

3 July 2023

Homes Tasmania

Via email: tasmanianhousingstrategy@homes.tas.gov.au

SUBMISSION – TASMANIAN HOUSING STRATEGY EXPOSURE DRAFT

Thank you for the opportunity to make a submission on the Tasmanian Housing Strategy Exposure Draft, 'the Strategy'.

The Planning Institute of Australia (PIA) is the peak body representing the planning professional, and planning more broadly, championing the role of planning in shaping Australia's future. PIA facilitates this through strong leadership, advocacy and contemporary planning education.

PIA's [Role of Planning in Housing: Position Statement 2022¹](#), the 'Position Statement', has parallels with the themes of the Tasmanian Housing Strategy. Significantly, it identifies how good planning practices are important to the delivery of housing and should not be viewed as an impediment.

The Tasmanian Division of PIA (PIA Tas) has reviewed the Tasmanian Housing Strategy exposure draft (the Strategy) and provides the following feedback.

Summary statement

PIA Tas supports the development of a Tasmanian Housing Strategy and notes that there is broad correspondence with PIA's own position statement and the draft Strategy. The draft Strategy does not however sufficiently address key opportunities Tasmanian planning system.

Accelerating planning approvals is not considered by PIA Tas as the issue. Instead, there needs to be more effort put into maintaining and evolving policy and strategic elements to ensure:

- A regularly monitored pipeline of appropriate housing land supply that is well serviced and located.

¹ <https://www.planning.org.au/documents/item/12216>

- More opportunities to improve understanding of growth challenges in the urban environment so the community are more supportive of the urban changes required to support housing and urban growth.
- Finer grained spatial resolution of housing growth opportunities in strategic documents.
- Contemporary State Planning Provisions to provide clearer approval pathways for diverse dwelling types: not just single dwellings.
- Better housing design outcomes to support high quality amenity and ensure the best possible integration of new development into our existing urban fabric.
- Ongoing monitoring of success in delivering housing and land supply through clear benchmarks and metrics.

Tasmania has quick assessment timeframes and an effective legislated assessment process.

Tasmania has been through extensive planning reforms over the past 10 years, including legislative changes to reduce statutory timeframes. Timeframes for approvals enabled by the *Land Use Planning and Approvals Act 1993* are now 28 days for a permitted development and 42 days for a discretionary application.

As demonstrated in Table 1, Tasmania has the second fastest observed assessment timeframe for discretionary applications. For permitted applications the average assessment timeframe in Tasmania is even quicker with a statutory and observed timeframe (including stop clock periods) of 28 days².

The draft Strategy states that there should be an accelerated timeframe for assessment of social and affordable housing; however, there is no evidence that the current statutory timeframes are an impediment and instead are minimal with most applications being determined within a comparatively efficient time. Any further reduction in timeframes may result in insufficient time and capacity to adequately assess compliance of new development therefore resulting in outcomes that do not adequately achieve the objectives of good development.

² 2021/22 Tasmanian Local Government Consolidated Data Collection

Table 1: Statutory and observed assessment timeframes for applications requiring public notification³

	NSW	Vic	Qld	WA	NT	ACT	SA	TAS
Statutory time	None	60	180	90	None	45	50	42
Observed time (incl stop clock days)	106	121.4	86	no data	55	61	33	60

Relatively recent planning reforms have also introduced a ‘no permit required’ pathway, in effect since 2013 through *Planning Directive No. 4.1 – Standards for Residential Development in the General Residential Zone*. This change means that single dwellings on a vacant lot can progress without a planning permit and therefore are not even subject to assessment so do not even feature in the timeframes shown in Table 1.

Regulatory planning instruments need to be regularly maintained as contemporary and support diverse housing outcomes and good design.

PIA Tas recognises that residential development standards implemented through the Tasmanian Planning Scheme are an important tool in enabling sustainable and safe housing options and neighbourhoods and should be seen as a first step and complementary to building code requirements. While there are clear ‘no permit required’ pathways for single dwellings, current State Planning Provisions do not sufficiently resolve clear pathways and requirements for other types of dwellings.

The objectives of the Act, policies of the Regional Land Use Strategies and standards of the planning schemes align closely with those of the draft Tasmanian Housing Strategy in assisting in the delivery of safe development. Where further reforms are proposed to streamline planning systems in a way that reduces assessment times and regulatory costs, these should fully achieve the value of adopted strategic outcomes for people, places and buildings.

A housing opportunity in the Tasmanian planning system is therefore increasing support for diverse dwelling types and ideally clearer assessment pathways, particularly for medium density residential development. To get to this point however PIA Tas

³ Sources:

NSW: Assessment times (gross days) for DAs FY23 to May –NSW Government –NSW Planning Performance Dashboard.

