



TASMANIAN HOUSING STRATEGY

Feedback on the Tasmanian Housing Strategy Exposure Draft

GLENORCHY CITY COUNCIL

17 July 2023

Question 1: 'Our way forward' identifies several levers for achieving a more equitable housing system for all Tasmanians. Are there additional or alternative more important levers that you believe should be addressed?

Housing First approach - Council welcomes the inclusion of Housing First as a key principle of the Strategy. However, it appears to be limited to people experiencing primary homelessness. Council's submission to the Strategy Discussion Paper highlighted the importance of adopting a Housing First approach that includes not only primary homelessness but also tenant protections and early intervention and prevention so that we are both helping people to be housed as well as keeping them housed. This foundation principle of the Strategy needs to reflect the vision, for all Tasmanians in all housing circumstances.

Needs of women and their children - Council's Discussion Paper submission highlighted the importance of the Strategy addressing the specific housing needs of women and their children. Council supports the research being undertaken by State Government in partnership with Shelter Tasmania to better understand those needs so that the findings can inform the Strategy. Council reiterates the importance, for an effective housing strategy, of a gendered lens to properly reflect the housing needs of women and children, including those escaping family and domestic violence. A specific 'trauma-informed' approach to housing and homelessness services is vital, including trauma-informed design principles for constructing homes and emergency accommodation with a supported pathway to a stable home for women and their children.

Lived experience - Council's Discussion Paper submission also included the importance of hearing from community with lived experience. While Council recognises this has been included in the Strategy, the importance of including people with lived experience in the development of the Strategy Action Plan/s cannot be over-emphasised.

Data and evaluation - Council reiterates its Discussion Paper submission on the importance of regular data and access to this data across all levels of government. To have real value, the Strategy must provide projections of future housing demand linked to future scenarios of population growth, at least at a statewide level, and preferably at Regional or Local Government Area level. A greater emphasis is required on the availability of data across all levels of government and the community sector.

More inclusive communities - Council welcomes the inclusion of community education to challenge some of the 'not-in-my-backyard (NIMBY) community concerns. This lever also needs to advocate for the dispersal of social and affordable housing and to enhance their integration within the communities rather than being segregated. This will help balance and reduce the stigma around social and/or affordable housing and prompt social cohesion among our community's most vulnerable.

Innovative design and high-quality housing - Under this lever, the Strategy states, "We need to ensure the current planning reforms are effective and that efficient regulatory settings deliver new housing stock that is well designed, adaptable and energy efficient. The needs of our population will change over time and the quality of our housing stock will need to change as well." This is a commendable approach, and the principles are sound. However, it is not clear from the current document, what actions (or strategies) are to be undertaken to achieve this goal.

Question 2: Theme one identifies the need for 'more homes, built faster'. Are there additional or alternative objectives you recommend for consideration?

Building regulations and planning approvals

Accelerating planning approvals is not the issue

It is noted that the Strategy mentions strategies about accelerating planning approvals for more housing. Tasmania's development application assessment timeframes are already the quickest in the nation, with current timeframes barely enabling full assessment and meaningful community engagement. Reductions in planning application assessment timeframes is not supported. Perhaps the focus should be upon strategic planning systems and policy development. The Strategy needs to review and address this. A clear action plan (or list of strategies) needs to be provided and considered thorough broad community consultation to understand what the repercussions of the proposals under this section are.

Industry-wide education to ensure faster and efficient planning approvals processes

The maximum statutory timeframes for assessing development applications in Tasmania is 42 days for discretionary pathways and shorter (28 days) for permitted pathways. In most circumstances, longer assessment periods occur when planning applications are put on hold when councils require further information to undertake assessment to issue a planning permit. The time the application is put on hold depends on how long it takes the applicant to prepare the further information requested, and this could depend on a number of factors including availability and workloads of external consultants, which causes further delays. Therefore, rather than accelerating planning approvals processes, a better approach would be for industry-wide education (including the general public) on what is expected / required so a complete planning application with all the relevant information can be submitted to councils. That will, in turn, expedite planning approvals timeframes.

Sustainability and energy efficiency

The Strategy states, “We need to ensure the current planning reforms are effective and that efficient regulatory settings deliver new housing stock that is well designed, adaptable and energy efficient.” Currently there are no adequate regulatory settings in the planning or building approvals processes that provide for good design, adaptability or energy efficiency of new housing. It is commendable that the Strategy addresses these issues. However, it is not clear what actions are to be undertaken to achieve the goal. The Strategy must advocate for amendments to State Planning Provisions (SPPs) to further sustainability and energy efficiency of housing. Planning controls need to be updated to require / encourage good design outcomes that achieve solar efficiency, cross ventilation, etc. Furthermore, noting that the current Building Regulations require a base level of energy performance for buildings, the Strategy must advocate for higher standards of energy efficiency where appropriate, for example a percentage of higher density housing to achieve higher standards of energy efficiency.

