

7 August 2009

Dr Claire Noone
Director
Consumer Affairs Victoria
GPO Box 123
Melbourne
VIC 3001
Via email: respark@justice.vic.gov.au

Dear Dr Noone,

OPTIONS PAPER: TENANCY POLICY FRAMEWORK FOR RESIDENTIAL PARKS

The Victorian Council of Social Service (VCOSS) welcomes the release of the Options Paper on the tenancy policy framework of residential parks.

VCOSS is the peak body of the social and community sector in Victoria. VCOSS works to ensure that all Victorians have access to and a fair share of the community's resources and services, through advocating for the development of a sustainable, fair and equitable society. VCOSS is committed to realising the principles of affordable and secure housing as a basic human right for all Victorians.

VCOSS wishes to endorse the views expressed by the Tenants Union of Victoria in their submission to this Options Paper dated 23 July, 2009. VCOSS would like to particularly highlight the general principle that any reform should provide equal consumer protections to all people who live in residential parks as their primary place of residence. The use of caravan parks as temporary and emergency accommodation can mean that some residents are particularly vulnerable.

The Options Paper defines residential parks by their predominant occupant and dwelling type, owner-renters. VCOSS suggests that this definition does not reflect the diversity of practice within caravan parks and as such, may exclude some caravan park residents. It is of concern that the reforms outlined in the Options Paper may fail to provide adequate consumer protections to all park residents.

VCOSS looks forward to the response of CAV following this consultation process and would welcome any further opportunity to discuss tenancy policy reform. To arrange a meeting for more detailed discussion or clarification of this submission, please contact VCOSS Policy Officer, Sarah Toohey, on T: 9654 5050, E: sarah.toohey@vcoss.org.au.

Yours sincerely,

Cath Smith
Chief Executive Officer