



TASMANIAN PLANNING POLICIES

SHELTER TAS SUBMISSION TO THE CONSULTATION, JUNE 2023



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**Homes
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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IMAGE: Deposit Photos



27 June 2023

By email to tpc@planning.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 membership includes all Tasmanian Specialist Homelessness Services and registered Community Housing Providers, and we are Tasmania's representative for the national Community Housing Industry Association (CHIA). 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 TPPs"). The TPPs set the high-level strategic policy direction for the planning system. The Settlement TPP, in particular, makes an essential contribution to securing better housing outcomes for all Tasmanians.

As noted in our 2021 submission to the *Scoping Paper for the draft Tasmanian Planning Policies*, the TPPs will embody 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 updating the Draft TPPs. Shelter Tas supports the content of the current draft policies. The policies will contribute to improved planning and decision-making across Tasmania.

The importance of social and affordable housing

Shelter Tas welcomes the recognition in the Settlement TPP of the importance of social and affordable housing and crisis accommodation. The Policy Context for the Settlement TPP states that that "It emphasises the delivery of social and affordable housing and recognises that these types of housing are essential to improve social and economic resilience." The Settlement TPP recognises the importance of social and affordable housing and crisis accommodation in the following clauses (emphasis added):

1.0.1 Policy Context ... The Settlement TPP requires that sufficient land is allocated to meet the community's needs for housing, including **social and affordable housing**...

1.3.3.6 Facilitate the provision of services that support vulnerable or at-risk people, including **crisis accommodation**, neighbourhood houses, **youth-at-risk centres**, **women's shelters and men's shelters**;

1.5.5.3 Facilitate **social and affordable housing** to meet the needs of the community that is located close to services, employment and public transport networks;

1.5.5.4. b) supporting the provision of well designed **social and affordable housing**; and

1.5.5.4. e) catering for **people requiring crisis accommodation**

Including social and affordable housing within the TPPs will help to ensure the needs of all Tasmanians for safe, secure and appropriate homes are met.

Tourism and Visitor Accommodation

As the peak body for housing and homelessness services across Tasmania, Shelter Tas has a long-standing interest in the impacts of short-stay accommodation. Research shows that short term rentals impact private market rents by impacting on the vacancy rate in the long-term rental market, and that in small competitive markets, such as Tasmania, these impacts can be significant.¹ Better management of short stay accommodation will help local planners and decisionmakers to balance the needs of residents and visitors.

Shelter Tas welcomes the inclusion of *Visitor Accommodation* in the Tourism section of the TPPs, which we advocated for in our 2021 submission to the *Scoping Paper*. In that submission we argued that

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.²

Section 4.4 Tourism acknowledges the importance of managing visitor accommodation where it impacts on the availability of long-term homes for local residents:

4.4.3.3 Manage visitor accommodation so it does not significantly impact the supply of housing for the local community.

¹ https://sheltertass.org.au/wp-content/uploads/2022/01/STR-Baseline-Report-June-2022_FINAL-combined-files.pdf; https://sheltertass.org.au/wp-content/uploads/2022/12/STR-Progress-Report-1_Dec-2022.pdf

² https://sheltertass.org.au/wp-content/uploads/2021/10/ShelterTasSub_TPP-scoping-paperF.docx.pdf

It is very positive to see the TPPs recognise the importance of managing this impact, to enable effective planning into the future.

Strategic Planning

Shelter Tas welcomes the TPPs recognition of the need to align land use planning with population planning:

7.2.3.4 Promote the integration and coordination of land use planning with population strategies and social and physical infrastructure planning.

As the state's peak body for housing and homelessness, we have long advocated for a Housing in all Policies approach and a Housing Impact Analysis for major projects.

Population, employment, and tourism are some of the policy areas that affect demand for, and use of, Tasmania's residential accommodation. Health, education, and justice all are impacted when people cannot find or afford the homes they need. All policy areas can have a bearing on housing and a 'Housing in all Policies' approach is the best way to recognise and manage these impacts.³

It is very positive to see the TPPs support an integrated policy approach with analysis and appropriate planning for effective housing outcomes in relevant domains of government decision making.

Definitions

We are pleased to see the terms 'Affordable housing', 'Housing Stress' and 'Low-income household' are precisely defined in the Glossary, aligning with the standard definitions used nationally and in Tasmania, and reflecting the recommendations in our submission in November 2022.⁴ These definitions are essential to provide consistency and clear guidance to planners and decisionmakers.

Digital Infrastructure

Shelter Tas is pleased to see that digital infrastructure is encouraged in section 5.0 Physical Infrastructure:

5.1.3.9 Encourage the connection of new lots, or provide for potential future connection to, telecommunication services at the time of subdivision, where the land is in a serviceable area and there is a reasonable expectation that the future use of the lot will require telecommunication services.

³ https://sheltertass.org.au/wp-content/uploads/2022/11/Shelter-Tas-Budget-Submission-2023-24_WS.pdf

⁴ <https://sheltertass.org.au/wp-content/uploads/2022/11/ShelterTasTPP-Submission.pdf>

The importance of digital inclusion is vital for Tasmania's future. As Shelter Tas has previously argued

There is also an opportunity to consider the costs and needs of people living in newly constructed homes, such as digital inclusion. For example, NBN connection could be included in new housing stock as is the case for electrical connection and water. This could make a substantial improvement to digital inclusion in Tasmania, with particular education benefits for families with school aged children.⁵

Shelter Tas appreciates the inclusion of these elements as they will help improve housing and liveability outcomes across Tasmania.

For any further information on this submission, please contact:

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⁵ https://sheltertass.org.au/wp-content/uploads/2022/11/Shelter-Tas-Budget-Submission-2023-24_WS.pdf