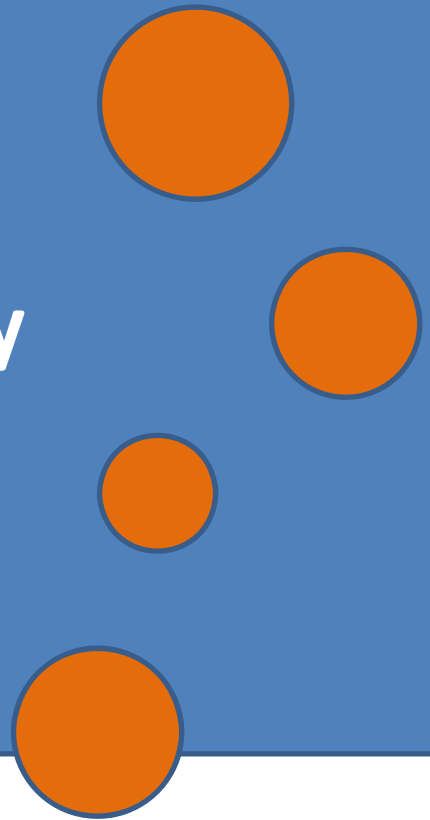


Feedback on the Draft Residential Development Strategy



Shelter Tasmania

December 2011

All human rights are universal, indivisible and interdependent and related. The international community must treat human rights globally in a fair and equal manner, on the same footing, and with the same emphasis. — Vienna Declaration and Programme of Action, World Conference on Human Rights, 1993



Shelter Tasmania is the Peak Body for Housing and Homelessness in Tasmania

Our Vision

Shelter's vision is that every person has affordable, appropriate and secure housing and our Mission is to end homelessness in Tasmania.

About Shelter 2011

Shelter Tasmania is an independent not-for-profit housing peak organisation funded by the Department of Health and Human Services. Shelter Tasmania is the key NGO body that represents the interests of low to moderate income housing consumers, housing providers and Specialist Homelessness Organisations across Tasmania.

Shelter Tasmania is committed to working towards a fairer and more just housing system and ensuring the rights of tenant and people experiencing or at risk of homelessness. We provide an independent voice on housing rights and a link between governments and the community through consultation, promoting research and policy advice. We seek to improve housing access to all Tasmanians, and as a member of National Shelter we support its policy platform and recommendations to the Federal Government.

Shelter Tasmania's membership consists of a wide range of organisations across Tasmania, such as: tenants groups, consumers, community housing providers, homelessness and crisis accommodation services, local government, research organisations and a range of individuals and services interested in housing and homelessness issues.

Residential Development Strategy for Tasmania

Shelter Tasmania is pleased to have the opportunity to provide feedback on the Draft Residential Development Strategy. As the peak body for Housing and Homelessness, Shelter Tas has played a leading role in lobbying for and supporting a comprehensive plan for reducing homelessness in Tasmania. As such, we welcome the Residential Development Strategy with its focus on supporting State and regional settlement strategies and develop a broad vision for the provision of housing in Tasmania. We congratulate the Office of the State Architect on producing this document for consultation and discussion into future residential development in Tasmania.

Strategy and Feedback so far

Shelter Tasmania has provided information on the Strategy to members through a posting a link on our website and through this medium we have invited feedback and comments. Shelter Tasmania has also consulted with our Management Committee, representing the Housing and Homelessness related sector. Shelter has met with other local and non-government organisations that have already provided feedback and Shelter Tasmania has viewed their submission and would like to reinforce comments made by Anglicare and Hobart City Council.

Although the Residential Development Strategy in its inception has started dialogue around increasing sustainable residential developments in an ever increasing urban sprawl and developing liveable communities, there is no firm commitment to provide housing to all Tasmanians and cease the issue of homelessness which is a very real experience for too many Tasmanians. With this in mind, the response from Shelter Tasmania in representing its members will provide comments including some supporting ideas.

The response from Shelter will contain:

- General comments from members

General Comments

Feedback on the Strategy has been provided by those Shelter members who are homelessness and housing service providers, advocates and researchers. Many of the comments sought clarification on the scope and context of the Strategy that is what affordable housing will be available for low income and marginalised groups. There is also no reference to the how the Residential Development Strategy is positioned within the National Affordability Housing Agreement (NAHA). Comments provided are not listed as recommendations but are for the Department of Justice to consider and provide clarification. The following comments are an indicative list of themed comments, but are not exhaustive. Shelter's staff and Executive are available to provide further comment, on request.

Wide Support for Strategy

All those who provided feedback supported and welcomed the intent of a Residential Development Strategy for Tasmania. They consider it has potential to, however still ask a number of key questions:

- It is positive that the Tasmanian Government is willing to commit to quality, forward thinking projects
- Support and encourage plans to develop and maintain inclusive, resilient and prosperous communities
- However is there is commitment to ensure the funding of services and staff beyond the absolute minimum
- To continue with the theme of resources, that "housing is more than simply providing a rook to shelter under" (pg. 2) complement the bricks and mortar with support to ensure there is no 'revolving' door' for those who struggle with community living.
- How affordable is the housing if it is to be "built using best practice urban design, architectural and construction techniques and materials" (pg 15)?
- How will the tenants be chosen for the developments, will it be based on the Housing Tasmania waiting list and if so, what does this mean for those who are not on the list?

