

Ref: 13/011-EM

17/07/2023

Tasmanian Housing Strategy
GPO Box 65
HOBART TAS 7001

Dear Sir/Madam

Re: Tasmanian Housing Strategy | Exposure Draft

Thank you for the opportunity to provide a submission on the draft Tasmanian Housing Strategy (the Strategy). I note that local government, via the Local Government Association of Tasmania (LGAT) has secured an extension of time to provide feedback until 5pm, 17th July 2023, and we appreciate the extension being granted.

This submission deals with issues across a range of strategy themes, as well as general omissions and considerations for the Strategy, and is therefore detailed below, rather than directly responding to the templated questions.

1. Action Plans

General

The work undertaken to date is positive; however, the Strategy lacks the ability to be measured for success, without the accompanying action plans being offered for consultation. The Strategy states: "A robust reporting and governance process will accompany the implementation of the Strategy. It will be supported by action plans that will outline specific initiatives to help us achieve our housing vision for Tasmania." It is vital that the action plans that deliver the Strategy are made available for consultation, to ensure that relevant stakeholders are aware and supportive of their role in enabling and executing the Strategy, particularly as Local Government are named as being a facilitator of the action plans.

2. Data

General

Tasmania's population projections are not sufficiently detailed to provide local context and it is unclear to what extent factors such as underutilisation and land banking are considered in

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determining future housing demand. Local data is important in understanding where, and what type of housing is needed, to address identified shortfalls. The Tasmanian Housing Exposure Draft – Data Dashboard provides important dwelling demand projections and the mix of housing required; however, this has not been well represented within the Strategy.

3. Definition of affordable housing

Theme 1 – Scaling up

The commitment to deliver 10,000 social and affordable homes is undermined by the general interpretation of what affordable housing is, versus the definition within the Strategy document - which would be more appropriately defined as accessible/adaptable housing. The NSW Department of Communities and Justice definition is more aligned with community expectations of what affordable housing is, and is defined as follows:

“Affordable housing is housing that is appropriate for the needs of a range of very low to moderate income households and priced so that these households are also able to meet other basic living costs such as food, clothing, transport, medical care and education. As a rule of thumb, housing is usually considered affordable if it costs less than 30% of gross household income.” (source: <https://www.facs.nsw.gov.au/providers/housing/affordable/about#1>)

4. Housing Tasmania vs private development

Theme 1 – Scaling up

Insufficient incentives or regulation currently exists to promote adequate affordable housing within the private sector, as a) the Private Rental Incentives Program (PRI) capped price has not kept pace with the current rental trends, and b) there is no mandate for a portion of affordable housing (as per NSW definition) within new developments. Housing Tasmania, backed by appropriate legislation and acquisition options, is best placed to be a pro-active development agency and increase the stock of affordable housing and explore alternative housing models, that provides a pathway for private development.

5. Barriers to infill development

Theme 1 – Residential land

Barriers to infill development have been well analysed in the document *Toward Infill Housing Development 2019*, prepared by Place Design Group for the Department of State Growth. This report contains a range of recommendations that are yet to be implemented in their entirety, beyond the promotion of ancillary dwellings. Key recommendations of the report include:

- Infrastructure charges/developer contributions to gain sufficient benefits from increased density.
- Review infrastructure capacity to allow best use of existing infrastructure.
- Complete review of State Planning Provisions and Regional Land Use Strategy with focus on enabling infill for developer confidence and to set expectations.

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- Community buy-in of increased density and education of associated benefits (i.e., improved services).

6. Planning approvals

Theme one – Building regulations and planning approvals

Tasmania is at the tail end of a significant planning reform program, which has seen numerous iterations residential development provisions rolled out. While consistency across the state has improved, there has not been significant changes to approval timeframes. Assessment timeframes, as required by the *Land Use Planning and Approvals Act 1993* (LUPAA), are consistently met; however, delays are perceived when further information is required to undertake an assessment. The regulated assessment timeframe should not be reduced, to ensure consultation can occur adequately and meaningfully and ensure the Schedule 1 objectives of LUPAA are met. Resources are therefore best allocated to:

- improving design guidelines to aid best practice design and comprehensive applications;
- improved infrastructure to facilitate development opportunities and ease of development; and
- community education on planning regulation and processes.

7. Short Stay Accommodation

Theme Four - Short Stay Accommodation

Despite the *Short Stay Accommodation Act 2019* requiring booking platform providers to provide short stay premises information to the Director of Building Control (CBOS) on a quarterly basis, the associated reporting is almost a year behind schedule and contains numerous data quality issues. Nevertheless, based on the information provided, the impact of short stay accommodation on rental vacancy rates outside of the Hobart and key tourist areas, is minimal, with energy and resources better directed to other aspects of housing provision.

8. Other considerations

Other matters that require consideration within the Strategy include:

- The needs of culturally and linguistically diverse peoples is not well represented within the Strategy.
- Collaboration between Housing Tasmania and Local Government to ensure alignment in allocation of future services.
- Importance of placemaking and streetscape design in creating liveable communities/neighbourhoods.
- Land banking and associated incentives/disincentives.
- Underutilisation and vacant housing.
- Consideration of timeframes from 'concept' to 'move in' in terms of a rolling reserve of land supply.

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- The need for community acceptance regarding densification.

Thank you again for the opportunity to provide comment. Should you have any further questions, please do not hesitate to contact me, either by email erin.miles@nmc.tas.gov.au or by phone 6397 7303.

Yours Sincerely

A handwritten signature in black ink that reads "Erin Miles".

**Erin Miles
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