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The Project Managers
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Dear Mr Mackey and Ms Riley

The Tasmanian Council of Social Service (TasCOSS) welcomes the opportunity to submit to the Draft Southern Tasmania Regional Land Use Strategy 2010-2035 (the Draft Strategy).

TasCOSS is the peak body for the Tasmanian community services sector. Its membership comprises individuals and organisations active in the provision of community services to low income, vulnerable and disadvantaged Tasmanians. TasCOSS represents the interests of its members and their clients to government, regulators, the media, and the public. Through our advocacy and policy development, we hope to draw attention to the causes of poverty and disadvantage and promote the adoption by government of effective solutions to address these issues.

We would like to acknowledge the Tasmanian Government and the Councils of the Southern Region for their commitment to addressing the need for strategic and integrated land use planning through the regional planning process and congratulate the Councils Authority and the project team on producing an innovative document that addresses, in a coordinated manner, issues that have long required attention.

We are concerned, however, that the interests and needs of low income and disadvantaged Tasmanians, more than one third of our population, have not been addressed with the same attention and immediacy as commercial, industrial, environmental and internal government concerns and that consequently the Draft Strategy is unbalanced.

The Draft Strategy strays from traditional land use planning parameters focused on development controls and the balance between land use zoning, and rightly so, as this

attention has been sorely needed. It considers issues such as infrastructure planning, the future needs of the agricultural and industrial sectors, climate change, environmental conservation, transport, and to some extent, social inclusion. But in our opinion the social policy aspects of this document require greater attention.

While we do not disagree that addressing the commercial and infrastructure needs of the region will provide the backbone for a healthy economy, which if focused appropriately has the potential to improve the lives of many of Tasmania's disadvantaged people, more than one third of our state struggles daily with obtaining the very basics of modern life, a struggle which results in poor health and educational outcomes and prevents them from taking advantage of economic opportunity. As acknowledged in the Draft Strategy, land use planning can have a significant role to play in helping to address structural factors which lead to and cement disadvantage. The influence that the built environment and the spatial allocation of resources has on individuals and their quality of life should not be underestimated.

We recognise that the lack of priority given and attention paid to social policy issues in the Draft Strategy, in particular to affordable housing and preventative health, may be due to the lack of currently developed and funded policies within federal, state and local government, which is not the fault of the project team. But nevertheless we feel that the Strategy could have done considerably more to address these issues. Furthermore, given that this strategy was developed in close consultation with both local and state government, we expected the potential of integrated land use planning to improve social inclusion to have been better realised by translating the acknowledgement of social policy problems into actions that will address them. We had seen this as an important opportunity particularly in light of the attention paid to land use planning by the Social Inclusion Strategy for Tasmania and the growing attention paid to social inclusion by the Federal Government and local councils throughout Australia.

Affordable Housing

The section of the Draft Strategy that discusses housing and other social issues, 'Social Infrastructure', deals almost exclusively with social housing and aged care facility provision. The Strategy provides a brief discussion of these issues, but in regards to social housing, fails to identify actions that will effectively address the chronic shortage of social housing properties. We recognise that this failure is due to the lack of policy and funding commitment to adequately address social housing needs by both federal and state governments, and is largely outside the purview of the Strategy.

The Draft Strategy does, however, fail to acknowledge and address the wider problem of housing affordability, through the mechanisms that are available to land use planning. This failure is despite the high likelihood that housing affordability in the region will worsen considerably due to the proposed settlement strategy, which aims to increase urban density and prevent further growth at the margins. While we are not opposed to this measure, as we feel that well located housing close to services and public transport is essential, and that increasing density will enable better services and infrastructure to be provided to a greater number of people, nevertheless, with the Strategy as it presently stands, these policy

changes will increase housing costs. This has not been acknowledged in the Draft Strategy nor have any actions been identified to counteract it.

