Engineers & Planners

117 Harrington Street
Hobart 7000
Phone (03) 6231 2555
Fax (03) 6231 1535
infohbt@jmg.net.au

49-51 Elizabeth Street
Launceston 7250
Phone (03) 6334 5548
Fax (03) 6331 2954
infoltn@jmg.net.au

Johnstone McGee & Gandy Pty Ltd
ABN 76 473 834 852
ACN 009 547 139
as trustee for Johnstone McGee & Gandy Unit Trust

www.jmg.net.au

JMG Ref: 173112PH

27th July 2021

The General Manager
Clarence City Council
PO Box 96
Rosny Park 7018

Attention: Ross Lovell – Manager City Planning

Dear Ross,

52 RICHARDSONS ROAD SANDFORD – URBAN GROWTH BOUNDARY AMENDMENT

Further to your letter of the 12th April 2021 and email of the 21st May 2021, we respond as follows:

Executive Summary

The Council's seeks further information to respond to the Minister's request for further analysis on the need for additional residential land supply outside the Urban Growth Boundary. The additional information is to include clarification of statements regarding excessive lot supply in the Council officer's report, assessment against the departments *Reviewing and Amending Regional Land Use Strategies* – Information Sheet, an analysis of local impacts and the requirement for consulting with other Councils in the region.

Council have requested we provide a submission to support Council's consultation process with the other regional Councils by responding to the policy and Clarence Council's current land supply data. On reviewing the provided data we found:

- The Department of Treasury and Finance high growth scenario for population projections are a fairly accurate representation of the current and projected population growth for Clarence to 2032.

- Based on these predictions there will be a need for 3900 additional dwellings in Clarence over the next 15 years. If the STRLUS target of 50:50 infill/greenfield is achieved this will mean around 2000 greenfield dwellings over this period.

- Whilst theoretically there may be a sufficient supply of land zoned for either residential or future residential purposes, it is evident there is a significant under supply in the delivery of sealed lots to the market. The reasons for this vary from site to site.

- It is also clear from the data that there is an extremely limited potential supply of lots in Lauderdale.

- The data provided does not provide a basis to consider the Southern Tasmanian Regional Land Use Strategy 2010-2035 (STRLUS) policies as it does not differentiate residential infill development verses greenfield ratio within Clarence; and

- 52 Richardsons Road will have no significant impact on the supply chain for at least 2-3 years and even then less than an expected 20 lots per annum or 6% of the required supply.

The requirements of the Information Sheet (excluding the consultation with Councils in the region) are covered by the submission report put to Council as part of the application.

The applicant has undertaken local community consultation with a 'drop in' session on the 27th April 2021 at the Lauderdale Tavern. Approximately 70 people attended and discussed a range of views with the project team.

Reviewing and Amending the Regional Land Use Strategies – Information Sheet RLUS1

The information requirements of the information sheet are as follows:

Information Requirement	***Response***
Details on why the amendment is being sought	Refer to Section 2.2 of the Planning Report
Schedule 1 objectives of LUPAA	Refer to Section 2.3 of the Planning Report
State Policies	Refer to Section 2.3 of the Planning Report
Tasmanian Planning Policies	N/A
Overarching strategic directions and related policies in the regional land use strategy	Refer to Section 2.3 of the Planning Report
Current population growth projections prepared by the Department of Treasury and Finance	Refer to Section 3.1 of the Planning Report and the response to Council's figures below.
Analysis of land consumption	Refer to Section 3.1 of the Planning Report and the response to Council's figures below.
Suitability of the area in terms of access to existing physical infrastructure	Refer to Section 3.2 of the Planning Report.
Consideration of appropriate sequencing of land release	N/A – this part of STRLUS has not been acted upon.
Consideration of any targets for infill development	Refer to Section 3.1 of the Planning Report.
Potential for land use conflicts with use and development on adjacent land	Refer to Section 3.2 of the Planning Report.

The requirements of the RLUS1 Information Sheet have been provided in the application documentation together with further analysis below.

