

Affordable Housing
Environment Planning and
Sustainable Development Directorate
GPO Box 158
CANBERRA ACT 2601

Dear Sir/Madam

Towards a New Housing Strategy

I welcome the discussion paper *Towards a New Housing Strategy* released in July 2017 for public comment.

Housing affordability and homelessness are endemic in the ACT and strategic, innovative responses are required to address this issue.

I applaud the honesty reflected in the paper and the thinking that has contributed to its goals and strategies to reduce homelessness and improve housing affordability. In particular the paper recognises that averages can conceal the real disadvantage experienced by many, and that a range of solutions are needed to address this complex issue.

Housing affordability affects the most vulnerable people in our community. The ACT Government Housing Strategy will need to address a range of economic, social and environmental factors that impact on homelessness and housing affordability in order for those most vulnerable in our community to live sustainable and meaningful lives.

I provide the following recommendations to be considered as supporting and important elements of an affordable housing strategy.

Housing Strategy Goals

The four broad goals identified by the Affordable Housing Action Group are well developed, and consider the strategic factors that need to be addressed to deliver affordable housing. However, the need for families and individuals on low incomes to be able to access the resources and opportunities to live sustainably also needs to be recognised. This involves a range of urban sustainability factors including energy efficiency, flexible and adaptive building design, access to public transport and walkability, and reduction of social exclusion and stigma.

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Recommendation One: Include an extra goal to the existing four goals identified by the Affordable Housing Action Group to ensure that broader sustainability and liveability outcomes are integrated into the ACT Government Housing Strategy.

The new goal could read *“Achieve best practice environmental sustainability in the renewal and development of affordable housing.”*

The matters explored below support this additional goal.

Building Efficiency

Building design directly impacts on people’s health and wellbeing.¹ The construction and renewal of affordable housing in Canberra needs to be environmentally sustainable to reduce energy consumption and ensure that residents have a good quality of life.

Apartments that are well designed and energy efficient, with good thermal comfort and adequate access to daylight, reduce people’s energy consumption and in turn reduce their energy bills. This is especially important for households on low incomes who are vulnerable to fluctuations in energy costs. The CRC for Low Carbon Living provides guidance on best practice policy in this regard.²

Energy efficiency in the private rental market should be a prominent feature in the Housing Strategy. Currently there is little incentive for landlords to invest in rental properties to reduce energy costs due to split incentives and legislative barriers.³ Most rental houses are significantly less energy efficient than owner-occupier houses. A high proportion of people and families on low incomes live in rental properties, making them more vulnerable to rising energy bills than homeowners. Therefore, the housing strategy should consider what measures can be used to incentivise landlords to make rental properties more energy efficient.

The strategy should also consider initiatives that enable renters to access renewable energy and new technologies in order to improve the energy efficiency of their homes. Currently tenants face barriers to access renewable energy, such as solar, due to regulations in the energy market and strata laws.⁴ In December 2016 the Stucco apartments, a student housing co-operative in Sydney, became the first apartment building in Australia to have solar and batteries in an embedded network.⁵ Residents at the Stucco apartments receive 80 per cent of their power from solar and have significant monthly savings on energy costs.⁶ The Housing Strategy should include measures

¹ World Resources Institute, 2017: *Accelerating Building Efficiency*

² CRC Low Carbon Living, 2017: *Best Practice Policy and Regulation for Low Carbon Outcomes in the Built Environment*

³ <https://theconversation.com/renters-are-being-left-out-in-the-cold-on-energy-savings-heres-a-solution-65712> accessed on 15 September 2017

⁴ <https://theconversation.com/get-in-on-the-ground-floor-how-apartments-can-join-the-solar-boom-79172> accessed on 15 September 2017

⁵ <http://www.stucco.org.au/solar> accessed on 15 September 2017

⁶ <http://www.stucco.org.au/solar> accessed on 15 September 2017

similar to the Stucco apartment solar initiative to ensure that low income earners receive the economic and environmental benefits of accessible renewable energy.

