

Mr Peter Fisher  
Acting Executive Commissioner  
Tasmanian Planning Commission  
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30 March 2020

Dear Mr Fisher

Thank you for the opportunity to comment on the Tasmanian Planning Commission's Draft Planning Directive No. 7 – Permits for Temporary Housing.

TasCOSS advocates on behalf of low income Tasmanians who often live in vulnerable or disadvantaged circumstances. We advocate for public policy that values and respects the diversity of Tasmanians and makes a real difference to the lives of people experiencing vulnerability. We work to ensure that the human rights of all Tasmanians are integrated into government consultations, processes, policy approaches and budget allocations.

We endorse the intent and content of the draft Planning Directive No. 7 which aims to increase the supply of affordable dwellings for Tasmanians. In particular, we welcome the ways in which the Draft Directive takes into account the issues raised by TasCOSS, Shelter Tasmania and other stakeholders in relation to using the planning system to increase the supply of affordable housing.<sup>1</sup> A significant issue is the need for short-term solutions to be consistent with meeting long-term policy goals in order to avoid unforeseen deleterious consequences. They must also ensure that public money is spent responsibly and appropriately.<sup>2</sup>

In the case of temporary permits for housing, this means that temporary dwellings must be of high quality and, if used for extended periods, able to be maintained at high quality. This will ensure that short-term solutions to immediate housing need are consistent with the long term goal of affordable, stable, appropriate housing for all Tasmanians.<sup>3</sup> We recommend that, to be consistent with these principles of good public policy, the Planning Commission implements a mechanism for oversight of the quality of all temporary dwellings, particularly those that receive extensions.<sup>4</sup>

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<sup>1</sup> See for example, TasCOSS submission to Tasmanian House of Assembly Inquiry into Affordable Housing 2019,' <https://www.tascoss.org.au/home/for-members/vaults/?documentid=190812052828-37183a16b8dc0d021e52509980d57916&folderid=dedffe3-80a9-4371-90b8-32cbfecf0a15>; 'Submission from Shelter Tasmania on Residential Housing Supply Bill 2018' [https://www.justice.tas.gov.au/\\_data/assets/pdf\\_file/0017/415034/Draft-Residential-Housing-Supply-Bill-2018-Shelter-TAS.PDF](https://www.justice.tas.gov.au/_data/assets/pdf_file/0017/415034/Draft-Residential-Housing-Supply-Bill-2018-Shelter-TAS.PDF))

<sup>2</sup> Australian Public Service Commission, 'Tackling wicked problems: a public policy perspective,' June 2018 <https://www.apsc.gov.au/tackling-wicked-problems-public-policy-perspective>

<sup>3</sup> Shelter Tasmania, 'Cheap fixes no answer to homelessness,' *The Mercury*, 19 June 2019 <https://mailchi.mp/c1f0569a0835/talking-point-cheap-fixes-no-answer-to-homelessness?e=91a124a7a0>

<sup>4</sup> The oversight could be based on the minimum standards contained in the *Residential Tenancy Act 1997*.

We also note and endorse the comments and suggestions raised by Shelter in its submission on the draft Directive, in particular:

- The need to maintain confidentiality with respect to the location of services that provide housing support to vulnerable people
- Where dwellings are constructed on existing or neighbouring land, the need to maintain the security and privacy of residents already in crisis accommodation

Further, we echo Shelter's call for amendment of the *Tasmanian Planning Commission Act 1997* so that it recognises the importance of a planning response to the need for immediate and longer-term affordable housing. Our submission to the Tasmanian House of Assembly Inquiry into Affordable Housing 2019 outlines a range of ways that planning and zoning schemes can help to deliver more affordable housing for Tasmanians with a range of affordable housing needs.

Once again, thank you for the opportunity to comment on the draft Planning Directive. Please contact us if you have any questions in regard to our response.

Yours sincerely



Nic McBride  
Acting CEO TasCOSS