



Submission to the

**Tasmanian Government
Draft Residential Development Strategy**

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Executive Summary

Anglicare Tasmania welcomes this opportunity to provide comment on the Tasmanian Government's Residential Development Strategy (November 2011). We congratulate the Office of the State Architect on producing a clear, concise and visionary document to inform future residential developments in this State.

Our recommendations seek to ensure that the importance of social inclusion and equity are recognised and prioritised within all planning relating to Tasmania's housing system. We endorse recommendations made by the Tasmanian Council of Social Service (TasCOSS), particularly the need to identify residential solutions for rural contexts. We also endorse Shelter Tasmania's identified need to include social planners and landscape architects within residential planning processes.

Predominantly, we seek to remind the Tasmanian Government of our shared ultimate aim – to reduce and prevent homelessness - which means the development and provision of a housing system that has the capacity to house *all Tasmanians*. This submission provides seventeen recommendations we believe will strengthen the current Draft Residential Development Strategy, section by section. In addition, we provide four recommendations for the Tasmanian Government.

Refinements to the new Residential Development Strategy:

Recommendation 1. Anglicare suggests that a vibrant and comprehensive housing system needs to be based on social inclusion principles; be embedded with aims of social equity; and provide an achievable plan for housing all Tasmanians.

Recommendation 2. That the Strategy state clear aims to reduce homelessness, increase social inclusion, and reduce stigma associated with poverty.

Recommendation 3. That the Strategy include clear aims of ensuring that new residential developments provide adequate access to social infrastructure, including affordable, accessible and effective public transport.

Recommendation 4. That the Strategy acknowledges adequate housing as a basic human need and right, essential for health and wellbeing.

Recommendation 5. That the Strategy explicitly state that in Tasmania, adequate housing supply includes a comprehensive supply of public housing (requiring policy reform and Government investment) as well as private investment.

Recommendation 6. That an evaluation of the effectiveness of the Strategy be measured against aims of reducing homelessness, increasing social inclusion, and reducing stigma associated with poverty.

Recommendation 7. That the Office of the State Architect provide some guidance for how the Strategy might be embedded within local Government planning assessment processes, and policies relating to requirements of private residential developments.

Recommendation 8. That the reality that many Tasmanians are on low incomes (one third are in receipt of Government pensions or allowances) should be acknowledged and taken into account within all current and future plans relating to housing affordability, liveability and sustainability.

Recommendation 9. That the Strategy more closely embeds Australian and Tasmanian Government aims to reduce and prevent homelessness.

Recommendation 10. That the Strategy Vision includes a fifth key dimension relating to Equity. For example: 'To ensure all Tasmanians have access to affordable, appropriate and secure housing, and where necessary, that support to maintain housing is provided'.

Recommendation 11. That wherever the Strategy states an aim of liveability, the equally important need for 'adequate housing stock' is also acknowledged.

Recommendation 12. That within the Strategy, alongside environmental impact, car dependency and the provision of road networks, water and sewage, that 'heating costs' are recognised as an additional indirect cost associated with urban sprawl.

Recommendation 13. That the Strategy identifies housing solutions for specific vulnerable groups, including young people, older people, and people living with mental and/or physical ill health.

Recommendation 14. That the Strategy state an intended aim of at least 15% affordable housing in all new significant residential developments (that is, affordable to Tasmanians receiving Government pensions and allowances), including one third or 5% for those living with mental and/or physical ill health.

Recommendation 15. That the Strategy includes an aim of preventing discrimination relating to poverty, gender, sexuality and cultural background within new residential developments, including guidance for minimising and/or alleviating risks associated with stigma.

Recommendation 16. That the Strategy clearly state that public housing is an essential element within a vibrant, liveable and sustainable Tasmanian housing system.

Recommendation 17. That the Strategy offer guidance for how the social housing sector (including public housing and community housing) and the private housing sector will be engaged in the implementation of this Strategy.

Requests of the Tasmanian Government:

Recommendation 18. That the Tasmanian Government adopt a policy for the provision of at least 15% affordable housing in all new significant residential developments (that is, affordable to Tasmanians receiving Government pensions and allowances), including one third or 5% for those living with mental and/or physical ill health.

