Housing workforce, the delivery of housing programs and support, and all Housing Connect programs. These are vital roles in keeping all Tasmanians safely and affordably housed.

Across the twenty-year life of the *Strategy*, it will be necessary to attract, retain and support workers to build sector capacity for the housing and homelessness workforce. Workers will be needed to support growth of the Community Housing sector and the State Government's \$1.5 Billion investment in new social and affordable homes. Support for capacity building and tailored workforce development (including Shelter Tas' specialised workforce development program) for these skilled workers is an essential element of the *Strategy*.

The *Strategy* needs to be informed by the current strengths of the sector workforce as well as the challenges it faces, such as increasing caseload pressures and work intensification, and the uncertainty from significant reforms and changes. The *Strategy* needs to recognise the essential nature of the work of the sector and the imperative to attract, retain and develop skilled and professional workers that are needed in this specialised area.<sup>14</sup>

#### **A gendered analysis of housing need across Tasmania**

The *Tasmanian Housing Strategy* needs a thorough analysis of the housing needs of women and their children. Although the *Tasmanian Women's Strategy* commenced in 2018, in 2022 Tasmania still lacks a specific *housing* strategy for women. Shelter Tasmania recognises housing affordability, family breakdown, family and domestic violence, lower incomes and ageing as particular issues impacting the housing security of women and girls, including all people from LGBTQI+ communities who identify as being part of this cohort.

It is essential to recognise that many women may have a home, but that home is not a safe place to be. This forces women and children into unsafe situations:

Domestic and family violence makes a woman's home the least safe place she can be, and getting to safety often means finding somewhere new to live. But a lack of available social and affordable housing drives many women to return to their perpetrators and the risk of violence, or into homelessness.<sup>15</sup>

Tasmania's worsening housing crisis has disproportionate impacts on women. Data from Tasmania's system of Specialist Homelessness Services shows there were 5,279 unassisted requests from men, and 13,934 unassisted requests from women – more than twice as many. The proposed *Tasmanian Housing Strategy* will need a specific strategic focus on issues around women and housing availability, cost, safety and security.

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<sup>14</sup> This workforce can be seen as the 'Invisible Army' that underpins the construction work of the 'High-Vis Army'.

<sup>15</sup> [http://everybodyshome.com.au/wp-content/uploads/2021/07/EE\\_Women-Housing\\_Domestic-Violence\\_WEB\\_SINGLES.pdf](http://everybodyshome.com.au/wp-content/uploads/2021/07/EE_Women-Housing_Domestic-Violence_WEB_SINGLES.pdf)



## Advocacy

The *Tasmanian Housing Strategy* Discussion Paper has a list of roles and responsibilities on page 8. The list of advocates is incomplete. It does not include any voice of lived experience, nor does it include the key role of systemic advocacy and representation across the housing and homelessness sector (which is the main role of Shelter Tas). These roles are distinct from “advocating on behalf of those in need of housing and homelessness services” and make an essential contribution to the good functioning and continuous improvement of the housing system, providing invaluable intelligence and strategic and risk management policy advice.

There is a significant opportunity to develop a program to formalise structural support for people with lived experience of housing need and homelessness to ensure their input to system design and ongoing improvements. A proposed program for upskilling and engaging consumer advocates is recommended in the Shelter Tas 2015 Report *A Tasmanian Consumer Engagement Strategy*.<sup>16</sup>

### ❖ Question 3: Are there additional objectives that are important for Tasmanians?

As noted in our submission to the Draft Discussion Paper, the *Strategy* needs to include a pathway towards Aboriginal-owned and led-services, and self-determination across the housing and homelessness sector.

