Tasmanian Housing Strategy

Submission to Exposure Draft July 2023







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About Anglicare Tasmania

Anglicare Tasmania is a large community service organisation in Tasmania with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport, Burnie, Sorell and Zeehan and a range of programs in rural areas. Anglicare Tasmania's services include: crisis, short-term and long-term accommodation support; mental health support services; support services following a motor vehicle accident; aged and home care services; alcohol and other drug services; financial and gambling counselling; and family support. In addition, Anglicare Tasmania's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

Anglicare Tasmania is committed to achieving social justice for all Tasmanians. It is our mission to speak out against poverty and injustice and offer decision-makers alternative solutions to help build a more just society. We provide opportunities for people in need to reach their full potential through our services, research and advocacy.

Anglicare Tasmania's work is guided by a set of values which includes these beliefs:

- that each person is valuable and deserves to be treated with respect and dignity;
- that each person has the capacity to make and to bear the responsibility for choices and decisions about their life;
- that support should be available to all who need it; and
- that every person can live life abundantly.

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Anglicare's experience in housing services and advocacy

Anglicare Tasmania's operational experience and research provides valuable insights into the housing needs of Tasmanians and how they might be met.

Housing and homelessness services

Anglicare Tasmania is a statewide provider of housing and homelessness services, including:

- supported accommodation for people aged 18 and over in seven lodges statewide
- supported accommodation for people aged 18 to 24 in Youth 2 Independence housing located in Devonport, Launceston and Hobart
- Housing Connect services in the North and North West
- crisis, short-term and long-term accommodation support statewide.

Research

Anglicare's Social and Action Research Centre (SARC) has undertaken and published a range of research, making recommendations to address disadvantage and create a more just Tasmania. Anglicare recommends that the Tasmanian Housing Strategy is amended in response to SARC's research findings to implement relevant recommendations. Recent SARC projects with findings and recommendations relevant to the Strategy include:

- Young, in love and in danger—responding to violence and abuse in teen partner relationships (2022)[1]
- <u>Better, Bigger, Stronger</u>—responding to the mental health care needs of unaccompanied homeless children in Tasmania (2022) [2]
- <u>Treasured Lives</u>—the experience and needs of Tasmanians who live with hoarding or have challenges maintaining a healthy home (2021) [3, 4]
- <u>Rental Affordability Snapshot</u>—an annual analysis of whether properties listed for rent on 'snapshot' weekend (in late March) are affordable and appropriate for Tasmanians living on low incomes (2023) [5]
- <u>Trips Not Made</u>—addressing transport disadvantage experienced by disabled people and young people in Tasmania's outer urban and regional communities (2023) [6]

In-home care and other support services

Anglicare Tasmania has frontline experience working with and providing services to people

- requiring in-home care, aged-care, disability support
- seeking support for their mental health, their use of alcohol and other drugs
- experiencing poverty and receiving inadequate income to pay for essentials.

These services can be critical to enabling them to live independently, maintain tenancies and avoid homelessness.

Lived experience of our clients

The recommendations of this paper are supported, where appropriate, with accounts of the experience of Anglicare clients. Names and some details have been changed to protect their privacy.

Executive Summary

What the Strategy Does Well

The government is to be applauded for developing this 20-year Tasmanian Housing Strategy ('the Strategy').

Anglicare Tasmania commends and supports the Strategy's

- acknowledgement that housing is a fundamental right and a social determinant of health
- vision of a well-functioning, viable housing system that provides safe, appropriate and affordable housing for all Tasmanians
- commitment to a Housing First approach
- recognition that wrap around supports are fundamental to successful implementation of a Housing First approach
- intention to adopt a person-centred approach
- commitment to support capacity building in the housing and homelessness sector workforce
- commitment to increase the supply of affordable housing
- intention to address challenges in the private rental market, including working with the Australian Government to provide appropriate levels of rent assistance
- intention to adopt a comprehensive and integrated approach
- recognition that individual housing needs of Tasmanians are diverse and housing needs to be fit for purpose
- intention to create inclusive communities with access to transport and services, which support improved health and wellbeing
- commitment to provide safe accommodation and support for people experiencing domestic violence
- data dashboard and commitment to developing appropriate measures of progress.

