



• 38 Bligh St Rosny Park
• PO Box 96
• Rosny Park TAS, 7018
• **Dx** 70402
• **Ph** 03 6217 9500
• **E** clarence@ccc.tas.gov.au

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Tasmanian Housing Strategy
Department of Communities Tasmania
GPO Box 65
Hobart TAS 7001

Via 'Have Your Say – Written Submission

Dear Sir / Madam,

RE: Tasmanian Housing Strategy Discussion Paper Response

Thank you for the opportunity to comment on Tasmanian Housing Strategy Discussion Paper.

Please find the following as a combined submission from the City of Clarence's Planning and Community Development Departments.

The implementation of a Tasmanian Housing Strategy is generally supported. However, it would be considered a missed opportunity if the following items were not addressed and included in the strategy.

Planning Framework and Inclusionary Zoning

There are currently no mechanisms in Tasmania to encourage housing affordability through the planning framework. Promoting new sources of affordable housing means encouraging provision through the private market of housing options that are more likely to meet the needs of low to moderate-income households now and in the future.

Councils in other parts of Australia have introduced requirements in their planning schemes to encourage diverse housing forms.

New South Wales example:

- Leichhardt Council enforces mandatory requirements for diverse multi-unit configurations.

- Blue Mountains Council has developed specific development controls for accessible housing, including residential care facilities, hostels, or groups of two or more self-contained units intended to be used for older people or people with a disability. These controls include requirements to ensure that such housing is fully adaptable.
- Waverley Council encourages shop top or mixed commercial/residential developments through floor space incentives.

Council recommends that the scope of the policy includes consideration of planning objectives to promote diversity in housing supply and incentives or mandatory provisions for affordable housing allocation in new developments.

Adopt a Housing Approach for All

The 'housing continuum' approach identified in the draft strategy categorises people against housing assistance programs. Adopting a 'housing for all' approach based on inclusion, supporting the most vulnerable, and ensuring all people are catered for, shifts the way we view housing for everyone in the community. This model better supports diversity in planning scheme frameworks and inclusionary zoning by placing people in the centre of a circular rather than a linear continuum.

Local Council Housing Strategies

The development of city-wide strategies for all local government areas that identify a vision and set a clear housing plan for the next 10 to 20 years would significantly contribute to a strategic approach to the allocation of housing for everyone.

Local Housing Strategies map the demographics across each local government area, meaning local councils can better respond to population increases, ageing populations, supporting people with a disability and those who want to 'age in place', from a life course approach.

They identify the efficient use of land and infrastructure by evidence-based mapping of demand, supply, land use opportunities and constraints; thereby helping to identify areas with development capacities, including for the supply of affordable and sustainable housing and supported accommodation.

This type of overarching strategic planning adds to improved local area master planning and associated considerations such as transport, services and amenity. It also provides improved opportunities for the wider community to be included in decisions that affect their lifestyle, quality of life, and housing choice.

Other state governments in Australia have introduced contemporary housing strategy policies to better support local governments to develop these strategies. For example:

- New South Wales government has developed a resource for local councils to develop Local Housing Strategies, including guidelines and templates.

Universal and Innovative Housing

Design that does not address the needs of the community frequently results in people being unable to participate fully in community life.

A universal design approach focuses on the design and composition of the environment so that it can be accessed, understood, and used by all. It has a person centred approach on users' needs rather than simply meeting the minimum compliance requirements.

Aspiring towards innovation and encouraging developers and builders toward platinum standard and smart homes support a life course approach to ageing in place no matter your ability or circumstance.

Research partnerships with academic institutions are critical to innovation. They help to support and incorporate recommendations based on rigorous research and community involvement. For example:

- The City of Clarence has partnered with the University of Tasmania (UTAS) on a three year fully funded research project 'Planning Inclusive Communities'. The project is using a co-design methodology to help determine the critical elements that make cities inclusive for everyone, when so often our planning systems are not always contributing to this outcome. This type of evidence based research will significantly contribute to a Local Housing Strategy and associated master and local area plans.

Dwelling Numbers, Housing Typology and Adequate Policy Clarification

The discussion paper mentions the commitment to provide an additional 10,000 social and affordable houses by 2032. Still, it does not communicate if this will be greenfield or infill development or the typology or diversity of housing product. Social housing development should not be relegated to greenfield sites, often lacking suitable and sustainable infrastructure. Appropriate infill and diversity in housing typology should be given greater consideration to meet an ever-growing diverse population struggling to find suitable and affordable housing.

Development Contributions

There is no single, coherent legislative framework in Tasmania for applying infrastructure contributions. Instead, powers to levy charges for infrastructure are dispersed across several Acts and isolated from the planning process. Inadequate and inconsistent infrastructure contribution charging has resulted in inequitable cost distribution and ultimately discourages developers from being able to provide affordable housing product with an adequate level of infrastructure.

Further, infrastructure charging can also be used to steer the correct type of development to suitable locations to meet realistic affordable housing targets

Infrastructure delivery is fundamental to activating development to meet new housing targets for infill and greenfield development. It is recommended that the scope of this policy includes consideration of provisions in the TPS that will allow the application of more consistent infrastructure contributions.

Short-stay Accommodation

Short-stay accommodation significantly impacts rental availability and housing affordability but does not appear to be identified within the discussion paper. Current short-stay and visitor accommodation planning requirements have long been inappropriate to address the negative impacts caused by a rapidly growing number of dwellings being used for short-stay use in an already limited rental market. Any housing policy should address the increasing detrimental impact short-stay accommodation places on an existing residential environment that cannot provide available and affordable long-term housing.

Macro-economic policy relating to housing

Any housing strategy should advocate a national policy shift with the provision of housing viewed as a right for all, rather than a money-making venture for developers and investors. A shift to support long term tenure, focusing on the rights of tenants is required. Economic reform is needed to provide opportunity for more individuals to enter the housing market rather than the current policy that favours multiple property owners.

Sustainability and Health

Housing choices and design should prioritise sustainability and be designed to maximise the health opportunities for residents. Healthy environments make for healthier homes including considerations of walkability and urban greening. Greening impacts local climates as well as liveability and should be factored into all housing provision.

If you would like to discuss the above matter, please contact Strategic Planner, Shannon McCaughey on 6217 9552.

Yours sincerely



Ian Nelson
CHIEF EXECUTIVE OFFICER