The Draft Strategy claims that by instituting a common requirement for developer charges that are cost reflective, development at the urban margin will no longer be as attractive, because the cost of infrastructure provision at the margin is much greater than in established areas. We agree that if this is done, that development is unlikely to be as attractive on the outskirts to developers and homebuyers, and that there will be a clear price signal about the relative costs to society of the location of development, but we have doubts as to whether this will make inner areas any more 'affordable', it will merely increase housing costs on the outskirts.

Inner urban areas cost a premium not because of the relative costs of building, but because of the competition for close proximity to services, shops, transport, education and employment, and in many cases, location in a 'fashionable' suburb. This is not going to change with alterations to developer charges. Furthermore, the Draft Strategy also notes that high building costs associated with meeting building code regulations for multiple storey buildings make higher density developments in inner urban areas, such as small apartment buildings, much less attractive to developers. These factors, combined with greater competition for remaining lots, mean that despite projected increases in density, preventing urban expansion at the margins will drive up the cost of both greenfield and brownfield developments and put further pressure on thousands of Tasmanians struggling to afford housing.

Presently more than 34% of Tasmanians rely on government payments as their primary source of income, and a substantial proportion of these people reside in households with a gross annual income of \$30,000 or less. For households with this income, the affordable dwelling price is less than \$108,000 to buy or \$173 per week to rent.¹ A survey of current properties for sale and rent in southern Tasmania will reveal very few properties for sale or rent at these prices, and even fewer suitable for children. Even a household with a reasonably comfortable annual income of \$75,000 cannot reasonably afford a house priced at more than \$270,000, which would limit that household (if it has children and desires any kind of private open space) to the outer northern suburbs of Hobart or rural centres, far from most public transport, services and employment.

The lack of affordable housing is a problem that extends beyond the need for public or social housing, which by modern government policy standards exists to house those whom the private market will not, and who have higher needs beyond that of merely having a very low income – it is in fact a separate issue related to housing supply, monetary and fiscal policy and a raft of other economic factors. Housing stress is being experienced by increasing numbers of Tasmanians, including many who we would not class as low income or even working poor. These numbers will continue to grow, as the numbers of people who own their own home outright decreases, and combined with our aging population, will result in an increasing number of aged pensioners who will be vulnerable to fluctuations in interest rates and increases in private rental prices.

¹ Nicole Gurrán, 'Affordable Housing National Leading Practice Guide and Tool Kit', National Commitment 2 Working Group, June 2008, p.27.

While the Draft Strategy does discuss the problem of a lack of affordable housing, most of the discussion is hidden away in the background report, 'Social Infrastructure and Interactions'. The issues discussed in this section, including the identification of the land use planning system as a mechanism by which to address affordability, fail to make it into the primary Draft Strategy document, nor are there any actions identified associated with affordable housing. The background report does seem to acknowledge that affordable housing does not just encompass housing designed specifically for and sold or provided to low income people, it is also a wider issue for the population in general.

The main Draft Strategy document states, however, in relation to affordable and social housing,

At a national level, the States, Territories and National Government (through COAG) are working together to develop long term strategies to increase affordable housing. This includes developing an Integrated Housing Strategy to increase affordable housing provision in the long term, improving supply through planning mechanisms and supporting organisations in the non-government sector to become viable and sustainable housing providers. While many of the funding streams and projects under the national reform environment finish within a few years, it is expected that there will be a tangible increase in social and affordable housing over the long term as a result of the reform process. It is however noted that the current lack of direction and strategic planning in this sector is likely to have impacts on the attainment of further funding from the Commonwealth Government.

TasCOSS has doubts as to the long term and tangible increases in affordable housing delivered by these current processes, and given the noted current lack of direction and strategic planning in the area that may affect further funding from the Commonwealth, TasCOSS is disappointed that the Strategy does not do more to identify and commit, at the very least, to exploring solutions via land use planning. We have waited many years for COAG and the federal government to take concerted action on issues such as climate change and energy efficiency, and we do not think Tasmania needs to, or should, wait for the Commonwealth to address planning issues and affordable housing.

