

5 October 2020

General Manager
Sorell Council
47 Cole Street
PO Box 126
SORELL TAS 7172

Dear Sir,

**REPRESENTATION - PLANNING SCHEME AMENDMENT APPLICATION TO REZONE
THAT PORTION OF LAND FROM PARTICULAR PURPOSE
ZONE 1 - URBAN GROWTH ZONE TO GENERAL RESIDENTIAL 5 ARTHUR HIGHWAY & LOT 1 ARTHUR
HIGHWAY (CT 8740/1), SORELL**

I have a number of concerns about the request to amend the Sorell Interim Planning Scheme 2015 to rezone land at 5 Arthur Highway and Lot 1 Arthur Highway (CT 8740/1), Sorell to General Residential. As is the case with a large number of planning scheme amendments concerning expansions of residential zonings, compliance with the policies the Southern Tasmania Regional (regional strategy) is often postulated.

I am supportive of the rezoning of the land in the right circumstances, but it is unclear that the right circumstances exist at this time. The proponent has prepared a good quality application and the Council has made a good quality assessment, but a significant number of questions remain. The primary reason for my concern is that the regional strategy is outdated, and has growth management strategies that are difficult to interpret. But there are other concerns too, and these concerns are a manifestation of the failure of state and local governments to properly fill a void of intelligence between the regional strategy and appropriate planning controls in planning schemes.

Residential Land Supply

I have reviewed the Sorell to Hobart Planning Study - Land Use Planning Analysis 20 February 2019 and the Land Supply and Demand Memo dated 20 July 2020. These documents are very comprehensive and the authors have done well in difficult circumstances to break the land supply and demand problem down into numbers. I have some sympathy for the authors, because they are being asked to make a case for rezoning in a situation where there is no agreed method to interpret the residential supply and demand policies of the regional strategy.

For example, how do you factor in the number of 'shack'/'holiday homes' existing into the calculations, and to what extent, if any, do they need to be factored in to this particular rezoning proposition? How do you know what buildings are being used as dwellings and what buildings are being used as shacks? The regional strategy is silent on this matter. Equally, how do you determine, which is the proper baseline data that should be used for calculating the amount of growth upon which further supply of residential lots is provided? How do you calculate whether infill targets have been achieved, and how do the infill targets relate to the time when the provision of land for greenfield residential subdivision should be considered? How does supply in Sorell relate to other areas in the region like Clarence and Brighton? Is there an oversupply regionally? Should some land be back-zoned? The lack of methodology for such mathematical calculations is one area of

deficiency that the regional strategy has i.e. that it does not anticipate how residential supply and demand should be determined. It was crucial that the document actually provided the methodology. For the public, it is unfair to have to try to undertake complex mathematical calculations within a short period of exhibition.

The Land Supply and Demand Memo states that *'a further 1692 dwellings will be required by the year 2025 and by year 2036, a further 4,778 dwellings will be required.'* It is impossible to verify the data and the adequacy of the methodology used for its calculations. The municipality has a current population in the vicinity of 15,000-16,000, and 2.4 people per household. Multiplying 2.4 by 4,778 provides a figure of 11,467. Even when considering that this is the higher 3% growth scenario, and that some of those dwellings may be shacks for people that may otherwise live elsewhere, does the addition of say, 7,000 new residents in the Sorell municipality in the next 16 years really make practical sense? These projections are somewhat at odds with Figure 13 on page 22 of the consultant's Planning Scheme Amendment Request report, which appears to be predicting lower population growth.

The Council and the Tasmanian Planning Commission will attempt to make a decision on this rezoning request with some level of uncertainty about whether the correct circumstances are present for the rezoning to take place. If either organisation can't be certain that the rezoning would not allow the area to be detrimentally impacted by a flood of additional lots, then the rezoning should be refused. Again I have some sympathy for the proponent and the Council Officers who are being asked to make a case for rezoning within an unexplored realm of the planning system between the regional strategy and the planning scheme. It is clear that more work needs to be done by the State government to provide a better idea of where provision for additional dwellings/lots should be provided across the region to better inform isolated decision making on scheme amendments of this type. The leap between the regional strategy and such rezonings is too great for this system to work properly. I know that this is also a problem in the north and north-west regions off the State.

