



Tasmanian Council of Social Service
PO Box 1126 Sandy Bay Tas 7006
Ph 03 6231 0755 Fax 03 6223 6136
www.tascoss.org.au

Submission to the Office of the State Architect,
Department of Justice on

Draft Residential Development Strategy

About TasCOSS

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.

Authorised by:

Tony Reidy, Chief Executive Officer

For inquiries:

Wynne Russell, Policy and Research Officer

wynne@tascoss.org.au

Summary of key recommendations

The next iteration of this wide-ranging, forward-thinking document would benefit from:

- ❖ Definitions of ‘adequate’ and ‘affordable’ housing supply
- ❖ More discussion of rural residential development
- ❖ More detail on the planning linkages between residential development, transport and government, commercial and social services
- ❖ More emphasis on Universal Design
- ❖ Inclusion of a broader range of services and stakeholders in the formulation and implementation of the Strategy
- ❖ More detail on implementation as well as linkages to existing documents
- ❖ A monitoring and evaluation framework focused on measurable outcomes.

We note that the Residential Development Strategy as currently conceived does not represent a substitute for a fully articulated Tasmanian Housing Policy.

Introduction

TasCOSS welcomes the initiative taken by the Tasmanian Government and the Office of the State Architect in drawing up a strategy for residential development in the state. We appreciate the opportunity to comment on the Draft Residential Development Strategy (hereafter “the Draft”), a wide-ranging and forward-thinking document which takes on the difficult task of strategising across tenures. We strongly support the Draft’s attention to social inclusion, its commitment to good design and environmental principles, and its emphasis on strategic and holistic approaches to residential development. As discussed in our conclusion, however, we note that the Residential Development Strategy as currently conceived does not represent a substitute for a fully articulated Tasmanian Housing Policy.

Laudable attention to social inclusion

As a design brief, the Draft’s attention to social inclusion issues is laudable. The Draft correctly identifies the affordability of housing—both in terms of the purchase price of residences and in terms of the ongoing costs associated with energy use and commuting—as an important factor in social inclusion/exclusion in Tasmania, and proposes an approach to future development that can help curb these costs, both through greater supply of a range of dwelling sizes, a stronger focus on limiting urban sprawl and location of residential development close to transport facilities, and a stronger focus on energy-efficient design and construction. Such a move has the potential to benefit not only Tasmanians requiring public and social housing, but also individuals and families currently struggling to meet high direct and indirect prices and costs in the private purchase and rental markets.

The Draft also correctly identifies the need to overcome the stigma associated with public and social housing, which contributes to social exclusion. In its endorsement of residential development that includes a mix of housing tenures (public/private, primary residence/rental), the Draft continues to promote an alternative to the historic approach of “banishing” public and social housing to the urban fringes—an approach that has left many lower-income and disadvantaged Tasmanians

isolated from services and employment, “away from supportive networks, away from transport choices, away from industry and learning opportunities and away from key sporting, recreational and cultural facilities.”¹ By emphasizing the need for best-practice design and construction principles across housing tenures, the Draft also provides an antidote to the “cheap and nasty” stereotype that has dogged public and social housing.

Laudable attention to better design and energy efficiency

By emphasizing the need for best-practice design and construction principles across housing tenures, the Draft also offers up hope for better-quality medium- and high-density development across the board—a necessary development if Tasmanians are to be encouraged to shift to higher-density living. Many of the medium- and high-density dwellings in the state were built as investment properties aimed at renters, with the emphasis on keeping construction costs low. As a consequence, many do not offer:

- Attention to aesthetics
- Adequate protection for residents from noise and other invasions of privacy by neighbours
- Spaces for gardens or relaxation
- Good design for older people or the disabled
- Good energy efficiency

Dissatisfaction with such unattractive spaces is one of the main reasons that many people cite for wishing to move ‘up’ eventually to a detached dwelling, or for being unwilling to give up their existing detached home. For Tasmanians unable to afford the purchase or rent of a detached house, wishing to reduce their land use footprint, or wishing to age at home in downsized residences, the creation of more attractive medium- and high-density options has the potential to be a valuable development.

Need for definitions of ‘adequate’ and ‘affordable’ housing supply

The Draft does a good job of laying out the demographics behind Tasmania’s housing environment, as well as certain features of Tasmania’s housing stock. However, as Anglicare have noted in their submission, readers would have a better idea of the magnitude of the task at hand if the final Strategy laid out housing stock levels across tenures—including public as well as private housing—adequate to ensure that all Tasmanians have access to affordable, appropriate and secure housing. The Strategy would also benefit from a clear definition, in dollar terms, of an “affordable” housing price range, given the fact that 27.1 % of Tasmanian households were classified as ‘low-income’ in 2009-2010 and that one third of Tasmanian households are reliant on government pensions and allowances as their principle source of income; how much housing in this price range can realistically be expected to be provided by private development; and the supply of public housing that these figures suggest is necessary to ensure that all Tasmanians can be housed.²

¹ Social Inclusion Commissioner (Adams, David) (2009) *A Social Inclusion Strategy for Tasmania*, pp. 73-74.

² Social Inclusion Commissioner (Adams, David) (2011) *A Cost of Living Strategy for Tasmania*, pp. 9, 30.

Need to address rural residential development

The Draft is a high-level document that clearly is attempting to establish general principles that are applicable to a wide range of settings and needs. We understand that the RDS will initially be applied to Government-funded housing projects, which suggests a focus for now on urban and peri-urban areas. However, rural areas also require a focus on the future direction of residential development.