Recommendation 19. That the Tasmanian Government offers subsidies for private developers who meet the target of providing 15% affordable housing to Tasmanians on lowest incomes, including one third or 5% for those living with mental and/or physical ill health.

Recommendation 20. That the Tasmanian Government adopt a policy that all new residential developments must demonstrate how the social infrastructure needs of residents will be met, including access to public transport and essential services.

Recommendation 21. That the Tasmanian Government adopt a policy that all new residential development plans must include partnerships with social service providers to ensure tenants are supported to maintain their housing, where required.

Introduction

Anglicare Tasmania welcomes this opportunity to provide comment on the Tasmanian Government's Residential Development Strategy (November 2011). We congratulate the Office of the State Architect on producing a clear, concise and visionary document to inform future residential developments in this State.

Anglicare is the largest community service organisation in Tasmania and delivers a range of services, including in the areas of housing and homelessness. In addition to these services, for many years, our Social Action and Research Centre (SARC) staff have undertaken a range of research projects.

Although significant investments in housing and homelessness are currently being made by the Tasmanian Government, Anglicare's service delivery experience and research evidence demonstrates that Tasmania needs more housing stock - including more affordable, appropriate and secure housing for people on low incomes (such as those on Government pensions and allowances)¹. Research suggests that of those on low incomes, people living with mental and/or physical ill health are most in need of affordable and appropriate housing².

It is our belief that the current Draft Residential Development Strategy goes some way towards summarising the social and economic context and housing needs of low income Tasmanians, but falls short of making full use of this opportunity to promote equity - towards an ultimate aim of housing all Tasmanians. We recommend that the Draft Strategy be refined to include a higher vision - an ultimate aim of housing all Tasmanians. We also present a range of additional 'smaller' refinements, to ensure housing equity for people experiencing social and economic disadvantage.

All Tasmanians will benefit when people on low incomes are actively participating in affordable, liveable and sustainable housing, and when people living with mental and/or physical ill health are adequately housed, with support if required.

This submission provides feedback on the Draft Strategy, section by section. At its heart, the submission holds firm to an aim of reducing and preventing homelessness in Tasmania - by seeking to house all Tasmanians, and to offer extra support where required.

1. From the Minister (p.1)

The Minister states that she seeks a housing system that is 'people centric, environmentally sustainable and limits urban sprawl' and describes a 'uniquely Tasmanian housing system' as including simplicity, affordability, and style - leading to 'more sustainable, socially inclusive and connected communities'. We congratulate the Minister on her compassionate and insightful statements, and are reminded that the needs of the most disadvantaged Tasmanians should not be forgotten within such a vision.

Whilst the Minister recognises the need to ensure Tasmanians on low incomes have access to affordable housing, the critical need for affordable housing to be matched with affordable services such as public transport options, appears to be missing.

Anglicare Tasmania commends the inclusion of the term 'liveability' within this Strategy – 'a collaborative, connecting process that focuses on people and place making'. From Anglicare's perspective, Government services must include the provision of affordable, appropriate and secure housing for all – which in the Tasmanian context requires the provision of a comprehensive public housing system³.

The Minister states 'This draft strategy has been developed primarily to ensure that Government subsidised social and affordable housing developments do not repeat mistakes of the past'. She states that the Strategy will be applied to affordable housing developments – 'to support the creation of increasingly liveable and sustainable communities' and 'in the future, to be embedded within private developments'.

From Anglicare's perspective, these statements are worthy and worthwhile. Aims of developing 'liveable' residences and residential areas are important. Yet it is our hope, that wherever liveability is mentioned within the Strategy, 'enough housing stock' is also mentioned. We are reminded that both quality (liveability) and quantity (adequate stock) are vital ingredients in a residential development strategy that meets the needs of all Tasmanians. We encourage the Government to work towards finding a balance between meeting liveability aims alongside 'quantity' needs, to ensure all Tasmanians can be housed.

