

28 July 2023

Eleri Morgan-Thomas  
Chief Executive Officer  
Homes Tasmania

Via email: [tasmanianhousingstrategy@homes.tas.gov.au](mailto:tasmanianhousingstrategy@homes.tas.gov.au)

Dear Ms Morgan-Thomas,

### **Tasmanian Housing Strategy – Exposure Draft**

Thank you for the opportunity to provide a submission on the Exposure Draft of the Tasmanian Housing Strategy. This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of Tasmanian local government in collaboration with our members; all 29 councils.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for local government in Tasmania. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as lack of support by LGAT for that specific issue.

Our recommendations are that the Strategy:

1. Provide a robust problem description and analysis of the housing crisis as the essential foundation to properly inform action.
2. Identify productive and unproductive housing market behaviours and seek to incentivise productive behaviours and remove incentives for unproductive or antagonistic market behaviours.
3. Seek to investigate policy settings that improve efficiency in delivering housing to market by making investment in housing construction and sale more attractive relative to investing in established housing.
4. Seek a review of local government infrastructure financing and development contributions.

5. Seek to help communities navigate growth and change by the State Government leading a communication program on housing and managing growth.
6. Find ways to support and accelerate the strategic planning reforms through to completion, and ensuring planning reforms reflect both State Government and local government housing needs.
7. Seek to build better collaboration between local government and crisis housing organisations.
8. Identify and classify proposed actions and approaches as systemic or interventions, providing rationale as to why an intervention is chosen, rather than a systemic solution.
9. Seek to build State Government understanding of local government needs in delivering housing.
10. Seek to action the recommendations of the Toward Infill Housing Development Report.

Please contact Michael Edrich if you have any questions or would like further information, at [michael.edrich@lgat.tas.gov.au](mailto:michael.edrich@lgat.tas.gov.au) or 03 6146 3740.

Yours sincerely,



Dion Lester  
**CHIEF EXECUTIVE OFFICER**

## **LGAT Submission: Tasmanian Housing Strategy Exposure Draft**

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### **Introduction**

We undertook close consultation with all 29 Tasmanian councils, with a high response rate. This included a well-attended workshop with council planning and community development staff to inform our response to the Draft Strategy. Interest in housing from local government is extremely high, as councils are dealing with the consequences of the housing crisis on a daily basis. People at all levels of local government are keen for material solutions and are looking to the State Government's unique capabilities to coordinate effectively with them to deliver solutions for their communities.

Councils appreciate the State Government's efforts to address housing. However, there is a strong sense that the Draft Strategy misses the mark, particularly in relation to land development and housing supply, and needs improvement before release. The primary reason for this position is that the strategy makes limited attempts to analyse the housing problem to guide and assess responses, and it has missed some well-known local government challenges and needs in housing delivery. Unfortunately, for many in local government working hard on housing issues, this translates into a sense that the State Government is not properly listening, or hasn't engaged local government sufficiently, to build its own understanding of what the sector needs to help support housing delivery.

Most of all, the Draft Strategy does not seem to seriously address the core questions at the heart of our housing crisis:

1. What is the nature of our housing crisis? Why do we have a housing crisis at all?
2. What are the causal factors that led us here? Why has the market, and our previous interventions, failed for so long?
3. What are the tools we have at our disposal to address this crisis? How do they work, what are their effects on housing security, and how best are they applied?
4. What actions are needed, and what should this Strategy in particular do, to make a material and lasting difference in housing outcomes for Tasmanians?
5. How can the State Government properly support local government's role and set it the sector up to play its part for successful delivery of the housing system?

### **Define the problem to solve it**

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Our view is that to deliver solutions, we need to understand the problem properly and explain it clearly in strategy. Unfortunately, the Draft Strategy is limited in how it attempts to describe the nature of our long-standing and steadily worsening housing crisis. This means that the contributing factors and root causes of our situation are assumed, so the approach and actions proposed by the Strategy are also assumed to work and be practical and effective.

Without a clear picture of the core problems, the Draft Strategy becomes a collection of well-intentioned objectives and ideals. Without a strong basis in problem analysis, a collection of objectives means that actions will be difficult to target and are unlikely to achieve sustained results.

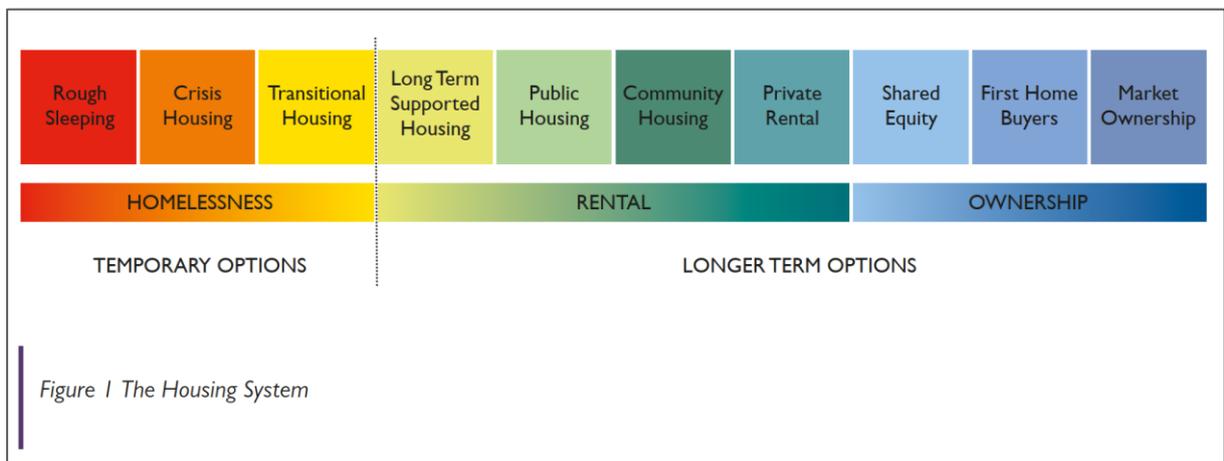
We come back to questions such as: the housing crisis is not new, so what have we been doing wrong? Why has the market failed us? What assumptions have we made in the past that need to be re-examined?

