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25 October 2022

Mr P White
Deputy Secretary
Department of Communities Tasmania

Attention: Brad Kelly, Project Manager, Tasmanian Housing Strategy

tasmanianhousingstrategy@communitiestas.gov.au

Dear Peter,

SUBMISSION - TASMANIAN HOUSING STRATEGY DISCUSSION PAPER

Thank you for the opportunity for Council to comment on the Tasmanian Housing Strategy Discussion Paper and for extending the time to make a submission to 25 October to enable Council's submission to be formally considered at a Council meeting.

I attach Council's submission.

Council unanimously endorsed this submission at its meeting on 24 October.

We look forward to the next phase of this work and the opportunity to have input into the draft Tasmanian Housing Strategy on its release for consultation early in 2023.

Please do not hesitate to contact Marina Campbell if you have any questions about Council's submission.

Yours sincerely



Tony McMullen
General Manager



TASMANIAN HOUSING STRATEGY

Submission to the Discussion Paper

You can provide feedback on the Tasmanian Housing Strategy Discussion Paper using this template by responding to any or all of the questions below. Add additional pages if required.

Question 1: Should the vision for the Strategy include other factors?

Recommend the vision be strengthened to be person centred and uniquely Tasmanian to reflect the diversity and challenges faced in Tasmania.

As a framework for the next twenty years, the Strategy needs to align with the State Government's current and future strategies and policies. This approach would ensure an integrated and regional response to housing impacts and housing need from areas such as population, employment, infrastructure, health, education and tourism.

Councils are motivated to best support their communities and look to supportive State Government leadership to effectively respond to challenges and coordinate a strengths-based approach.

Question 2: Are there important issues not covered by the focus areas?

A Focus Area on the specific housing needs of women and their children. An effective housing strategy needs a gendered lens to properly reflect the housing needs of women and children, including those escaping family and domestic violence. A specific 'trauma-informed' approach to housing and homelessness services is vital, including trauma informed design principles for constructing homes and emergency accommodation with a supported pathway to a stable home for women and their children

A Focus Area for a Housing First approach, tenant protections and early intervention and prevention. A Housing First response to homelessness is recognised as International best practice. This means housing people unconditionally as the first priority before dealing with their other needs. This approach ensures that people in housing need are supported with prevention and early intervention pathways that keep people housed. Prevention includes tenant protections and rights, modernising the Tasmanian Residential

Tenancy Act, and the need to assist people to avoid housing stress and homelessness. Evidence shows this to be a cost-effective strategy. This focus area would also encourage innovative solutions in the support and 'people-focussed' space, as well as the construction space which is well-covered in the Strategy. To be fully effective, the Strategy as a whole, and this focus area in particular, needs to be informed by the various voices of lived experience and services and practitioners from the housing and homelessness sector. Throughout the life of the Strategy, its implementation and Action Plans will be enhanced by attention to the experience of practitioners, providers, tenants, service users, people living with housing stress and people experiencing homelessness, with appropriate support for their participation where needed.

A Focus Area for data and evaluation of the Strategy at regular intervals. The Discussion Paper provides some figures and graphs showing recent changes in the supply and cost of housing, but it lacks the basis for a future focus in that it does not quantify the number of new dwellings required to meet projected growth in population or the population target set by the Tasmanian Government. To have real value, the Strategy must provide projections of future housing demand linked to future scenarios of population growth, either at a statewide level, or preferably at Regional or Local Government Area level.

A greater emphasis is required on the availability of data across all levels of government and the community sector. For example, projections of the number of new dwellings required to be delivered annually under low, medium and high growth scenarios for five-year intervals aligned with the census years should be an essential element of the Strategy, to ensure it is practical and measurable. It is noted that several other projects (Hobart City Deal and review of the Regional Land Use Strategies) recognise the need to identify and monitor population and housing construction data.

Throughout its twenty-year life, the Strategy needs to be informed by a rigorous approach to all relevant data. This will ensure that changes to circumstances, emergence of new housing needs, impacts such as experienced through COVID-19 on the use of homes as spaces for work and education, or changes to Federal funding models, can keep the Strategy agile and relevant. Evaluating the net gain in social and affordable properties is essential to monitor the effectiveness of the Strategy and its implementation at delivering housing outcomes.

Question 3: Are there additional objectives that are important for Tasmanians and should be included?

The Strategy should take the opportunity to 'market' the benefits of diverse housing forms and seek to increase the visibility of this type of housing in the community. To meet affordable housing goals, there is a need to provide for a diversity of housing forms: from detached single dwellings to multi-generational housing designs to medium and higher density forms. Social and affordable housing could be enhanced by promoting quality medium density housing styles and advocating through the media its benefits in order to increase the community's level of comfort with this built form.