The priorities of the Strategy are supported overall. Areas which can be strengthened to increase the likelihood of successfully implementing the Strategy to achieve its vision are outlined in the next section.

Strengthening the draft Strategy

Anglicare Tasmania has identified some priority areas where the Strategy could be strengthened. These are outlined below. Further discussion, evidence and alternatives are provided in the subsequent discussion.

Housing to reduce disability

Housing to reduce disability should be added as a separate objective in the Strategy to ensure that it adequately responds to the needs of people living with a disability and the range of disabilities experienced. Appropriate housing is a key lever by which the experience of disability can be reduced. Housing to reduce disability must be people-centred, informed by the disability sector, focus on services as well as buildings and provide more options in affordable and social housing.

Building and construction industry labour strategy

Capacity constraints are a key risk to the successful implementation of the Strategy. This includes skilled labour. The Strategy should be supported by a building and construction industry labour strategy.

Community housing providers and the Housing First approach

The Housing First approach is welcomed. However, it is unclear how community housing providers will be incorporated into delivery of the model. Successful implementation will require ongoing consultation and adequate policy and funding support for community housing providers.

A range of services need to contribute to the Housing First model and to ensuring people can live independently and safely in their chosen accommodation type.

Safe housing

Safe housing should be broadened beyond families experiencing domestic violence to include a range of people who may experience greater vulnerability, including:

- Tasmanians who are reliant on support for daily living or are otherwise more vulnerable
- people living with a disability
- people under 18 years experiencing or at risk of intimate partner violence
- people under 18 years without effective guardianship.

The Strategy should acknowledge the need for adequate and sustainable funding for services to ensure safety and good outcomes for clients and communities.

Healthy housing market

A healthy housing market with sustainable rental vacancy rates (market equilibrium) should receive greater emphasis throughout the Strategy as a starting point for reducing rental vulnerability.

Addressing implementation risk

Anglicare Tasmania identified some risks to effective implementation of the Strategy, which should be addressed by including the following information in the Strategy:

- the specific standard on which the definition of adaptable housing is based
- the role of local government and local planning needs to be made explicit

- how inclusive communities will be created and by what mechanism or process
- how lived experience will be elicited and incorporated into action plans and measurement.

Support for effective advocacy

Anglicare Tasmania recommends that the Strategy recognise the critical role performed by expert systemic advocates such as Shelter Tas, the peak body for housing and homelessness services. As the peak body, Shelter Tas provides a consolidated voice for the sector, is a conduit for information between the sector and Government, delivers expert policy advice and development, and is recognised by Government for the vital role it plays.

Recommendations for implementation — actions and progress

Measuring success

Anglicare Tasmania recommends:

- 1. Monitoring and reporting rental vacancy rates at a regional level. The Strategy should define a target vacancy rate range as one criterion of a well-functioning private rental market.
- 2. In addition to changes in the private rental market (which has traditionally housed people on lower incomes), better data is needed on current and emerging issues including new uses for residential homes such as short stay accommodation and changing household formation over the next twenty years.
- **3.** Tracking the net gain in social and affordable properties is essential to monitor the effectiveness of the Strategy and its implementation in delivering housing outcomes for Tasmanians.
- **4.** Measurement of success should include voices of lived experience and practitioners from the housing and homelessness sector.
- **5.** Measurement includes the performance measures nominated by the Productivity Commission for monitoring performance of the National Housing and Homelessness Agreement[7]:
 - the stock of social housing dwellings relative to the target population for social housing
 - an increase in the proportion of social housing occupants that are housed in homes that match their needs
 - an increase in the number of social housing occupants with greatest need as a proportion of all new allocations
 - an increase in the proportion of social housing occupants whose needs are met and are satisfied with services provided by their housing organisation
 - the stock of affordable rental housing relative to the population
 - a decrease in the proportion of rental households with household income in the bottom two quintiles that spend more than 30 per cent of their income on rent
 - a decrease in the number of people experiencing homelessness
 - a decrease in the number of people that experience repeat homelessness
 - an increase in the proportion of people who are at risk of homelessness that receive assistance to avoid homelessness

- an increase in the proportion of people who are homeless that are assisted to achieve housing
- an increase in the proportion of Indigenous Australians purchasing or owning their own home
- the total number of dwellings relative to the population
- an increase in the number of dwellings that are permitted by zoning in cities or urban areas
- a reduction in the average time taken to decide the outcome of a development application or residential building permit (as applicable) in cities or urban areas.