VIC: Average processing days to final outcome FY23 to May 2023 –Department of Transport and Planning –Planning permit activity reporting dashboard.

QLD: Decision timeframe average (business days) for material change of use –UDIA Queensland –Development assessment monitor.

SA: Performance assessed application with referral required (planning consents) –PlanSA–Performance indicators.

TAS: Actual timeframes for discretionary applications –Tasmanian Government –Tasmanian Local Government Consolidated Data Collection (CDC), releases to 2021.

NT: Average processing times for all DAs 12 months to May 2023 (total days) –Department of Infrastructure, Planning and Logistics –Land development data.

ACT: Average days to make a decision on DA FY23 to April –ACT Government –Development application performance webpage.

recognises the need to more clearly identify appropriate locations through finer grained spatial strategic planning that includes community engagement as well measures to improve design quality.

PIA Tas therefore welcomes not only the State Government's Residential Standards Review but also the Medium Density Design Guidelines project.

Quicker more effective housing outcomes in the Tasmanian planning system can be achieved through better 'front-loading'.

PIA Tas believes that the Tasmanian planning system's unfounded reputation for 'slowness' comes from the lack of comprehensive spatial strategic planning that resolves matters as early in the planning process as possible. Instead at the moment, planning issues are being left to resolve at the individual application level, increasing information requirements from applicants as well as debate around each individual project.

The pace of change in the urban environment has increased over the past 10 years and with it poor examples of housing outcomes, which has only increased community resistance.

PIA Tas welcomes the upcoming review of Regional Planning Systems and the Regional Land Use Strategies. We also promote strong consistent local level strategic planning to help 'ground' higher level strategies into local areas.

Embedding desired housing outcomes within these processes is fundamental to ensuring that mechanisms for the delivery of housing are cohesive with broader strategic planning considerations. The implementation of the strategy should be aligned with the ongoing efforts of the Tasmanian Government and the planning profession to deliver effective strategic planning. It also should be within an environment that improves community literacy and acceptance of urban change.

We need clear benchmarks and metrics to measure success, particularly in the context of the Planning System.

The implementation of the Strategy identifies 'measuring success', however, except for Figure 2, the draft strategy provides very little baseline data on the existing housing situation in Tasmania or any measurable targets to assess the effectiveness of the strategy. This is relatively unsurprising to PIA Tas. Consistent with PIAs Position Statement the strategies should target, measure, and monitor the delivery of all forms of housing.

Regulatory pathways through the planning system are an effective tool in monitoring land use and development outcomes. This has been demonstrated through the

application of a permitted pathway for Visitor Accommodation and the mechanisms established under the *Short Stay Accommodation Act 2019*, that have enabled government to understand the number of dwellings that have been converted to short stay accommodation.

Maintenance of a contemporary data dashboard, available not only to agencies, but local government and the private sector is strongly advocated for by PIA Tas. Data that should be captured and reported on in a centralised location include:

- Residential zoned land supply and rezonings (in hectares and through spatial mapping).
- Residential lot approvals (in no of lots, average lot size, uncompleted lots and through spatial mapping).
- Total housing stock by tenure (total, private, social, community).
- Total housing stock by type.
- Dwelling completions by housing type.
- Construction timeframes.
- Average development costs per square metre by dwelling type.
- Number of permit applications (by category: no permit required, permitted, and discretionary).
- Observed approval timeframes.

In conclusion, **PIA Tas recommends** that the draft strategy's planning outcomes are reviewed against PIA's Position Statement to deliver best practice. It should also:


- Clearly state that housing is a fundamental Human Right.
- Acknowledge the important role that planning has in delivering sustainable and productive urban settlements, inclusive of safe, secure and affordable housing.
- Recognise the importance of achieving the value of end outcomes for people, places and buildings in the planning system and its roles in delivering safe and sustainable housing, liveability, and neighbourhood outcomes.
- Set clear targets, measurements and monitoring to assess outcomes.

PIA members recognise and experience the realities of delivering affordable housing every day and advocacy for these measures is embedded in our professional practice.

We welcome acknowledgement by the Government of the importance of delivering affordable housing and look forward to seeing real housing outcomes of benefit to the sustainability of Tasmanian communities.

Thank you again for the opportunity to make a submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Purves', with a long horizontal stroke extending to the right.

Michael Purves

President

Planning Institute of Australia, Tasmanian Division

Attachments:

Attachment 1 – *Role of Planning in Housing Position Statement 2022*, Planning Institute
Australia