We need to map a better path to a system that can consistently resolve housing issues as they arise and gives people hope that housing security is a realistic ambition for them. This only comes from strategy based on sound problem analysis. We make an attempt at describing the nature of the housing crisis and its causal factors below.

**Recommendation:** provide a robust problem description and analysis at the beginning of the Tasmanian Housing Strategy to provide a foundation for the Strategy’s solutions, and provide a strategic direction for action planning.

### The Housing Security Spectrum

The Draft Strategy includes the following figure on page 9:



This is excellent and useful as a conceptual basis, and we offer some improvements.

This is more like a spectrum of housing security, rather than the housing system. The figure name should be changed to 'The Housing Security Spectrum'. For example, the Australian Government refers to this as the housing continuum, not the system<sup>1</sup>.

Other than a colour gradient it is directionless and does not clearly express an objective for people on this spectrum, for more secure, safe housing. The direction of improving housing security should be displayed to imply the overall objective of this Strategy. A strategy must have direction, and an improved diagram could help convey this. The addition of a directional arrow with 'less secure' at the left side, and 'more secure' at the right side.

The diagram classifies the homelessness category as 'temporary options', but this is not appropriate. People rarely, voluntarily select these options, or are in a position to choose. These are best classified as 'crisis responses'. The rental category is more secure than crisis accommodation, as there is more choice involved and the arrangements are term limited by their agreements. However, many private rental agreements are only for 12 months – not truly a 'longer term option'. There remains a vulnerability of having to renew these agreements periodically just to keep a roof over your head. Ownership, at present, provides the most secure tenure and can be truly classed as 'longer term options'.

The diagram also misses two important categories that play significant and different roles in the housing market and system. The first is multiple property investors, or owner non-occupiers, who control the housing tenure of others, particularly private rental tenancies, but also in occupying residential dwellings with short-term rental accommodation businesses. The second is those supported by friends and family with informal agreements. The community generosity to help others through difficult times should be recognised by the Strategy, as it is an important component of local community resilience.

Many of the categories need explaining in the text or glossary for clarity.

We recommend reconstructing the diagram as shown in Figure 1 to better represent the challenges they present and their role in the problem we are seeking to solve.

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<sup>1</sup> See:

[https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/Briefing\\_Book47p/HousingMarketInterventions](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/Briefing_Book47p/HousingMarketInterventions)