Putting this strategy into action

- **6.** Implementation and Action Plans should pay attention to the experience of practitioners, providers, tenants, service users, people living with housing stress and people experiencing homelessness, with appropriate support for their participation where needed. This includes providing appropriate funding for effective advocacy.
- 7. Implementation of housing in all policies that includes:
 - reviewing policy through the lens of housing as a social determinant of health
 - seeking to maximise the positive impact of other policies on the Housing Strategy's objectives.
- **8.** Development of an implementation plan articulating how more inclusive communities will be delivered, including clear roles and responsibilities, and the process for engaging with and supporting key stakeholders (including planners and local government) to partner in delivering this priority outcome.
- **9.** Actions to create inclusive communities pay attention to ensuring that no Tasmanian community is stigmatised.
- **10.** Development and implementation of a complementary Building and Construction Industry Labour Strategy to address both labour supply and demand by:
 - reviewing the effectiveness and progress against the Tasmanian Building and Construction Industry Workforce Action Plan 2021 (developed in response to COVID-19)
 - ensuring that the necessary skills and labour supply are available to implement this objective
 - exploring opportunities to retain people who have been upskilled and/or attracted into the sector by providing ongoing secure employment pathways in Tasmania
 - appropriately managing public investment in projects competing for the same resources and prioritising housing construction where labour and other capacity constraints cannot be otherwise addressed.
- **11.** Public support of private investment in housing is transparent and allocated only when it is demonstrated that:
 - there is a net public benefit
 - without the proposed level of public support, the investment would not otherwise be made.
- 12. Additional and ongoing investment in existing public transport and social infrastructure,

- paying particular attention to the deep connection between housing affordability and access to public transport.
- **13.** Articulation and implementation of a mechanism by which the housing stock will match and meet the needs of people living with a disability
- **14.** The review the *Residential Tenancy Act* includes amending the Act to:
 - repeal provisions allowing no reason end of lease evictions and prevent unreasonable eviction of tenants to homelessness
 - support effective advocacy for tenants' rights
 - define the term 'reasonable' with respect to reasonable rent increases
 - prevent discrimination against prospective tenants on the basis of parenthood, disability, unemployment or pet ownership, and/or strengthening the operation of the *Anti-Discrimination Act 1988* with respect to residential tenancies.
- **15.** Development and implementation of an action plan to address the housing needs of young people in transition to adulthood.
- **16.** Policies and actions under the Strategy are carefully considered to ensure that they are not regressive—that is, they should not increase wealth inequality.
- 17. Actions in relation to making home ownership more affordable should consider the Productivity Commission finding that the public and private benefits from assisting people who are—or are at risk of—experiencing homelessness are likely to be greater than helping people buy a home.
- **18.** Developing a Housing First implementation plan in consultation with community housing providers that:
 - articulates roles and responsibilities
 - is informed by lived experience on an ongoing basis
 - allows for coordination and support services
 - is adequately funded to ensure that people are referred to and receive the appropriate support services that they need
 - ensures that community housing providers can deliver the Housing First model without compromising existing services
 - addresses support service gaps including assistance with full costs of moving, and a pilot program to assist people living with hoarding and challenges maintaining a healthy home
 - includes adolescents under 18 for whom the Y2I program is not suitable within its scope and provides complex mental health support and care coordination
 - addresses the needs of young people between 18 and 25 years in transition to adulthood
- **19.** Reinvestment of the proceeds of social housing asset sales into social housing and support services necessary to implement the Housing First policy.
- **20.** An action plan to deliver housing that is accessible and ensures that people with disability have choice and control about where they live, who they live with and who comes into their home. This includes:
 - providing more affordable homes that are accessible

- increasing the proportion of homes meeting 'gold' standard, by one or more of:
 - regulating the higher 'gold' standard for new dwellings
 - providing incentives to private investors who build or upgrade rental properties to 'gold' standard
 - requiring and funding social housing to meet the 'gold' standard
- ensuring that planning of infrastructure and urban infill is accessible and inclusive
- ensuring that innovative and high-quality design includes accessibility and sustainability.
- **21.** That actions in relation to short stay accommodation do not adversely impact the supply of residential (long-stay) accommodation.

