



# Submission on the consultation draft of the Southern Tasmania Regional Land Use Strategy 2010-2035

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## Introduction

Anglicare welcomes the opportunity to make comment on the draft Southern Tasmania Regional Land Use Strategy prepared by the Southern Tasmanian Regional Planning Project (STRPP) team. We congratulate the team on its efforts in producing such a comprehensive document, and note with particular appreciation the accessibility of the document for non-planners. The plain language and minimal jargon will mean that more people will be able to read and understand the strategy and therefore provide informed comment on the document and have their say about planning in Tasmania over the next 25 years.

## **About Anglicare**

Anglicare is the largest community service organisation in Tasmania, with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport and Burnie, and a range of outreach programs in rural areas. Anglicare's services include emergency relief and crisis services, accommodation support, employment services, mental health services, acquired injury, disability and aged care services, alcohol and other drug services and family support.

In addition, Anglicare's Social Action and Research Centre (SARC) conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes. In recent years, SARC has devoted significant resources to work on housing policy, and particularly the future of the public housing system. We have done this because of the urgent need for more public housing among our clients. SARC's most recent publication in this area, *There are people living here: exploring urban renewal and public housing estates* (Flanagan 2010), is a discussion paper examining the issues involved in the redevelopment of broadacre public housing estates and the implications for residents.

## **Limitations of this submission**

The draft strategy is a comprehensive document. Unfortunately at this time Anglicare is unable to make comment on the document and strategy as a whole, but is instead focussing on one area where we believe we can make a valuable contribution to the debate. This is in the area of social housing.

However, in lieu of a broader submission, we would like to endorse the submission made by the Tasmanian Council of Social Service, which does engage with the broader issues in the strategy. In particular, we endorse their comments on:

- the need to give greater priority in the strategy to the needs of the most vulnerable in our community, especially those Tasmanians living on low incomes, and to ensure that the planning system contributes to addressing the structural factors that reinforce disadvantage;
- the need to develop specific actions to ensure that the proposed settlement strategy does not simply result in increased house prices and that affordable housing is still available in all areas of southern Tasmania (while acknowledging the benefits of action that promotes better-located housing and increases density to support better infrastructure development);
- the need to provide greater priority and direction in relation to urban design in residential areas, particularly in relation to
  - disability access
  - design, privacy and security in higher-density developments
  - access to basic shopping facilities within easy walking distance
  - encouraging better population health outcomes by creating environments that encourage and support physical activity
  - access to open space;

- the need for a clear policy prohibiting the unreasonable restriction of any residential property for utilisation as public, social or group housing;
- the level of funding that will be necessary to ensure that the strategy is implemented successfully, particularly in relation to social policy goals; and
- the lack of consultation with the wider community on the development of the strategy to date.

## Social housing

### Terminology

In this submission, Anglicare uses the following definitions:

- **Public housing** is housing that is owned and managed by the government. In Tasmania, it is provided through Housing Tasmania and is tightly targeted to people on very low incomes and with complex needs.
- **Community housing** is housing that is owned and/or managed by non-government organisations. In Tasmania it is generally targeted to people on low incomes, but not exclusively so.
- **Social housing** is an umbrella term referring to both public and community housing. The general understanding of social housing is that it refers to housing targeted to low income earners, available with reasonably secure tenure, and provided on a not-for-profit basis, with rents linked to capacity to pay.

### The role of social housing

In Tasmania, most social housing is public housing; the community housing sector is very small and fragmented (although recent investment and policy attention means it is growing). The public housing authority, Housing Tasmania, operates under extremely constrained circumstances, with inadequate funding leading to over-targeting in order to ration a small supply of housing, a massive accumulated maintenance backlog and an extreme shortfall in supply due to the need to sell off stock to pay for ongoing operating costs.

The constraints on the system are a major problem for Tasmania with implications for the whole community: low income earners who would normally be living in public housing are excluded from the system and must rely on private rental housing which is unaffordable and insecure, and, at the bottom end of the market in particular, in very poor condition. The shortage of public housing also affects the homelessness service system, with Anglicare workers in this area reporting that while public housing is the only form of housing that is suitable for their clients, they are unable to obtain access to it, which means that they are living in either extremely insecure housing, crisis accommodation or are homeless. These things all contribute to increased social dislocation and increased costs to other government services.