Context of the Southern Tasmanian Regional Land Use Strategy and its Urban Growth Boundary

The Southern Tasmanian Regional Land Use Strategy (STRLUS) was declared on 27 October 2011. The Regional Strategies were intended to be periodically reviewed in line with changing population indicators and demographics. To date a comprehensive review has not occurred but there have been a number of amendments in response to various requests. The STRLUS provides an overall settlement network and growth strategy for all settlements within the southern region including Greater Hobart by way of an Urban Growth Boundary (UGB).

The UGB was developed to include around a 15 year supply of residential lots and was intended to be amended to accommodate changes to population and demographics under a regular review process. Maintaining the supply of new residential lots is a significant factor in meeting demand to avoid unsustainable price increases due to constrained supply. The UGB is intended to take into account the relatively long lead times required to process land through the rezoning, subdivision and construction phases.

Potential residential land supply within the 2010 Urban Growth Boundary was based on the medium level population growth scenario which is 30% less than what has been experienced to date and is predicted to continue to 2032

Population Growth

To assess the appropriateness of the STRLUS policy the amount of land within the Urban Growth Boundary needs to be considered by reference to the population growth of the municipality and ideally the region.

The population of Clarence is currently around 58,965. The Department of Treasury and Finance (DTF) 2019 projections suggested a high growth scenario would see a population for Clarence this year of 58,688 – this is close to the actual figure in 2021. This suggests that the DTF high scenario projection is a fair representation of the projected population growth in Clarence.

According to the DTF high level scenario, the population projection is around 67,931 or another 9000 people settling in Clarence between 2021 and 2032. Based on the occupancy rate of 2.3 people per dwelling this equates to around 3900 additional dwellings in Clarence (note this is slightly above the 295 new dwellings per year based on new bin services which would total 3,245 dwellings over the same 11 year period). Assuming the STRLUS aim of moving to a ratio of 50/50 infill to greenfield (which is probably ambitious) this equates to 1956 new greenfield dwellings in this period.

Clarence Council Land Supply Analysis

The two sets of data provided are dated July 2020 (Attachment 7 of the 9th February 2021 Council Agenda) and May 2021 (for the Hobart Metropolitan Plan).

The July 2020 figures suggested a lot yield of 2820 available lots and an additional 2311 potential lots within the Urban Growth Boundary – total 5131 lots. The May 2021 figures suggest a potential yield of 7899 lots in vacant land and an additional 2642 lots in underutilised land – totalling 10,541 lots. It further notes, based on 'new domestic bin services' the number of new dwellings is 295 dwellings per year on a 10 year average.

The two sets of figures are difficult to compare because the May 2021 figures include both infill development and greenfield development, whereas the July 2020 only considers greenfield sites. This explains the significant difference in the totals. Note also that technically under STRLUS 'infill' is any development within the Urban Growth Boundary outside the defined greenfield areas not just underutilised lots generally.

It is important to appreciate the assessment of available lots available in terms of land supply does not equate to actual supply. For example based on Council's July 2020 figures:

- of the 411 lots approved in Clarence Heights in 2010 only one lot has been sealed;
- of the 498 lots approved in 81-93 Pass Road in 2016-18 none have been sealed; and
- of the 217 lots approved in in 6 Aralia/74 Sugarloaf Road and 1 Elaia Drive in 2017-18 none have been sealed.

Understanding these figures are not current, it shows that relying on the area of zoned land or the number of lots in active permits is an unreliable and inaccurate way of understanding actual residential lot supply. Likewise, the inclusion of vast amounts of Future Urban land is also misleading. The Droughty Point (Carr Estate) Future Urban zoned land of 100Ha for example is unlikely to be realised in any substantial way within a 15 year period given the current stage rezoning approved in 2010 for 95 lots is still incomplete. Thus only a small fraction of the 1771 lots forecast will be completed in the 15 year supply horizon. The rate of actual development is an important consideration in considering and analysing land supply.

Based on the figures in the Councils July 2020 assessment but excluding those developments that either have not progressed in 10 years (such as Clarence Heights) or don't have a planning permit (such as Lindhill Avenue) the supply of available lots at July 2020 was 1966 lots.

