

3 March 2023

The Officer Tasked
ACT Planning System Review and Reform Project
Environment, Planning and Sustainable Development Directorate
Dame Pattie Menzies Building
DICKSON ACT 2602
Via online lodgement portal

Dear Officer,

RE: Response to submission of representation and feedback on the draft new Territory Plan and draft district strategies: ACT Planning System Review and Reform Project: Blocks 2, 7 and 8 Section 74 Holt

We are writing on behalf of the lessees of Blocks 2, 7 and 8 Section 74 Holt (Royal Freemasons' Benevolent Institution) as respondent to the ACT Planning System Review and Reform Project. We are replying to your request for feedback on the Draft new Territory Plan and draft District Strategies. The subject site leased by the Lessee is located adjacent to the Kippax Group Centre (Figure 1 below) and located in the Division of Holt, District of Belconnen.

The site

Blocks 2, 7 and 8 Section 74 Holt leased to the Lessee, is located adjacent to the Kippax Group Centre to the south of Hardwick Crescent and with access from Hardwick Crescent and Powell Place. The subject sites are currently developed for a Residential Aged Care Facility (RACF) and a Community Hall as well as an aged persons home containing independent living units (ILUS), one bedroom aged persons units and administrators accommodation with ancillary facilities.



Figure 1 – Aerial map of Blocks 2, 7 and 8 Section 74 Holt (Source ACTMAPi, February 2023)



The block is bounded by carparking in the Kippax Group Centre and a church (Community Facilities zoned land under the Territory Plan) to the north and north east, parkland, leisure (sporting) and reserve areas to the south, east and west and RZ2 residential development to the west and adjacent to the south east.

The proponent

The Royal Freemasons Benevolent Institute (RFBI) was founded in 1880 to assist those in need and continues this mission with the provision of aged care services and benevolence and annuity programs, including at sites such as the subject precinct. The RFBI owns and operates 20 retirement villages and 22 residential aged care villages in NSW, VIC and the ACT and cares for over 2,500 community members every day.

RFBI Holt constitutes 48 2-Bedroom ILUs, a 53-bed Residential Aged Care Facility (RACF) and a Community Hall situated in attractive gardens with other site amenities. The village and its facilities have been in operation for some years and have delivered this annuity benefit to the community for nearly 30 years. Being located immediately adjacent to the Kippax Fair Shopping Centre and in close proximity to shopping, health, recreation and public transport facilities, the site is an ideal locality for a use of this kind.

RFBI Holt Masonic Village was built in three stages: Stage 1 in 1984 comprising 17 units. Due to public demand, between 1987 and 1992 a further 31 units were constructed. The site is fully utilised under the current Crown Lease development rights and the current applicable Territory Plan provisions being a low rise, low density, older style facility.

Current statutory and strategic planning context

The subject sites are currently developed for retirement and residential care related uses and are zoned 'RZ2-Suburban Core' under the Territory Plan. The block contains an array of low rise, low density semi-attached ILU dwellings and a residential care facility with associated amenities and administration areas. The site enjoys good northern aspects and some established vegetation and gardens.

The current use represents the only use that the subject land has ever been leased for. From the initial development of Holt and the Kippax Group Centre the site has been used for Retirement living and residential age care uses. The development seen onsite represents the initial built from that dates back many years.

The current development realised onsite is considered to represent a highest and best outcome under the existing planning policies for the site but falls well short of the proponent's vision for a modern and current market appropriate and demanded retirement village development. The site was initially developed under the National Capital Development Commission consideration prior to self-government in the Act and predates the Territory Plan. The RZ2 zoning in place represents the initial consideration of the development outcome that was in place when the Territory Plan was created in the early 1990's.

In current times the most common zoning subscribed for and associated with Retirement Village Use and Residential Care Accommodation is the CFZ-Community Facilities zoning and by inspection of the Zone objectives in the Territory Plan, the current and modern form of Retirement Village Use and Residential Care Accommodation appears to better fit within the aspirations for the CFZ-Community Facilities zoning. Many contemporary Retirement Village Complex developments have been progressed on lands released by the Government that was specifically prepared for this use and was specifically subject to the CFZ zoning upon release and sale.



The proponent and project team have considered the site and its context in the locality adjacent to the Group Centre, surrounding use and the draft planning strategies, policies and other Government initiatives presented at this time relating to urban development in the ACT. They further considered the changing needs and expectations of the Aging Canberra population, the type and form of retirement living and aged care that represents the current and expected future demand and need profile of the community and the changing nature of this community assessment in Canberra.

The proponent's investigation and experience are demonstrating a substantial need for new, modern and diverse housing choice in the Retirement Living/Aged Care market, and is exploring the opportunity to investigate and progress an opportunity to redevelopment of the subject Leases for a modern, high amenity, use appropriate Retirement Village with multiple housing, living and care options that will continue to cater for the needs of the community for these services.

Need for an expanded facility

The Lessee commissioned investigations into the proposition for redevelopment of the subject site with specific focus on understanding the growing need to and demand for as well as use expectations of the Canberra community. The proponent commissioned a retirement living and residential aged care market assessment to better understand the socio-economic and demographic profile, the unmet, underlying need for retirement village use and the key market context and position of these uses in the site's catchment. We include a copy of this study for your perusal at Attachment 1.

