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## RE: TASMANIAN HOUSING STRATEGY – EXPOSURE DRAFT

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) welcomes the opportunity to provide comments on the *Tasmanian Housing Strategy – Exposure Draft*. To prepare this submission, we have consulted with our membership and drawn from the expertise of our policy team.

Overall, the Institute endorses the themes explored in the Draft. It is also great to see that topics raised in the Institute’s submission to the former draft of the Tasmanian Housing Strategy in October 2022 have been considered.<sup>1</sup> This includes emphasising strategic development of in-fill in urban areas, minimising greenfield development where possible, and underscoring the importance of new builds to be environmentally and socially sustainable.

In the current Draft, we would like to comment across the two themes of “*More Homes, built faster*” and “*Affordability in the private market*”. A design-led approach is a critical success factor in the delivery of more homes for Tasmanians. We are pleased that the strategy acknowledges the critical role of design: “*Developments can also target specific life-stages and support needs to cater for a diverse population while maintaining the design-led principles that promote sustainability and affordability*” (p. 13). There are repeated references to good design contributing to outcomes of liveability, accessibility, health/wellbeing, inclusive housing and communities. The attributes of “High quality” dwellings require detailed explanation and should include references to dwellings being built to last, and well designed for sustainability, access to solar gain, liveability and accessibility. “*High quality*” and “*quality*” are used in different contexts throughout the strategy, but this needs to be well-explained in operational terms that can then be used for criteria when specific projects are being procured and especially in any design guidelines.

Durability needs to be one of the explicitly specified indicators of quality. In terms of Tasmania’s climate, and especially the increasing recognition of the role of condensation in building degradation (sometimes resulting from poor water proofing /water-shedding), durability should be an explicit outcome in the delivery. This will ensure that the end asset holder will have overall lower maintenance and refurbishment costs in the longer term. Other Australian states are currently promoting this stance. For example, the *Apartment Design Guidelines for Victoria* (2021) now include guidance that are codified into the Victorian Planning Provisions (VPP) External walls and materials objective (Clauses 5.0604 and 55.07-19). The guidance specifies, that “External walls with durable materials age well over time, support the building’s longevity by protecting it from the elements, minimise ongoing maintenance needs and mitigate fire risks.

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<sup>1</sup> <https://www.architecture.com.au/wp-content/uploads/20221019-Tasmanian-Housing-Strategy-Institute-Submission-FINAL.pdf>

“Ground-level facades that incorporate form, textures and colours make neighbourhoods more coherent and interesting and create pleasant experiences for pedestrians.” (p. 48). As there is a strong emphasis on faster development of homes, the Institute would like to reinforce that speed should not negatively impact the longevity of built outcomes.

Taking in the scope of the strategy the Institute would also like to encourage a broad range of housing typologies for these new homes. This could include, townhouses, units, apartments, and inner-city dwellings, adaptive reutilisation of second story shops in the CBD and some alternative housing typologies as seen but the Nightingale Projects across Victoria.<sup>2</sup>

Tasmania needs to accelerate its work on the draft Apartment Code which commenced four years ago.<sup>3</sup> Tasmania needs its own apartment design guidelines similar to the way Victorian has its *Apartment Design Guidelines*, NSW has *SEPP65 Design Quality of Residential Apartment Development*, South Australia has *DESIGN GUIDELINES FOR SUSTAINABLE HOUSING & LIVEABLE NEIGHBOURHOODS – Form of housing 1.3 Apartment Design*. The strategy is an important reason to establish design review panels. Whereas greenfield development might benefit from expedited planning pathways, increased levels of in-fill development will require design review panels to ensure that well design projects achieve highly liveable neighbourhoods, where the resulting neighbourhood character is not perceived negatively by local communities.

Homes Tasmania will also need to pay close attention to its procurement methods. Certain procurement methods, such as novated Design and Construct, could result in unforeseen “value management” during the construction phase that corrupts the original design intent. The result can include the substitution of materials, fixtures and fittings that diminishes durability, thermal performance, and aesthetics.

In addition to the “*More Homes, built faster*” theme, the Institute would like to see an additional theme of “*Housing Renewal*” that offers incentives to repurpose and redistribute existing underutilised housing stock in Tasmania. These include incentives for downsizing empty-nesters and incentives to maximise the use of the vacant private dwellings across Tasmania so they can be brought into the housing market<sup>4</sup>.

In the case for the empty-nester’s in Tasmania, the institute would like to see downsizing incentives. In New South Wales and Victoria stamp duty exceptions or concessions are offered for pensioners who are downsizing.<sup>5</sup> These incentives would aid in the addition of further housing stock into the current market. Incentives could also be given to families for multigenerational living arrangements. This could be in the form of tax advantages or grants to fund retrofitting houses or the addition of self-contained units<sup>4</sup>. Multigenerational living arrangement incentives could apply for both the older generation, who may be struggling to live independently and the younger generation who are saving up to purchase their first home. The positive and practical outcomes from multigenerational living exceed the benefits of housing shortages but also offer unique benefits to each generation, including increased social interactions, a decline in loneliness for both older and adolescent generations and also provides financial benefits to all.

Existing housing stock in Tasmania needs to be assessed, and government support should be provided to enable existing housing stock to be adapted to cater for the needs of the occupants, and to provide housing suitable for all needs and demographics, including young people, families, the elderly and those with specific needs. The Institute would also like to see incentives for vacant houses to be brought up to code and an appropriate standard and used in the housing stock. There is a definite need for new homes in Tasmania, but the institute would like to see an additional focus on upgrading the current housing stock and bringing empty homes into use.

As a last note, in the Glossary, the definition of “Affordable Housing” appears to be describing “Adaptable Housing”: “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.” This is an important term to include, which promotes different housing typologies. However, there ought to be an

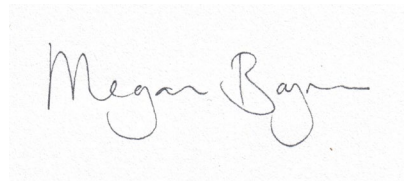
additional definition that lays out the intended meaning of “Affordable Housing” as the term is referenced throughout the Draft,

Once again, thank you for the opportunity provide feedback on the *Tasmanian Housing Strategy*. We hope the outcomes of the Exposure Draft will provide meaningful avenues to assist with the housing crisis in Tasmania. Please feel free to contact us if you need further clarification or explanation on any of issues the Institute has raised.

Kind regards,



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