Recommendation 1. Anglicare suggests that a vibrant and comprehensive housing system needs to be based on social inclusion principles; be embedded with aims of social equity; and provide an achievable plan for housing all Tasmanians.

Recommendation 2. That the Strategy state clear aims to reduce homelessness, increase social inclusion, and reduce stigma associated with poverty.

Recommendation 3. That the Strategy include clear aims of ensuring that new residential developments provide adequate access to social infrastructure, including affordable, accessible and effective public transport.

2. Introduction (p.2)

The Strategy states 'Housing is a basic human need'. Anglicare Tasmania asserts that in Australia in 2011, affordable, appropriate and secure housing is also a basic human right⁴.

The Strategy states 'A substantial increase in housing availability and affordability is required to ensure that all Tasmanians have an opportunity to live in homes that meet their needs'. We are reminded that simply increasing the gross supply of housing will not immediately improve affordability. To ensure houses are affordable for Tasmanians on low incomes, in addition to increases in housing stock, we require policy reform. From Anglicare's perspective, as well as encouraging strong private investment, to achieve this aim in Tasmania requires significant Government investment in the provision and maintenance of a comprehensive public housing system⁵.

Whilst we commend the Strategy's aspirations for seeking a housing system of 'comfort, family, community, independence and security', Anglicare believes these ideals must not be sought too far above the critical aim of supplying 'enough rooves'.

Again, this section of the Strategy missed an opportunity to state the essential need for an effective public transport system. Anglicare believes the provision of affordable and accessible public transport goes hand in hand with the provision of an effective housing system⁶.

Recommendation 4. That the Strategy acknowledges adequate housing as a basic human need and right, essential for health and wellbeing.

Recommendation 5. That the Strategy explicitly states that in Tasmania, 'adequate housing supply' includes a comprehensive supply of public housing (requiring policy reform and Government investment) as well as private investment.

3. About the Residential Development Strategy (p.4)

The Strategy states that the plan will be implemented in a 'strategic and incremental manner', including an extensive and ongoing testing program. The plan for testing the Strategy appears to include applying it to selected State Government-owned public housing projects, and evaluating project outcomes. Anglicare Tasmania recommends that all new residential development outcomes be measured against aims of reducing homelessness, increasing social inclusion, and reducing stigma associated with poverty.

Whilst mention is made of the importance of local government and private developers in enacting this Strategy, little guidance is offered for how that might be achieved. Anglicare recommends that the Office of the State Architect provide some guidance for how the Strategy might begin to be formally adapted and implemented by local government, and by private developers.

Figure 3. reminds readers that Tasmania has the highest percentage of population dependent on Government pensions and allowances, which means that of all states and territories, Tasmania has the highest portion of people on the lowest incomes. Anglicare recommends that this statistic be embedded within all current and future residential development policies.

Recommendation 6. That an evaluation of the effectiveness of the Strategy be measured against aims of reducing homelessness, increasing social inclusion, and reducing stigma associated with poverty.

Recommendation 7. That the Office of the State Architect provide some guidance for how the Strategy might be embedded within local Government planning assessment processes, and policies relating to requirements of private residential developments.

Recommendation 8. That the reality that many Tasmanians are on low incomes (one third are in receipt of Government pensions or allowances) should be acknowledged and taken into account within all current and future plans relating to housing affordability, liveability and sustainability.

4. Why We Need a Strategy (p.6)

Anglicare agrees that a focus on improving affordability and enhancing liveability requires policy reform and strategies that increase the supply of new residential developments. For both environmental and economic reasons, we support the prioritisation of urban consolidation.

In addition to aims of decreasing dependency on cars for transportation, we are reminded that a strong public transport system, and a strategy to achieve this, are crucial to the achievement of a strong Residential Development outcomes.

Anglicare commends the Strategy for recognising Tasmania's obligations to the National Affordable Housing Agreement; however we request that the Strategy more closely embeds both Australian and Tasmanian Government aims of reducing and preventing homelessness⁷.

Recommendation 9. That the Strategy more closely embeds Australian and Tasmanian Government aims to reduce and prevent homelessness.