Discussion

Priority objectives — Our way forward

Considering housing in policy development

Anglicare Tasmania recommends improving clarity by explicitly stating that housing in all policies involves

- reviewing policy through the lens of housing as a social determinant of health
- seeking to maximise the positive impact of other policies on the Housing Strategy's objectives
- incorporating the experience of practitioners, providers, tenants, service users, people living
 with housing stress and people experiencing homelessness, with appropriate support for their
 participation where needed.

More inclusive communities

Anglicare Tasmania supports the priority outcome to create inclusive communities. The Strategy provides little information about how this will be achieved beyond identifying a role for local government and the community sector.

Anglicare Tasmania recommends that the Strategy clearly articulates what actions will be taken to deliver more inclusive communities, including clear roles and responsibilities and the process for engaging with and supporting key stakeholders to partner in delivering this priority outcome.

More private investment

This priority outcome is supported provided that public support of private investment in housing is transparent and it is demonstrated that:

- there is a net public benefit
- without the proposed level of public support, the investment would not otherwise be made.

Innovative design and high-quality housing

This outcome should more explicitly address the need for accessible and affordable housing stock.

Coordinated delivery of social and economic infrastructure

Anglicare Tasmania recommends additional and ongoing investment in existing public transport and social infrastructure.

SARC's research project *Trips Not Made* explored transport disadvantage experienced by disabled people and young people in Tasmania's outer urban and regional communities. The research found a deep connection between housing affordability and access to public transport.

"I do live in a slightly outer-lying area...as much as I would love to be right near public transport, let's have a look at the housing situation in rental...that's not going to happen any time soon."[6]

The research also found that lack of public transport, particularly in outer urban fringes areas where housing was more affordable, prevented people from doing many things, including accepting work shifts at times when public transport was not available.

"I had to deny night shift. Because I couldn't go back home..." [6]

Diverse types of housing to meet the needs of all Tasmanians

The mechanism by which housing diversity will respond to and match the needs of all Tasmanians is unclear. Private investment has been identified as a mechanism for increasing and diversifying housing supply. The mechanism by which the housing stock will match and meet the needs of people living with a disability also needs to be articulated at a high level.

Adaptability, accessibility and sustainability should be identified as key factors for reducing involuntary moves and ensuring the state's housing stock is fit-for purpose.

Reducing rental vulnerability

Anglicare Tasmania recommends positive reframing of this outcome for consistency with other priority outcomes and the positive approach of the Strategy. A suggested alternative is 'Rental security and affordability'.

While not a complete solution, a sustainable vacancy rate will promote rent (price) stability and reduce power imbalances between renters and landlords, and should be identified here as a key contributor to this outcome. Reducing involuntary moves is a desirable outcome. [7]

Anglicare Tasmania supports the commitment to review the *Residential Tenancy Act* and recommends a comprehensive review that includes amending the Act to:

- repeal provisions allowing no reason end of lease evictions and prevent unreasonable eviction of tenants to homelessness
- support effective advocacy for tenants' rights
- define the term 'reasonable' with respect to reasonable rent increases
- prevent discrimination against prospective tenants on the basis of parenthood, disability, unemployment or pet ownership, and strengthening the operation of the *Anti-Discrimination Act 1988* with respect to residential tenancies.

Strengthening of tenants' rights should include providing appropriate support for the Tenants' Union and acknowledging within the Strategy the critical advocacy role it plays in the housing system.

Childhood and youth development

This priority should be expanded or an additional outcome added to address the housing needs of young people in transition to adulthood.

