

General Manager  
Brighton Council  
1 Tivoli Road  
OLD BEACH TAS 7017

By email: [development@brighton.tas.gov.au](mailto:development@brighton.tas.gov.au)

Dear Mr Dryburgh,

## **Representation - Draft Planning Scheme Amendment RZ2022/05**

Thank you for the opportunity to make representation to Draft Amendment RZ2022/05 currently advertised on your website.

Homes Tasmania does not support the rezoning of part of 33 Elderslie Road (CT 178982/1) to Local Business and offers questions, comments and concerns below.

Homes Tasmania (then Communities Tasmania) made a significant investment when purchasing this property in September 2022. The site was selected because it is appropriately zoned for residential development. The proposal to apply the Local Business Zone to a portion of the site reduces the expected residential yield of the site and presents potential land use conflict therefore reducing the ability of Homes Tasmania to provide much needed social and affordable housing in the Brighton Local Government Area (LGA).

The Demand for Social Housing by LGA data<sup>1</sup> in January 2023 showed that there were 239 primary applicants in Brighton. A primary applicant may indicate a single person, couple or family. The Brighton LGA consistently shows high demand for social and affordable housing.

### **Reduced Residential Yield**

The preliminary subdivision plans for this site indicate a potential yield of around 150 lots. Moving in a new direction from the broadacre social housing estates of the past, around 85% of these lots would be offered for affordable private home ownership through the MyHome program with the remainder to be developed for social housing.

Homes Tasmania would need to subdivide and sell the Local Business zoned land, causing a lower yield to the planned subdivision. In past experience, a certain economy of scale is required to make a

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<sup>1</sup> Tasmanian Housing Register Data January 2023

Local Business Zone successful. Applying the Local Business Zone to small, isolated pockets of land has caused problems with vandalism and empty tenancies. There is a larger Local Business area within 500m on Brighton Road with multiple vacant lots which demonstrates a low demand for Local Business zoned land in this area.

## Land Use Conflict

The Local Business Zone also provides for a range of Permitted uses that could potentially cause land use conflict with the proposed residential development on 33 Elderslie Road, and on the adjacent 1 Elderslie Road (CT 178981/1) which will be the site of the new Brighton High School.

While the Local Business Zone offers the opportunity for compatible uses (such as a medical centre, a local supermarket or a childcare centre) there are also inappropriate uses that would be No Permit Required or Permitted. These include tobacco outlets (General Retail and Hire), alcohol sales and gambling (Hotel Industry).

## Regional Strategy

The Southern Tasmania Regional Land Use Strategy (Regional Strategy) recognises the importance of social and affordable housing and directs Local Governments to provide greenfield land for residential purposes to meet the demand for housing choice and affordability (SRD 2.3).

The Regional Strategy also explicitly states the direction to increase the supply of affordable housing (SRD 2.11). By limiting the yield and causing land use conflicts for residential development at this site, the application of the LBZ is inconsistent with the Regional Strategy.

Homes Tasmania encourage Council to utilise the time between now and the Commission hearing to engage with us as to their future vision for the land and the proposed zoning, including future tenure, subdivision, and appropriate use classes for the location.

Yours sincerely



Richard Gilmour  
Director - Community Infrastructure  
**Homes Tasmania**

22 February 2023