5. Vision (p.8)

The Strategy's list of four key dimensions appears useful, however we believe the notion of equality, and an aim of seeking to develop an 'equitable' housing system is missing. We suggest that the Government consider including a fifth key dimension to this list: Equity.

Recommendation 10. That the Strategy Vision includes a fifth key dimension relating to Equity. For example: 'To ensure all Tasmanians have access to affordable, appropriate and secure housing, and where necessary, that support to maintain housing is provided'.

Social

An alternative to the above recommendation is that equity be included as a specific direction within the social key dimension. For example, add the following statement as a key social dimension: '*Ensure all Tasmanians have access to affordable, appropriate and secure housing, with support to maintain housing where necessary*' - as a specific intended direction.

In this section, Anglicare notes again, that aims of liveability appear to come above the basic need of achieving adequate housing stock. Aims of ensuring liveability are a worthy goal, necessary, and to be commended - but not at the cost of 'housing for all'. First, everyone needs accommodation. Planning for liveability should not prevent the development of adequate housing supply. As already mentioned, we recommend an equal emphasis is placed on quantity alongside quality, throughout the Strategy.

Recommendation 11. That wherever the Strategy states an aim of liveability, the equally important need for 'adequate housing stock' is also acknowledged.

Economic

This section lists a range of costs that are cut via moderate to high density residential developments in contrast to urban sprawl and spacious green acre developments: '*Increasing residential density, particularly within urban centres, helps to reduce the indirect costs of housing, such as environmental impact, car dependency and the provision of road networks, water and sewage*'. Apparently missed, and of high relevance to Tasmanians on low incomes, is the reality that higher density developments will also generally assist with reducing the heating costs of individual homes⁸. We recommend adding 'heating' to the stated list of 'indirect housing costs'.

Recommendation 12. That within the Strategy, alongside environmental impact, car dependency and the provision of road networks, water and sewage, that 'heating costs' are recognised as an additional indirect cost associated with urban sprawl.

6. Liveability Development Principles (p.16)

Again, this section of the Strategy misses an opportunity to state a clear ultimate aim of seeking to house all Tasmanians. For example: '*A vibrant housing system will enable all Tasmanians to be housed*'.

Research suggests that people living with mental and/or physical ill health are especially disadvantaged within the private rental market⁹. Estimates suggest that one third of social housing stock should be tailored to people living with mental ill health¹⁰.

In 2005, the Government of South Australia adopted a policy for the provision of at least 15% affordable housing in all new significant developments, including a third (or 5%) for those with high needs. In their case, affordable housing includes rental and home ownership opportunities for people earning a low or moderate income¹¹. Anglicare recommends that the Tasmanian Government adopt a similar policy, and that the new Residential Development Strategy include an to provide affordable housing for people receiving lowest incomes (including those on Government pensions and allowances).

Anglicare suggests that in the paragraph beginning 'Developments must', the following could be added:

1) Include provision of appropriate housing for people on low incomes, including young people, older people, and those living with mental ill health and/or physical ill health.

Further, in the 'Affordable principle', we recommend the following could be added:

Equity: at least one third of housing purchase prices and rental prices must be affordable to people on the lowest Tasmanian incomes. A standard benchmark measure for housing affordability is 30% of income of people in the two lowest income quintiles. As 30% of income is still unaffordable for low income households with high cost pressures, prices associated with new residential developments must be appropriate and certainly not exceed 30% of the income of those on Government pensions and allowances (currently making up one third of the state's population).

Recommendation 13. That the Strategy identifies housing solutions for specific vulnerable groups, including young people, older people, and people living with mental and/or physical ill health.

Recommendation 14. That the Strategy state an intended aim of at least 15% affordable housing in all new significant residential developments (that is, affordable to Tasmanians receiving Government pensions and allowances), including one third or 5% for those living with mental and/or physical ill health.

7. Implementation (p.22)

Within this section, the first sentence states 'This strategy's primary objective is to enhance liveability and sustainability'. Anglicare questions why this document misses an important opportunity to align with the Tasmanian Government's own aims of seeking to reduce and prevent homelessness. We believe the Strategy would be strengthened by promoting an ultimate aim of developing a housing system that provides affordable, liveable and sustainable housing for all Tasmanians.