Theme one—more homes, built faster

Additional objective—labour and industry strategy

Labour is a significant constraint on housing supply that has been identified by the Housing Industry Association (HIA), the Australian Housing and Urban Research Institute (AHURI) and Master Builders Australia.[8-10] Objective 6 under this theme should be supported by a complementary Building and Construction Industry Labour Strategy to address both labour supply and demand by:

- reviewing the effectiveness and progress against the Tasmanian Building and Construction Industry Workforce Action Plan 2021 (developed in response to COVID-19)[11]
- ensuring that the necessary skills and labour supply are available to implement this objective
- exploring opportunities to retain people who have been upskilled and/or attracted into the sector by providing ongoing secure employment pathways in Tasmania
- appropriately managing public investment in projects competing for the same resources and prioritising housing construction where labour and other capacity constraints cannot be otherwise addressed.

Property upgrades

Building on the commitment to transparency in social housing sales, Anglicare Tasmania recommends that the Strategy commits to:

- reinvesting the proceeds of sales in social housing and support services necessary to implement the Housing First policy
- monitoring and reporting the total stock of social housing.

Roles and responsibilities

The partnership section notes that successful implementation of the Strategy is dependent on the actions of entities outside the State Government to engage collaboratively; for example, the Tasmanian planning system comprises State and local governments. Similarly, it is unclear how the Housing First approach will impact or involve community housing providers.

Anglicare Tasmania suggests that the Strategy requires additional detail and transparency about how other entities will be engaged with and supported to work with the Tasmanian Government to deliver the outcomes.

Theme two—affordability in the private market

An equitable housing market

Between March 2018 and March 2023, median house prices increased by 53% in Hobart and by 71% in the rest of Tasmania, recording the highest growth of any state in both its capital and the rest of the state.[12] The nationwide increase in house prices is driving an increase in wealth inequality due to:

- a disproportionate increase in asset value for home owners
- decreased capacity of non home-owners to save due to increased rents.

Rising wealth inequality is an obstacle to achieving a more equitable housing market.

Anglicare Tasmania recommends that policies and actions under the Strategy are carefully considered to ensure that they are not regressive—that is, they should not increase wealth inequality.

Home ownership

Actions toward achieving Objective One should take account of the Productivity Commission's review of the National Housing and Homelessness Agreement (August 2022), which found that 'the public and private benefits from assisting people who are—or are at risk of—experiencing homelessness are likely to be greater than helping people buy a home' and recommended that 'Governments should redirect assistance provided to home buyers'.[7]

Rental

In addition to the comments on page 12, Anglicare Tasmania recommends that the Strategy defines a target vacancy rate range as one criterion of a well-functioning private rental market. The Strategy covers a 20-year period and so it is important that it anticipates variation in rental market conditions and is flexible to respond.

Theme three—people at the centre

Safety

Anglicare Tasmania recommends that the scope of this priority outcome is extended to:

- people under 18 years experiencing or at risk of intimate partner violence
- Tasmanians who are reliant on support for daily living or are otherwise more vulnerable
- people living with a disability
- people under 18 years without effective guardianship.

We also recommend that the Housing Connect reforms improve coordination and funding of services to ensure that people are referred to and receive the appropriate support services that they need.

Adopt Housing First

This priority outcome is supported subject to further details of implementation and appropriate funding of wrap-around supports and parallel services.

To successfully implement Housing First and the needs of all people at risk of homelessness, the following issues need to be addressed:

Housing First must be supported by adequate, funded wrap-around supports

To achieve successful implementation, it is critical that the Housing First approach is supported by parallel funding for adequate wrap-around services for all age groups and particularly people who are at risk of homelessness. Like Troy (see below), many people experiencing or at risk of homelessness have complex needs and require significant psychosocial and other supports to maintain a tenancy.

Anglicare Tasmania recommends that shortfalls and critical gaps in support services are identified in consultation with community housing providers and informed by lived experience. Adequate funding should be provided to address identified service gaps.

Client story—Troy, 48

Troy is a disability pensioner who previously lived in a community housing property. He was forced to give up his tenancy due to increasing antisocial behaviour in his neighbourhood. Troy's history as a victim of assault makes him especially nervous about rowdy and aggressive behaviour and also makes him reluctant to consider share-housing.

Troy is currently moving in between caravan parks and his sister's couch. He's not allowed to keep his campervan at a caravan park for longer than their maximum stay, and there are some he avoids as he considers them unsafe. His camper doesn't have kitchen or bathroom facilities and gets extremely cold at night. His sister's place isn't a long-term option either, being a small one-bedroom unit.

