

KENTISH & LATROBE COUNCILS

Our Ref: SC/GM
Your Ref:
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17 July 2023

Homes Tasmania

Sent via return email to: tasmanianhousingstrategy@homes.tas.gov.au

Dear Sir/Madam,

Submission – Draft Tasmanian Housing Strategy

Council acknowledges and appreciates the extension of time to 17 July 2023 for local government to make a submission on the Exposure Draft of the Tasmanian Housing Strategy.

There are multiple references in the document to the role of local government, however it is vital to understand that the actual influence that local government has on a number of aspects of housing supply to the market is limited. In particular, the document commits to encouraging *local governments to play their important role in increasing rental supply*. Council submits that this is quite unclear given that Council has no statutory power over the tenure or occupants of housing.

Further, *Theme One ... More Homes Built Faster* does not account for the key roles that State agencies, infrastructure providers such as TasWater and TasNetworks and the Tasmanian Planning Commission have in the provision of additional land to the market through strategic planning processes.

The document acknowledges the diversity of Tasmania's regions and that the 'response will be sensitive to the priorities and challenges to rural and regional areas'. In elevating the role of State planning reforms, it is important to understand the statutory implications of those reforms. Council has submitted to the public exhibition of the Tasmanian Planning Policies, that they will, in fact, actively impede housing growth in a large number of rural townships that offer good service levels and housing opportunity.



In improving the supply of land and housing to the market, there must be a clear understanding of objectives and outcomes that are practically realisable. Page 24 of the document incorrectly refers to targets for 70% infill development contained in the Regional Land Use Strategies and city deals. There are no such targets in the State's Regional Land Use Strategies and this statement should be removed. Whilst infill development and densification may be appropriate in numerous locations, prior experience has shown that infill targets act as an impediment to reasonable greenfield rezoning, as the circumstances required to enable commercially viable, infill development have not been properly understood.

In particular, legacy infrastructure constraints and lack of service capacity act as a significant impediment to both infill development and greenfield expansion. Interventions to facilitate infrastructure upgrades and serviceability will be critical to enabling both infill and greenfield land supply for additional housing.

The document states that there is more on a legislative front that can be done to deliver homes faster, through expedited approvals of social and affordable housing. Currently, the planning and building approval system does not distinguish between types of dwellings and their residents, yet provides for an expedited approvals process upon the residential development meeting particular standards (a bar which is not particularly high). Council queries what legislative changes are being contemplated given that it is only those developments that do not meet the standards that may be subject to longer process timeframes, noting that Tasmania has, on average, the fastest development approvals timeframes in Australia.

The document refers to 'Action Plans' to achieve the objectives, yet there is no clarity around the role of local government, or the resources that may be required, to achieve those outcomes.

Fundamental to the ability to provide timely availability of land (infill and greenfield) is the ongoing and contemporary monitoring of 'real-time' release and development of land. Understanding the on-ground influences on demand and supply of land and development to the market is critical to achieving successful planning scheme amendment outcomes in Tasmanian Planning Commission decisions. Experience has shown that five yearly cycles of data review that are backward looking are not a sufficient reflection of potential future pressures and Council queries the Draft Strategy's reliance on the default DTF projections that have historically proven to be deficient in providing an up to date analysis to support planning scheme amendments. Each region is undertaking a more detailed analysis of demand and supply of residential land and the Draft Strategy should instead make reference to contemporary data analysis.



This type of ongoing monitoring will enable a proper understanding of the effects of land banking and infrastructure constraints.

Council supports the acknowledgement on page 14 that housing requirements for specialised workforces for infrastructure projects such as pumped hydro and seasonal worker accommodation will have a unique impact on the provision of housing in the future.

Council recommends that the Tasmanian Housing Strategy would be best served by:

- ensuring that the suite of legislative planning instruments actually recognises and enables...

“distinct regions, each with key strengths and advantages and the potential to attract new investment, expand business and drive the state’s economy forward. 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”(p36); and

“Collaborating with local governments on housing programs specifically tailored to the local needs of Tasmanian communities, including regional Tasmania”.(p37)

As stated above, Council has identified direct impediments to the achievement of these goals in the Draft Tasmanian Planning Policies.

- finding solutions for the impediments to the provision of active supply of land for housing, both infill and greenfield, including physical infrastructure and land banking.

Council looks forward to further discussion regarding the Action Plan program.

Yours Faithfully,

A handwritten signature in blue ink that reads 'Gerald Monson'.

Gerald Monson
GENERAL MANAGER