### ❖ Question 4: Are there additional housing outcomes that are important for Tasmanians?

Shelter Tas recommends:

1. A target for the delivery of social and affordable housing that reflects increasing population across the state, e.g. 10% of all dwellings
2. Targets for the reduction of homelessness, such as reducing the number of repeat instances of homelessness presentation at SHS by 50% in five years, and a further 50% in the following five years
3. Specialised attention to women’s housing needs (a gendered lens), especially for women and children escaping family and domestic violence
4. The Productivity Commission’s Report into the National Housing and Homelessness Agreement, *In Need of Repair*, recommends targets for reducing homelessness, expanding early intervention and prevention and Housing First-type responses. Shelter Tas supports these recommendations
5. Stronger focus on consumer engagement and enabling pathways. There is an important opportunity to strengthen consumer representation and roles across the suite of housing and support services, and the entire housing system in Tasmania. Greater investment and cultural change are needed to support participants and enable pathways so that the voices of service users inform the development of the services, policies and practices that will affect their lives. Shelter Tas has long advocated for establishing the Victoria-based Peer Education and Support Program (PESP) in Tasmania, including in a major report by Shelter Tas undertaken in 2015.<sup>17</sup> People with lived experience can also be involved in community education about solutions to housing need and homelessness.

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<sup>16</sup> [https://shelbertas.org.au/wp-content/uploads/2018/12/CES\\_2015\\_NO-BUDGETCOVER.pdf](https://shelbertas.org.au/wp-content/uploads/2018/12/CES_2015_NO-BUDGETCOVER.pdf)

<sup>17</sup> [https://shelbertas.org.au/wp-content/uploads/2018/12/CES\\_2015\\_NO-BUDGETCOVER.pdf](https://shelbertas.org.au/wp-content/uploads/2018/12/CES_2015_NO-BUDGETCOVER.pdf)



## Focus Area One: Affordable Housing

### ❖ Question 5: What additional interventions could governments consider to improve housing affordability?

Housing affordability depends on both the cost of housing and the income of tenants. Shelter Tas supports the increase of Commonwealth Rent Assistance and income support measures, especially for people on the lowest payments, to enable people to live without housing stress.

There is an opportunity to consider the costs and needs of people living in newly constructed homes, such as digital inclusion. For example, NBN connection could be included in new housing stock as is the case for electrical connection and water. This could make a substantial improvement to digital inclusion in Tasmania, with particular education benefits for families with school aged children.<sup>18</sup>

### ❖ Question 6: What scope is there to increase the role of the private and community sectors in improving housing affordability?

The *Strategy* needs to maximise housing supply and deliver the best housing outcomes. A key proven approach is to involve community housing providers as major developers. The inclusion of private investors and large-scale investors, such as superannuation funds, is an important opportunity. Shelter Tas is aware of significant work underway by the national peak body Community Housing Industry Association (CHIA), and can provide more information if needed. This includes work on subsidised housing for key workers.

Shelter Tas notes that community housing providers deliver social housing as a build-to-rent model. We recommend investigating ways to expand this scope to facilitate balanced communities, mixed tenure types, and resilient and diverse neighbourhoods.

It is important to distinguish housing supply that needs a subsidy from supply that does not. All social housing needs a subsidy, because income-based rents from the lowest income earners do not cover the costs of delivering homes and supporting tenants. However, for-profit housing developers do not face this situation, and do not deliver homes for purchase or rent below cost.

As the recent AHURI Report *Private sector involvement in social and affordable housing* states:

Maximising these opportunities to increase new social and affordable housing supply through increased private involvement will require strong policy setting and regulation, efficient procurement processes, and adequate and ongoing 'gap' subsidy from government, particularly to serve those in highest need. Models should emphasise collaboration and partnership across the public, community, and private sectors, to build capacity throughout the housing industry. This collaboration should be guided by rigorous Australian

Government, state and territory government and local government housing strategies. These strategies should identify long term demand for specialist, social, affordable and market housing and articulate clear delivery targets by market segment. These strategies must be underpinned by firm funding commitments and viable delivery mechanisms.<sup>19</sup>

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<sup>18</sup> See for example, the WA digital inclusion project, and recent announcement in the Federal Budget.