All this is having a significant negative impact on Troy's mental health. He has a history of suicide attempts and hospitalisation and his condition is visibly deteriorating. He is on the Priority waitlist for public housing, but is becoming increasingly frustrated with the wait times. Troy needs transitional housing in a location that makes him feel safe in order to stabilise his mental health.

Client story—Leanne, mid 50s

Leanne's back injury ten years ago left her with significant mobility issues. She requires assistance for basic daily tasks such as showering and can no longer drive. Leanne's adult children live in Queensland and her sister who lives locally is also disabled.

Leanne's companion is her cat Tigger. When her landlord decided to sell the home she's lived in for 20 years, Leanne's main concern was to find somewhere that would allow her to keep Tigger. She was also worried about how she would physically manage the tasks associated with moving, such as cleaning, packing and shifting furniture.

Her Disability Support Pension means she can afford to pay \$180 a week rent, which is not enough for anything but a sharehouse. A one-bedroom unit in Launceston is likely to cost around \$250 per week, which is over 40% of her income.

Anglicare's Rental Affordability Snapshot found that on Snapshot weekend in late March 2023, there were no affordable properties advertised in Launceston. Only three potentially appropriate properties in the state were affordable for Leanne, one in Zeehan and two in Queenstown. Even if the houses met Leanne's physical requirements and allowed her to keep a pet, their remote location over 230km from Launceston and the support services she requires, means that they are not an option.

One example of a support service gap is the lack of assistance with removal costs. For people living with disability or mobility limitations, this needs to include funding of assistance with packing as well as removals (see Leanne's story). Leanne's situation also illustrates the importance of support services and affordable housing being in close proximity.

A second example is the significant gap in supports and coordination to assist people living with hoarding or challenges maintaining a healthy home, identified in SARC's 2021 research report *Treasured Lives*.[4] People living with these challenges can struggle to maintain a tenancy and their homes are often unsafe for a range of reasons, including elevated risk of fire and falls.

Based on these research findings, Anglicare Tasmania recommended in its 2023–24 budget submission that the Tasmanian Government allocate funding to pilot an improved service delivery model to support Tasmanians living with hoarding and challenges maintaining a healthy home.[13]

Clear implementation plan in consultation with community housing providers

Anglicare Tasmania recommends that the Strategy clearly commits to engaging in development of the implementation plans and articulates how that will happen.

We recommend that the Strategy commits to developing clear roles and responsibilities for delivering the Housing First approach in consultation with community housing providers.

Clear articulation of how lived experience will be incorporated

Anglicare Tasmania recommends that the Strategy articulates how lived experience will inform policies, plans, action and measurement or progress.

Scope of Housing First approach should explicitly include people under 18

Research undertaken by Anglicare Tasmania's Social Action and Research Centre has repeatedly identified a lack of secure age-appropriate housing for young people who are considered too old for intervention by child safety services and not eligible for supports available to adults. [2]

Anglicare Tasmania's 2022 SARC research report *Better, Bigger, Stronger: Responding to the mental health care needs of unaccompanied homeless children in Tasmania* found that 'Children, young people and professionals describe the *concurrent* provision of secure accommodation, youth outreach support and access to specialist mental health services as the ideal context in which greater physical and psychological stability and recovery can be achieved.' [2]

Similarly, SARC's research report *Young, in love and in danger*, which explored teen intimate partner violence, found that 'Few of the teens had economic resources, and this significantly constrained their ability to escape a violent or abusive relationship. Young people and professionals described feeling failed by systems that do not adequately provide teens with access to safe and suitable housing and material resources for escaping violence and abuse.'[1]

Young, in love and in danger recommends action to eliminate the choice faced by adolescents between homelessness and violent and abusive intimate partner relationships. [1]

Anglicare Tasmania acknowledges the government's significant investment in Youth 2 Independence (Y2I) facilities. However, the Y2I model does not suit all young people experiencing or at risk of homelessness, particularly those who have experienced complex trauma.