As the nation, including Tasmania, witnesses an ageing population, it is now vital that the Strategy also addresses universal/ adaptable housing to suit people with disabilities and seniors so that they can ‘age in place’. The Strategy must advocate for a review of planning/building controls to enable the delivery of this type of housing. Where higher density housing is proposed there must be mandates for a percentage of universal housing.

Review of car parking standards in the Planning Scheme

The acceptable solutions in the State Planning Provisions consists of generic requirements for the minimum number of car parking spaces for land uses, including for residential use. These standards are not area specific, and do not consider the local context. For example, residential dwellings close to/within the CBD areas/ activity centres with easy access to public transportation have the same requirements as those dwellings situated in the peri-urban and lesser connected areas. This becomes problematic when trying to attract infill development and/or higher densities in suitable locations as failure to meet the acceptable solutions pushes applications down a discretionary pathway. This adds to the assessment timeframes for planning approvals due to the proposals’ inability to meet the acceptable solution stipulated in the Scheme and the time and costs involved with preparing supporting information. Therefore, we suggest that the Housing Strategy advocate for the review of car parking requirements under the State Planning Provisions, so the minimum car parking requirement is based on location of the site and proximity to public transport options.

Residential land

Land banking

Another significant issue seen in the development market in Tasmania is ‘land banking’. Currently the legislation allows a planning permit to be valid indefinitely once ‘substantially commenced’. There is no definition for what is classed as ‘substantially commenced’ and no timeframe within which a development must be completed. This leads to the issue of land banking, wherein land with an approved development/ subdivision has gained ‘substantially commenced’ status with a valid indefinite planning permit but has not been fully developed for this purpose. Sometimes land banking occurs for several years, which is especially problematic when planning controls have been changed in that locality and the surrounding area has evolved except for the banked land and approved development within. Therefore, the Strategy should advocate for changes in the legislation to clearly define ‘substantial commencement’, so this is not open to interpretation. Further promoting a set timeframe within which

development approved under a planning permit must be commenced and completed is also encouraged.

Land availability

Council is open to the idea of partnering with Homes Tasmania and other housing providers to release Council-owned land for potential residential development. However, it should be noted there are legislative requirements for disposal of public land under s. 178 of the *Local Government Act 1993* that must be followed, as well as Council Policy relating to public land disposal.

Notwithstanding, it is emphasised that additional land availability is not the point of focus when target infill densities have not yet been achieved.

Partnerships

While Council understands this is a state-wide Strategy, there is much to be leveraged from other work already undertaken, such as the signing of the 30 Year Greater Hobart Plan (the Plan). The Plan applies to the urban metropolitan areas of the four central Hobart councils of Clarence, Glenorchy, Hobart and Kingborough, represented by the areas within the primary metropolitan Urban Growth Boundary of each council and their immediate surrounds.

Council worked as partner and advocate with the other councils and the State Government to support the Greater Hobart Committee's approval of the Plan on 24 August 2022.

The Plan provides a detailed strategic approach to residential development, infrastructure and economic development for inner metropolitan Hobart over the next 30 years and describes how:

- appropriate residential development can best meet the city's future housing needs;
- physical infrastructure and related services can best support the future spatial development of Greater Hobart; and
- development can strengthen the city's future economy and competitiveness.

It is essential that significant frameworks to address the role of the Plan are explicit in the Strategy.

Question 3: Theme two centres on 'affordability in the private market'. Are there additional or alternative objectives you recommend for consideration?

Equitable housing market:

Limiting holiday homes will allow more housing stock that will inevitably increase affordability of housing

The Strategy needs to address visitor accommodation (holiday homes) and considerations to put an appropriate cap on this type of accommodation being approved amidst the housing crisis. In a Planning sense, the permissibility of the visitor accommodation use class in certain zones, the planning pathway to obtain approvals and applicable planning controls in the Tasmanian Planning Scheme need to be reviewed. It is likely that the inclusion of regulations around holiday homes (short-stay accommodation) being approved, may reduce their numbers and enable more long-term housing stock to become available for the community.

Furthermore, the Strategy also needs to consider other incentives which will attract new rental properties to the market, including properties that are currently being utilised as holiday homes. This

will require an incentive that is greater than the financial return that could be achieved in the normal market while being used as visitor accommodation.

Definition of affordable housing

The current definition of Affordable Housing in the draft Strategy is considered inappropriate.

The draft Strategy defines Affordable Housing (included in the Glossary) as, *“Housing designed to cater for people of all ages and abilities, for example a home that is wheelchair accessible. The adaptability of housing is measured by the capacity of buildings to accommodate substantial change in terms of flexibility, convertibility and expandability.”* (page 44 - Glossary)

This definition would be more appropriate for the term ‘accessible housing’ or ‘universal housing’, rather than for affordable housing. While it is noted ‘affordable rental housing’ and ‘affordable home ownership’ have more suitable definitions, the definition of affordable housing in the draft strategy requires a review. Examples of definitions for affordable housing from other jurisdictions are below:

In Victoria, the *Planning and Environment Act 1987*, Clause 3AA defines, *“Affordable housing is housing, including social housing, that is appropriate for the housing needs of any of the following- Very low income households; Low income households; Moderate income households.”* The definitions for very low-, low- and moderate-income households are also provided within this legislation.