<sup>19</sup> <https://www.ahuri.edu.au/research/final-reports/388>



Developing new ways to improve housing supply can include innovative partnerships with Community Housing Providers and the private sector that include cross-subsidy models. However, in order to ensure resources are directed towards homes for people most in need, rather than increasing profits of private developers, private involvement should be viewed as a way of extending rather than replacing the subsidy to public housing low income earners and those with special needs.<sup>20</sup>

Wherever governments are supporting new supply there is a need to manage the risk that these new properties will be diverted to short-stay accommodation rather than be retained as homes for Tasmanians. One possible option is that where any financial contribution is provided by the State Government a covenant or caveat is placed on the title to the effect that it is not to be used for short-stay accommodation until 30 years have passed, or unless the subsidy is repaid. This would ensure that subsidies intended for local residents remain used for that purpose.

Value for money needs to be measured against these programs so that public funds deliver the best outcomes, including mixed developments with both private and social homes. The level of subsidy must support long term outcomes for Tasmanians, and care must be taken that investment in for-profit development does not leave a legacy of increased costs in the longer term.

❖ **Question 8: Noting increased rental prices and decreased rental vacancies across Tasmania, what are some of the ways the challenges in the private rental sector, particularly around security of tenure, could be addressed?**

Renting in the private rental market is no longer just a short-term option. More people are renting for a longer period, but the conditions under the current regulatory system privilege short-term leases and provide little security of tenure for renters. More than 40% of Tasmanian renters spend over 10 years in the rental market. The recent Choice report *Disrupted: the consumer experience of renting in Australia* reveals the lack of consumer protections.<sup>21</sup> Despite paying thousands of dollars each year, tenants face unsatisfactory conditions and are often too afraid to complain. In this context it is crucial to maintain a well-functioning system that protects both tenants and landlords, and enables people who rent their homes to lead healthy, safe, secure and productive lives for the long term.

Across Tasmania insecure conditions and a highly competitive market makes rents more expensive and leads to increased practices of renting out marginal housing (such as informal rooms), overcrowding and sub-standard dwellings.

Shelter Tas calls for a refresh and reset for the regulation of the private rental market. As more people are renting for longer, renting is no longer a transitional tenure. Tasmania has an opportunity to refresh the regulatory and cultural framework for the private rental market to ensure it is better adapted to the contemporary environment. For example, as subleasing and the renting of individual rooms becomes more prevalent in the tight rental market the legal and regulatory system needs to be modernised.

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<sup>20</sup> <https://www.ahuri.edu.au/research/final-reports/388>

<sup>21</sup> <https://www.choice.com.au/money/property/renting/articles/choice-rental-rights-report-dec-2018>



With the *Strategy* Tasmania has an opportunity to align with best national practice on matters such as exemptions from the *Residential Tenancy Act*, pets, and digital rights. The current three-month exemption from the *Residential Tenancy Act* for domestic violence and homelessness shelters needs urgent review. In the current housing crisis compliance is almost impossible, due to the difficulty of finding pathways out of the shelter system and into long-term housing.

In addition, Shelter Tas' consultation revealed widespread concern across the sector regarding barriers for tenants seeking to apply for properties. Requirements, such as police checks that must be renewed after 3 months, are costly and burdensome. It was suggested that the *Strategy* could look at the need to regulate or standardise guidelines for real estate agents, including guidance around inappropriate or intrusive questions. Information requirements for rental applications also raised concerns about privacy and data safety, and whether real estate agencies are safeguarding that information to protect it against hacking or inadvertent disclosure.

Along with the submission from the Tenants' Union of Tasmania, Shelter Tas recommends the following resources to help inform the *Tasmanian Housing Strategy* on rental issues:

- *COVID-19: Rental housing and homelessness impacts in Australia* (UNSW and ACOSS) [https://shelter.org.au/site/wp-content/uploads/Covid-19\\_rental-housing-and-homelessness-impacts-in-Australia-24-Nov.pdf](https://shelter.org.au/site/wp-content/uploads/Covid-19_rental-housing-and-homelessness-impacts-in-Australia-24-Nov.pdf)
- *Unsettled – life in Australia's Private Rental Market* (Choice, National Shelter and National Association of Tenants' Organisations) <https://shelter.org.au/site/wp-content/uploads/The-Australian-Rental-Market-Report-Final-Web.pdf>
- National Shelter's policy paper, which includes ways for Federal and State Governments to work together on housing <https://shelter.org.au/site/wp-content/uploads/National-Shelter-Policy-Positions-FINAL-3.pdf>
- The Constellation Project <https://theconstellationproject.com.au/>
- SHARP proposal from CHIA <https://www.communityhousing.com.au/wp-content/uploads/2020/05/SHARP-Full-Report-1.pdf?x59559>
- *Social housing keeps women safe from family violence, expands economy* (Everybody's Home report) <https://everybodyshome.com.au/report-social-housing-keeps-women-safe-from-family-violence-expands-economy/>
- *Go for Gold* (Queensland Shelter) <https://thedeck.org.au/wp-content/uploads/2022/07/Go-for-Gold-Legacy-Report-Q-Shelter.pdf>

❖ **Question 9: How could the effects of the short-stay accommodation industry on the rental sector be managed into the future?**

Information about the impacts of the short-stay accommodation industry is key to managing it successfully. Shelter Tas is producing a series of independent reports that monitor the impacts of short-stay accommodation, and will make these available to inform the *Strategy* and its implementation plans. The Baseline Report is available at [https://sheltertass.org.au/wp-content/uploads/2022/01/STR-Baseline-Report-June-2022\\_FINAL-combined-files.pdf](https://sheltertass.org.au/wp-content/uploads/2022/01/STR-Baseline-Report-June-2022_FINAL-combined-files.pdf)



The Baseline Report clearly shows there is a need to manage the flow of properties from long-term to visitor rentals, especially for any properties that receive grants or other financial support from the State Government. In particular:

- New dwellings that have received funds from Government should not be converted into short-stay accommodation
- Local Councils should be empowered to limit the use of entire homes for short-stay accommodation where there is a shortfall of homes for local people
- Short-stay accommodation should be included in the Planning System to ensure that any displacement of local homes or loss of amenity can be managed<sup>22</sup>
- A review of the regulation of short stay accommodation, to ensure that the permit system delivers sufficient funds to ensure appropriate monitoring and compliance with permits and exemptions and that local decisionmakers are empowered to make place-based decisions to balance short-stay visitor accommodation with the needs of local workers and residents for appropriate rental accommodation.

## Focus Area Two: Housing Supply

### ❖ Question 10: What must be considered to make sure new housing meets diverse needs into the future?

The *Strategy* requires a thorough housing needs analysis for each Local Government Area of the State. This will include the needs of different cohorts over time, such as members of the Aboriginal Community, women and children, people living with disability, younger tenants, people from migrant and refugee backgrounds, and older people. The analysis needs to include demand for affordable, social and market-priced housing (rent and purchase) with clear targets for each category, underpinned by a funding commitment and delivery mechanism.

In addition, Shelter Tas notes opportunities to:

- Deliver flexible and quality design
- Develop a build-to-rent affordable housing asset class through Community Housing Providers, where all state investment is captured and retained for the long term benefit of Tasmanians in housing need
- Increase funding capacity to spot-purchase properties for particular needs, such as four bedroom homes for larger families. We know from all regions of the state that there is a need for homes for larger families. Consideration could also be made for spot-purchase of motels and larger existing homes capable of modification for diverse needs
- Monitor new evidence for emerging issues.

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<sup>22</sup> <https://shelertas.org.au/shelter-tas-submission-to-the-scoping-paper-for-draft-tasmanian-planning-policies/>



❖ **Question 12: What additional interventions could governments consider to improve housing supply?**

We refer to the Shelter Tas budget submission 2022-23:

Our expert members in the housing and homelessness sector advise us that Tasmania is seeing an increase in both houselessness (people who only need a house) and homelessness (people who require specialised support to help them gain and maintain a safe and stable home). It is important to understand and respond to the different needs of these groups as we strive to achieve safe, secure, affordable and appropriate housing for all, and an end to homelessness.