Residents and communities are generally culturally conservative to change. Councils can improve conversations with our communities; however, this needs to be a collaborative approach between all levels of government, non-government and peak bodies. The Strategy should take the opportunity to endorse Shelter Tasmania approach of a YIMBY (Yes In My Backyard) to help counter opposition to social housing while promoting the positive outcomes for community.

Question 4: Are there additional housing outcomes that are important for Tasmanians and should be included?

The Strategy should address the housing needs of migrants regardless of entry or visa status, be that through humanitarian services and skilled migrant program, so that they can fully participate in community life, training and employment opportunities.

FOCUS AREA ONE: AFFORDABLE HOUSING

Question 5: What additional interventions could governments consider to improve housing affordability?

From a planning perspective, a review of the generic rates for parking spaces in the Parking and Sustainable Transport Code of the State Planning Provisions should occur to ensure that an appropriate level of carparking is required for medium density housing. Reduced car parking numbers can make housing cheaper to build and in turn more affordable.

Question 6: What scope is there to increase the role of the private and community sectors in improving housing affordability?

Private and community sectors would require government incentives so that higher rental costs are not passed on to tenants for improvements such as retro fitting for energy efficiency or improved accessibility to existing homes.

Question 7: What other issues would you like to be considered regarding housing affordability?

Promoting medium density housing options close to employment, services and facilities and public transport reduces transport costs for residents. Maintaining an urban growth boundary that maximises the use of existing infrastructure also helps to reduce overall costs to Councils (which impacts on rates) and helps make development more affordable. Further, promoting and mandating best practice environmental design principles in planning schemes helps to reduce energy costs and makes housing more affordable.

Question 8: Noting increased rental prices and decreased rental vacancies across Tasmania, what are some of the ways the challenges in the private rental sector, particularly around security of tenure, could be addressed?

Prevention includes tenant protections and rights, modernising the Tasmanian *Residential Tenancy Act*, and the need to assist people around security of tenure.

Question 9: How could the effects of the short-stay accommodation industry on the rental sector be managed into the future?

To facilitate an increase in rental supply, the application of a levy on short-stay accommodation could be implemented, with funds going to the State to contribute to housing assistance.

FOCUS AREA TWO: HOUSING SUPPLY

Question 10: What must be considered to make sure new housing meets diverse needs into the future?

At the time of the 2016 Census approximately 88% of dwellings across Greater Hobart were detached single-family dwellings. In 2021, there were 17,549 separate houses in the area (80.3%), 4,074 medium density dwellings (18.6%), and 51 (0.2%) high density dwellings, compared with 83.8% (separate houses) 13.2% (medium density) and 2.0% (high density) in the Greater Hobart respectively. Given the diverse range of households there is undoubtedly already a mismatch between supply and the current needs of the community, which without action is certain to increase into the future. The predominance of detached single-family dwellings means an increase in the proportion of new medium and high-density apartment style unit developments is required to arrive at a more suitable mix in the future. An effective Strategy should address housing diversity and provide clear direction on the mix of dwelling types and forms required to move toward a more appropriate mix in the future, including targets for the proportion of attached dwellings at regional and local government levels.

Question 11: How can housing supply respond rapidly to changing social and economic environments?

To have real value, the Strategy must provide projections of future housing demand linked to future scenarios of population growth, either at a state-wide level, or preferably at Regional or Local Government Area level.

Question 12: What additional interventions could governments consider to improve housing supply?

Governments at all levels can be significant holders of land potentially suitable for housing supply. Consulting with housing providers about their needs and strategically releasing land to the market that is potentially suitable for housing are two actions that Governments can undertake to improve housing supply.

Question 13: What other interventions could improve housing supply?

While the State has an important role in providing housing, the majority of new dwellings required to meet future needs will be delivered by the private sector. One of the most common forms of private sector residential development in Glenorchy over the past few years has been the construction of an additional detached single-family dwelling behind an existing detached single-family dwelling. This form of development falls far short of the yield and diversity that would result if the existing dwelling was instead demolished and a multiple unit development constructed in its place. Also the investment in the additional detached dwelling effectively removes any potential for the site to be redeveloped at higher densities in the future. While it is noted that the current costs of buying a property and demolishing the existing dwelling are often prohibitive to achieving higher density built forms, the Strategy should thoroughly examine the reasons behind the popularity of this form of development over multiple units and identify what can be done to encourage a shift toward the delivery of more multiple unit developments by the private sector.

