



DRAFT TASMANIAN PLANNING POLICIES SHELTER TAS SUBMISSION TO THE CONSULTATION, NOV 2022



ShelterTAS
Housing and Homelessness Peak

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Shelter Tas is supported by the Department of Communities Tasmania.



Shelter Tasmania acknowledges the Traditional Owners of country throughout lutruwita/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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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 membership includes all Tasmanian Specialist Homelessness Services and registered Community Housing Providers. 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 Consultation Draft for the *Tasmanian Planning Policies* (the *Draft TPP*).

As noted in our 2021 submission to the *Scoping Paper for the 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*).

We appreciate the work that has gone into the *Draft TPP* and we are very pleased to see the inclusion of *Social and affordable housing* in the Settlement Policy, and the inclusion of *Visitor Accommodation* in the Tourism section, which we advocated for in our submission to the *Scoping Paper*. We were also pleased to see reference to housing in other sections such as the inclusion of housing and services to support mining employees and their families in remote settlements at 4.2.3.7.

Overall, the *Draft TPP* is a significant, thorough and important document. We offer the following suggestions to improve it further.

- Use the standard definition of Affordable housing in the *Glossary*

The current definition is not clear. It defines **affordable housing** as where the housing costs of a **low income household** are low enough that the household is not in **housing stress** or **crisis**. However, the terms **low income household**, **housing**

stress, and **crisis** are not defined, leaving the meaning of **affordable housing** unclear at best.

We recommend using the standard definition of a low income household being in the lower 40% by income, and housing stress as being housing costs over 30% of the income of a low income household. This is known as the 30/40 rule.¹ Consistency with the definition being used in the *Tasmanian Housing Strategy* (a twenty-year strategy currently under development) would also be an advantage.

- At 1.4.3, both social and physical infrastructure are linked. However, when developer contributions are described in the **Infrastructure section**, social and physical infrastructure are not linked. There is an opportunity to recognise the importance of social contributions from developers as well as contributions to physical infrastructure.² For example, the phrasing at 5.1.3.5, could be paralleled in the Settlement/Housing section to enable and encourage developer contribution to inclusionary zoning.

For comparison, South Australia has an inclusionary zoning scheme which requires 15% of homes in new residential areas to be affordable and is mandatory on government land, providing a fair and level playing field and certainty around requirements.³ The Tasmanian Planning Policies could enable a similar system in Tasmania to be phased in over time.

- We would suggest using the term ‘person living with disability’ rather than ‘person with disability’. Similarly for tenant living with disability, or resident living with disability (see, for example, the Glossary definition of Assisted Housing).
- The issue of short stay accommodation needs to be addressed more clearly. The wording in the Tourism section at 4.4.4.3 is

Ensure visitor accommodation does not significantly impact the supply of housing for the local community.

In our earlier submission to the *Scoping Paper Shelter Tas* called for a clear pathway for planners to balance the need for long term rentals and visitor accommodation. There needs to be a way to limit short stay accommodation as part of the Housing Strategies in 1.5.3, because increasing supply of homes for long term residents (the existing and future needs of Tasmanians) will be undermined to the extent that new builds are diverted to short stay accommodation. We recommend linking this issue to section 1.5 Housing as well.

¹ See, for example, <https://shelertas.org.au/wp-content/uploads/2021/09/Shelter-Tas-Terms-with-cover-v2.docx-2.pdf>; <https://aifs.gov.au/resources/policy-and-practice-papers/housing-stress-and-mental-health-and-wellbeing-families>

² For discussion, see <https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning-Development-contributions-for-affordable-housing.pdf>

³ <https://www.ahuri.edu.au/sites/default/files/documents/2022-09/Executive-Summary-FR388-Private-sector-involvement-in-social-and-affordable-housing.pdf>

We recommend specifically that the Tasmanian Planning Policies spell out the need to limit the conversion of residential properties to short stay accommodation where locals are missing out on the homes they need. We would suggest using a local 'vacancy rate' for rental accommodation as an indicator of whether the supply of rental properties for the local community is adequate. The standard view is that a rental vacancy rate of 2.5% is sustainable. So if the local vacancy rate falls below that level, noting there is a lag in reported data, a pause in the granting of new permits for whole house short stay accommodation would be an appropriate response, with the pause lifted when the vacancy rate rises again.

- Criteria for review, measurements and evaluation. We note from the *Report on draft TPP Scoping Consultation* that 'Monitoring, evaluation and reporting TPP is provided for specifically under the Act' but note that in some areas, there is not enough specificity in the *Draft TPP* to be able to monitor or evaluate its impacts. Short Stay Accommodation is one example where a clear standard for monitoring impacts is needed.

For any further information on this submission, please contact:

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