The lot yield in the updated Council July 2020 figures is based on the 960m^2 gross figure from the JMG Lauderdale Urban Expansion Study, but this is an approximate measure only. The recently submitted 22 Atkins Street application (PDPLANPMTD-2021/019000) was estimated in the July 2020 figures to produce 69 lots, but in reality produced 59 lots (due to bushfire and other site constraints) – 15% lower. There are also overlaps in the July 2020

figures. For example the 125 lot - 170 Sugarloaf Road application (SD-2015/49) and the 98 Lot - 1 Elaia Drive (PDPLANPMTD-2020/008974) application have 45 lots in common. These examples illustrate only that it is difficult to accurately calculate available lot numbers and that a margin for approximation needs to be factored into the calculation of land supply.

Whilst it is difficult to draw conclusions based on the data at hand, it is evident that theoretically there may be sufficient land zoned for either residential or future residential purposes, however anecdotally there is an inadequate supply of sealed lots being delivered to the market. If the ratio of infill to greenfield development is under 50/50 the amount of greenfield supply could be substantially under demand. Note, the Council data provided does not provide a basis to consider the STRLUS policies as there is no data comparing residential infill development verses greenfield development within Clarence. In our experience this is common to many Councils.

It is also clear from the data that there is no supply of lots in Lauderdale. The proposal at 52 Richardsons Road will have no significant impact on the supply chain for at least 2-3 years and even then, less than 20 lots per annum. This is only 6% of the suggested annual dwelling supply based on the bin service growth numbers.

Consultation

The applicants had a 'drop in' session with the local community on the 27th April 2021 at the Lauderdale Foreshore Tavern. Approximately 70 people attended and spoke with the facilitators on an informal basis. Attendees were both opposed and in support of the proposal, but others were simply wanting to understand the process of the application. Issues raised were as follows:

Traffic

- Via Bayview Road;
- Via Richardsons Road onto highway via Forrest Hill Rd;
- Peak Hour;
- School/Acton Turnoff;
- Concern about 300 extra cars and ~1300 car movements;

School

- Unable to accommodate more potential students;
- Claims Lauderdale Primary it is already at capacity;

Environment

- Questions about the bush & animals, but no specific complaints about the plans/studies in the Planning Report;

Bayside Drive Houses

- Closeness of houses and potential units;

- View into their backyard (privacy);
- Number of houses behind them (Mainly the 2 large blocks at the top of Bayside Drive);

Richardsons Road

- Appreciated the 5-acre rural residential block & landfill buffer;
- Some concerned about majority of traffic via Richardsons Rd onto Forest Hill to South Arm Highway;

Services

- Sewerage capacity;
- Water capacity;
- Power underground or overhead;
- Misunderstood the connection between the existing Bayside Drive and the South Arm Highway or were concerned with its capacity for the intended traffic; and
- Shop's capacity (cars, stock, etc).

As a result of the consultation, a number of design changes were considered, particularly with respect to the interface with existing houses on Bayside Drive and rural residential properties to the north-east of the site.

Attendees were advised that modelling based on the indicative concept plan and discussions with the Taswater have confirmed that any future residential subdivision within the proposed change to the UGB could be serviced via the existing mains water supply and pressure sewer network.

Further, attendees were directed to the Traffic Impact Assessment which shows that Council, State Roads would not be negatively impacted by a future development based on the indicative concept layout. The Traffic Impact Assessment included modelling of the roads and intersections and concluded "traffic volumes will not create any operational issues along each of the three roads including junctions along Forest Hill Road, Richardsons Road and Bayview Road".

Further to the initial "drop in" session a dedicated website (www.richardsonsroad.com.au) has been established to provide information on the application for the community and other stakeholders. Included are links to consultant reports including a Traffic Impact Assessment. The website also provides an opportunity for stakeholders to directly contact the applicants to raise any concerns, provide feedback and make suggestions for the concept masterplan. It is proposed to hold additional consultation and feedback sessions with the community as the application progresses.

We trust the above information responds adequately to your request and the Ministers query about land supply data in the Council agenda.

Yours faithfully
JOHNSTONE McGEE & GANDY PTY LTD



Mat Clark
PRINCIPAL