



# TASMANIAN HOUSING STRATEGY

## Provide your feedback on the Tasmanian Housing Strategy Exposure Draft

**JUNE 2023**

We encourage you to read the Tasmanian Housing Strategy Exposure Draft (draft Strategy) prior to responding to the following questions. You may choose to respond to some or all questions. Completed documents can be uploaded using the submissions drop-box on the website: <https://tashousingstrategy.homestasmania.com.au/consultation>.

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I commend the state government for a detailed and well-considered draft housing strategy. Overall, it is a sound document. There are, however, some important considerations that must be considered in the revised strategy, which I address below.

Question 1: ‘Our way forward’ identifies several levers for achieving a more equitable housing system for all Tasmanians. Are there additional or alternative more important levers that you believe should be addressed?

The draft strategy includes some excellent priority outcomes (p. 10-13). It is important that the environmental focus of housing “well-functioning housing system that supports improved...environmental outcomes...” is retained in the final strategy. In other countries there is a well-documented relationship between the location of affordable housing and noxious land uses, higher levels of air pollution, hazardous sites (e.g., flood prone land), and food deserts, where there are concentrations of fast-food restaurants and where fresh food is expensive and hard to access (Agyeman 2005). Recognising that housing is a “social determinant of health” and a fundamental right” it is important to ensure that environmental equity is a key focus of the housing strategy (Scally and Koenig 2012).

There are many examples of so-called affordable housing in Tasmania where the private sector has put profit ahead of people’s wellbeing. This includes a very low, or virtually non-existent, provision of greenspace and vegetation. Trees and vegetation around housing are a key component of liveability and must not be treated as an afterthought. Included with this submission are two photographs – a private sector development in Sorell and a community housing provider development in Bridgewater. The Sorell development is an example of very poor design whereas the Bridgewater example shows that high quality housing can be provided at an affordable price-point. New housing needs more greenspace and must be climate responsive.



Image 1 – Housing with no vegetation Sorell



Image 2 – Housing with greenery, Bridgewater

A very important consideration is how to integrate water-sensitive urban design with new housing (both infill and greenfield). Tasmania is lagging well behind other states for water sensitive urban design. There is an opportunity to integrate this with greenspace provision to boost environmental quality. New research shows that communities with access to trees, greenery and open space are healthier, happier, better adjusted and more prosperous (Astell-Burt and Feng 2019).

The Climate Futures forecasts indicate a potential fourfold increase in extreme heat events in parts of Tasmania by 2050 (White, Grose et al. 2010). It is essential that future housing is designed to reduce the impact of extreme heat on residents. Research shows that heatwaves are the leading killer of Australians above all other natural hazards combined (Coates, van Leeuwen et al. 2022). Many Tasmanian houses are already poorly designed, and their occupants suffer from energy poverty – paying substantial heating costs in winter and cooling costs in summer (Churchill and Smyth 2021). Occupants also suffer health consequences from being too cold or too hot.

Given that older people are highly susceptible to extreme heat, and that the state's population is rapidly ageing, it will be critical that the Tasmanian Government require future housing to be energy and climate responsive and provide mechanisms for the retrofitting of existing housing stock to combat climate change impacts (see p. 23). This should include design guidelines that require tree-planting and the provision of greenspace around housing.

The recognition in the strategy of the importance of promoting infill development is commended, especially along rapid transit corridors (p. 13). The housing strategy needs to be aligned with planning provisions that foster improved mobility – given the high levels of disability in Tasmania (p. 24). The majority of the state's bus stop infrastructure is not compliant with national disability standards. Putting housing in proximity to public transport without supporting infrastructure is meaningless. Investment in public transport infrastructure is also required.

**Question 2: Theme one identifies the need for 'more homes, built faster'. Are there additional or alternative objectives you recommend for consideration?**

Simply building more housing quickly is not sufficient. As noted above – new housing needs to be accompanied by investment in public transport, greenspace, revegetation, and energy efficiency. New housing needs to also be co-located with essential services such as education, healthcare, social support, and employment opportunities (as noted on pp. 14, 22 and 36 of the draft strategy).

An extra objective of theme 1, consistent with my preceding comments, should be to maximise environmental quality and minimise environmental harm, including the quality of built environments. This should also require the location of new housing away from natural hazards (e.g., land prone to bushfire and flooding) (p. 18-19). And the final strategy should require a tree canopy target for all new neighbourhoods of 30-40%, including for infill areas and places with higher density, as well as access to parks and greenspace, within 300 metres of a residence, as recommended by the World Health Organisation (World Health Organization 2016). For higher density development, this could be achieved by siting new infill development proximate to under-utilised parks.

New housing, both infill and greenfield, should enable people to age in place (Baldwin, Matthews et al. 2020). One way that theme 1 could achieve this, while also addressing the upgrading of existing housing stock to make it climate resilient, would be to facilitate the

conversion of under-house garages into studio accommodation or separate flats. The State Government could work with architects to devise efficient and effective ways to achieve this, with design codes/guidelines, and then provide a 'right of development' of homeowners meet environmental objectives (e.g., installing double glazing, achieving thermal mass, passive cooling, disability compliance etc.) (see p. 23-24 and bullet point 7, theme 1, p. 26 and theme 2, bullet point 2, p. 30).

**Question 3:** Theme two centres on 'affordability in the private market'. Are there additional or alternative objectives you recommend for consideration?

Please see my comments above – affordability must not be compromised as a trade-off with environmental quality; both are needed.

**Question 4:** Theme three places 'people at the centre' of the draft Strategy. Are there additional or alternative objectives you recommend for consideration?

The principle of housing first (p. 33) is important, but again this cannot be substituted for safety and wellbeing considerations. So, for example, it would not be appropriate to develop housing in hazardous locations (e.g., bushfire prone land) or to trade off environmental quality (e.g., not requiring the provision of greenspace and trees and vegetation) to meet housing first. That would be a perverse and undesirable outcome. The strategy needs to acknowledge that this is a case of 'both/and' not 'either-or'.

**Question 5:** Theme four highlights 'local prosperity' as a priority. Are there additional or alternative objectives you recommend for consideration?

The siting of housing in places that are not exposed to natural hazards (e.g., bushfire, heatwaves, and flooding) and close to public transport is essential for local prosperity. As seen in New South Wales and Queensland, buy-back of housing in hazardous locations is expensive and traumatic for residents and undermines social capital. As noted above, it is essential that the final housing strategy require the siting of new housing and the retrofitting of existing housing to avoid harm and maximise health and wellbeing, including protecting environmental quality.

**Question 6:** Are there other ways the government could make its actions and progress to meet the proposed objectives more transparent and accessible?

The government could include regular progress updates and ensure there is a monitoring and evaluation strategy in place, that including post-occupancy evaluation.

**Question 7:** Do you have any comment on what this draft Strategy does well?

Please see my points in the preamble.

**Question 8: Is there anything you think the draft Strategy does not cover but should, or that it mentions but could be highlighted more?**

Yes – please see my points about environmental equity/justice, greenspace preservation and provision, natural hazards avoidance and provision of high-quality public transport infrastructure (e.g., disability compliant bus stops). Please also see my comments about Water Sensitive Urban Design (WSUD).

It would also be good to recognise in the strategy the need to manage housing build quality, to provide some assurances to homeowners that they are protected from poor construction practices, as is currently being worked-up in New South Wales. This is a safety and wellbeing issue.

The final strategy should also make explicit reference to the “Toward Infill Housing Development” document prepared for State Growth in 2019 by the Place Design Group (Isles, Watts et al. 2019). That document provides excellent examples of design solutions for gentle density and the missing middle density.

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