



**SHELTER TAS SUBMISSION TO THE SCOPING PAPER
FOR DRAFT TASMANIAN PLANNING POLICIES** OCT 2021



ShelterTAS
Housing and Homelessness Peak

GPO Box 848 Hobart Tasmania 7001 | www.sheltertass.org.au
E: ceo@sheltertass.org.au | P: (03)6224 5488 | M: 0419 536 100

Contact Shelter Tas

GPO Box 848 Hobart Tasmania 7001

W: shelertas.org.au

E: ceo@shelertas.org.au

P: (03) 6224 5488

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Shelter Tas is supported by the Department of Communities Tasmania.



Shelter Tasmania acknowledges the Traditional Owners of country throughout Tasmania and their continuing connection to the land, sea and community. We pay our respects to them and their cultures, and to elders past and present.



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

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By email to haveyoursay@justice.tas.gov.au

About Shelter Tas

Shelter Tas is Tasmania's peak body for housing and homelessness services. We are an independent not-for-profit peak organisation representing the interests of low to moderate income housing consumers, community housing providers and Specialist Homelessness Services across Tasmania. We provide an independent voice on housing rights and a link between governments and the community through consultation, research and policy advice. We work towards a fairer and more just housing system. Our vision is affordable, appropriate, safe and secure housing for all Tasmanians and an end to homelessness.

Our submission

Shelter Tas welcomes the opportunity to respond to the *Scoping Paper for draft Tasmanian Planning Policies*. This is a rare opportunity to make an important difference to the planning principles that will "shape the future for Tasmania through strategic land use planning" (Minister's foreword to the *Scoping Paper*).

Our Submission recommends that:

- *Social and affordable housing* is added as a **topic** in its own right, and
- *Short Stay Accommodation* is added as an **issue** in the Economic Development section.

At present, the *Scoping Paper* does not include social and affordable housing, or short stay accommodation. Including these items in the *Tasmanian Planning Policies* is vital and timely to ensure that the Tasmanian Planning System can address Tasmania's chronic shortage of social and affordable rental housing in the future.

Social and affordable housing

Social and affordable housing are described in the *Tasmanian Affordable Housing Strategy 2015-25*:

Social housing: is a broad term used to capture both housing provided by the government (public housing) and non-government organisations (community housing) with below-market rent prices.
Affordable housing: refers to rental homes or home purchases that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress or crisis.¹

¹ https://www.communities.tas.gov.au/_data/assets/pdf_file/0014/30254/AHS_Strategy_Final.pdf

The *Tasmanian Planning Policies* scoping paper needs to include social and affordable housing. Shelter Tas recommends that the *Tasmanian Planning Policies* refer directly to social and affordable rental housing, specifically by naming social and affordable housing as a topic in its own right, alongside the Liveable Settlements topic.

Ensuring that all Tasmanians are safely and appropriately housed is an appropriate and necessary purpose for the first high-level policy framework for the Tasmanian Planning System, which “articulates a vision for our future – what we want our society, our settlements, our infrastructure and our landscapes to look like” (Minister’s Foreword to the *Scoping Paper for draft TPPs*). The entire community benefits when everyone has the home they need, and social and affordable housing is needed to achieve that goal, especially for lower income Tasmanians who rent their homes.

In Tasmania, as in other parts of Australia, there is a chronic shortage of affordable rental options for people on low and moderate incomes. Tasmania has seen unprecedented growth in both purchase prices and rental prices. Hobart has been Australia’s least affordable capital city since 2018, on the standard measure that compares income to rental cost.² Hobart has been in the top two capitals for unaffordable rentals since the National Rental Affordability Index began in 2015. This chronic lack of affordable rental housing leads to increasing numbers of people experiencing housing stress and homelessness across the state. Our planning system needs to play its part in reversing this trend.

Tasmania’s housing crisis is not being solved by the current planning approach. The latest report on housing market trends from the University of Tasmania’s Housing and Community Research Unit (HACRU) shows that Tasmania’s housing market continues to be under extreme pressure.³ House prices and rents remain high, while the private rental vacancy rate remains very low. Increasing the supply of affordable and social rental housing is essential to meet the housing needs of all Tasmanians and meet the State Government’s economic and social objectives. 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, through naming it as an issue within the *Tasmanian Planning Policies*.

The cost of housing, including both purchase and rental, is rising much faster than people’s incomes, leaving more and more Tasmanians facing rental stress and the risk of homelessness. In 2021, the Anglicare Rental Affordability Snapshot found only 729 properties advertised for rent across Tasmania, in contrast to 2 677 properties in 2013. In

² <https://www.sgsep.com.au/projects/rental-affordability-index>

³ https://www.utas.edu.au/_data/assets/pdf_file/0005/1475465/UOTBR210619-Tasmanian-Housing-Update_vFinal.pdf

Tasmania's southern region, which includes Hobart, there were only 433 properties advertised as available to rent in 2021, compared with 1 304 in 2013.⁴

As Tasmania's population increases, there is increased demand for both rental and purchase properties. House prices are surging while home ownership rates are declining.⁵ 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.⁶ The private rental market is increasingly unaffordable for people on the lowest incomes. Tasmania's planning system needs to account for these trends by encouraging effective and strategic planning for social and affordable housing.