In this context, Anglicare does note with concern the suggestion in the strategy's background paper on social infrastructure and interactions that the loss of public housing is reasonable provided the housing is sold to tenants (STRPP 2010b, pp. 2-3). While many former public housing tenants have been able to enter home ownership by purchasing a Housing Tasmania property, the proceeds from the sales have not been used to fund replacement public housing, but have been used to plug the gap in Housing Tasmania's operating budget. Nor is demand for public housing set at a single point in time. When demand for public housing is rising, an overall erosion of stock levels over time means that the community as a whole is worse off.

The role of public (and social) housing should be broader than simply providing a de facto transitional housing system for people in crisis, but Housing Tasmania is being forced to undertake this role due to inadequate funding and a lack of political and community support. It is this changing role that is the root cause of the stigmatisation of the system, and it is this stigmatisation that puts up barriers between public housing tenants and the rest of the community. Stigmatisation is not a problem belonging simply to broadacre estates, although it is most visible in that context. Even in communities where there is a mix of public and private housing, stigmatisation is still attached to the public housing, with significant implications for tenants (Flanagan 2010, pp. 22, 23-4).

Tasmania needs a large, well-funded public housing system that can house a wider range of people than simply 'people with problems'. The Tasmanian Government is, in line with federal reform objectives, seeking to grow the community housing sector in order to increase social housing supply. Anglicare's research shows that there are significant question marks over this approach, particularly its capacity to deliver good outcomes for tenants and substantial growth in supply, without larger government subsidies than currently appear to be forthcoming (Anglicare Tasmania 2010, pp. 3-8). While the draft land use strategy and planning schemes in general obviously cannot be expected to deal with all of these wider policy issues, it is important that the strategy creates an environment that is as supportive as possible of good social housing policy outcomes.

There are a number of policy directions in the draft strategy relevant to social housing. Anglicare notes in particular regional policies SI-P7, SI-P8 and SI-P9:

- Minimise locational disadvantage by locating social housing and housing for disadvantaged communities in areas with good public transport accessibility or in proximity to employment, education and other community services as locations with good quality urban and open spaces.
- Encourage a broad distribution of social housing across urban residential areas that have good access to services and facilities.
- Social housing to be responsive to emerging housing needs and provide a range of accommodation options for a variety of people within the community (STRPP 2010a, p.49).

These policy directions aim to ensure that social housing is located close to the services and infrastructure that will be needed by tenants, and that the range of properties available will be suitable for the people who will need them. However, in practice, implementation of these policy directions through the strategy's actions could be complicated, and these complications are outlined below.

Anglicare acknowledges that many of the government policies and funding decisions discussed below are not the responsibility of the project team responsible for the draft strategy or of the planning sector as a whole. However, the final strategy will have considerable status within Tasmania and, even though most of the Actions discussed in this submission are not listed in the strategy as being implemented through planning schemes specifically but will instead be the responsibility of Housing Tasmania and the Housing Innovations Unit, Anglicare considers it appropriate to make comment on them.

### **Comments on draft Actions**

*Action 6 (SI-A6): Undertake a full audit and analysis of social housing demand and supply taking into account suitability of housing stock, suitability of publicly owned vacant land and the needs and desires of the community. Any housing stock or vacant land not suited to the needs and community having regard to social inclusion principles should be disposed of and an active program of acquisition developed and funded.*

Anglicare has serious concerns about including this action in the strategy in its present form. It appears to us to be a recipe for wholesale disposal of existing public housing stock, in response to the quite narrow measure of 'demand' represented by the public housing waiting list, with considerable disruption to existing public housing communities. The 'social inclusion principles' which are to guide this disposal process are not defined. While the intent is clearly not for a net loss of stock (given the recommendation to develop and fund an active acquisition program), the lack of substantial funding from either the State or the Commonwealth for significant expansion of the social housing sector would suggest that a net loss of stock would nevertheless be the most likely result.

To deal with each of these concerns in turn, the method by which the audit and analysis would be undertaken is not clear, but at the moment, the only real indicator of demand available is the public housing waiting list. While the overwhelming majority of the 3179 households on this list as at 30 June 2010 (DHHS 2010, p. 15) would certainly be in urgent need of housing, Anglicare is also aware that many low income earners do not put their names down on the list because they are aware that their likelihood of being housed in a reasonable timeframe is limited.

The decline in public housing supply and the requirement for those 'in greatest need' to be prioritised means that effectively that there is a bias within the list — people with extremely complex needs are most likely to be housed and so people with extremely

complex needs tend to be the ones on the list. Associated with the complexity of need is a bias towards single person households. While Housing Tasmania does need to increase the amount of housing it has available for such households, redesigning the entire system exclusively for this group would simply skew it in a different direction and make it harder for public housing to become the broader, more inclusive system discussed above. A sustainable public housing system should have a variety of different housing types available to meet a variety of different needs.

