



## NATIONAL HOUSING and HOMELESS PLAN

SHELTER TAS SUBMISSION, October 2023



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**Community Housing**  
INDUSTRY ASSOCIATION

Shelter Tas is the Tasmanian branch of the  
Community Housing Industry Association (CHIA)

SUPPORTED BY:



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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**6 October 2023**

## **Shelter Tasmania Submission on the National Housing and Homelessness Plan**

Shelter Tas is pleased to provide this submission to the National Housing and Homelessness Plan

### **About Shelter Tas**

Shelter Tas is lutruwita/Tasmania's peak body for housing and homelessness services. We are a not-for-profit peak organisation representing the interests of low to moderate income housing consumers, Community Housing Providers and Specialist Homelessness Services. With the Youth Network of Tasmania (YNOY), Shelter Tas co-convenes the Tas Youth Housing and Homelessness Group (TYHHG). The sector we represent directly employs over 1200 people across Tasmania.

Shelter Tas provides an independent expert voice on housing rights and a link between the Tasmanian government and the community through consultation, research and policy advice. We work towards a fairer and more just housing system. Our vision is for affordable, appropriate, safe and secure homes for all Tasmanians and an end to homelessness. Shelter Tas is a member of National Shelter, and also represents the Community Industry Housing Association (CHIA) in Tasmania. All of Tasmania's Specialist Homelessness Services and registered Community Housing Providers are members of Shelter Tas.

Shelter Tas submission to the National Housing and Homelessness Plan

1. Shelter Tas supports the submission to the National Housing and Homelessness Plan from National Shelter and the Community Housing Industry Association (CHIA).
2. Shelter Tas supports the Homelessness Australia Key Messages at <https://homelessnessaustralia.org.au/wp-content/uploads/2023/08/Submission-GuideHomelessness-Plan.pdf>.
3. Shelter Tas supports the position on the National Housing and Homelessness Plan from the National Aboriginal and Torres Strait Islander Housing Association (NATSIHA).
4. Shelter Tas considers that it is essential for Australia to have an adequately funded National Peak Body for Housing, and recommends that National Shelter should be

funded at least \$800 000 per year, this amount matches the amount requested by Shelter Tas in our most recent Submission to the State Budget Process (attached).

5. Shelter Tas supports the national peaks' call for a plan across the whole housing system led by an agency with housing system expertise
6. Shelter Tas supports the national peaks' call for distinct and fully integrated plans for specific focus areas including Homelessness, First Nations' Housing, housing for people with disability, young people, older people and housing for low and moderate income households
7. Shelter Tas along with our members participated in the Stakeholder Consultation held in Hobart on 26 October 2023. In that consultation, we emphasised
  - a) The need for adequate funding, fully indexed for inflation, that reflects the actual and growing costs of providing housing and homelessness services in all states and territories;
  - b) the need for specific evidence-based strategies for particular strategies for young people and unaccompanied children under 16 experiencing or at risk of homelessness – other cohorts are mentioned specifically in the Issues Paper, but young people are not – and we know that failure to address youth homelessness means that young people suffer significant harm, with lifelong personal and financial impacts, and flow on costs to the broader community.
8. At the Stakeholder Consultation Shelter Tas undertook to provide a link to world leading Research on the impacts of short stay accommodation in Tasmania:  
[https://shelertas.org.au/wp-content/uploads/2022/12/STR-Progress-Report-1\\_Dec-2022.pdf](https://shelertas.org.au/wp-content/uploads/2022/12/STR-Progress-Report-1_Dec-2022.pdf)  
[https://shelertas.org.au/wp-content/uploads/2022/01/STR-Baseline-Report-June-2022\\_FINAL-combined-files.pdf](https://shelertas.org.au/wp-content/uploads/2022/01/STR-Baseline-Report-June-2022_FINAL-combined-files.pdf)

In addition to our comments above, our feedback in the Stakeholder Consultation, and the positions of National Shelter, CHIA, Homelessness Australia, and NATSIHA, Shelter Tas is makes the following recommendations based on our work as the Peak Body for Housing and Homelessness in Tasmania:

#### **Recommendation 1**

- 10% of all dwellings to be social housing with an additional 5% as affordable rental housing
- Clear definitions of social and affordable housing to enable clear measurement and accountability
- Ensure that social housing delivered under the National Plan remains social housing in perpetuity

- Ensure that land release is counted separately from delivery of a home ready for people to live in, and not treated as equivalent to a housing outcome
- End homelessness across Australia, with measurable timely milestones, such as
  - reducing the numbers of people experiencing homelessness by 50% by the next ABS Census date (2026), and a further 50% reduction by the following ABS Census date, and
  - reducing the number of repeat instances of homelessness presentation at SHS by 50% in five years, and a further 50% in the following five years
  - making experiences of homelessness rare, brief and non-recurring
  - end homelessness for women and children escaping domestic and family violence
- Targets for reducing housing stress for tenants in the private rental market
  - measure current levels, and aim to reduce by 20% each year
- Address the instability and insecurity in the private rental market by developing a formula for fair limits to rent increases in consultation with States and Territories
- Establish stronger protections for tenants against excessive rent increases with clear processes of oversight and dispute resolution in each jurisdiction
- Strengthen and empower Aboriginal owned and managed housing and homelessness services; and
- Support states and territories to introduce strategies to reduce and eliminate land banking, such as date limits to Development Approvals to combat land banking – so unused Development Approvals expire.

**Recommendation 2:**

- Specialised attention to women’s housing needs (a gendered lens), especially for women and children escaping family and domestic violence
- Ensuring that new supply of social and affordable housing includes homes with 3 and more bedrooms to meet the needs of families and women and their children, especially those in housing stress, experiencing homelessness and escaping family violence.