Our targeted consultation with members, including our annual member survey, has identified particularly urgent gaps for certain cohorts and regions. Addressing these needs will complement and add to the value of the *Tasmanian Affordable Housing Strategy 2015-25*, and *Action Plan 2019-23*. The additional funds needed by these initiatives could be drawn from Housing Debt waiver funds, cost savings, or shared budgets in other areas such as health and justice. The initial cost of increasing the stock of affordable housing and reducing homelessness and housing hardship is an investment that yields economic return in areas such as health, education and social engagement.

Our consultation also identifies positive opportunities for innovative projects and for ways to enhance the private rental conditions experienced by tenants.

**1. *Develop a suite of innovative housing options to meet people's needs and improve use of space through density and infill projects***

In Tasmania's ongoing housing crisis, we need to explore additional ways to address the chronic shortage of affordable rental housing.

The 2019 Report *Towards infill Housing Development* provided to the Department of State Growth notes the "increased demand for well-located, affordable housing within the State's urban centres."<sup>23</sup> The Report also notes:

A lack of affordable housing has the greatest impact on vulnerable groups within society, who are least able to access the private housing market. This includes people on low or fixed incomes and long-term renters. These groups form a high proportion of households across Tasmania. (P 20)

To develop additional innovative housing options in response to Tasmania's ongoing rental crisis, Shelter Tas recommends immediate investment in demonstration projects for new redevelopment and urban renewal projects such as shop-top accommodation. To further

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<sup>23</sup>[https://www.stategrowth.tas.gov.au/data/assets/pdf\\_file/0019/216172/Toward Infill Housing Development.pdf](https://www.stategrowth.tas.gov.au/data/assets/pdf_file/0019/216172/Toward_Infill_Housing_Development.pdf) P3



explore alternatives to traditionally built homes Shelter Tas recommends establishing and facilitating stakeholder groups to explore housing innovations, and identify innovative community-based solutions to housing need, in line with Housing Connect reforms. These forums would include UTAS, LGAT, TCCI, HIA and Master Builders, and would include user perspectives, financing options, and planning pathways towards infill, inclusionary zoning and improved density.

**Recommendation 6a:** *Shelter Tas recommends commissioning a project to re-imagine and revisit new and innovative options to deliver more affordable and well-located housing options, such as shop-top accommodation, retrofit offices and infill housing. Project outputs would include regional forums, a report and recommendations for pilot projects and initiatives.*

**Recommendation 6b:** *Shelter Tas recommends a grant program to fund and showcase well-designed affordable shop-top accommodation, and use of vacant office space or other well-located space targeted at low and moderate income renters and social housing tenants.*

❖ **Question 14: What can be done further to improve planning processes in Tasmania, particularly in the context of the delivery of social and affordable housing and increased density via infill development?**

Good planning is essential to ensure that all Tasmanians can find the homes they need, including facilitating an adequate supply of social and affordable homes. With the current twenty-year *Tasmanian Housing Strategy* (2022-2042) now under development, it is essential to include supporting the construction of social and affordable housing as an urgent priority. This is an opportunity to make an important difference to Tasmania's planning rules.

At present the planning system needs to be modernised to recognise the importance of social housing so that it can be treated as an urgent priority. Recent case studies (which we can supply) show developments have been recommended by local government planning professionals but blocked by elected Councillors. This impedes and slows the building pipeline for much needed social housing, in an environment where housing everyone needs to be a priority for public health as well as people's rights to a safe home.

Affordable housing needs to be included in all new developments, and Tasmania needs an Inclusionary Zoning system to support this. Progress for implementing the system could be staged, but with a mandatory process there can be certainty around requirements and fairness to all involved.