While the action notes that ‘the needs and desires of the community’ will be taken into account when making decisions about stock retention or disposal, experience in other states is that public housing tenants are often given little opportunity to have input in these kinds of decision making processes and that the standard consultation mechanisms and timeframes used are often inappropriate and inadequate for their needs (Flanagan 2010, pp. 38-9).

‘Social inclusion principles’ will also be used to assess what stock or land should be disposed of, but what this means is not defined. The background paper suggests that social inclusion means ‘integration with the community’ (STRPP 2010b, p. 5) (the way this is worded, Anglicare notes, carries the implication that public housing areas are not currently part of ‘the community’). However, ‘integration’ remains undefined, as does the mechanism by which it, whatever it is, might be achieved.

Action SI-A6 fits with the Commonwealth’s agenda of ‘urban renewal’ — the break-up of existing public housing estates through the disposal of public housing and their redevelopment into ‘mixed communities’ of public and private housing (Plibersek 2009, pp. 6, 7-8). As noted above, Anglicare has done extensive research on this policy approach, which has been widely implemented on the mainland and overseas. Our research has raised a number of serious concerns, including the following:

- this policy approach is based upon the assumption, sometimes explicit, sometimes implicit, that communities that are disadvantaged are inherently dysfunctional and in need of ‘rescuing’ through the introduction of home owners, who are perceived to be morally superior — this devalues existing communities and the people in them;
- the evidence base for the underpinning thesis of ‘mixed communities’ is limited, inconclusive and contradictory — effectively, there is almost no research evidence to suggest that ‘mixing’ a public housing community will lead to better outcomes for public housing tenants;
- in Australia, urban renewal projects have generally resulted in the displacement of existing residents, and therefore the break-up of existing communities and networks of social support;
- private sector interests tend to dominate in urban renewal projects, particularly projects that are pursued as public-private partnerships, which has led to the subjugation of community and public interests in favour of commercial interests, and the channelling of any profit from the projects to the private sector; and

- existing communities have been offered little opportunity to have a say in the goals and the process of redevelopment, with the interests of private developers and the incoming moderate income home buyers shaping the outcomes (see Flanagan 2010).

Finally, Anglicare acknowledges that Action SI-A6 does call for investment in a program of social housing acquisition, presumably of housing to replace the stock which will be sold following the audit. While a program of acquisition (to expand the supply of public housing) is something Anglicare has long called for, and while we welcome this recommendation in the strategy, we are concerned that the current funding and policy environment is not supportive of substantial investment in this area, at either a State or Commonwealth level. The funding that has recently been available for social housing construction in Tasmania was provided through the economic stimulus strategy, and will soon be withdrawn, and sustained investment at this level is unlikely to be available in future. As a result, there is a risk that Action SI-A6 will only be partially implemented, leading to a net loss in precious public housing stock which, while it may not be precisely aligned to the needs of people on the waiting list, is still providing valuable shelter, right now, for Tasmanian households who may otherwise be homeless.

*Action 7 (SI-A7): In planning for future social housing development only identify sites in well serviced areas with adequate access to public transport.*

Anglicare agrees that social housing should be located close to services and jobs, and therefore very much supports the intent of this recommendation. However, the recommendation could be interpreted to mean that unless a location already has good public transport, plentiful employment opportunities and services in close proximity, social housing should not be built there. Given that very few places in southern Tasmania genuinely meet these criteria (and those that do often have little vacant land available on which social housing could be built) this could lead to a situation where not enough social housing is built because few sites can be found which meet the definition of an appropriate location.

Anglicare is not suggesting that the solution to this problem is to build social housing in poorly-serviced locations — rather, the recommendation should ensure that an obligation is placed on government to ensure that well-serviced locations are available. In other words, if social housing is needed and the only location available, for example, is one where there is inadequate public transport (noting that much of Housing Tasmania's land is in such places), then there is an obligation on Government, in the interests of good planning outcomes, to ensure that public housing transport services are improved in such areas. The planning system should be designed to facilitate this kind of investment in public services.

*Action 8 (SI-A8): Examine all opportunities for private public partnerships where the provision of social housing can be integrated with other development opportunities.*

Including social housing as a component of any residential housing development would be a welcome strategy for increasing the overall supply of social housing, and is one that Anglicare has previously called for (e.g. Anglicare Tasmania 2007, p. 27). However, the reason governments must provide public housing themselves (or funding for community housing) is because the market, on its own, does not produce accommodation that is affordable enough for people on very low incomes and inclusive of people with complex needs. Therefore expectations of public-private approaches need to be modest, and do not replace the need for significant government investment – investment that currently is not on the horizon in large enough amounts.