Within this section, no mention is made of problems associated with stigma. Due to the relatively poor and deteriorating quality of public housing in Australia, social housing tenants experience significant stigma in our context¹². From service delivery experiences and research evidence, Anglicare believes that stigma relating to social housing and poverty affect the health and wellbeing of people living on low incomes within the Tasmanian community¹³. Our hope is that the new Residential Development Strategy will provide some guidance for minimising and/or alleviating housing stigma in the Tasmanian community.

This section states 'In order to generate social capital and support social inclusion, they must be linked to community networks and to broader social agendas, including those to increase employment opportunities, education and the prevention of poverty'. Anglicare commends the office of the State Architect for including such a statement in the Strategy, and suggests that this point could be taken further. For example, we believe the Strategy would benefit from the following kind of statement:

In order to increase equity, liveability and sustainability, housing developments must be designed to prevent stigmatisation of social housing, and encourage respect for people living in poverty. Diversity in residential developments will assist this aim, as will the provision of adequate support for those who need it in order to maintain their housing.

Figure 13. provides a strong message in a highly effective way. Anglicare Tasmania suggests adding a new column before the last one – a 'Social housing' column (which includes public housing). We also suggest adding that the ultimate aim is to provide 'affordable appropriate, liveable and sustainable housing for all Tasmanians'.

Recommendation 15. That the Strategy includes an aim of preventing discrimination relating to poverty, gender, sexuality and cultural background within new residential developments, including guidance for minimising and/or alleviating risks associated with stigma.

Recommendation 16. That the Strategy clearly state that public housing is an essential element within a vibrant, liveable and sustainable Tasmanian housing system.

8. Next steps (p.24)

Within the Strategy, good recognition is given to the notion that support is necessary for some people living in social housing settings. From practice and research, Anglicare believes a proportion of people living in social housing need support in order to maintain their housing¹⁴.

We believe this section could be strengthened by including some guidance for how both the social housing sector (including public housing and community housing) and the private housing sectors may be engaged in this plan.

In reference to the section on 'Statutory Planning – Action', Anglicare supports the development of unified planning provisions to reduce inconsistencies across jurisdictions, and to reduce inefficiencies in current assessment processes.

In reference to the section on 'Private Developers', Anglicare suggests that towards an aim of housing all Tasmanians, the Strategy should consider stating that at least 15% of all new residential developments must meet the affordability needs of Tasmanians on lowest incomes (including those receiving Government pensions and allowances); that of this, one third should be suitable for people living with mental and/or physical ill health; that all new residential developments take account of social infrastructure needs of future residents; and that developers partner with social service providers to ensure tenants are supported to maintain their housing, where required.

Whilst Anglicare commends the encouragement of partnerships between private and social housing providers, we believe that the responsibility for ensuring access to housing for all Tasmanians lies predominantly with the Tasmanian Government¹⁵. Given Tasmania's unique socio-economic context, for Anglicare this means that the Tasmanian

Government must ensure an adequate supply of public housing stock is available for Tasmanians who are excluded from home ownership and/or the private rental market.

Until Tasmania has an adequate supply of social housing (including public and community housing), more collaboration with private residential developers is necessary, in order to maximise investment in affordable residential developments. Anglicare recommends that the Tasmanian government follow the lead of the South Australian Government in this regard, and adopt a policy for the provision of at least 15% affordable housing in all new significant developments, including a third (or 5%) for those with high needs. In the South Australian context, this policy operates through Development Plan policies and is linked to development approval processes.

In reference to the section on 'Social Support', we suggest mention be made of Safety. Research demonstrates that community perceptions of a lack of safety contribute to stress and levels of fear in individuals and reduce levels of trust and social connection¹⁶.