The background report notes the possibility of the development of a State Policy on Affordable Housing but fails to carry this over to the primary document and identify it as an action that needs to be prioritised and carried out. The background report also identifies the adoption of a 15% affordable housing target for all new developments in South Australia, as an example of one approach, but fails to identify and discuss the other possible mechanisms available to land use planning to increase the supply of affordable housing.

Some of the mechanisms presently used in other Australian jurisdictions include:

- Section 26 (d) of the New South Wales *Environmental Planning and Assessment Act 1979*, which allows local schemes to include provisions for 'providing, maintaining and retaining, and regulating any matter relating to affordable housing'.
- The South Australian Housing Plan target of 5% high needs housing plus an additional 10% affordable housing within all new developments, which is supported in their regional

planning strategies and that require 'councils to consider how they are to achieve this through their local strategic and development plans'.²

- Victorian Planning Provisions exempt boarding houses with up to 10 rooms from the requirement to obtain a planning permit.³

- The East Perth Redevelopment Authority in Western Australia allows greater density developments on some land parcels as long as some units are sold to eligible low income buyers and ensures the property will remain affordable in the future by placing restrictions on the Certificate of Title and Strata Management Scheme.⁴

These and other possible planning mechanisms have been identified by the 'Affordable Housing National Leading Practice Guide and Tool Kit', intended to be a tool to assist housing, planning and local government bodies to provide affordable housing through the planning system. This tool kit further states that, 'affordability outcomes should be considered at every stage of the planning process.... planning objectives for affordable housing should be contained in state planning legislation, in relevant state and or regional policies or plans, and in planning instruments applying to specific local government areas or sites.'⁵

It is recognised nationally that aside from not having accurate data on housing need, affordability and supply, Tasmania, 'lacks any state level planning policy related to Housing, and this may have represented a barrier to actively incorporating affordable housing considerations in plan making and development assessment at the local level in Tasmania.'⁶

Given that we are already lagging behind other jurisdictions in this area, we should not now be considering the development of regional land use plans for the next twenty years without such policy direction. Given that the settlement strategy for the southern region is likely to exacerbate the lack of affordable housing, the lack of action identified by the Draft Strategy to address this issue is deeply troubling and a serious failure, and should not receive endorsement by local councils or the Minister for Planning until concrete actions are identified and agreed upon.

We call on the State Government to produce a State Policy on Affordable Housing as soon as possible and if necessary amend the *Land Use Planning and Approvals Act 1993* to provide any heads of power necessary to direct and enable regional and local planning instruments to introduce mechanisms designed to increase the supply of affordable housing.

Industrial land

We would also like to draw your attention to the policy on the protection of industrial land, in particular that land identified as a regionally significant industrial hub, located in Moonah

² Ibid., p. 21.

³ Ibid., p. 56.

⁴ Ibid., p. 66.

⁵ Ibid., p. 15-16.

⁶ Vivienne Milligan et al., 'Innovation in affordable housing in Australia: Bringing policy and practice for not-for-profit housing organisations together', AHURI Final Report #34, June 2009.

and Glenorchy on the main transport corridor to the northern suburbs. We recognise the value of employment generating industries in close proximity to surrounding neighbourhoods, especially when the Draft Strategy makes the point that the majority of jobs in the region are in the Hobart local government area and that we frequently advocate for the location of housing close to employment opportunities. We also recognise the need to protect and identify new industrial land. We are concerned, however, that the protection of industrial land in Moonah and Glenorchy may be in conflict with the stated desire to increase housing density in these areas and the identification of the rail line as an ideal public transport corridor.

The location of this industrial area impinges on the amenity of the residential areas surrounding it and takes up a large area of flat land, readily accessible to shops, transport and services, land that would be ideal for the location of medium density affordable housing suitable for the aged, disabled, young and low income. Furthermore, the northern suburbs of greater Hobart are in great need of efficient, frequent and affordable public transport and the rail line has been identified as an ideal resource to utilise for future public transport expansion. It has been suggested to us, however, that the viability of a public transport service on this corridor may be compromised by the lack of medium density housing located close by in Moonah and Glenorchy.