Anglicare Tasmania recommends that the Strategy is explicit that the Housing First approach includes providing age-appropriate safe housing for children under 18 years without effective guardianship and/or at risk of abuse or harm, with parallel funding of age-appropriate wrap-around supports, including:

- a complex mental health service with significant outreach capacity in the Tasmanian Child and Adolescent Mental Health Service
- a care coordination service through Children, Youth and Families for children and young people experiencing complex needs, comprising mobile care coordination teams and multiagency specialist practitioner teams
- appropriate age-appropriate housing for young people for whom the Youth 2 Independence program is not yet a suitable or feasible option.

Addressing the additional needs of young people in transition to adulthood

The Emergent Adulthood: Review of Literature released in March 2023 by Youth Network of Tasmania and undertaken by the Tasmanian School of Business and Economics at UTAS found that young people transitioning to adulthood (aged 18 to 25 years) require specific age-appropriate supports.[14]

Anglicare Tasmania recommends that the implementation of the Housing First approach includes actions to address housing needs of emergent adults and that these plans are informed by *Emergent Adulthood: Review of Literature* and the ongoing work being undertaken in this area by UTAS and YNOT, as well as other relevant institutions.

Additional objective—housing to reduce disability

Supporting those in need is an important objective which is supported. To achieve the vision, Anglicare Tasmania recommends an additional outcome to provide housing to reduce disability is included in the Strategy under Theme Three. This is recommended for the following reasons:

Housing directly impacts disability

For many members of our community, housing itself can be disabling. Experiences of impairment can be directly increased or decreased through the design, construction and location of their housing and whether the housing meets their specific needs.

More than 1 in 4 Tasmanians is living with a disability and they are more likely to live in poverty

Tasmania has a high rate of disability (26.8%) overall, and around half of older Tasmanians have a disability. [15] A third of these people need support for the activities of daily living. These rates are higher than in other states. Poverty rates for people with disability are 1.5 times higher than for non-disabled people. They are less likely to own their own home and more likely to rent, making it costly and challenging to modify the home to meet their needs. For people living with disability, specific housing needs, low income and the limitations of rental properties are all major barriers to accessing appropriate housing. A healthy private rental market with a vacancy rate in the range of 2-3% is still unlikely to meet the varied and specific needs of people living with disabilities without government intervention.

Housing to reduce disability starts with the person's needs

On page 24, the Strategy identifies the potential for housing design to address mobility, mental health and neurological needs. This recognition that housing to reduce disability is about more than wheelchair access and mobility needs should be addressed by identifying housing to reduce disability as a separate outcome.

Disabilities are diverse and, by their nature, individual. It is important that community housing providers and housing support services have the flexibility and funding to access a range of appropriate housing options to address people's specific needs. For example, some people like Scott (see his Client Story below) may need isolation and individual housing for their wellbeing. Other people with disabilities may require a community setting for their mental health.

While aging is a factor in disability and chronic illness, young people and families with affected children are also living with conditions that may need to be accommodated in housing, such as additional rooms or a secure backyard.

Client story—Scott, 45

For the last 12 months Scott has been living in his car. Conditions are cramped and makeshift, but for Scott it's better than living in a housing complex with neighbours. Scott receives the disability support pension and his mental health condition makes it difficult for him to live in close proximity to other people. He is 'sound sensitive' and noises that may be mildly annoying for another person can be completely intolerable for him. In the past he's had to move out of secure and stable housing due to everyday sounds like car doors closing and dogs barking.

Like many disabled people, Scott's needs aren't straightforward. He has a health condition that requires access to clean, private, hygienic bathroom facilities to prevent infections occurring, so living in his car isn't a good long-term option. Scott's needs are best met by a home in a semi-rural location away from other people. Anglicare workers have noted other clients who don't want to or cannot be part of a community with nearby neighbours.

Client story—Ben, 30, and his daughter Ivy, 8

Ben has shared care of his daughter Ivy, who uses a wheelchair. However, Ben is currently living in a caravan, which Ivy cannot access. The only way for Ivy to see her dad is if the two stay at another relative's property for the night.

Ben's Anglicare housing worker has tried to make referrals to community housing providers, including one that specialises in single fathers, but has been unable to find a property that suits wheelchair users. Wheelchair accessible social housing stock is limited and in high demand.

Ben's relationship with Ivy is important for the whole family, including Ivy's mother, who receives much needed respite when Ivy is with her dad. Ivy's condition is progressive and Ben wants to spend as much time as possible with her while she is still relatively healthy.