Furthermore, within 'Action', we suggest more actions could be added. For example, we believe inclusion of the following Actions, with some detail, would strengthen the Strategy:

- *The intended provision of more social housing stock (via increases in public and community housing stock)*
- *The importance of reducing stigma*
- *The importance of providing transport options and access to services*
- *The importance of ensuring safety in all residential housing developments*
- *The importance of design principles that protect physical and mental health.*

Recommendation 17. That the Strategy offer guidance for how the social housing sector (including public housing and community housing) and the private housing sector will be engaged in the implementation of this Strategy.

Recommendation 18. That the Tasmanian Government adopt a policy for the provision of at least 15% affordable housing in all new significant residential developments (that is, affordable to Tasmanians receiving Government pensions and allowances), including one third or 5% for those living with mental and/or physical ill health.

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Recommendation 20. That the Tasmanian Government adopt a policy that all new residential developments must demonstrate how the social infrastructure needs of residents will be met, including access to public transport and essential services.

Recommendation 21. That the Tasmanian Government adopt a policy that all new residential development plans must include partnerships with social service providers to ensure tenants are supported to maintain their housing, where required.

9. Conclusions

Anglicare Tasmania appreciates this opportunity to provide feedback on the Tasmanian Government's Draft Residential Development Strategy.

At the heart of Anglicare's feedback is our recommendation that the new Strategy be embedded with the Tasmanian Government's own stated aims of reducing and preventing homelessness - by integrating statements reflecting that aim throughout the document. We also recommend that future evaluations of the Strategy's implementation include targets of reducing homelessness.

It is our belief that a true reflection of the worth of this Strategy will lie in its capacity to guide the development of a liveable and sustainable housing system - which includes the achievement of housing for all Tasmanians.

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- ¹ Flanagan, K 2010a, *Hard times: Tasmanians in financial crisis*, Anglicare Tasmania, Hobart.
- ² Pryor, A 2011, *Well and at home, 'It's like a big mental sigh': pathways out of mental ill health and homelessness*, Anglicare Tasmania, Hobart.
- ³ Flanagan, K 2007, *Stories from the waiting list*, Anglicare Tasmania, Hobart.
- ⁴ United Nations 1948, *Universal Declaration of Human Rights*, viewed September 2011, <<http://www.un.org/en/documents/udhr/>>
- ⁵ Flanagan, K 2008, *Going for growth: The pros and cons of using community housing associations to increase housing supply*, Anglicare Tasmania, Hobart.
- ⁶ Flanagan, J & Flanagan, K 2011, *The price of poverty: the cost of living for low income earners*, Anglicare Tasmania, Hobart.
- ⁷ Tasmanian Government, 2010, *Coming in from the cold: Tasmanian homelessness plan (2010-2013)*, Department of Health and Human Services, Hobart.
- ⁸ Flanagan, J & Flanagan, K 2011, *The price of poverty: the cost of living for low income earners*, Anglicare Tasmania, Hobart.
- ⁹ Pryor, A 2011, *Well and at home, 'It's like a big mental sigh': pathways out of mental ill health and homelessness*, Anglicare Tasmania, Hobart.
- ¹⁰ Government of South Australia, 2005. *Green paper: Housing Strategy for South Australia*, South Australian Government, Adelaide.
- ¹¹ Government of South Australia, 2005. *Green paper: Housing Strategy for South Australia*, South Australian Government, Adelaide.
- ¹² Atkinson, R & Jacobs, K 2008, *Public housing in Australia: Stigma, home and opportunity*, Housing and Community Research Unit, University of Tasmania, Tasmania.
- ¹³ Flanagan, K 2010b, *There are people living here: exploring urban renewal and public housing estates*, Anglicare Tasmania, Hobart.
- ¹⁴ Pryor, A 2011, *Well and at home, 'It's like a big mental sigh': pathways out of mental ill health and homelessness*, Anglicare Tasmania, Hobart.
- ¹⁵ Flanagan, K 2007, *Housing: building a better Tasmania – the bigger picture*, Anglicare Tasmania, Shelter Tasmania and Tasmanian Council of Social Service, Hobart.
- ¹⁶ Victorian Health Promotion Foundation, 2008, *Research summary: Key influences on health inequalities*, VicHealth, Melbourne.