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dc:tic
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Homes Tasmania
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Via email: tasmanianhousingstrategy@homes.tas.gov.au

Dear Sir/Madam

Thank you for the opportunity to provide feedback on the draft Tasmanian Housing 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?

- 1 The sustainable distribution of population growth must also be considered. Southern Tasmania is experiencing significant population related pressure such as traffic congestion and the state's highest levels of homelessness, at the same time that many regional areas are facing ageing, plateauing and even declining population. The State Government ('the Government') must address this through initiatives such as:
 - Reforming Tasmania's land use planning system, so that local communities, through their council, can plan their own future. Under the current system and proposed changes, it can be very difficult to progress developments which aim to leverage location and lifestyle factors to attract and retain population, and increase housing supply. Please refer to our recent submission on the draft Tasmanian Planning Policies for further details.
 - Decentralising the public sector; too many lucrative public service jobs are advertised as being Hobart or Launceston based, despite the normalisation of remote working.
 - Ensuring that communities outside of Hobart and Launceston have affordable and convenient aviation connections to mainland Australia and the world.

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

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- 1 The Government should incentivise and support property owners to take-up the following kinds of initiatives:
 - Converting houses to share houses.
 - Converting unused retail / commercial space to residential use.
 - Enlarging existing dwellings, through granny flats and extensions.
- 2 The Government should run pilot projects which de-risk emerging concepts in housing by demonstrating to the market, regulators and other stakeholders, what is possible. This should occur in the following areas:
 - Modular and rapid-build housing.
 - Tiny homes.
 - Sustainable housing.
 - Shared living arrangements.
 - New ownership and development models.
- 3 Support for tiny homes, which also requires a review of Planning and Building regulation. The Council is aware of some instances of Australian made tiny homes being purchased only for the owner to find that they cannot obtain the necessary approvals. In one instance we recently became aware of, a Planning permit was issued, however a Building Permit cannot be issued due to the home not meeting Building Code of Australia requirements.
- 4 The Government must articulate what it believes are the barriers within the Tasmanian land use planning system, so that councils, developers and others can engage in a meaningful conversation about practical solutions. It must be acknowledged that while councils are responsible for administering many land use planning processes, it is the Government that determines what those processes look like and the way they impact development through the Land Use Planning and Approvals Act 1993 and the Tasmanian Planning Scheme. It must also be acknowledged that Tasmania has among the fastest statutory assessment timeframes in the country.
- 5 Clarity is required about how the strategy will align with the Government's current land use planning reform agenda.

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

- 1 Page 29 says the Government “... *will continue to work with property owners to bring new dwellings into the rental market and encourage local governments to play their important role in increasing rental housing supply.*”. The Council reiterates its request for those discussions to occur; while constant references are made to the role of local government in addressing issues related to housing affordability, the Government has not articulated this in any detail.
- 2 The Government needs to consider incentives which will attract new rental properties to the market, such as properties that are currently being utilised as holiday homes or visitor accommodation. This will require an incentive that is greater than the financial return that could be achieved in the normal market. Anecdotally, one of the factors behind the existing Private Rental Incentives Program being undersubscribed is that the incentives offered (at least in some cases), are less than the financial return that could be achieved in the market.

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

- 1 The Council welcomes the references to a Housing First approach. Because the model has been applied in different ways across different jurisdictions, it is vitally important that Tasmanian decision makers quickly develop a shared understanding of what this means in our context. This will require consideration of the regulatory regimes, business models and other factors at play in countries which have successfully applied the model to reduce homelessness, such as Finland.

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

- 1 Page 36 refers to “*The provision of diverse and affordable housing, increased pace of rezoning and joined up planning and policy prioritisation in our rural and regional communities will support these social and economic endeavours.*”. This requires a review of the *State Policy on the Protection of Agricultural Land 2009* and associated instruments, to ensure they do not constrain development beyond what is reasonable and appropriate in the current context.
- 2 The Council calls on the Government to lead a review of short-term rental accommodation, aimed at identifying its impact on housing affordability and availability within each LGA and achieving a consistent, balanced and effective approach to regulation if and when it should be applied.

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

- 1 The Council is concerned that local government is often portrayed as not doing enough and as a source of inefficiencies in Tasmania's land use planning system. If the Government is committed to transparency, then it must also commit to identifying and articulating what it thinks councils should stop doing, start doing and keep doing, so that councils can consider those issues and work constructively with the Government to try and improve the situation.

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

- 1 While the strategy is very high-level, it addresses most of the key areas where action is required. We appreciate the work of the Government and the team at Homes Tasmania.

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

- 1 While the strategy should improve outcomes for Tasmanians over the long term, other solutions – including crisis accommodation in Central Coast – are required *right now*. Over the past few weeks, the Council has directly assisted the following people:

- Seven adults and one child who were living in tents, vehicles and caravans at Midway Point reserve, who the Council helped relocate to a more suitable (but not ideal) location on other council-owned land.
- A family of five, including two children with high needs, who have been living in a tent for seven months, and are now living in a bus.
- One adult and one child who were recently evicted and are now living in somebody's garage.

The Council has provided varying degrees of support to these people and ensured they are known to Housing Connect. The system is failing them, and there are almost certainly many others in similar situations in Central Coast, who are not known to us. The Government must prioritise the provision of safe and comfortable accommodation for these people. The nearest Safe Space, located at Burnie, was unable to accommodate them. The Council is also aware of local women's shelters and providers of accommodation for at-risk youth having nowhere for people to transition to, which is undermining existing government investment and placing staff and volunteers under hazardous levels of psychological and physical stress.

The Council has also provided funding to Gran's Van to expand their shower and laundry van service to our municipality, and from mid-July we will be making a shower block available through a partnership with the Salvation Army.

The Government must recognise the strain that homelessness is placing on communities and councils and must urgently provide funding or other appropriate interventions.

- 2 The Government should consider whether inclusionary zoning should be incorporated into the planning system so that a certain portion of any large housing development or proceeds from it, are allocated to social housing, and / or where developers are provided with relief from certain restrictions or other incentives to provide affordable housing.

Thank you again for the opportunity to provide comment. Please do not hesitate to contact me if you have any questions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Daryl Connelly', with a long horizontal flourish extending to the right.

Daryl Connelly MBus (PIA Assoc.)
DIRECTOR COMMUNITY SERVICES