**Recommendation 3:**

- Clearly articulating the role and value of Community Housing for Australia’s housing system throughout the National Plan
- Identifying strategic areas to grow and develop the community housing sector including workforce development
- A commitment to fair national benchmarks for adequate funding for community housing providers for construction, tenancy management and other support
- Investigating ways to expand the scope of the Community Housing Build-to-Rent model to facilitate mixed and balanced communities, mixed tenure types, and resilient diverse vibrant neighbourhoods
- Developing a clear partnership approach with the community housing sector for delivering new homes and urban renewal projects.

**Recommendation 4:**

- New dwellings that have received funds from Government should have a caveat placed on the title to ensure that they remain available for residential use, and are not converted to short-stay tourist accommodation

- Councils should be empowered to limit the use of entire homes for short-stay accommodation where there is a shortfall of homes for local people. As argued in previous submissions, this option should be linked to the rental vacancy rate, as an indicator of the ability of the rental market to accommodate essential workers
- Short-stay accommodation should be included in the Planning System to ensure that any displacement of local homes or loss of amenity can be managed
- A review of the regulation of short stay accommodation, to ensure that the permit system delivers sufficient funds to ensure appropriate monitoring and compliance with permits and exemptions and that local decisionmakers are empowered to make place-based decisions to balance short-stay visitor accommodation with the needs of local workers and residents for appropriate rental accommodation

**Recommendation 5:**

- The definition of affordable housing needs a clear metric. The standard definition of affordable housing is where a household in the lower two quintiles (40%) is paying less than 30% of their income for their housing costs (rent or mortgage). We suggest using the standard definition.
- Throughout the Plan, discussions of affordability need to focus homes that low to moderate income households can afford, and
- Separate definitions and explanations are needed for affordable rental and affordable home ownership, including who are the target cohorts.

**Recommendation 6:**

- Shelter Tas recommends committing resources to form a consortium of key agencies to work on building community support for housing diversity including higher density development, social and affordable housing.

**Recommendation 7:**

- A housing in all policies approach including a housing impact analysis for all major government strategies, including education, economic development, tourism and population
- Clear identification of responsibility and accountability for timely and transparent housing impact analysis.

**Recommendation 8:**

- Immediate investment in demonstration projects for new redevelopment and urban renewal projects such as shop-top accommodation
- A grant program to fund and showcase well-designed affordable shop-top accommodation, and use of vacant office space or other well-located space targeted at low and moderate income renters and social housing tenants
- Analysis of vacant homes and ways to incentivise use of vacant homes and office or commercial premises for people to live in, and
- Analysis and spot purchase of appropriate homes to meet the needs of particular cohorts such as larger families.

**Recommendation 9:**

- A refresh and reset for the regulation of the private rental market, including modernisation of the Residential Tenancy Act in each jurisdiction
- Consultation to inform improvements to Residential Tenancy Acts

- Alignment of Tenancy and Landlord law and regulations to best practice in all Australian jurisdictions.

**Recommendation 10:**

- Establishing a system to monitor the private rental market in urban and rural areas at quarterly intervals, based on best practice in other jurisdictions.

**Recommendation 11:**

- Subsidies for housing are focussed on supporting community housing sector where profits are reinvested in community development, support for tenants and new homes,
- All housing subsidies ensure the business case includes value for money for the community, long term housing benefits for tenants.

**Recommendation 12:**

- An robust advisory role for people with lived experience of housing need and homelessness to ensure their input to system design and ongoing improvements, such as a consumer and advocate advisory body. A proposed program for upskilling and engaging consumer advocates is outlined in the Shelter Tas 2015 Report *A Tasmanian Consumer Engagement Strategy*
- Clearly articulate the need to attract and retain skilled workers into the specialist housing and homelessness workforce
- Clearly recognise the need for specialist workforce development programs for the housing and homelessness sector, and to develop capability and capacity in all of the organisations who play a role in delivering social and affordable housing and homelessness services
- Commit funding for a Workforce Development Program for the housing and homelessness workforce in each state and territory.

**Recommendation 13:**

- Shelter Tas recommends a regional and local analysis of the impacts of housing shortages on workers. This is particularly important when major projects are under consideration, as a construction workforce can present major housing demand in a local area. Housing is also a key feature of attracting and retaining long term workers, including health care workers.

**Recommendation 14:**

- Full implementation for a Housing First approach, including recurrent funding for support
- The Productivity Commission's Report into the National Housing and Homelessness Agreement, *In Need of Repair*, recommends targets for reducing homelessness, expanding early intervention and prevention and Housing First-type responses. Shelter Tas supports these recommendations.

**Recommendation 15:**

- Incentivise digital inclusion for all new dwellings.

**Recommendation 16:**

- New homes need to be resilient to changing environments and must incorporate energy efficiency standards
- Quality of homes to meet people's needs including trauma informed design.

**Recommendation 17:**

- Inclusionary zoning becomes part of the Planning System in each state and territory.

**Recommendation 18:**

- Specific responses are required to be developed within the National Plan for the following groups:
  - members of the Aboriginal Community
  - women and children
  - people living with disability
  - people from migrant and refugee backgrounds
  - groups experiencing housing stigma and discrimination, such as LGBTQIA+, younger tenants, and older people
  - unaccompanied young people under sixteen experiencing homelessness.

**Recommendation 19:**

- The National Plan needs have a system to monitor new evidence for emerging issues.

Please feel free to contact Shelter Tas for any further information.

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