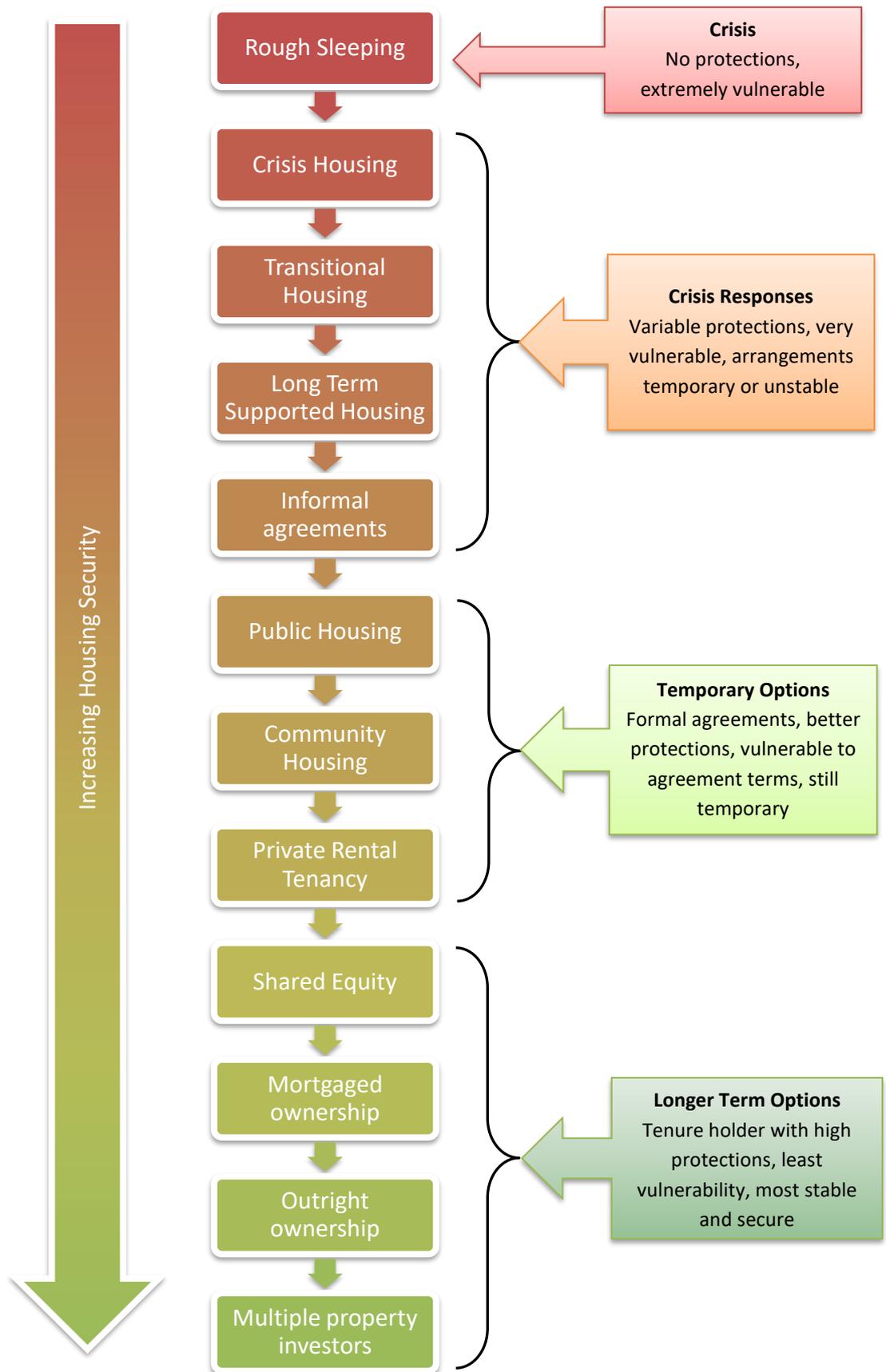


Figure 1. The Housing Security Spectrum

Importantly, the Strategy should properly analyse and build a thorough understanding of these categories to better understand how to improve housing security for Tasmanians. This should include understanding how people transition between categories and the existing and potential capacity of each category. Clear, measurable objectives can then be set against each category. For example, the Strategy could then make statements like:

1. We want to progressively move people through the housing security spectrum toward increasing security.
2. In the Rough Sleeping category, we want to reduce both the number of people and nights spent to zero, by developing our Housing First approach and our crisis housing responses.
3. We want to reduce people's reliance on crisis housing responses, by moving them into more secure options along the housing security spectrum.
4. We want to reduce the demand on private rentals by allowing more residential tenants to achieve longer term, improved security housing options such as shared equity.
5. We want to reverse the trend of declining home ownership and increase the proportion of Tasmanians owning their own home by creating a greater number and diversity of housing tenure options.

## **Market behaviours**

### **Escalating prices escalate demand which escalates prices – Unaffordability escalation**

Tasmania's rate of growth since 2016 has been unprecedented, vastly outstripping projections and even the most ambitious population targets. Population growth delivers many vital benefits but has also consumed capacity of our infrastructure and especially our housing stock, impacting quality of life.

Increased demand pushes up house prices and provides the market a price signal that housing is a good investment. This encourages more investors to buy housing, further escalating prices, further incentivising more investment – a positive feedback loop.

Economic theory predicts that demand for a product should decline as prices escalate, but our market behaviours toward housing are different. Housing is an essential need, not a discretionary spend, so the demand for housing doesn't easily decline, keeping a floor underneath price changes. For investors who can afford to buy more housing, rising prices makes holding housing for capital appreciation look like a good investment, so increases demand.

### **Private investment favours consuming, rather than increasing, supply**

Private investment in housing overwhelmingly favours buying and holding existing established housing, rather than in the productive construction that carries project completion risk. Australian Bureau of Statistics housing financing data shows that only 12 per cent of investor financing goes toward constructing new houses, with the majority focused on taking up established dwellings. These may be owner-occupied, go onto the private rental or short stay accommodation markets. This consumes housing supply more than adding to it, creating a market of holding property, rather than releasing it to address need.

In market conditions of rising house prices, private investors purchase excess housing increasingly for capital value gain, rather than for rental returns or for the profit of developing and increasing housing supply to the market. Holding housing carries little risk. Renting presents risks of asset damage. The completion of development and physically activating land for housing is complex and presents significant project construction risks. Rising property prices incentivises withholding excess housing from the market (land banking) and diminishes the relative reward of taking the risk of developing and adding real value to the market.

By favouring established housing, private investment doesn't target our housing need and so is inefficient in generating the right market response and this is borne out in the housing data.

**Recommendation:** the Strategy should seek to improve investment efficiency in delivering housing to market. Incentivise, de-risk and make more profitable investment in housing construction, relative to investing in established housing. Review and remove incentives to investment consuming supply of established housing.

### **Exclusive market dynamics making housing more exclusive**

Rising house prices become a greater barrier for those without secure housing tenure. For investors with existing tenure rising prices support them to buy up more excess housing as they can leverage the growing equity on their existing properties. This creates more demand and consumes supply of housing stock that doesn't reach those in need.

The existing equity allows further buying up of more housing equity, and this investment favours existing housing over productive construction, consuming supply instead of contributing to it. Indeed, we see about a third of Australia's 11 million houses are held from the market by investors and used as private rentals, short stay accommodation, or unoccupied.

**Recommendation:** investigate policy settings that improve investment efficiency in delivering housing to market by making investing in housing construction and sale more attractive relative to investing in established housing.

## **Policy settings incentivise withholding housing from market**

Federal taxation policies, like negative gearing, manipulate the housing market by supporting private investors to use public tax revenue to continue to withhold properties from the market, even when running at a loss. In more free market conditions, losses would dictate the investor should sell and release the properties to the market. Instead, public funding is subsidising withholding excess properties from the market. If release of these properties to the market were incentivised, this would make more established housing available for renters to move into property ownership, reducing the demand for rental properties.

State taxation policies, like stamp duty, tax the sale of land, also disincentivise the release of land to the market that might help increase supply. Stamp duty could be waived or reimbursed in a targeted way, to where the sale improves housing security, such as where sold to become someone's primary residence, and applied in cases where dwellings are sold to be a non-primary residence.

**Recommendation:** investigate policy settings that incentivise faster housing release to market and phase out the subsidisation of withholding excess housing from the market.

## **Market incentives not optimised to deliver on need**

Overall, these factors create a market where the more housing secure can consume more housing stock than the less housing insecure. This fuels the trend in declining housing security that we have seen over the last 25 years. Even though those policy settings are key contributors to the problems, too often it is local government that tends to be the one blamed for this artificial situation.

Our policies need to move away from incentivising withholding excess housing from the market and penalising release to market, and instead support both physical activation of land for housing (construction), and release of these properties to market (sale). This means policy settings that makes construction and sale more profitable than simply holding and banking properties.

## **Supply-side problems**

Increasing housing supply overwhelmingly resides within the market and not in regulation. Yet there are problems that State and local government can address to improve construction market conditions and increase physical activation of land.