Recommendation Two: Consider how to incorporate energy efficient standards and incentives for both landlords and tenants into Goal 3 in order to enable people on low incomes to have access to the resources and opportunities that will improve the energy efficiency of their homes.

Building Design

The development of affordable housing and upgrades to existing housing stock should achieve best practice urban design. New and upgraded affordable housing should be flexible and adaptive in order to respond to specific needs of low income and vulnerable residents including people with a disability, older citizens, single parent families, older women, women fleeing domestic violence and members of Aboriginal and Torres Strait Islander communities.

Additionally, poor building design and quality have been identified as issues affecting medium and high density development in Australia.⁷ Low income households are more susceptible to the negative impacts of poor building design and quality because they are more likely to rent in cheaper, poorly constructed buildings and must negotiate building repairs and improvements through a landlord.⁸

The ACT Government's discussion paper *Improving the ACT Building Regulatory System* advised that adopting an independent design review panel was one option for improving building design and quality in Canberra.⁹ The ACT Government Architect, Catherine Townsend, will form a Design Review Panel (DRP) of suitably qualified professionals to provide an iterative review of the strategic and technical aspects of development applications and ensure that best practice building design and quality is achieved. It is anticipated that the DRP will commence in December 2017.

Catherine Townsend's vision for the DRP is to be the "voice of the city" and interpret both the planning guidelines and the sentiment of the community in order to achieve best practice building design and construction for new developments in Canberra. This initiative is highly commended.

In Victoria the Office of the Victorian Government Architect (OVGA) provides strategic advice to the Victorian Government to protect the quality of the built environment and achieve design that is *sustainable, inclusive, healthy and beautiful*.¹⁰ In addition to the OVGA, Victoria has adopted

⁷<https://theconversation.com/this-is-why-apartment-living-is-different-for-the-poor-82069> accessed on 15 September 2017

⁸<https://theconversation.com/this-is-why-apartment-living-is-different-for-the-poor-82069> accessed on 15 September 2017

⁹ACT Government, 2015: *Improving the ACT Building Regulatory System*

¹⁰<http://www.ovga.vic.gov.au/about-ovga.html> accessed on 15 September 2017

apartment design guidelines that set out best practice measures relating to solar access, thermal cooling, stormwater management, waste and recycling.¹¹

We consider that the ACT Government Architect and Design Review Panel should perform a similar function to the OVGA and that opportunities for the development of apartment design guidelines to achieve best practice in building energy efficiency and design should be explored.

Recommendation Three: Implement measures that ensure affordable housing achieves best practice design and quality and that the Design Review Panel provides comment on affordable housing development and renewal.

Transport and Walkability

Proximity to regular public transport routes is critical for low income households to seek medical support, access opportunities for education and employment, and participate in civic life.

The ACT Council of Social Services (ACTCOSS) has identified that individuals and families on low incomes often work outside of a typical nine to five work day and experience difficulty accessing public transport to get to employment. This can lead to families and individuals cutting back on money spent on food and health care in order to keep a car on the road. Therefore, affordable housing should be located close to regular public transport so that vulnerable people in our community have affordable access to employment.

Access to public transport also provides individuals and families on low incomes with the opportunity to participate fully in the community, which subsequently combats social isolation and stigma. This is of particular importance to single parent families, people with a disability, and older citizens.¹² The Common Ground development in the Gungahlin town centre has frequent public transport connections and provides a good example of affordable housing that achieve this outcome.¹³

Walkability is also a key factor that should be encouraged within the strategy as it can bring about many co-benefits. Research by Professor Billie Giles-Corti has shown the linkages between walkability and health.¹⁴ This is true in a physical and mental sense and is particularly relevant for low income households should they struggle with mental health challenges.