Affordable Housing

The term 'affordable housing' has been used a significant number of times throughout the Council officers report, in the proponent's planning consultant's report, and in the Sorell to Hobart Planning Study - Land Use Planning Analysis. The regional strategy, policy SRD 2.11 seeks to *'increase the supply of affordable housing.'* Affordable Housing is defined in the regional strategy as *'housing that is affordable for households on low to moderate incomes, when housing costs are low enough to enable the households to meet other basic long-term living costs. For example household costs should be less than 30 per cent of household income for occupants in the bottom 40 per cent of household incomes.'* While I am cognisant that the regional strategy is also deficient in this i.e. it does not deal with affordable housing outside of the instances mentioned above, and therefore does not explain what it intends to happen, the documents mentioned above do not appear to contemplate whether or not the land would in fact provide for 'affordable housing.' How does the Council and the Tasmanian Planning Commission intend to address this issue? Although the regional strategy is non-descript, the assessment still needs to interpret and have regard to these policies.

Social Infrastructure

The Council's S34 report and the proponent's submission have not specifically addressed the following social infrastructure policies:

SI 1.2 Match location and delivery of social infrastructure with the needs of the community and, where relevant, in sequence with residential land release.

SI 2 Provide for the broad distribution and variety of social housing in areas with good public transport accessibility or in proximity to employment, education and other community services.

On average, the lead time for a doctor's appointment in Sorell for my husband is approximately one month. There is a question of whether the proposal satisfies SI 1.2 of the regional strategy and also whether the use and development permissible under the amendment would have an unreasonable impact on the region in social terms. The Sorell to Hobart Planning Study states the following in section 3.2.3:

'The current travel patterns of residents of the Sorell LGA strongly indicate reliance on Clarence and Hobart to meet their employment and social infrastructure needs.'

The Sorell to Hobart Planning Study states the following in section 4.1:

'The relationship between land use and the provision of infrastructure is a critical one. When one is planned without the other, we often see scenarios where the infrastructure provided does not match population growth, or on rare occasions, where considerable investment occurs in infrastructure without the commitment from the community to support it.'

The Sorell LGA in particular has grown at a rate that exceeds the provision all types of infrastructure, from reticulated services and road infrastructure to social infrastructure. In addition, the strategic planning system has not been dynamic enough to keep pace with the rate of change.

There has been a position of government that due to the cost implications, providing further road and reticulated services infrastructure to these areas is not viable, and encouraging a higher density living model for the inner urban areas is a more sustainable and viable approach.

This is not disputed. However, to date there has been a slow uptake of infill housing in inner urban areas and it is often the subject of community opposition. In addition, for lifestyle reasons such as proximity to beaches and rural areas, there has continued to be a push to live in outlying areas of Greater Hobart. Without any changes to land use zonings, this has resulted in continual development pressure in both LGAs, highlighting the infrastructure deficiencies.'

Is this evidence that social services in Sorell are already deficient? The Sorell to Hobart Planning Study states section 3.2.5 that the *'Tasmanian Government has announced the establishment of the South East Region Emergency Services hub, to house Ambulance Tasmania, Tasmania Fire Service, Tasmania Police and the State Emergency Service close to the Council chambers.'* Are there any plans to provide other social infrastructure services such as health care to the area? Policy SI 1.2 of

the regional strategy requires that the location and delivery of social infrastructure is matched in sequence with residential land release. Can the Council be satisfied that this would occur? Would rezoning of the land be ahead of its time?

Physical Infrastructure

PI 2 Plan, coordinate and deliver physical infrastructure and servicing in a timely manner to support the regional settlement pattern and specific growth management strategies.