We note that Queensland has a system for approval of public housing developments that does not require development approval from local government.<sup>24</sup> Shelter Tas would be happy to see reforms

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<sup>24</sup> Public housing in Queensland is considered 'accepted development' under the Queensland Planning Act and Planning Regulation. As long as the development is in accordance with the planning scheme it does not require development approval from local government. (See Schedule 6 Part 5 of the Planning Act, proposals for public housing are required to be considered against the relevant local government planning scheme at <https://www.legislation.qld.gov.au/view/pdf/inforce/current/sl-2017-0078>). The Director-General Department of Housing and Public Works makes a determination about the level of compliance with the relevant planning



to the Tasmanian planning system include such a measure for public housing and for social housing, delivered by registered Tier One Community Housing Providers when funded by the Department of Communities.

❖ **Question 15: What scope is there to increase the role of private developers and local government in improving housing supply?**

See questions six and fourteen above.

❖ **Question 16: How can we bring whole communities along to promote the benefits of social and affordable housing in local areas?**

There is increasing awareness in the community about the housing crisis, because it affects more and more Tasmanians. It is timely for *The Strategy* to initiate a community education program to support better housing outcomes for all Tasmanians, and address outdated NIMBY objections.<sup>25</sup> Changing the NIMBY (Not in My Backyard) mindset to YIMBY (Yes in My Backyard) requires a positive campaign to showcase the benefits of an inclusive community where people from all walks of life can share a healthy and vibrant neighbourhood. Shelter Tas recommends committing resources to form a consortium of key agencies to work on building community support for housing diversity, including higher density development, social and affordable housing.<sup>26</sup>

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scheme. When a public housing development proposal is considered ‘substantially inconsistent with the relevant planning scheme’, DHPW will publish notification online and in relevant newspapers, and notify adjoining landowners. Following the end of the public notification the Director-General will have regard to any submissions received when deciding whether or not to proceed with the proposed development. (see <https://www.yoursayhpw.engagementhq.com/public-housing-developments>) *Information sourced from Queensland Shelter.*

<sup>25</sup> The *Shelter Tas Submission to the State Budget Process 2022-23* contains a proposal for a grass roots program, to change the conversation from NIMBY to YIMBY. <https://shelertas.org.au/shelter-tas-submission-to-the-state-government-budget-process-2022-23/>

<sup>26</sup> See also earlier discussion in this submission.



## Focus Area Three: Housing Sustainability

### ❖ Question 17: What actions are needed to improve sustainability of housing?

As the Productivity Commission's Report into the National Housing and Homelessness Agreement (*In Need of Repair*) notes:

Sustainability has a number of dimensions, including **to support people to maintain housing over time**, provide accessibility for people with disability and support social, and cultural and environmental wellbeing.<sup>27</sup>

Please see our earlier discussion of **People who need support to obtain and sustain their housing** (p3).

### ❖ Question 19: What can be done to improve the energy efficiency of existing and new homes?

#### **Explore energy efficiency measures**

After paying for rental and housing costs, energy bills are the hardest household cost for people to manage. The latest PowerHousing Australia *Australian Affordable Housing Report* points out that "Australian social housing stock is often old, less efficient and costly to run with impacts on economic and social wellbeing for those that can afford it least."<sup>28</sup> Tasmania has an opportunity to improve the energy efficiency of new and existing homes, to also contribute to the achievement of net carbon zero by 2050.

Shelter Tas recommends developing a suite of options to improve energy efficiency and enhancing support for people experiencing energy hardship.

Shelter Tas has collated a range of housing and planning models utilised interstate and overseas, that we can provide in more detail as the *Strategy* develops.

For further information on any of these issues, please feel free to contact Shelter Tas.

Pattie Chugg

Chief Executive Officer, Shelter Tas

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<sup>27</sup> <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness-overview.pdf> (P3 emphasis added)

<sup>28</sup> <http://www.powerhousingaustralia.com.au/wp-content/uploads/2021/11/PHA-eScan-2021-FINAL.pdf> see p 4, 63.



## **Appendix 1 – Shelter Tas submission to the Draft Discussion Paper for the Tasmanian Housing Strategy**

As the peak body for housing and homelessness services across Tasmania, Shelter Tas appreciates the opportunity to offer indicative feedback to the *Tasmanian Housing Strategy Draft Discussion Paper*. We note that there will be an opportunity for more extensive feedback when the *Discussion Paper* is released for consultation, so we are limiting our initial response to the areas that we think need more attention at this early stage.