## **Supply dominated by private market decisions**

"Land release" is mentioned the Draft Strategy and must be clarified. It is often referred to by politicians as the source of all housing supply problems and its panacea. However, this is a

skewed understanding of land release for housing as purely about approvals, as a regulatory issue, and as a result misattributes blame on planning authorities.

There are at least six components to land release for housing, shown in Figure 2, below:

1. the land must be zoned for housing use
2. purchased for housing development
3. a compliant quality development application lodged
4. development approval issued
5. the approval must be acted upon and housing constructed
6. finally the finished product must be released to market and sold to a purchaser intending to use it for housing.

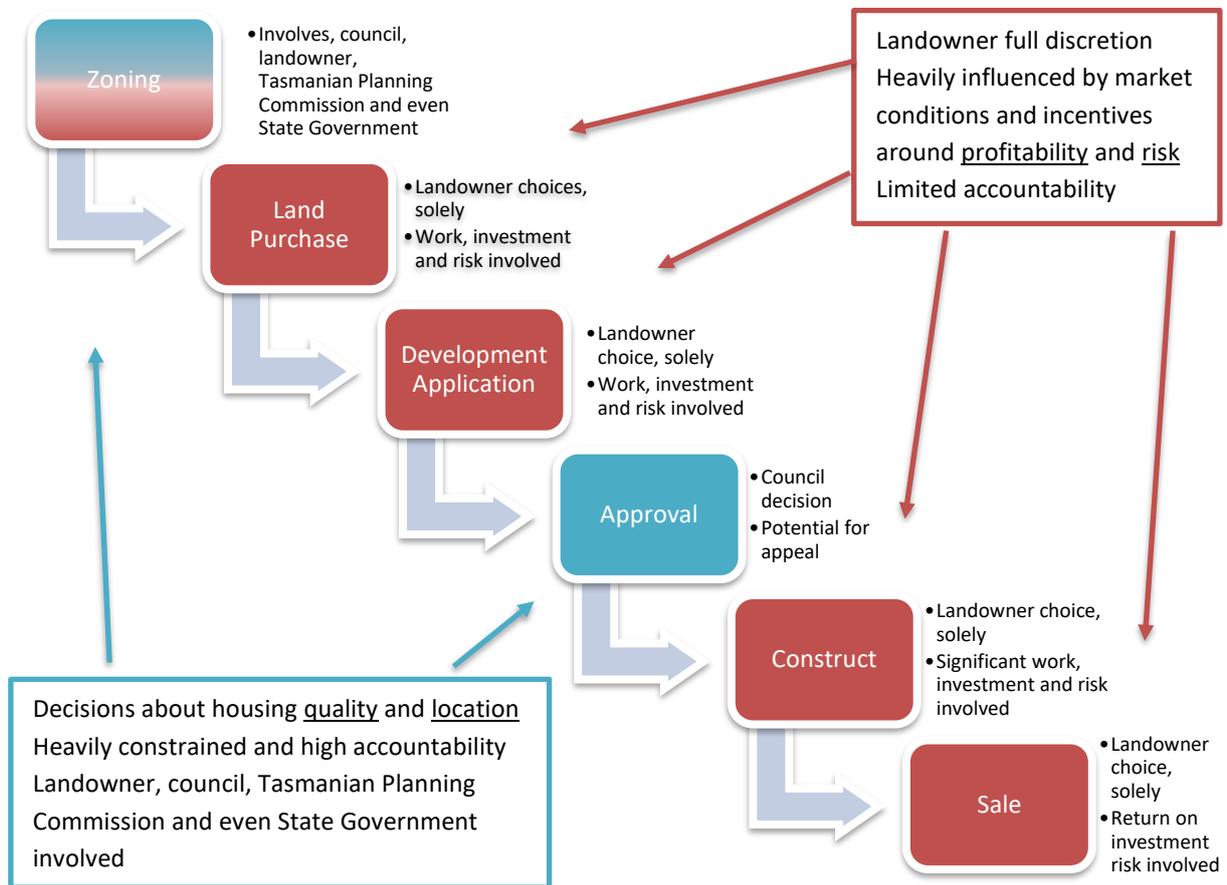


Figure 2. Components of Housing Supply Release

Councils are only involved in two of the six steps. This involvement is restricted by legislation, driven by statutory timeframes and involves other parties, including the Tasmanian Planning Commission (TPC), the landowner, and sometimes even the State Government.

In contrast, the majority of these steps are at the full and sole discretion of the landowner. Landowners can, and often do, choose not to proceed at any of those stages, withholding the potential housing land from the market. It is the aggregation of landowner decisions, influenced by market and economic conditions, that set the speed of new housing development and its release to the market to be available to improve housing security.

Regulatory planning decisions, like approvals, set the location and quality standards of new housing development, but not the speed. The speed of new housing development is dictated by landowner decisions informed by financial and economic information. A better resourced planning system could make small improvements to average development assessment times. Yet, this would have a barely perceptible effect on the overall rate of housing development. Councils do not control the number of applications they receive, whether approvals will be acted upon and completed, or if the finished housing product will be released to the market.

The overwhelming control of land release for housing is held in private holdings, not being activated and released to market.

### **Infrastructure financing tools not up to the task**

Housing development relies on infrastructure delivery, but Tasmania has arguably the least effective infrastructure contributions framework of all Australian jurisdictions. This prevents the resolution of land development issues and hinders housing delivery. While other jurisdictions have worked on their frameworks and systems iteratively, Tasmania has not even reviewed ours for over two decades. This puts us well behind other states in our housing delivery ability. LGAT and councils have been calling for this since at least 2019, yet this hasn't been addressed by the State Government.

**Recommendation:** ensure that the Tasmanian Housing Strategy seeks a review of local government infrastructure financing and development contributions.