¹¹<https://www.planning.vic.gov.au/policy-and-strategy/planning-reform/better-apartments> accessed on 15 September 2017

¹²<https://aifs.gov.au/cfca/publications/relationship-between-transport-and-disadvantage-austr> accessed on 15 September 2017

¹³https://www.google.com.au/search?q=Common+Ground+Gungahlin&rlz=1C1GCEA_enAU760AU760&og=Common+ground&aqs=chrome.69i59j69i60j69i57j69i60l2j69i59.1799j0j7&sourceid=chrome&ie=UTF-8 accessed on 15 September 2017

¹⁴http://www.futureleaders.com.au/book_chapters/pdf/Dancing-in-the-Rain/Melanie-Lowe_Billie-Giles-Corti.pdf accessed on 15 September 2017

A development bonus is one strategy to increase affordable housing in neighbourhoods that are walkable and close to regular public transport. Developer bonuses award additional building height, floor space or apartments in new developments in exchange for providing affordable housing.

The 2014 City of Melbourne Housing Strategy *Homes for People*¹⁵ identified that developer bonuses in specific urban growth areas and the central city would increase the provision of affordable housing. In November 2016 the Victorian Government in partnership with the City of Melbourne introduced new planning controls in the central city.¹⁶ The new planning controls include a floor area uplift provision in developments that provide a public benefit, which includes affordable housing. This example demonstrates that development bonuses can effectively increase the provision of affordable housing when implemented by clear statutory planning controls.

Recommendation Four: Affordable housing development should have adequate access to public transport, and walkability must feature in identifying and fostering affordable housing options.

Implement incentives for developers to include affordable housing in new developments in areas that are walkable and have access to regular public transport and investigate changes to statutory planning controls to include development bonus incentives.

Social Exclusion and Stigma

The Housing Strategy presents an opportunity to challenge the existing negative perceptions of public housing and public housing tenants held within our community and reflected in or voiced by the media¹⁷.

Within Australia and elsewhere, public housing has progressively 'moved from being a general needs tenure, in which a range of groups lived, to one containing a much larger proportion of high need and deprived tenants'.¹⁸ Due to a number of factors, primarily a significant reduction in government funding over time, public housing is now perceived as a last resort option amongst the general public. Additionally, harmful attitudes towards public housing policy and development have been reinforced by negative media attention.¹⁹ These attitudes held by the public and the media compound the social isolation and exclusion of public housing tenants.

¹⁵ <http://www.melbourne.vic.gov.au/SiteCollectionDocuments/homes-for-people-housing-strategy.pdf>
accessed on 15 September 2017

¹⁶ <https://www.planning.vic.gov.au/policy-and-strategy/planning-reform/central-city-built-form-review>
accessed on 15 September 2017

¹⁷ Jacobs, K. etc. 2011: The stigmatisation of social housing: findings from a panel investigation, AHURI Final Report No.166. Melbourne: Australian Housing and Urban Research Institute.

¹⁸ Rowland Atkinson, Keith Jacobs, 2008: Public housing in Australia, stigma, home and opportunity, Housing and Community Research Unit, viewed 12 December 2016, <<http://apo.org.au/node/311>>.

¹⁹ Jacobs, K. etc. 2011: The stigmatisation of social housing: findings from a panel investigation, AHURI Final Report No.166. Melbourne: Australian Housing and Urban Research Institute.

The ACT Government Housing Strategy provides an opportunity to address negative media discourse and challenge community perceptions towards public housing and public housing tenants. The Housing Strategy could be celebrated within the community as a demonstration of best practice policy, sharing that good design outcomes improve the livelihoods of those most vulnerable within our community and enhance social cohesion.

Recommendation Five: Ensure that elements which can enhance social inclusion and reduce stigma are incorporated into the Housing Strategy.

Thank you once again for the opportunity to comment on the discussion paper *Towards a New Housing Strategy*. My office is happy to be contacted for further clarification if required.

Yours sincerely

A handwritten signature in blue ink that reads "Kate Auty". The signature is written in a cursive, flowing style.

Professor Kate Auty
Commissioner for Sustainability and
the Environment

15 September 2017