The background report 'Industrial Activity' identifies the settlement strategy and future use of the rail corridor and other factors such as the Brighton industrial hub as potential threats to this industrial area, but overall the Strategy does not provide clear direction as to the future of this regionally significant industrial area.

TasCOSS believes it would be beneficial to provide some policy direction in the near future on this issue, and although we recognise that a number of stakeholders would need to engage in such a process, clear direction will enable greater certainty for planning and funding in key government agencies such as the Department of Infrastructure, Energy and Resources.

Urban Design

We note the lack of directive or action identified in the Draft Strategy for ensuring good quality urban design in residential areas. Given that the settlement strategy aims to increase housing density and improve the low amenity of many of the existing medium density housing developments in greater Hobart, as well as the poor open space and community facilities provided for in most of our low density suburban areas, we find this surprising. Left unfettered, private development will not create neighbourhoods and buildings that result in good urban design. The strategy states that, 'ultimately, planners need to achieve higher residential densities with mixed-use zoning, interconnected streets and access to public transport' but we believe that planning guidelines need to address other factors, discussed below, that affect neighbourhood and private amenity in the built environment. Disappointingly, the Draft Strategy even fails to identify how the Strategy will help achieve the stated aims, despite the opportunity to provide clear and even binding direction in this area.

When discussing the implications for planning of disability access, the 'Social Infrastructure' background report suggests the possibility of a 'standard schedule which identifies the relevant classes of development of which a standard or standards would apply...policies should be developed that take account of accessibility for all development undertaken by a local authority to ensure public spaces are adequately designed'. Given current obligations under the *Disability Discrimination Act 1992* we do not understand why the development of such a schedule and common policy was not identified as a priority action in the main document.

The use of a similar assessment schedule could be used for all developments to ensure good urban design. Such a schedule would provide clarity for developers and assist local government development assessors to make good decisions about the future built environment in their area. Such a schedule should go far beyond existing considerations of street and boundary setbacks, but should also consider issues including noise, privacy, standards of private open space or the close proximity to public open space, aspect, and pay closer attention to the design, privacy and security of ground floor dwellings in multiple story buildings. It could include standards of public open space allocations for greenfield and applicable brownfield developments. It could ensure that new suburban neighbourhoods, or existing ones, have at least some lots commercially zoned, to ensure that people have a local shop selling their basic daily needs within easy walking distance.

We note the acknowledgement of the Heart Foundations 'Healthy by Design' guidelines and the discussion of the importance of enabling active transport and preventative health principles in urban design, but again are disappointed that this discussion occurs in the background report and that there are no strong directives or action carried over to the main document, despite stating that, 'population health underpins the social and economic well-being of the community' and 'the importance of creating an urban environment that encourages cycling, walking, social interaction and other physical activity in a visually stimulating and attractive manner cannot be underestimated'. Some related actions are identified, two being the development of a regionally consistent open space policy and the examination of walking and cycling routes, but neither has been given high priority.

We are aware that the Housing Innovations Unit has provided funding to the State Architect's Office to produce a Residential Development Strategy considering such urban design principles, which will be completed shortly and will likely include such an assessment framework as mentioned above. We call upon the project team and the Tasmanian Planning Commission to consider the Residential Development Strategy's suitability for use as a local government planning instrument or investigate alternatives as a priority. TasCOSS is of the opinion that it is necessary to prioritise a strong directive process to achieve good urban design for both greenfield and infill development, to fill the traditional gap between building codes and land use planning. This gap resulted in the poor amenity of many of our residential areas and contributed in a very real way to the barriers faced by low income and disadvantaged people and the concentration of obesity related diseases in this cohort of the population.

Unnecessary Restrictions on Residential Development Types

We strongly support the inclusion of S1-A11, 'Ensure that planning scheme provisions provide flexibility particularly in residential development standards for the delivery of social infrastructure associated with the care of disadvantaged communities'.