### **Development conservatism constrains ability to respond**

For many years Tasmania developed slowly in a low-growth environment. This has left us with both low-growth settings throughout our development systems and, most influentially, a culture that is resistant to change. This is completely understandable. However, our context is now high growth, posing a particular challenge to both our policy settings and our community attitudes toward change. When faced with growth, Tasmania can either develop the infrastructure and housing to keep up and maintain quality of life for as many as possible, or resist development and change, eroding our quality of life and impacting vulnerable people the most.

Development conservatism and community resistance to change is one of our greatest challenges to our ability to respond to growth pressures and deliver housing. Tasmanian

communities want better housing outcomes for each other, but when it comes to specific proposals nearby, people can respond defensively and resist the change needed to deliver the housing security needed.

We know that the State Government and councils can work together much better to help our communities navigate change.

**Recommendation:** help communities navigate growth and change by the State Government leading a communication program on housing and managing growth.

### **Planning system not complete**

Tasmania is currently undergoing the largest and most important planning reforms in its history. Until that is complete, councils lack multiple important growth management tools to respond. The most important elements of a functioning planning system are the policy and strategic foundations. We still don't have the Tasmanian Planning Policies and our Regional Land Use Strategies are well over a decade old and need substantial overhaul. LGAT and councils have been calling for these since at least 2018.

This impacts housing delivery. These gaps have led to opacity, uncertainty and delay in the system, making it harder for development proponents to navigate the system, to achieve their business goals, and for councils to achieve their communities' development goals. Councils urgently need these tools, completed in a way to meet their growth management and community building needs.

**Recommendation:** find ways to support and accelerate the planning reforms through to completion, fit-for-purpose for councils to deliver housing. Ensure planning reforms reflect both State Government and local government housing needs.

### **Better coordination of crisis housing responses**

The State Government, many councils, and not-for-profit and community organisation are all undertaking actions to respond to emergency housing needs, improve shelter conditions, and help people into improved housing security. However, these various organisations may not have good awareness of what the other is doing. This is leading to duplication, uncertainty and slow responses, and, at times, conflicting action. Some councils are taking action here, but are bearing risk to do so. Effective coordination and understanding of risk and liability would allow councils to take an effective supportive position for emergency housing responses, helping our communities.

**Recommendation:** the Strategy should seek to build better collaboration between local government and crisis housing organisations.

## What tools do we have?

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### Systemic solutions versus interventions

Because we rely on a market system of housing delivery, the failures to deliver on our housing needs are market failures. Resolving them requires either changing market behaviours and function to meet our needs, or intervening in the market to directly deliver specific housing outcomes. Each option has different effects, benefits and disbenefits. Understanding this is important in designing and selecting actions to generate housing outcomes.

### Sustainable solutions are systemic and improve market operation

Systemic solutions seek to change how the market behaves to deliver different outcomes, based on varying the incentives and disincentives. Ideally, you want to identify productive and unproductive market behaviours, incentivise the productive and disincentivise the unproductive ones.

Productive market behaviours are those that improve individual and overall housing security, that add productive value by constructing more housing and improve trade by making it available to the market for use as housing. These behaviours should be incentivised or de-risked.

Unproductive market behaviours are those that diminish or block housing security by consuming housing stock without delivering improved housing security, or by removing or withholding housing from the market and away from our housing objectives. These behaviours should be investigated for resolution.

Taxation and its discounts are examples of systemic market tools that create a system of incentives and disincentives that can be applied to support our housing objectives.

The Australian Government controls negative gearing and capital gains tax discounts that influence how investors make decision in the market. Negative gearing<sup>2</sup> allows housing property investors to keep holding their excess houses from the market when running at a loss and reduce their tax contribution to do so. Capital gains tax discounts<sup>3</sup> allow property investors to reduce their tax contribution upon a profitable property sale.

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<sup>2</sup> Negative gearing: <https://treasury.gov.au/review/tax-white-paper/negative-gearing>

<sup>3</sup> CGT discount: <https://www.ato.gov.au/Individuals/Capital-gains-tax/CGT-discount/>

The State Government controls property transfer duties<sup>4</sup> (previously known as stamp duty) on property sales and land tax<sup>5</sup>. Stamp duty imposes a cost on the release of land to the market. Land tax applies a cost to withholding land from the market.

Local government controls property rates<sup>6</sup> to deliver property services. Councils are investigating how rates can be applied to incentivise market behaviours to improve housing security outcomes (see [Appendix 1 Table 1](#))

### **Interventions are critical when we lack systemic solutions**

In the absence of sustainable, systemic solutions to resolve housing market failures, interventions become necessary.

Interventions differ from systemic solutions in being actions within the housing market rather than changes to how the market functions. They usually address effects or deliver outputs directly, rather than seeking to resolve root causes. Interventions typically require heavy public investment to deliver outputs that the market and private investment would typically perform, in order to address an immediate problem.

Public housing, crisis housing responses, and the State Government's 10 year \$1.5 billion housing package to deliver 10,000 new homes by 2032 are examples of direct intervention. They deliver outputs without changing market function or resolving market failure. The size, or need, for these programs and the public expenditure would have been less if systemic solutions had been operating.

Interventions are the first aid of housing responses; systemic solutions are the preventive health.

**Recommendation:** that the Strategy identify and classify proposed actions and approaches as systemic or interventions. Provide explicit rationale as to why an intervention is chosen, rather than a systemic solution.

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<sup>4</sup> Property transfer duties: <https://www.sro.tas.gov.au/property-transfer-duties>

<sup>5</sup> Land tax: <https://www.sro.tas.gov.au/land-tax>

<sup>6</sup> Council rates:

[https://www.dpac.tas.gov.au/divisions/local\\_government/about\\_councils/finance\\_and\\_planning/council\\_rates](https://www.dpac.tas.gov.au/divisions/local_government/about_councils/finance_and_planning/council_rates)

## Specific issues

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### Explain “Housing First”

The proposed “Housing First” approach is excellent to see and is supported. However, it needs to be properly explained what it is, how it works, and what it needs to succeed. We are aware that some countries have effectively implemented Housing First, while others have tried with less successful results.