Increased housing stock with investment with liveability

The Strategy recognises that there is currently a housing shortage and lack of housing choices and clearly outlines a shift away from recognisable housing estates on the peripheral of urban centres to

housing which underpins a more holistic approach to living. This approach recognises the importance of social, economic and cultural needs through access to employment, safety, recreation and infrastructure. Shelter Tasmania congratulates this key concept and notes the Minister states “create more sustainable, socially inclusive and connected communities” (pg. 1) is a step towards preventing homelessness, however Shelter Tasmania believes the process would benefit from other professionals or groups being a part of the process. This could include representatives from the community housing providers, social planners and landscape architects. These professionals would have the necessary skills and language to bridge the gap between development and planning to understand the social, economic and cultural issues and have connections to consult with community groups.

However providing a liveable community is one aspect of housing the low income and marginalised Tasmanians. Shelter Tasmania would support a commitment to increase housing stock, which we note that although there is acknowledgement of “Tasmania ...currently experiencing a housing shortage...” (pg 2) there is no clear obligation to ensure enough housing stock is available. As indicated previously, Shelter Tasmania advocates for every person to have affordable, appropriate and secure housing.

Tenancy or ownership

Tasmania has a high rate of low income tenants as demonstrated with the high waiting list for public housing. As of June 2011, figures from the Tasmanian Government indicate 2972 people were on the waiting list¹. As such, strategies for residential development should include a commitment to ensure the provision of properties for low income earners with, it is suggested 15% of stock set aside. A portion of the 15% could be set aside for those with mental or physical ill health as research conducted by Anglicare Tasmania into mental ill health suggests appropriate affordable housing supports mental health.

Shelter Tasmania would also seek clarification on how decisions are made in regards to who would be offered the tenancies. Although Housing Tasmania has a waiting list for public housing, not all people with low income and in need of housing are on this list. Shelter Tasmania would support consultation with the Specialised Homelessness Services in determining tenants for any residential development.

In the document, the development examples: small residential development, large residential development, adaptive reuse and infill development clearly have benefits in using already existing buildings. Therefore minimising the cost could flow to benefit the 15% set aside for low income earners. However it isn't clear whether these developments are public or private stock, whether they are for tenancy or home ownership and indeed if the properties will be affordable for those on low income. Shelter Tasmania supports a standard benchmark measure for housing affordability to stand at 30% of income of people in the two lowest income quintiles.

¹ Your Health and Human Services Progress Chart, September 2011, pg.20.

Marginalised Group

There is reference in the document about “Sustainable communities...tend to be more diverse, and include a mix of people of different life stages, incomes, tenures and household composition” (pg 6) a concept which is commended as a recognised consideration for any residential property. Shelter Tasmania would welcome further exploration into how this would look as feedback from our members clearly indicate that currently there is an absence of available properties for larger families with low incomes. In this document, there appears to be a lack of acknowledgement of this marginalised group as most of the plans indicate one or two bedrooms.

The strategy neglects to address the housing needs for young people particularly those in or leaving state care. This is an issue relevant in current housing policy and one which Shelter Tasmania’s members are grappling with. As stated previously, those with mental and physical ill health are also marginalised and we have an emerging housing issue for the older population who are either downsizing or due to a lack of superannuation or equivalent, are experiencing housing stress.

Shelter Tasmania suggest the document reflect these marginalised groups by including provision of appropriate housing for people on low incomes including young people, older people, those with mental or physical ill health and larger families.

Infrastructure

Shelter Tasmania welcomes the concept of increasing urban density as a means of providing housing close to services such as schools, hospitals, shops, parks and recreational activities. However a number of established services and communities are out of the CBD and although close by would suggest further infrastructure into transport options be explored. This would also decrease the reliance on cars for transportation, however to ensure confidence in this concept, public transport system may need to be reviewed to guarantee coverage and availability.

The Strategy largely explores the urban context, however Tasmania’s population is quite dispersed with a number of families including low income earners already living in rural Tasmania or planning to move there because of the availability of cheap housing. Some of these properties are ‘shacks’ or basic housing which are morphed into communities. The local Councils in most cases will approve development within their area because it attracts rates or taxes without consideration of the impact to the community and environment and without appropriate infrastructure and support. Shelter Tasmania would suggest the strategy includes provision for rural areas in particular infrastructure to ensure a liveable, prosperous and connected community.

Next steps

Shelter Tasmania welcomes the Strategy identifying that “social and affordable housing must be integrated with social support networks and broader social programs” (pg 24). This recognises the Strategy is in line with the current Tasmanian Homelessness Plan objective four, ‘Effective service responses’ with the focus on ensuring a level of support. What isn’t so clear is how that support will be provided, who would provide the support and where or what resources will be used. The actions on pages 25 and 26 highlight statutory planning and private developers and social support, but a

part from consultations with community organisations it doesn't appear very clear how this will occur.

What also isn't included in the actions is whether there is the intention to increase public and social housing stock, identify if development is for tenancy or ownership, the importance of providing transport options and infrastructure and ensure marginalised groups are well represented.

Conclusion

Shelter Tasmania appreciates the opportunity to provide feedback and reflect comments from our members on the Draft Residential Development Strategy. The main issues surround providing housing and housing options which is affordable to those on low income. We welcome the opportunity to provide further ongoing feedback as we strive to improve the rights and outcomes for those members in our community who are at risk of homelessness and those experiencing homelessness in Tasmania.

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