



**STATE PLANNING PROVISIONS REVIEW - SCOPING ISSUES
SHELTER TAS SUBMISSION, AUGUST 2022**



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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 yoursay.planning@dpac.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 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. As a member of the Ministerial Housing Reference Group, Shelter Tas is highly aware of the important connections between the development of the *Tasmanian Housing Strategy* and reforms to Tasmania's planning system.

Our submission

Shelter Tas welcomes the opportunity to respond to the *State Planning Provisions Review scoping paper*. This is an opportunity to make an important difference to Tasmania's planning rules. 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.

Our Submission recommends that a thorough review of the residential standards is undertaken to ensure that the Tasmanian Planning System can address Tasmania's chronic shortage of social and affordable rental housing in the future.

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.¹ Hobart has, indeed, 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

¹ <https://www.sgsep.com.au/projects/rental-affordability-index>

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.² 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, as well as the State Government's economic and social objectives. The planning system needs to clearly identify social and affordable housing and provide a pathway for planners, decision-makers and developers to build more of this type of housing in all suburbs and towns across Tasmania. The residential standards can be updated to encourage and facilitate the construction of social and affordable housing, and to encourage a constructive approach to higher density and inclusionary zoning to meet the community's increasing need for homes.

Tasmania continues to face a critical shortage of affordable rental accommodation. The waiting list for social housing in Tasmania is growing, reflecting increasing demand. In June 2022, over 4 453 Tasmanian households are on the waiting list for social housing. Residential planning standards need to be fit for purpose to alleviate this chronic shortage of safe, secure and affordable homes.

Areas where the State Planning Provisions can better facilitate the delivery of social and affordable housing include:

- Reducing car parking requirements for social/affordable housing developments
- Changing the use category for visitor accommodation in residential zones from permitted to discretionary (enabling local planners to maintain levels of residential housing stock)
- Prioritisation of social/affordable housing in residential zones by considering increased densities and heights for these developments.

As Shelter Tas stated in our submission to the Premier's Economic and Social Recovery Advisory Council (2020) process:

The planning system has long needed to adapt to facilitate the timely development of affordable housing. Planning the road to recovery will need to ensure a consistent pipeline of employment and housing supply to keep the economy moving, support our communities and

² https://www.utas.edu.au/_data/assets/pdf_file/0005/1475465/UOTBR210619-Tasmanian-Housing-Update_vFinal.pdf

keep people in jobs. We need to respond quickly by reforming the planning system to ensure continued productivity, investment and community wellbeing.

At present the planning system needs to be modernised to recognise the importance of social housing and treat it 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.

There are multiple recent cases where local resistance (nimbyism) to the building of new affordable housing and homelessness initiatives presents a significant barrier to new developments. This creates delays, meaning that people are waiting longer for the homes they need, and establishes a 'stop-start' flow of employment for the construction industry. At worst, the backlash means that a proposal is abandoned, and a process of finding another appropriately located site has to start again. Better planning, where expert recommendations are followed rather than overturned by local councillors will enable consistent employment.

As Shelter Tas has long argued in our submissions to the state budget process, the planning system needs to be updated to encourage construction of the social and affordable housing that is greatly needed across Tasmania. In short, there is a need to cut red tape and fast-track assessment processes to boost the construction pipeline and accelerate new affordable social housing projects. This will create and support construction jobs and allow work to continue wherever possible while avoiding constraints and delays that could undermine government investment in much-needed social and affordable housing.

We note that Queensland has a system for approval of public housing developments that does not require development approval from local government.³ Shelter Tas would be happy to see reforms 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.⁴

³ 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 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.

⁴ https://shelertas.org.au/wp-content/uploads/2020/06/Shelter-Tas-Response-to-PESRAC_June2020_FINAL.pdf

Thank you for the opportunity to contribute to the consultation on the *State Planning Provisions Review*. Planning for social and affordable housing within the residential standards is essential for good housing outcomes for all Tasmanians.

Please note our 2021 submission to the Tasmanian Planning Policies is available at https://shelertas.org.au/wp-content/uploads/2021/10/ShelterTasSub_TPP-scoping-paperF.docx.pdf.

For any further information on this submission, please contact:

A handwritten signature in black ink, appearing to read 'PAC' followed by a stylized flourish.

Pattie Chugg
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