In NSW, the *Environmental Planning and Assessment Act 1979*, Clause 1.4 defines, *“Affordable housing means housing for very low-income households, low-income households or moderate income households, being such households as are prescribed by the regulations or as are provided for in an environmental planning instrument.”* The Act then further defines very low, low and moderate income households and provides further stipulations relating to provision and management of affordable housing.

The Tasmanian Planning system to address Affordable Housing

The need for affordable housing is made clear in the Strategy. The Strategy needs to advocate for consideration to bring in affordable housing into the planning system. It is important to include this matter as one of the items in the Action Plan to set the policy context, such as modifications to the objectives of the *Land Use Planning and Approvals Act 1993* (LUPAA) or planning policy direction relevant to the SPPs.

It may be effective to define and address affordable housing within LUPAA, similar to other jurisdictions across the nation once the appropriate provision is made for it within the planning system. Associated policies and strategies are to be comprised within the Tasmanian Planning Policies and the Southern Regional Land Use Strategies. This should then be reflected within the State Planning Provisions which may enable delivery of well-designed and managed affordable housing supply.

Provision of affordable housing to be approached more holistically

The Strategy emphasises the importance of delivering affordable housing, primarily by Homes Tasmania with their target to deliver 10,000 new social and affordable homes by 2032.

The concept of delivery of affordable housing should be encouraged in a more holistic manner, including by the private sector. The draft Strategy does mention that the demand for social and affordable housing will continue to grow unless the private sector is encouraged to invest in and deliver quality housing supply, including affordable dwellings. However, there is little mention of how to achieve this and no indication of the actions required has been given. Homes Tasmania as the sole

producer of affordable / social housing may not be a sustainable approach in achieving a reasonable stock of affordable housing.

The private sector could be encouraged to provide affordable housing with incentives such as density bonuses /additional floor space ratios where a percentage of affordable housing is proposed in medium – higher density developments. This could be legislated, including the incentivised standards. A good example is the NSW *State Environmental Planning Policy (Housing) – Affordable Housing* which provides controls for who can provide affordable housing, design requirements, incentives, how long the housing should be used for affordable housing, who manages it, etc.

Question 4: Theme three places ‘people at the centre’ of the draft Strategy. Are there additional or alternative objectives you recommend for consideration?

As addressed above in Question 1. Housing First approach.

Council reiterates the importance to include people with lived experience throughout the development and implementation of the Strategy and Action Plan/s.

The Strategy makes a brief mention of migrants. Councils’ submission to the Discussion Paper highlighted the importance of addressing the housing needs of migrants regardless of entry or visa status, whether through humanitarian services or the skilled migrant program, so that migrants can fully participate in community life, training and employment opportunities.

Question 5: Theme four highlights ‘local prosperity’ as a priority. Are there additional or alternative objectives you recommend for consideration?

The Strategy highlights the role of local government in achieving the objectives of theme four. Council is unable to provide an informed response without the accompanying Action Plan

Question 6: Are there other ways the government could make its actions and progress to meet the proposed objectives more transparent and accessible?

Action Plan and Implementation

The draft Strategy provides policy statements and objectives under the four themes. However, there is a lack of detail around activities to be delivered under the ‘Action Plan’. Setting out the actions to meet the proposed objectives would be an essential first step in making them more transparent and accessible. Once that step is achieved, there would be the need to develop tangible measures to enable the reporting of progress against the actions and objectives.

It is noted that an Action Plan will be issued at a later date which will guide the implementation of initiatives identified in the Strategy. This Action Plan must be publicly exhibited so feedback can be provided. The Project Timeline in the Homes Tasmania webpage does not indicate more public consultation. It is essential for the Action Plan to undergo formal public consultation, so stakeholders are fully informed about the ‘actions’ that they are committing to. This would make the actions to meet the proposed objectives more transparent and accessible, and more likely to be supported by the community.

Question 7: Do you have any comment on what this draft Strategy does well?

The Strategy captures the key issues and sets out sound objectives for addressing Tasmania's housing and homelessness crisis.

However, there is need for more specificity around the actions to achieve outcomes against those objectives and a need to consult on these actions with key stakeholders, including local government; and the community.

Question 8: Is there anything you think the draft Strategy does not cover but should, or that it mentions but could be highlighted more?

Infill housing

The importance of infill housing has been clearly expressed in the draft strategy. It is important for the strategy to address associated infrastructure charges and advocate for legislative changes to facilitate developer contributions.

A definition for infill housing in the Glossary would be useful.

More rigid Urban Growth Boundary (UGB)

The draft strategy states “while some greenfield development will be needed, particularly for regional and remote communities, infill in urban areas and positive settlement patterns around or close to existing health, education, and public and active transport opportunities will be prioritised.”

It would be good to see the Strategy addressing a more rigid urban growth boundary as favourable so infill housing can be encouraged.