We are also taking the opportunity to provide some suggestions to support the broader consultation process into the future.

To strengthen the *Discussion Paper* and the consultation that will inform the *Tasmanian Housing Strategy*, Shelter Tas recommends including the issues below.

### **Items to include in the *Discussion Paper***

#### **1. The housing and homelessness workforce**

The *Tasmanian Housing Strategy* needs to recognise the importance of the workforce providing emergency accommodation, support and tenancy services across the range of housing assistance programs. While this is a smaller sector, the work is as essential as building and construction, and needs specific recognition in the *Discussion Paper* so that it can effectively “outline the strategic direction to address housing-related issues into the future and guide the work of the new Housing Authority.”<sup>29</sup> A professional and trauma-informed workforce to support people who may have experienced family violence and other challenges is a critical part of the successful implementation of the *Strategy*.

The current housing and homelessness sector employs almost 900 people statewide, and manages over 9 000 tenancies and approximately 50 specialist homelessness services. In addition, the expansion of the social housing sector by an additional 10 000 dwellings over 20 years will mean expansion of the skilled and professional workforce to support and sustain these tenancies. The *Strategy* needs to be informed by the current strengths of the sector as well as the challenges it faces, and the *Discussion Paper* offers a timely opportunity to undertake relevant consultation.

#### **2. The Planning System**

Tasmania’s housing crisis is not being solved by the current planning approach. There is a need to modernise and align Tasmania’s planning system with the *Tasmanian Housing Strategy*. Tasmania’s planning system needs to respond to a range of challenging trends by encouraging effective and strategic planning for social and affordable housing.

The planning system needs to provide a pathway for planners, decision-makers and developers to enable social and affordable housing to be built in all areas, with measures such as infill and increased density. Alignment with the Planning System will be necessary to support the outcomes of the *Strategy*, and the *Discussion Paper* could invite comment on ways to achieve this.

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<sup>29</sup> *Discussion Paper* p 3



### **3. NIMBYism**

The NIMBY (not in my backyard) issue is important as it delays and blocks the establishment of much needed social and affordable housing in all neighbourhoods. Again, Shelter Tas recommends that NIMBYism should be acknowledged in the *Strategy* and *Discussion Paper*. There may be a variety of views held by various stakeholders, as well as opportunities to bring the whole community along, as the *Discussion Paper* receives “input from the Tasmanian community to understand our housing needs and desires, and how that housing can be best accessed, maintained and delivered.”<sup>30</sup> Capturing that input on the issue of NIMBYism will ensure that the *Strategy* can have an effective focus in this area.

### **4. Short Stay Accommodation impacts**

The impact of Short Stay Accommodation is noted in the early part of the consultation paper, but there are no associated initiatives or activities.<sup>31</sup> This is clearly one of the factors impacting on demand supply and affordability, especially for renters. We would like to see the *Discussion Paper* outline some potential directions to better manage this impact, and use discussion questions to take the opportunity for feedback from the Tasmanian community on this increasingly pressing issue.

### **5. Housing for members of the Tasmanian Aboriginal Community**

The *Discussion Paper* needs to include housing for members of Tasmanian Aboriginal Communities across the state, in line with existing Government commitments.

### **6. A Tasmanian Women’s Housing Strategy**

Shelter Tas has for some years recommended a dedicated Housing Strategy for Women to ensure their specific housing needs, different life patterns, incomes and caring responsibilities are recognised in the design of programs and initiatives. We note that women and children are overrepresented in the statistics on experiences of homelessness, and in numbers turned away from emergency accommodation and shelters. More women than men live in poverty and housing stress in Tasmania. The *Discussion Paper* consultation offers an important opportunity to seek input from the Tasmanian community on this issue, and on different people’s experiences of housing stress and homelessness through a gendered lens.