- In recent years, particularly near beaches, collections of houses have grown in an unplanned fashion into small communities that, although they have year-round residents, do not have the services associated with a small town.
- Planning scheme constraints such as restrictions on multiple full-time dwellings on single rural titles complicate efforts to increase housing density in rural areas.
- Smaller regional centres, and even some small towns, also need to address issues such as housing affordability, at-home ageing for older people, and settlement sprawl.

We believe that the final version of the Strategy should address a full range of rural issues—not only the ones outlined above, but ones that might emerge from consultation with rural councils and stakeholders.

Need to address interlinked issues in greater detail

The Draft alludes across its length to the need for interlinkage between residential development and the development of what can be called “social infrastructure,” in particular transport routes and infrastructure and commercial, government and social services. However, it is light on how such interlinkages are to be achieved. The final version of the Strategy would benefit from a clearer articulation of the strategies and frameworks necessary to ensure the co-development of residential developments with the social infrastructure necessary to all residents, but particularly to low-income and disadvantaged Tasmanians. Key aspects of such infrastructure include:

- Affordable, accessible, effective public and community transport
- Basic services, in particular access to healthy food
- Healthy spaces
- Social support frameworks and programs

The importance of these related areas of development to the success of the Strategy further highlights the need for more integration at the planning and implementation levels across all spatial planning areas.³

More emphasis needed on Universal Design

The need to change residences when facing age-related mobility restrictions or in the event of permanent disability is an experience that imposes substantial cost as well as stress on all Tasmanians, but particularly those experiencing financial disadvantage. While Liveability Development Principle No 7 lays out the requirement to consider “safety” and “ease of access, regardless of physical capacity,” we argued that the Draft could go farther by emphasising the need

³ For more detail, please see TasCOSS’ recent publication *Social Inclusion Principles for Spatial Planning in Tasmania*, available at www.tascoss.org.au

for all new housing—detached dwellings as well as medium- and high-density development, in rural as well as urban and peri-urban settings—to apply principles of Universal Design, which extend past these two areas to encompass most aspects of daily use. Incorporation of Universal Design principles is vital to making it more likely that residents of new housing will be able to age in place or stay at home in the event of disability.

Need for inclusion of a broader range of services and stakeholders in these consultations and in implementation

TasCOSS supports the observation by Shelter Tasmania in their submission that the implementation of the Strategy will benefit from the inclusion of social planners during the stage of translation of the liveability development principles into best practice residential development. This stage of the process should involve community service organisations, council community development staff, mainline government agencies (in particular Health and Human Services, but also Justice and Tasmania Police) to ensure a genuine best practice outcome. It also is not clear how members of the community who may find a written submission process intimidating, whether individuals or community organisations, are expected to have input into this document’s consultation process.

Need for more detail on implementation and linkages to existing documents

We understand that the Draft is a high-level document that is still in its early stages. Nevertheless, more detail on a variety of aspects of the Strategy would be helpful. This is particularly noticeable in the area of implementation, where, as Shelter Tasmania and Anglicare have observed, the distribution of responsibilities is not entirely clear. For example, in the “Next Steps” section, it is not clear which agency or combination of agencies will be responsible for consultation with community organisations to consider social support frameworks and programs; nor is it clear how the social and private housing sectors will be engaged in the Strategy’s implementation.

In line with the comments above, we would also appreciate more detail on how the Draft articulates with existing initiatives such as the three regional settlement strategies, DIER documents such as the Southern Integrated Transport Plan, or state government spatial and social planning documents such as the Open Space Policy and Planning Framework or the Tasmanian Homelessness Plan.

TasCOSS also strongly supports Anglicare’s recommendation that the Office of the State Architect also provide some guidance for how the Strategy might be embedded within local government planning assessment processes and policies relating to requirements for private residential developments.

Need for a monitoring and evaluation system focused on measurable outcomes

The Draft does not discuss how the Strategy will be monitored and evaluated. TasCOSS supports Anglicare’s recommendation that monitoring and evaluation of the effectiveness of the Strategy be measured against the aims of—among other things—reducing homelessness, increasing social inclusion, and reducing stigma associated with poverty.

Need for a housing policy

Finally, TasCOSS concurs with the concerns of Anglicare over the Residential Development Strategy's place in the Tasmanian Government's overall social inclusion strategy, in particular in relation to the issue of the provision of social housing. This Draft appears to be a design brief, an effort to visualise a physical reality for an implied existing social policy. It does not appear to be a social policy document in itself. There remains a need for a housing policy that:

- Sets out a vision for an equitable housing system
- Provides an achievable framework for housing all Tasmanians
- Identifies the place of public and social housing within a vibrant, liveable and sustainable Tasmanian housing system
- Sets out targets for provision of social housing stock, including stock specifically aimed at meeting the needs of people living with physical and/or mental ill health, older people, and people with children.
- Sets out a strategy to reduce and prevent homelessness.

In the absence of an underlying social policy, the RDS runs the risk of simply providing the technical specifications for a largely market-driven exercise in development that does little to help socially excluded Tasmanians.

Need for a copy edit

Finally, we note that this otherwise clearly-written and elegantly presented document would benefit from a copy edit to pick up problems of grammar and punctuation.

Conclusion

Thank you for the opportunity to comment on this forward-thinking document. We look forward to seeing how the Strategy develops, and to being involved in any appropriate capacity.