Increasing the supply of adaptable and accessible housing is strongly supported. However, it is recommended that:

- the government explore principles of design that can be incorporated at the building stage to address mental health and neurological needs as well as physical requirements
- funding and policy governing support services enable a more tailored approach to housing that is suitable for all Tasmanians—including people living with disability.

Accessibility and adaptability

The Strategy provides a general definition of adaptability which should be expanded to include the standard to be applied in implementation.

Tasmania has committed to adopt the Australian Building Code *Livable Housing Design Standard* as mandatory for new dwellings from October 2024.[16] This Standard is based on the 'silver' (or minimum) level in Livable Housing Australia's *Livable Housing Design Guidelines* and is a welcome starting point.[17]

In addition to increasing affordable housing, *Australia's Disability Strategy 2021-2031* recommends as a priority policy that housing is accessible and people with disability have choice and control about where they live, who they live with and who comes into their home.[18]

Reporting on its review of the National Housing and Homelessness Agreement, the Productivity Commission states that the next Agreement should align with Australia's Disability Strategy. [7] The report recommends that the Australian, State and Territory Governments should also commission a housing Targeted Action Plan under the Australian Disability Strategy. [7]

Given Tasmania's ageing population, high rates of chronic illness and higher proportion of residents living with a disability, Anglicare recommends that the Tasmanian Government acts to increase the share of homes meeting the 'gold' standard in the Livable Housing Design Guidelines.[17] This might be achieved by:

- regulating the higher 'gold' standard for new dwellings
- providing incentives to private investors who build or upgrade rental properties to 'gold' standard
- requiring and funding social housing to meet the 'gold' standard.

Infrastructure planning and urban in-fill

SARC's research project *Trips Not Made* found that many disabled people living in outer urban communities did not have access to public transport that met their needs and public transport infrastructure in these areas frequently did not meet the national Disability Standards for Accessible Public Transport.[6]

Many people living with a disability would experience greater benefit than non-disabled people from affordable and accessible housing located on well-serviced public transport routes with easy access to services and amenities. For this reason, planning urban in-fill with affordable and accessible accommodation options with accessible infrastructure will be necessary if communities are to be inclusive.

"So, when I finish my degree, I have no idea how I'm going to get to work because of the public transport"[6]

Consistent level of commitment and approach to implementation

Compared to the other themes, theme three of the Strategy provides a lower level of commitment and less detail about how the Strategy will be implemented. Meeting the needs of people is more nuanced and complex than building physical infrastructure and so it is important that the Strategy outlines how the outcomes will be achieved and measured.

Anglicare Tasmania recommends that this theme is revised to ensure that the level of commitment and indication of how the stated objectives will be achieved is similar to that provided for the other themes.

Theme four—local prosperity

Key workers

As noted under the priority outcome 'More Private investment', public support of private investment in housing for key workers must be transparent and demonstrate that:

- there is a net public benefit
- without the proposed level of public support, the investment would not otherwise be made.

Short stay accommodation

Housing stock may be used as residential (long-term) accommodation or short stay accommodation. Both uses have economic benefits.

As a social determinant of health, stable residential housing makes a positive contribution to longer-term economic outcomes as outlined by the Productivity Commission.[7] Secure tenure in safe and appropriate housing is crucial to child development, engagement in education, positive health outcomes and continuity of employment. Improvement in these factors facilitates improved functioning of the labour market with more Tasmanians participating and able to provide the skills required by local businesses. Appropriate housing also delivers public benefit by reducing government expenditure on homelessness services, health, child safety and criminal justice.

Short stay accommodation generates short-term private economic benefits for property owners (investors) with some social (public) benefits through increased tourism. Housing stock diverted to short stay accommodation is generally not available as residential accommodation. This results in a negative spill-over (social cost) if there is insufficient total housing stock to meet demand in both markets.

The social cost of insufficient residential housing is very high and under these circumstances, the net benefit of short stay accommodation to the Tasmanian community as a whole is likely to be negative.

Anglicare Tasmania recommends that the Strategy commits to ensuring that actions toward Objective 3 do not adversely impact the supply of residential (long-stay) accommodation.

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