Multiple unit developments in other States have the benefit of providing a lower entry cost into home ownership and function as a pathway through an owner building equity toward future ownership of a

detached dwelling if that is their preference. These benefits come in part from the number of multiple dwelling developments on the market and the efficiencies that developers can achieve by delivering an increase in yield on an individual site. The ability to realise a shift toward more multiple unit developments, that will hopefully be facilitated by the apartment code, will depend on the capacity and willingness of the development industry to change the housing product it delivers. The Strategy should consider the barriers to increasing the attractiveness of multiple unit developments to the development industry, what is necessary for the local industry to adapt to this shift and whether experienced developers of multiple unit projects elsewhere should be encouraged to invest in Tasmania.

Question 14: What can be done further to improve planning processes in Tasmania, particularly in the context of the delivery of social and affordable housing and increased density via infill development?

The State Government should also consider the establishment of a development authority that can buy land, consolidate lots and subsequently deliver this 'missing' medium density-built form. The focus for housing provision should now be on *only* providing medium density housing options to make the most efficient use of land and existing infrastructure. Quality examples of diverse housing forms may also increase market demand for this type of built form encouraging the private sector to deliver this form of housing.

Other options to support housing supply could include a mandated percentage of affordable/social housing lots in subdivisions and multiple dwelling development over a certain size and review of planning scheme controls to consider if minimum density controls are appropriate to address under-utilisation of land.

Question 15: What scope is there to increase the role of private developers and local government in improving housing supply?

It is unclear whether allowing continued urban sprawl by facilitating the subdivision of land to provide more detached single dwellings through 'Headworks Holidays' is increasing the provision of affordable housing, and whether infill medium density development should be incentivised instead. This matter should be thoroughly investigated as part of the Strategy.

It is also unclear which planning processes are not operating 'efficiently and effectively' to deliver housing. Empirical evidence needs to be attained to demonstrate the problem in the planning system (and if there is one, this data would assist in correcting it) before any changes are made, otherwise the problem may remain.

Question 16: How can we bring whole communities along to promote the benefits of social and affordable housing in local areas?

Support for effective advocacy across the full scope of housing and homelessness policy areas. Advocacy for people who use and rely on housing and homelessness services is vital as noted on p 8 of the Discussion Paper. In addition, the Strategy needs to recognise the critical role performed by expert systemic advocates such as Shelter Tas, the peak body for housing and homelessness services. As the Peak Body, Shelter Tas provides a consolidated voice for the sector, provides a conduit for information between the sector and Government, delivers expert policy advice and development, and is recognised by Government for the vital role it plays. Linkages with national bodies such as National Shelter and the Community Housing Industry Association (CHIA), and counterparts in other states enable evidence-

based advice on innovations interstate and overseas. This systemic work is an essential component of an effective Housing Strategy for Tasmania, and this important role needs to be acknowledged within the Strategy.

Adequate and sustainable funding for services to ensure safety and good outcomes for clients and communities. The past twenty years and recent Royal Commissions have taught us the importance of safety, and the need for ongoing improvements in workplaces, professional, residential and institutional settings. The Strategy needs to be up to date with current best practice requirements, and responsive into the future as new understandings of risks and practice requirements emerge. To ensure a truly client-focussed and trauma-informed service system, recognition of people's rights, and adherence to new and emerging legal obligations, the Strategy needs to be well-informed about both the quality and nature of safe services, and the true cost of providing them. Indexation in funding models needs to account for yearly inflation, escalating costs for insurance, costs for compliance with new legislation, and changes to staffing models to ensure safety for clients and workers.

FOCUS AREA 3: HOUSING SUSTAINABILITY

Question 17: What actions are needed to improve sustainability of housing?

Mandating controls in planning schemes to require energy efficiency and universal design in development is supported. Noting that the layout of the dwelling at the planning stage should be the focus rather than relying on the National Construction Code standards at the end of the process.

Question 18: What Government assistance programs could help young people and people with changed life circumstances access affordable home ownership?

In the first instance all affordable homes available to be close to community services, transport, schools etc.

Government initiatives such as Rent to Buy program and the First Home Owners grant to respond to evident need for young people, parents with young children and older women experiencing changed life circumstances directly impacting on secure tenure.

Question 19: What can be done to improve the energy efficiency of existing and new homes?

Private and community sectors would require government incentives for improvements such as retrofitting for energy efficiency.

Question 20: What else can be done by stakeholders to improve sustainability?

Collaboration between businesses, community and all levels of government. To understand how to improve sustainability the Strategy needs to be informed by the various voices of people with lived experience.

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