The waiting list for social housing in Tasmania is growing, reflecting increased need. As at August 2021, there are over 4 367 applications, and this number is higher every year. Shelter Tas supports the *Tasmanian Affordable Housing Strategy*, and calls for an increase to the supply of social housing, beyond current commitments. Over 120 000 Tasmanians live in poverty.⁷ Good planning is needed to ensure that all Tasmanians in need can find the homes they need, including social and affordable homes.

Tasmania needs to deliver social rentals that stay affordable in the long term, from the current level of 6.2% to a level of at least 10% of all dwellings. Shelter Tas has advocated for this target in Tasmania since 2018.

All levels of government – national, state and local – have a part to play in ensuring that all Australians have a safe, secure, appropriate and affordable place to call home. [The 2021 Australian Infrastructure Plan](#) called for all levels of government to invest in social and affordable rental housing, recognising that well-maintained and designed social housing provides many community benefits, supporting individual and societal wellbeing and productivity, and reducing costs in health and justice services. The Tasmanian Planning System provides the high level framework that will enable all levels of government to play their part in delivering social and affordable housing. It also provides a direct way of implementing this through regional land use strategies and the Tasmanian Planning Scheme.

Shelter Tas calls for the wording from the 2017 Consultation draft to be reinstated in the *Tasmanian Planning Policies*:

3.6 Promote and facilitate the development and increased supply of affordable housing options, both public and private, that are designed to meet the health, safety and occupancy needs of households, and are located close to services and existing and

⁴ <https://www.anglicare-tas.org.au/research/anglicare-tasmania-rental-affordability-snapshot-2021/>

⁵ <https://www.corelogic.com.au/reports>

⁶ <https://www.abs.gov.au/statistics/people/housing/housing-occupancy-and-costs/2017-18>

⁷ <https://www.tascoss.org.au/120000-tasmanians-live-in-poverty/>

committed public transport networks; and

3.7 Facilitate the realignment and redevelopment of existing social housing stock to better meet the current and future demand.⁸

Good policies to relieve the housing crisis need to operate on multiple levels and at all levels of government, including the planning system. Adding social and affordable housing as a topic within the *Tasmanian Planning Policies* is an essential step towards delivering an adequate supply of affordable homes for people who are renting. In the table below, we have used the proposed template to suggest how social and affordable housing could be included within the *Tasmanian Planning Policies*, drawing on the 2017 Consultation draft.⁹

Tasmanian Planning Policy: Liveable Settlements	
Topic: Social and Affordable Housing	
Objective: To enable the development of accessible, safe, appropriate social and affordable housing that will meet current and future community needs	
Strategy: <p>Promote and facilitate the development and increased supply of affordable and social housing (public and community housing) options, that are designed to meet the health, safety and occupancy needs of households, and are located close to services and existing and committed public transport networks.</p> <p>Promote and facilitate a diversity of housing types and densities, including social and affordable housing, in and around activity centres, and any designated integrated transport corridors and densification areas.</p> <p>Ensure sufficient serviced land is available for social and affordable housing within or near to existing employment and well serviced activity centres and existing public transport networks.</p> <p>Encourage flexible, adaptable, sustainable and innovative housing design and configuration that meets the current and future community needs</p>	
Implementation into strategic planning	Implementation into statutory planning
RLUS Enabling legislation or regulation – if needed	SPPs LPS Enabling legislation or regulation – if needed

⁸ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

⁹ https://planningreform.tas.gov.au/_data/assets/pdf_file/0003/628239/Tasmanian-Planning-Policies-and-Overview-Consultation-Draft-April-2017.pdf

Short Stay Accommodation

While our main recommendation in this submission is that social and affordable housing appears in its own right in the *Tasmanian Planning Policies*, we know that the increase of short stay accommodation is one of the factors affecting the shortage of affordable rentals in all regions of Tasmania. There are approximately 5 000 short stay properties in Tasmania, with significant concentration in some areas. Residential properties continue to be converted to short stay accommodation.¹⁰ In Tasmania's tight housing market, any impacts from future growth in short stay accommodation will need to be carefully managed. The growth in short stay accommodation means that it will continue to impact current and future housing and community needs. We suggest that it is appropriate to include short stay accommodation in the scope of the *Tasmanian Planning Policies*.

Including short stay accommodation in the *Tasmanian Planning Policies* will give future planners and decision-makers the resources they need to manage any local impacts on residential accommodation. When so many Tasmanians are in rental crisis and facing homelessness, all elements of the housing system need to be considered by planners. Tasmania has an opportunity to include short stay accommodation within the planning system so that decision-makers can recognise both the benefits of the tourism economy and the housing crisis faced by many members of the local community.

Shelter Tas recommends that short stay accommodation be named as an issue in the Tourism section of the TPPs to provide a clear pathway for planners to balance the need for long term rentals and visitor accommodation.

Thank you for the opportunity to contribute to the consultation on the *Tasmanian Planning Policies Scoping Paper*. We recommend social and affordable housing in the *Tasmanian Planning Policies* as an essential step towards ensuring that all Tasmanians have the homes they need. It will bring a vital planning focus to this essential housing sector.

We urge you to update the draft *Tasmanian Planning Policies* to include social and affordable housing and short stay accommodation.

For any further information on this submission, please contact:

Pattie Chugg
Chief Executive Officer, Shelter Tas
ceo@shelertas.org.au

¹⁰ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>