For Housing First to work, it requires a sufficient amount of pre-existing housing to be able to provide for those in housing crisis. Tasmania obviously doesn’t have that currently, it must be constructed, so clearly a Housing First approach needs preparation for effective implementation. Acknowledging this in the Strategy is key to making it genuine and realistic, rather than appear like a collection of good intentions that follow with implementation problems.

### Housing is productivity

Expressing housing as a human right is welcome and appropriate. However, this isn’t well explained and so what it means for action for any stakeholders in the Strategy is unclear.

Housing is also a societal value, when efficiently distributed. Not only is housing essential to individuals’ and communities’ basic health and wellbeing, but it is also the cornerstone of every individual’s ability to engage in civic life, the economy, and contribute to the productivity of the nation that underpins our standard of living. Housing is not simply about the homeless, but also about the wealth of all Tasmanians. We all have a stake in better housing outcomes for each other.

We recommend that the Strategy highlight and raise awareness of the link between an individual’s level of housing security and their ability to engage in civic life, the economy, and contribute to national productivity. We note the helpful paragraph on productivity and growth at page 16, but recommend elevating this as a driving motivation for the Strategy.

### Engagement must achieve State Government understanding

Councils recognise the engagement efforts made by Homes Tasmania in the development of the Draft Strategy. However, as the Strategy is missing some key components that local government requires in delivering housing and has been asking for, it appears that this engagement has not properly built the right understanding within the State Government. More work is needed.

**Recommendation:** that in progressing the Strategy, the State Government build its understanding of local government needs in delivering housing by:

1. Undertake targeted consultation with councils on key local government needs in housing, particularly infrastructure contributions.
2. Review LGAT General Meeting resolutions related to housing.
3. Review LGAT and council submissions relating to planning and housing.
4. Ensure councils are closely consulted in the development of any Action Plans under this Strategy that involve or relate to local government.

### **Councils are Tasmania’s growth managers**

Tasmanian councils do almost all the strategic land use planning for our state, assess and decide upon virtually all development applications. They deliver transport networks, water quality and quantity management networks, parks and open space. Councils manage 80 per cent of Tasmania’s road network and virtually all of its public stormwater management systems. They provide community facilities, and deliver liveable communities and local wellbeing outcomes. This makes councils the primary managers of growth in Tasmania.

### **Ways to understand local government**

The most useful resources available for the State Government to better understand local government’s needs and various stances on the housing crisis are member resolutions at LGAT General Meetings. We have collated the housing-related resolutions since 2018 for your review, in [Appendix 1 Table 1](#).

We also recommend reviewing the following LGAT submissions and papers:

1. LGAT submission to [Refreshing Tasmania’s Population Growth Strategy](#) (2023)
2. LGAT Discussion Paper – [Infrastructure Contributions](#) (2022)
3. LGAT submission to [Scope of the Draft Tasmanian Planning Policies](#) (2021)
4. LGAT submission to [Draft Tasmanian Planning Policies](#) (2022)
5. LGAT submission to [Our Infrastructure Future - 30 Year Infrastructure Consultation Draft](#) (2019).

## Act on the Toward Infill Housing Development Report 2019

The Department of State Growth has published the Toward Infill Housing Development Report on its website, dating back to August 2019<sup>7</sup>. This is an excellent piece of work and properly identifies a major component of the housing problem in Tasmania, being infill. Its recommendations align extremely closely to the list of local government needs.

Our priority recommendations from the report are:

1. Recommendation 3: Infrastructure Charges Review
2. Recommendation 15: Community Infill Communication Program
3. Multiple planning reform related recommendations:
  - a. Recommendation 12: Tasmanian Planning Policy for Affordable Housing
  - b. Recommendation 4: Review Regional Land Use Strategies
  - c. Recommendation 6: Infill/Medium Density Design Guidelines
  - d. Recommendation 1: Review State Planning Provisions residential codes.

Tasmania's housing agencies should keep monitoring and push for progress on this report. Its recommendations are now four years old, with little progress to assist in housing supply.

**Recommendation:** that the State Government action the recommendations of the Toward Infill Housing Development Report.

## Housing Data – share and publish as a dashboard

LGAT has found that all levels of government are each looking for better housing related data from each other. The State Government should work on consolidating and sharing housing data in a public dashboard.

Local government is especially interested in data at a municipal level around occupancy rates, housing utilisation, development completion time (planning permit to building completion certification) and homelessness.

## Recommended Action Plans

We recommend that the Tasmanian Housing Strategy look to implement the following proposed Action Plans, while ensuring that any Action Plans that involve or relate to local government are developed in close consultation with councils and LGAT. We strongly

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<sup>7</sup> Access the Report at this page:

[https://www.stategrowth.tas.gov.au/policies\\_and\\_strategies/populationstrategy](https://www.stategrowth.tas.gov.au/policies_and_strategies/populationstrategy)

recommend generating buy in from local government before publishing Action Plans to support success.

## **1. Systemic actions:**

- 1.1. **Infrastructure delivery and financing** – undertake an urgent review of Tasmania’s infrastructure contributions legislative framework with a view to bring it into best practice and activate development.
- 1.2. **Housing market investigation and analysis** – investigate current market dynamics and mechanisms, including incentives, disincentives and barriers to housing construction and release to market. Determine local, state, and federal actions and policies that can improve market conditions for housing delivery and improved housing security.
- 1.3. **Advocacy to the Australian Government** – compare advocacy approaches to the Australian Government for federal policies that support and incentivise delivery and release to market of more housing, including the tax system. Combine advocacy on any agreed approaches.

