



Officer: Kelly Min
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Homes Tasmania
GPO Box 65
Hobart TAS 7001

Dear Sir/Madam,

RE: TASMANIAN HOUSING STRATEGY EXPOSURE DRAFT

Brighton Council appreciates the opportunity to comment on the Tasmanian Housing Strategy Exposure Draft ('the Strategy').

Please see the response to the questions below in relation to the draft Strategy.

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?

- It is recommended that Homes Tasmania ensures consistency between the draft Strategy and the suggested amendments to the SPP's to ensure consistency between strategy and statutory processes. For example, submissions to the amendments for the State Planning Provisions (SPPs) have included mandating the provision of wider parking spaces allocated for vulnerable uses such as residential care facilities to ensure elderly people have dignified, equitable, and reasonably achievable access to their homes.

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

- Brighton Council have found that one of the greatest barriers to development, particularly infill development, is that there is no statewide legislated framework for infrastructure contributions. All other Australian jurisdictions have infrastructure contribution frameworks that give developers certainty about the cost of infrastructure in developments. In Tasmania we operate under the "first mover" principle whereby the first developer has to pay for the infrastructure and then all others get a "free ride". Understandably, this incentivises developers to hold off on developing land while they wait for other to move first.
- Incentivising innovation may support greater flexibility and outcomes in delivering new housing. This could be further supported by creating a less risk-averse housing system and reducing red tape to facilitate innovative housing. Some examples of innovation applied to the housing market include not only prefabricated buildings or building components but smart and green buildings with more energy-efficient building design and technologies to address climate change issues, Building Information Modelling (BIM), and the introduction of new building materials.

- The planning approval process could be expedited if developers were to provide Council with an assessment-ready application. Moreover, the design guidelines should be incorporated as requirements of the SPPs for greater clarity and consistency, thus removing the risk and cost to future developments and upgrades. Faster planning approvals should not be at the cost of good built environment outcomes.
- Implementation of additional incentives to help address the current labour shortages in the housing market and improve capacity to deliver new housing faster should be considered (e.g., funding scholarships and loans for people to choose to study building-and-construction-related courses, bringing additional skilled migrants, providing incentives for housing developers to employ apprentices or trainees).
- Health and safety regulations should be strengthened in order to improve construction site work practices and minimise claim costs. The construction sector in Tasmania experienced about 12% higher serious injury frequency than a decade ago¹. This was the second-highest injury rate across 19 industries, behind health care and social assistance².

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

- Land banking remains a large contributor to restricting supply in response to housing demand. Therefore, it is highly recommended to consider implementing several levers, for example incentivising residential developments to undertake timely construction and the inclusion of sunset clauses applicable to any potential land release areas or rezoning applications that prohibit the lengthy and protracted release of lands under State Planning Provisions (SPPs).
- Regular review of the statewide Regional Land Use Strategies (RLUS) is critical to understanding current residential supply estimates and predicted demand for residential land. This will allow Council and developers to identify suitable land for release, and work to replenish supply through appropriate mechanisms. Urban land release has a long lead time between initial identification within a strategy and release to the market. Therefore, it is critical to require a 20-year supply plus the rolling stock available to ensure a reasonable opportunity for a constant supply of residential land to the market from a range of locations.

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

- The strategy should consider provision of social infrastructure to support increased housing densities and should aim to achieve 20-minute neighbourhoods that allow residents access to services they need, such as employment centres, schools, public and active transport options, local shops, healthcare, parks, and leisure facilities within a reasonable distance. This should be embedded within the priority

¹ WorkSafe Tasmania. (2022). Construction Industry Snapshot 2021.

https://worksafe.tas.gov.au/__data/assets/pdf_file/0005/673727/Construction_Statewide-Snapshot-2021_WEB.pdf

² WorkSafe Tasmania. (2020). Tasmania Industry Overview 2019. https://worksafe.tas.gov.au/__data/assets/pdf_file/0006/572127/2019-industry-report-Statewide.pdf

areas of the Strategy and other relevant mainstream policies, strategies, and programs to ensure equitable access to amenities from both social and affordable homes.

- Design guidelines and any consequent amendment to SPPs should include requirements to provide increased amenities, such as landscaping and access to passive solar design, as well as appropriate design to offset impacts such as increased stormwater runoff, and climate change impacts. Research shows that inclusion of green spaces has a positive effect on ambient temperatures. Requiring greenspaces will significantly contribute to a reduction in energy and maintenance costs, mitigate climate change impacts, and reduce spatial disparities in terms of well-being.

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

- We strongly agree with the strategic focus on workforce retention and growth in rural and regional areas through the facilitation of key worker rental housing developments. However, creating and implementing targeted responses should be for each region/township will allow for greater community sustainability and resilience.

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

- It was noted that the Strategy does not include a draft action plan. However, it sets out a summary of what is likely to be included in the action plan (see p.26 relating to Theme One). Therefore, we highly recommend the action plan be presented for further community consultation prior to its adoption, given that the draft strategy notes that “private and key community stakeholders . . . have a role to play in the delivery of housing actions” (see p.38).
- A coordinated approach is required between State and local government about data collection, implementation of strategies, and increased community consultation prior to plans being implemented, to provide clarity and certainty.
- It has been identified that some of the barriers to housing is a misunderstanding in relation to social and affordable housing, as well as infill development. It is crucial that a consolidated approach to provide regular community education on the strategy and planning system, is undertaken. This will enable residents to provide informed and meaningful feedback during opportunities for consultation.
- The ongoing commitment to housing equity can be achieved by the use of post-occupancy evaluation of housing projects which may improve safety and energy performance as well as housing design outcomes.

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

Overall, the draft Strategy is a sound document that captured all the priority areas. It provides an overarching strategic direction for all levels of government, private industry, and the community sector. In particular, we strongly support the implementation of Housing First principles which allows rapid

access and sustaining of tenancies to housing for the most vulnerable people without requiring other varying expectations to be met first.

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

- The clear strategic alignment between the Strategy and the SPPs must be presented in the Strategy to build aligning value, support, and actionable objectives that will drive the Strategy for success.
- Changes in legislation are required to include a requirement for a diverse mix of housing, such as social, affordable, and private, in each development. Also, there is an urgent need to finalise the Apartment Code as this will greatly impact the facilitation of medium to higher-density developments.
- The strategy should give consideration to the inclusion of objectives and outcomes for public transport which focuses on identifying issues, such as the anticipated differences in transportation outcomes between residents of affordable and market-rate units across different urban contexts and ensuring the delivery of affordable housing in areas that provide greater transportation choices.
- The delivery of programs and initiatives to ensure regional councils are appropriately resourced and supported to plan for planning scheme amendments and assess new housing in a timely and efficient manner.

If you have any queries about this submission, please contact the above officer on (03) 6268 7041, between 8:15 a.m. and 4:45 p.m. Monday to Friday or by email at development@brighton.tas.gov.au.

Yours faithfully,



Jo Blackwell
Acting Director Development Services