But we also call for a clear policy prohibiting the unreasonable restriction of any residential property for utilisation as public, social or group housing, which we do not believe is contained in the Draft Strategy. We know of numerous examples in Tasmania where social housing initiatives have not proceeded or faced significant hurdles to development approval due to community objections. The needs of low income and disadvantaged people to be housed is a fundamental human right, and should not be allowed to be compromised for the sake of neighbourhood sensitivities.

Implementation

We also have concerns about the status and nature of the document, and note that the responsibility for completing many of the actions identified fall outside the project team and the purview of the Minister for Planning and the *Land Use Planning and Approvals Act 1993*. While the Strategy identifies that upon declaration by the Minister the Strategy will become a statutory document, we have doubts about its ability to direct the actions of State Government Departments, and their attendant guiding legislation, not under the Planning Minister's control. Greater clarity on the status of the Strategy and the actions contained within it would be beneficial.

The funding implications are also considerable, particularly the workload identified for completion by the project team. The success of the Strategy will require the completion of dozens of planning, policy and funding processes by numerous actors. Although the strategy identified that a governing body will be convened to oversee the implementation, without identified funding commitments by the Tasmanian Government, we are concerned that the Strategy will be an ineffectual document. We are particularly concerned given the low priority and status given to a number of social policy actions, and in some cases the complete lack of identified policies and actions, in relation to crucial areas such as affordable housing.

We call on the State Government to adequately fund the implementation of this and the remaining Strategies, as well as the impending Metropolitan planning process required by COAG to secure future Commonwealth funding for infrastructure.

Social Housing

TasCOSS has strong concerns about the language used and policies discussed in relation to social and public housing in the Draft Strategy. For the purposes of this submission, however, we would like to draw attention to and support the submission by Anglicare in relation these issues.

Planning Processes and Social Inclusion

Finally, we would like to draw attention to the manner in which this process has been conducted. This has been a clear case of top down policy development, utilising ‘expert’ policy makers and ‘key stakeholders’ to identify issues and propose solutions in the development of the Strategy, while leaving the wider community, who will have to live with the consequences of these decisions, to be consulted, once the major policy decisions have been made. While it might be argued that expert advice is necessary and productive for technical processes such as this, we strongly believe that successful social inclusion requires the adoption of participatory democratic processes in policy development.

The number and range of issues the community can be informed about and cognisant of on election days, particularly when faced with a handful of candidates whose specific policy platforms on many issues either do not exist or are not made explicit, means that wider ‘lay’ community members often have few opportunities to have a productive voice in decision making on many issues that affect their daily lives. Instead, highly motivated and articulate individuals or community groups with the literacy and time are left to react negatively against issues.

Alternatively, building in broad community involvement from the beginning can result in sharing the burden of decision making and the necessity for compromise, and can give the community a sense of shared ownership as well as resulting in more effective policies that require review less frequently and are more efficient in the long run. We have already done this once as a community, with Tasmania *Together* an excellent example of public consultation. So too was the Social Inclusion Strategy, which included early community involvement, and the Core Passenger Service Review within the Department of Infrastructure, Energy and Resources. Tasmania *Together*, however, while an excellent mechanism to direct many Government activities, is not specific enough for most policy development in relation to land use planning.

We recognise that given the time and funding constraints, this regional land use planning process was perhaps too complex to initially engage the wider community on all the options available, but we do believe the project would have benefitted from an initial separate and inclusive visioning and goal setting process specific to the Strategy, to identify what people in the community would like to see change about their built environment, rather than relying solely on the opinion of government policy makers and ‘key’ stakeholders.

We call on state and local government bodies to embed community involvement much earlier and more inclusively in policy development and decision making, and hope that the community is truly engaged in future iterations of the Southern Regional Land Use Planning Strategy and any further planning projects, in particular the imminent Metropolitan planning process for greater Hobart.

Thank you for the opportunity to participate in this process and we hope our contribution has been helpful. We look forward to the outcome of this Review process.

Yours sincerely

A handwritten signature in black ink that reads "Ann Hughes". The signature is written in a cursive style with a large, looping 'H' and 'S'.

Ann Hughes
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