## **2. Intervention actions:**

- 2.1. **Community engagement program** – engage and support communities around growth and change, particularly social and affordable housing.
- 2.2. **Emergency shelter actions** – coordinate state and local emergency housing responses to ensure effective delivery. Pilot coordinated response initiatives. Share emergency housing experiences and issues for learning and resolution.
- 2.3. **Municipality-level housing insecurity assessment** – collection and analysis of LGA-level homelessness and housing security data to inform emergency shelter actions and strategic land use planning responses.
- 2.4. **Workforce improvement** – develop and support initiatives that improve workforce capability and capacity to deliver housing, such as shared resources, joint projects, training, professional placement, etc.
- 2.5. **Consolidated Housing Data Dashboard** – develop a consolidated dashboard of housing related data for Tasmania to assist planning and housing responses.

## **Related initiatives**

The Related Initiatives section on page 40 is missing a number of key strategies and activities. This list should include the following:

1. Refreshing Tasmania’s Population Growth Strategy 2015 – Department of State Growth
2. Toward Infill Housing Development Report – Department of State Growth

3. Medium Density Residential Design Guidelines – led by Department of State Growth
4. Tasmanian Development Manual Project – an LGAT initiative in collaboration with councils and the State Government’s State Planning Office
5. Tasmania’s Planning Reforms –
  - a. Tasmanian Planning Policies – especially policies on settlement, growth and housing
  - b. Regional Land Use Strategies – critical for defining settlement and growth pattern, development capacity
  - c. State Planning Provisions
  - d. Local Provisions Schedules

This Strategy should also attempt to illustrate its relationship with other policies, strategies and initiatives of other agencies. We have attempted to do this at Figure 3.

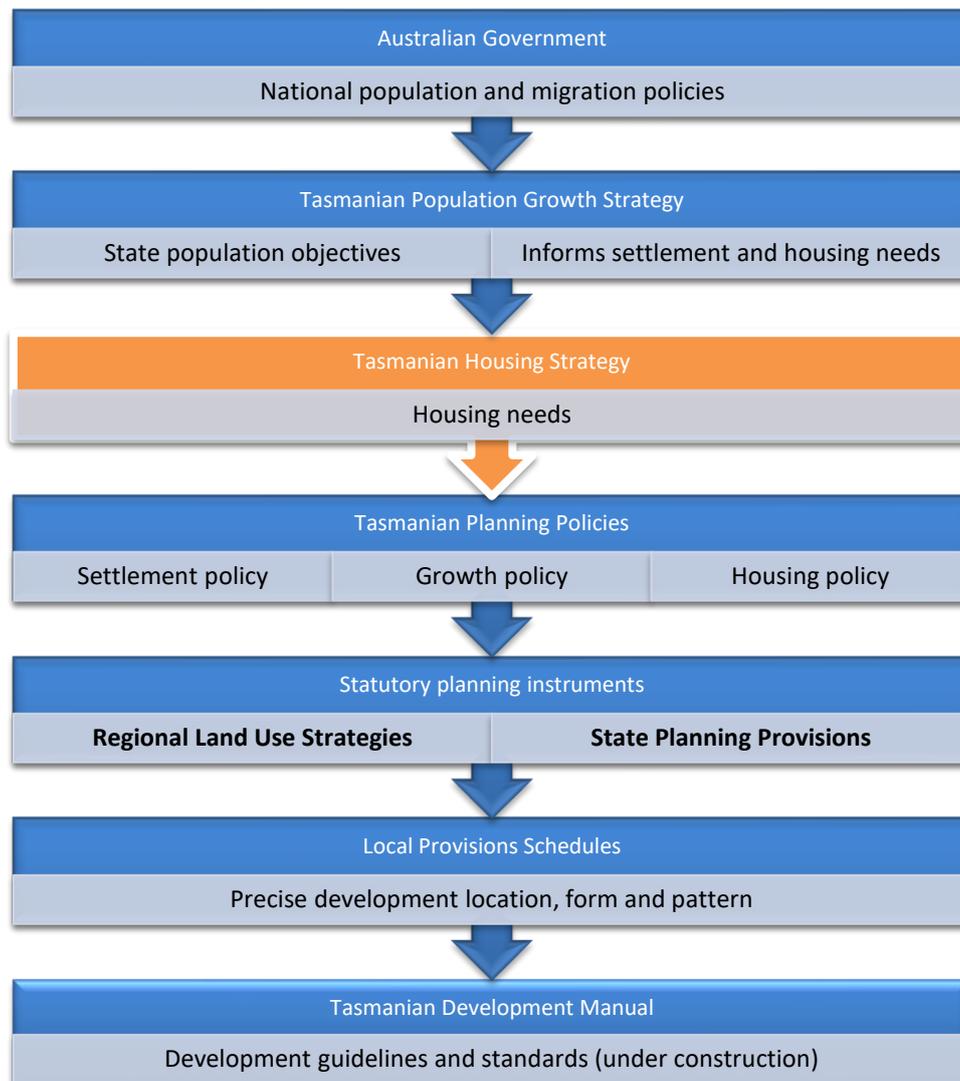


Figure 3. Tasmanian Housing Strategy relationship with other planning-related initiatives

## Appendix 1

**Table 1. LGAT General Meeting Motions related to Housing (since 2018)**

Meeting date	Motion or Item	Housing Related Area	Comments
2018 (March)	<p>Review Of State Planning Provisions</p> <p>That LGAT advocate to the Minister for Planning to initiate a review of the State Planning Provisions for the Residential Standards (SPP).</p>	<p>Development regulation</p> <p>Housing supply</p> <p>Housing diversity</p>	<p>Demonstrates early LG recognition that state planning tools were not meeting housing needs.</p> <p>SPP review finally initiated by the State Government in May 2022, but residential standards are still not updated.</p>
2018 (July)	<p>Affordable Housing</p> <p>That the Local Government Association of Tasmania be requested to lobby the State Government to ensure that the State is taking sufficient measures and allocating sufficient resources to provide affordable, low cost housing, particularly in rural and outer suburban areas with transport and social services to support the same.</p>	<p>Housing supply</p> <p>Housing diversity</p> <p>Affordable housing</p>	<p>Demonstrates LG motivation to ensure affordable housing supply.</p>
2019 (Dec)	<p>Women’s Shelter</p> <p>That LGAT advocate for the State Government to investigate the need for a Women’s Shelter/s to be located in and to service regional Tasmania and other rural areas, to service the population across the greater part of rural Tasmania.</p>	<p>Homelessness</p> <p>Crisis housing response</p>	<p>Demonstrates LG concern around worsening housing situation across the state.</p>