The Traffic Impact Assessment concludes that the road network in the vicinity of the site is adequate to cope with the future development of the site, however it and the Council's S34 report do not appear to address the broader impact that development of the site for residential purposes would have on the causeways. Is the capacity of that infrastructure enough to cater for the future development? If not, are the State government plans for duplication of the causeways at a stage where the Council and Tasmanian Planning Commission can be satisfied that PI 2 would be met, in that physical infrastructure and servicing would be provided in a timely manner to support the regional settlement pattern and specific growth management strategies?

Objectives of the Resource Management and Planning System of Tasmania and the Planning Process Established by the Land Use Planning and Approvals Act 1993

Part 1 of Schedule 1 of the *Land Use Planning and Approvals Act 1993* states the following:

The objectives of the resource management and planning system of Tasmania are –

- (b) to provide for the fair, orderly and sustainable use and development of air, land and water*
- (c) to encourage public involvement in resource management and planning*

Part 2 of Schedule 1 of the *Land Use Planning and Approvals Act 1993* states the following:

The objectives of the planning process established by this Act are, in support of the objectives set out in Part 1 of this Schedule –

- (a) to require sound strategic planning and coordinated action by State and Local Government.*

Referring to my earlier points on a void of State level strategic planning work connecting regional strategy policies with actual planning scheme controls, including zoning, has sound strategic planning and coordinated action by State and Local Government actually taken place? Would rezoning happen in an order provided for by provision of infrastructure and social services and therefore be consistent with Part 1 (b)? What is the purpose of public involvement in the planning system if mathematical calculations around land supply and demand are so complex and varied that they could only present questions rather than undertake their own verification of facts and methodology? Is this a natural justice issue?

It is a shame for the proponent and the Council that assessment work needs to be undertaken inside a void of information, because I think such strategic planning work should already have been

undertaken, for the most part by the State government. The Council has some local strategy that has been used to support this rezoning, but how do we know that the strategy has merit? To what degree will the Tasmanian Planning Commission scrutinise the merit of that strategy? Currently there is no way to test whether local strategies are sound, and no agreed format for how local strategies should be undertaken.

My view is that a lack of coordination between State and Local Government is manifesting in situations like this, where the decision on this draft amendment will be the best guess possible. The decision makers might be forced to decide what they think they should do, and then to bend the legislative and strategic narrative to suit that outcome. My estimation is that this reflects what most local planners would think but aren't prepared to say in public documents.

This situation is also symptomatic of a local government planning system that is far more troubled than most people realise - even those within the industry. The high number of councils means that the system operates in silos; making proper strategic planning impossible. The system has a complexity that only the most talented planning professionals can negotiate effectively. I am grateful that Sorell Council appears to have very capable officers working in planning. From the outside, it appears that the Council has a method for processing its development applications that is far more efficient than other councils. However such practical and efficient processing is not the case everywhere.

I would say that the biggest issue is that most planners do not have the vision or the high-level negotiation and advocacy skills to properly explain problems to councillors and State politicians. Less have the ability to identify a path to resolution. They are far too focussed on micro-level development assessments to notice the bigger issues, let alone to properly alert the decision makers to the catastrophic operational problems that lie ahead. My vision is that this can only be resolved through council amalgamations or development assessment occurring at the state level. Without this sort of change, the current local government planning system is destined for collapse. My prediction is that the planning functions of several councils in the State will need to be transferred to the State Government in the next 5 – 10 years.

Conclusion

I am broadly supportive of this proposal, however there many questions confronting this proposal. Can all of those questions be answered to the degree necessary to be satisfied that the proposal is compliant with the regional strategy and the *Land Use Planning and Approvals Act 1993*? If the Tasmanian Planning Commission determines that this is the case, then I wish the proponent well with their plans.

Thank you for considering my representation.

Regards,

Emily Hamley