There are risks in linking social housing production to the private market through public-private partnerships or approaches dependent on private investment. The need for an acceptable rate of return for investors is generally incompatible with genuinely affordable rents for tenants. This means that either very low income tenants are not accommodated in such developments or that tenants are paying rents that place them at risk of financial hardship (see Anglicare Tasmania 2010).

*Action 10 (SI-A10): Ensure that planning scheme provisions provide flexibility, particularly residential development standards, for the delivery of social infrastructure associated with the care of disadvantaged communities.*

Increasing the amount of social housing in a range of areas, either through spot-purchase or infill development, allows tenants to benefit from living in areas which they would otherwise be unable to afford but which might offer them improved access to services and jobs or proximity to specialist health care providers, family support or particular transport options. However, as the draft strategy acknowledges (STRPP 2010a, p. 48), community resistance in established suburbs (and even in newer developments) can be a significant barrier. Anglicare has experienced first-hand the scale of opposition to the development of our supported residential facilities, which provide communal housing for people on low incomes with low support needs.

As stated above, Anglicare endorses the submission on the broader strategy made by the Tasmanian Council of Social Service (TasCOSS). We would like to reiterate our support in particular for TasCOSS's recommendation that the strategy include a clear statement of policy prohibiting the unreasonable restriction of any residential property (an existing building or vacant land) being used as public, social or group housing. This would not mean that such developments could not be *reasonably* restricted, but it would prevent them from being blocked by ignorance, prejudice or private self-interest.

## Language

Although we have some concerns about the possible interpretation of some of the Actions relating to social housing, Anglicare nevertheless welcomes the attention and recognition given in the draft strategy to social housing and the role it plays. However, Anglicare would like to express concern about some of the language used in relation to social housing and social housing tenants. The stigmatisation of social housing and particularly public housing has been shown by research to have significant consequences for tenants, including discrimination by employers and mortgage providers, lowered self-esteem and reduced sense of belonging (Flanagan 2010, p. 10). For this reason, it is very important that official documents avoid language that contributes to stigmatisation or labelling, yet there are examples of judgemental language in the draft strategy.

In particular, Anglicare notes the reference in the strategy to broadacre public housing estates such as 'Bridgewater, Gagebrook, and Clarendon Vale', which are described in the following terms: '[t]his approach [of broadacre development], wherein families with similar socio-economic disadvantage were lumped together, has generally been socially disadvantageous to the community' (STRPP 2010a, p. 47). In the background report on social infrastructure, this statement is repeated, and followed by these comments:

Additionally, people living in broad acre areas frequently have lower levels of educational achievements, higher levels of unemployment, poorer health and high levels of social problems, such as family violence.... This has led to communities being under stress because of social and economic disadvantage. Dedicated government and community efforts at urban renewal have delivered significant improvements in these areas. Despite this, these estates continue to require significant re-profiling and investment in community development, as well as improvements in social and physical infrastructure (STRPP 2010b, pp. 3-4).

Aside from the derogatory tone of the words 'lumped together', this section of the strategy devalues the existing communities in those places by placing all the emphasis on the problems these communities, and more particularly, the people in them, 'frequently' experience. While Anglicare does not deny that there are problems in these areas, including high levels of unemployment and poor social and physical infrastructure, these communities also have very high levels of social capital and a strong sense of community (Flanagan 2010, pp. 10-12). Yet the strengths of these communities are ignored in the extract above and instead it is implied that everyone in them is a burden on the rest of the community and passive recipients of 'efforts' by others to 're-profile' them. The background report notes that broadacre estates are stigmatised (STRPP 2010b, p. 4), but fails to acknowledge that the language used by Governments at all levels can play a role in either reinforcing or tackling this stigma.

Anglicare recommends that this section of the strategy, and the relevant part of the background paper, be rewritten.

## Conclusion

Once again, Anglicare welcomes the opportunity to provide comment on the draft Southern Tasmanian Regional Land Use Strategy. We have confined our comments to the area of social housing, where we feel we have particular expertise and original and constructive comment to make. However, we have endorsed the submission of our colleagues at TasCOSS and expressed our support for many of their recommendations.

We congratulate the project team on producing such a comprehensive and accessible document, and hope that our comments will be helpful in shaping the final version of the strategy.

## References

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