



24 October 2022

Department of Communities

By email: [tasmanianhousingstrategy@communities.tas.gov.au](mailto:tasmanianhousingstrategy@communities.tas.gov.au)

Dear Sir/Madam

**Submission – Discussion Paper – Tasmanian Housing Strategy**

Thank you for the opportunity to make a submission to the preliminary stages of the development of a Tasmanian Housing Strategy. The vision as outlined in the discussion paper and the various programs to facilitate stable housing is commendable and reflects a long history of the public and social housing sector striving toward better liveability outcomes for Tasmanians in need and an approach that seeks to draw in multiple sectors to deliver the vision.

For the purposes of this submission I will focus on my area of expertise and experience in urban and regional planning, working over two decades in both the private and public sectors, taking in metropolitan urban areas and a number of Tasmania's rural-regional towns and villages.

Upon reading the discussion paper, I am compelled to submit some brief comments in regard to numerous statements relating to the components of the planning system, the planning reform agenda and recognition of the role that the State's regional settlements can play in providing good quality, 'liveable' housing and lifestyles. There is a reason the State's population growth has outstripped the Department of Treasury and Finance projections and in order to make substantial 'in-roads' in regard to meeting housing demand, it is important to have a detailed, and greater, understanding of the influences in the market. Particularly we need to understand the ability, or lack thereof, of the planning system to respond in a timely manner.

**Housing System Roles and Responsibilities:**

Early in the discussion paper, there is a distinct omission in the list of agencies/partners, in that it assigns the role of planning and responsibility for land supply and release to local government. Nowhere does the paper acknowledge the fact that the ultimate decision making for rezonings for additional land release lies with the Tasmanian Planning Commission (TPC).

There has been many an occasion where reasonable rezonings have been supported by Councils but have been rejected by the TPC, due to what many in local government and the private sector regard as an approach that is too conservative. The result of too conservative an approach to rezoning is a

constrained supply of land to the market, noting that not all rezonings relate to greenfield expansions. The lack of competitive development fronts results in artificially inflated land and housing price market, evidenced in the rapid escalation of the price of land over the last 3 years, the likes of which Tasmania has never experienced. This effectively means that the planning system has failed the Tasmanian community and economy by not interrogating the nuances and being prepared. The stark escalation in the un-affordability indicators for a number of cohorts and locations across Tasmania in the 2021 Census data is alarming. 'Business as Usual' is no longer an option and this is something that must be recognised at a policy level through all agencies of government, including the TPC ... in fact it must be more than recognised ... it must be championed.

It is critical, that in an effort to achieve some sort of equilibrium in the market, which is fundamental to competition and affordability, it is imperative to have a practical understanding of the influences on land release and development on the ground. This necessitates a thorough interrogation of population drivers such as inward and outward migration (why are people coming and why are they leaving), the influences on household size (what are people buying/renting and why?), the influences on location (ageing in place ... many people in rural areas want to age in the places and with the communities they have spent a great part of their lives and don't want to be forced to move to cities).

The Tasmanian Government has an aspirational target to grow Tasmania's population by 650,000 people by 2050. Unfortunately, Tasmania doesn't have an aspirational planning system to match it. The typical approach of decision makers is to look backwards as a measure of predicting the future and the entrenched conservatism in the system is preventing bold, aspirational actions that can make a real difference in the provision of good quality outcomes for housing. A recent example being the rejection of Kingborough Council's local planning for a purpose designed, higher density neighbourhood in possibly the highest demand locality in the State. It is imperative that the State government require its agencies and decision makers to be champions of aspiration that serves the vision of the Housing Strategy.

It is also imperative to recognise that as the situation currently stands, the Tasmanian Planning Scheme, along with other components of the planning reform agenda, are simply not up to the task of delivering the vision (I again refer to the Kingborough Council example). I note that the discussion paper makes several references to the aspects of the State Planning Reform agenda, those being the Tasmanian Planning Policies, the review of the Regional Land Use Strategies along with a new consistent framework. These components of the system cannot have any impact on the outcomes 'on the ground' if they do not understand and respond to detailed understanding of market influences and the interventions necessary for both public and private provision of housing. Zoning will not be enough .... particularly if you cannot get rezonings approved.

Figure 11 – *Overview of recent Tasmanian Government housing announcements* includes a number of planning related components, namely:

- 'implement planning amendments to make rezoning applications easier' ... what does this mean? In order to streamline rezoning (other than that initiated only for Crown land), you need to understand the impediments to approvals, particularly the very grey area of policy interpretation by the TPC and other matters that have prevented sensible rezonings ... and then fix it.
- 'Extend the headworks holiday' ... understanding the effect of charging for shared infrastructure is imperative.

- Introduce an apartment code to simplify approvals ... as drafted, it mostly acts as a quality assurance code to prevent poor quality developments. The issue lies more in streamlining particular locations and facilitating that.

The Land Use Planning & Approvals Act 1993 is appropriately structured to enable some very nuanced approaches to provide for good outcomes at a local level. It is the intermediate policy levels between State agencies, local government and infrastructure providers and the interactions between them that fail as the positioning of policy and strategic outcomes is not sophisticated enough to present as a cohesive State imperative. Through the development of three planning schemes, a Regional Land Use Strategy and multiple planning scheme amendments I have often experienced conflicting positions between State agencies, some of which were in direct contradiction to the stated policy position of Government.

The legislation enables the system to respond in a sophisticated way. It just requires the clear support of government in a more sophisticated drafting of its policy instruments to enable local government and the private sector to respond. As currently drafted (noting that it is earlyish in the consultation phases):

- The TPP's will significantly impede regional development for housing;
- Sophisticated local strategic planning by Councils will not be supported by the Regional Land Use Strategies because they are required to comply with the TPP's. Recent repairs to the RLUS's to facilitate greater flexibility and local strategic planning will be redundant.

I strongly recommend that the Department engage with the regional groups of Councils through their Regional Planning Groups to understand the detail and nuances of work currently being undertaken to interrogate the factors influencing the housing market and supply on the ground. I believe this will greatly assist the development of strategic planning responses in support of the vision and the drafting of the Housing Strategy.

Yours Faithfully



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**Director and Town Planner**