Meeting date	Motion or Item	Housing Related Area	Comments
2019 (Dec)	Public Spaces By-Laws That Tasmanian Councils consider adopting the provisions in the City of Hobart Public Spaces By-Law so that a person is not guilty of an offence in relation to camping in public spaces if at the time they are homeless.	Homelessness Crisis housing response	Demonstrates LG care and concern for those suffering homelessness.
2019 (Dec)	Housing Affordability and Homelessness That, with reference to the motion from the City of Hobart on Public Spaces By-Laws, Members discuss the current and future role of Local Government and LGAT with respect to housing and homelessness.	Homelessness Crisis housing response	Demonstrates LG attempting to think innovatively and collaboratively about addressing homelessness and the housing crisis.
2020 (July)	Headworks That LGAT advocate to the State Government and TasWater for the ceasing of the 'headworks holiday' for sewer and water infrastructure.	Infrastructure delivery	Demonstrates that LG understands that infrastructure charges are key to enabling development and that without equitable charging, development stagnates.
2021 (Aug)	Integrated Regional Housing Supply Strategy That LGAT Lobby the State Government to develop an integrated regional housing supply strategy in partnership with the federal government and the private sector to deliver a diversified housing supply to all the areas of housing undersupply across the state.	Housing supply Housing diversity	Demonstrates LG motivation to ensure affordable housing supply.

Meeting date	Motion or Item	Housing Related Area	Comments
2021 (Aug)	<p>Review of State Regional Land Use Strategies</p> <p>That LGAT Lobby the State Government to activate a comprehensive review of all state regional land use strategies given the expanding development growth demands and statewide housing shortages being experienced in most local government areas.</p>	<p>Housing supply</p> <p>Housing diversity</p> <p>Strategic planning</p>	<p>The RLUSs have been holding back growth and development supply and councils cannot update these key statutory documents alone. LG have been advocating for updates for years.</p> <p>Work on the RLUSs has finally begun, but won't be complete for some time.</p>
2021 (Dec)	<p>Tiny Houses</p> <p>That the Local Government Association of Tasmania call upon the Tasmanian State Government to address the use of Tiny Houses and Self Contained Caravans for alternative accommodation with appropriate standards in planning schemes or other legislation to provide for the safe and healthy use and addressing needs for affordable housing whilst balancing the potential poor planning and environmental outcomes.</p>	<p>Housing diversity</p>	<p>LG recognises that regulations can push people out of non-standard houses and into worse housing situations. LG seeks a more empathetic regulatory system.</p>
2021 (Dec)	<p>Infrastructure charges</p> <p>That LGAT advocate to the State Government for the introduction of a consistent State-wide approach to infrastructure charges to ensure that the burden of public infrastructure provision is shared equitably between developers and communities.</p>	<p>Infrastructure delivery</p>	<p>LG understands that infrastructure charges are key to enabling development and that without equitable charging, development stagnates.</p>

Meeting date	Motion or Item	Housing Related Area	Comments
2022 (March)	Options for Differential Rating – Vacation Rental Properties That LGAT investigate mechanisms to enable councils to differentially rate vacation rental properties and bring back to the next general meeting for a discussion and decision.	Housing supply Market incentivisation	LG recognises the potential for short term rental accommodation to consume housing supply, or to be converted back to housing.
2022 (Sept)	Options for Differential Rating – Vacation Rental Properties That Members note the existing powers for differentially rating vacation rental properties and that LGAT engage with the Valuer General on the mid cycle process.	Housing supply Market incentivisation	LG recognises the potential for short term rental accommodation to consume housing supply, or to be converted back to housing.
2022 (Dec)	That LGAT lobby the State Government to encourage the development of affordable housing, as a matter of urgency through measures that promote the efficient supply of well located, diverse housing.	Housing supply Housing diversity Affordable housing	LG recognises the urgent need for affordable housing options and seeks State Government leadership.
2022 (Dec)	That LGAT lobby the State Government to encourage the development of affordable housing, as a matter of urgency through promoting the development of affordable housing with specific incentives for affordable housing enabled through planning schemes and policies.	Housing supply Housing diversity Affordable housing Development regulation	LG recognises the urgent need for affordable housing options and seeks State Government leadership.
2023 (June)	Restrictive Covenants On Use Of Land And Property That LGAT lobby the State Government urging legislative change to outlaw the creation of covenants which place restrictions on the use of land and property for: a. public, social or affordable housing; or b. tenants or occupants based on their source of income, or social or financial circumstances.	Housing supply Housing diversity	LG is motivated to remove title impediments to council and developer efforts to implement affordable housing.

Meeting date	Motion or Item	Housing Related Area	Comments
2023 (June)	<p>Short Stay</p> <p>That LGAT convene an expert reference group from member councils to develop recommendations for the sector to consider on:</p> <ul style="list-style-type: none"> <li>• What further data and support is required to assist local government in responding to the housing crisis.</li> <li>• What changes are required to manage short stay accommodation’s contribution to housing availability, local amenity, economic development and equitable rating.</li> <li>• What tools are available to encourage owners of unoccupied dwellings to make their properties available as long term rentals.</li> </ul>	<p>Housing supply</p> <p>Housing diversity</p> <p>Affordable housing</p> <p>Development regulation</p>	<p>LG recognises the potential for short term rental accommodation to consume housing supply, or to be converted back to housing.</p>