### **7. A stronger emphasis on the private rental market – housing security for renters**

As Tasmania’s population expands, there is increased demand for both rental and purchase properties. House prices are surging while home ownership rates are declining.<sup>32</sup> This means people are renting for longer before being able to purchase a home, and higher proportions and greater numbers of people will be life-long renters. More than one in four Tasmanians rent their home.<sup>33</sup> The private rental market is increasingly unaffordable for people on the lowest incomes.

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<sup>30</sup> *Discussion Paper* p 4

<sup>31</sup> *Discussion Paper* p 8

<sup>32</sup> <https://www.corelogic.com.au/reports>

<sup>33</sup> <https://www.abs.gov.au/statistics/people/housing/housing-occupancy-and-costs/2017-18>



In Focus Area 1, it is very welcome to see the Tasmanian Government’s commitment “to provide an additional 10 000 social housing dwellings by 2032 to meet demand for social housing assistance”<sup>34</sup>. Social housing provides tenants with secure tenure as well as affordability. Secure and stable tenure is vital to ensure that renters in the private rental market can have a long-term home, and we call for more emphasis on housing security in the private rental market in the *Discussion Paper*.

#### **8. Pathways out of homelessness – a Housing First Approach**

Episodes of homelessness should be rare, brief and non-recurring. The most successful model to achieve this is Housing First, where people who experience homelessness are assisted with a secure home, and level of support they need to live well. This means wraparound support for as long as people need it, which will vary with circumstances. Evidence shows that a Housing First approach is the most effective pathway out of homelessness. Shelter Tas recommends the *Tasmanian Housing Strategy* commits to a Housing First approach, and adds it as a topic in the *Discussion Paper*.

#### **A small correction -**

We note that on p 11, the Discussion Paper states “...4 506 people waiting for social housing in October 2021.” This number refers to applications, which represent households, not individuals. That is, 4 506 is the number of applicants, but the number of people waiting would be higher, as many applications will represent a multi-person household.

#### **The consultation process to-date**

Shelter Tas, along with several of our members, has been involved in consultation for the *Tasmanian Housing Strategy* at several points already. As the peak body for housing and homelessness services, we recognise this is an important piece of work, with impact well into the future. We also appreciate that the decision to establish a new Housing Authority has significantly changed the landscape for the *Strategy*.

#### **Stakeholder involvement**

In the development of the *Strategy* it is essential to include the voices of people who have experienced homelessness and housing stress, and people who have used various forms of housing assistance, including tenants. The voices of people with diverse lived experience, from all regions of the state, will help to develop a strategy that delivers local solutions and meets the needs of all Tasmanians.

#### **Building and maintenance**

There is substantial expertise within the sector, in both building and support services. Community Housing Providers who build homes and provide tenancy support services have substantial expertise, and have ongoing responsibility for the homes they develop. They are key providers of new homes for people to be assisted under the *Strategy*. In particular, with respect to the construction of new dwellings, it is worth noting that Community Housing Providers manage their

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<sup>34</sup> *Discussion Paper* p 18



properties in the long term, so have a vested interest in quality and suitability of the homes they build. With an escalation of the construction of new social housing, Shelter Tas recommends priority be given to builders with a proven track record of delivering sustainable homes, and/or securing responsibility for maintenance over the long term for dwellings that will be provided as social and affordable housing.

### **Connecting processes, data and consultation**

We are aware that the Housing Connect Reform that is taking place at the same time has undertaken significant data collection and needs analysis (for example on demand for homelessness services), as well as consultation, including work commissioned from SGS Economics. Good policy builds on good data, and there is an opportunity for that data to inform the development of the *Strategy*. It would be helpful to understand how these processes are linked together, in particular with respect to consultations and data. This will be vital for the discussions at the Ministerial Reference Group (of which Shelter Tas is a member), and to build efficiencies into the various processes.

### **Evaluation**

As noted in the *Discussion Paper*, there are a variety of programs and initiatives underway, but as yet no evaluation of these programs has been made available. It will be worth undertaking rigorous cost-benefit analysis on current initiatives, such as private rental support and other programs to ensure that future investment supported by the *Strategy* is well targeted.