The study's findings clearly demonstrate that, not only is there a large and increasing underlying need for more retirement and retirement care options and choices in the catchment, but the study further confirms that the market and community expectations are well developed to support and facilitate the development of modern village options and services.

The penetration rate of those aged 65+ and living in retirement living (RL) communities is lower than the national average, a symptom attributed in part to the lack of quality supply rather than lack of demand. The pipeline of delivery of such facilities in the catchment is low when compared to the demand and perceived need and thus the availability of products in this asset class will remain low without intervention.

Investigations into the current planning policies for the site, early understanding of site constraints and character, including vegetation assessments, slope and aspect analysis, contextual analysis and supporting infrastructure reviews suggests that the redevelopment of the site into a modern purpose built and tailor-made facility is a strong and viable consideration albeit the limited opportunity afforded by the current RZ2 land-use planning policies currently in place.

The lessee wrote to the Chief Planner in December 2022 requesting that the Authority commence a review of the current Territory Plan Land Use policy for the site by way of a Territory Plan variation.

The ACT Planning System Review and Reform Project and Belconnen District Strategy: a Strategic Direction for additional Retirement and Aged Care facilities.

It was with great interest that the Lessee took up the opportunity to review the documents released in late 2022 in relation to the ACT Planning System Review and Reform Project, and particularly those documents that relate to the subject site. The documents in question are:

- The draft Belconnen District Strategy,

- The draft Territory Plan Belconnen District Policy,
- The Territory Plan draft Residential Zones Policy.

The Belconnen District Strategy

The demographic and needs consideration expressed in the Belconnen District Strategy are in full agreement with the Lessee's own investigations and assessments.

The District Strategy indicate that:

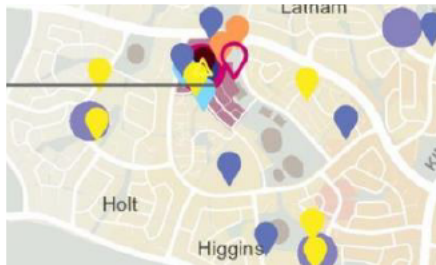
- Belconnen in 2021 housed the largest portion of the ACT population (over 105,000 people), this is approximately 20,000 persons more than the next biggest population by district which is Tuggeranong (~89,500 people) (p28 and p29),
- Of this population more than 35% of persons are approaching or are over 50 years of age. Over 65's is reported as 15% of the Belconnen population (almost 16,000 people), higher than the ACT average and close to the actual number of people in this cohort in Woden Valley. Belconnen houses the 2nd biggest population of older people in a district in the ACT (p29);
- The largest typology of home occupies in Belconnen is separate (Stand-alone) houses with 69% of the housing stock being represented by this type. Semi-detached and apartment living are only 30% of the housing stock available. Only 30% of households are renting their place of residence (p29).
- The Strategy as presented suggest that the ACTG population is set to increase by over 135,000 people by 2046 and that the trend to an aging population will continue. This in turn will require an increase in housing stock of around 58,000 new dwellings by 2046; the Belconnen share anticipated to increase by 11,500 2046. Recent reports suggest that the population forecast numbers are under review and reported at a lower rate as when compared to actual trends. The 2046 population is expected to be larger than previously forecasted, require more houses than predicted and have an increasing cohort of older members. (p32).
- The projected population forecasts a growth in aged population/retirees across the ACT is substantial (page 32).

The Strategy acknowledge that the increase population and demand for services such as Retirement Living and Residential Age Care will increase as the population grow and opportunities for expanding and increasing these services and facilities must be investigated. The Strategy include the following:

- That the demand for services such as this and the expansion of facilities are important considerations that must be further investigated (page 113);
- Areas for Aged Care near activity nodes and medical facilities should be identified as part of a *Sustainable and Resilient Territory* (Table 9),
- Areas in and around Group Centres are considered as high opportunity localities (Page 113), with specifically including the following statement: "*Future planning for the group and local centres could consider opportunities for these types of uses to be delivered, noting that identifying potential locations for any new facilities...*"
- The Kippax Group Centre and locality is an area of key consideration for new and/or expanded Aged Care services (Figure 37 page 114). The subject site is identified as an Aged Care locality adjacent to the Group Centre (See extract below).



- The housing and services demand are to be met by 70% infill development within the confines of the City.



Demand for these services is expected to continue to grow as the cohort of older Australians increase and as more people seeking to access these services and the current and forecasted number of places will continue to be outstripped by demand.

The proponent and advice from his market assessment echoes the Government's findings and we suggest that there is a substantial opportunity to use this site with a motivated and mobilised Lessee to implement a policy change that will deliver on this key requirement.

Draft New Territory Plan: Map, District and Zone Policies

The District Policy includes consideration of outcomes that include:

- a range of housing choices for a strong, egalitarian increasingly diverse and multi-generational and growing community.
- Strengthen the sense of community and
- Revitalisation of group centres
- A strong urban edge along Hardwick Crescent

Retirement Living is prohibited on a large list of Blocks as per the Land Use Table 1.2 of the District policy. Only the University of Canberra (At their Bruce Campus) have been afforded (Among other uses) a specific provision for retirement living.

The suggested Land Use Policy that will apply to the site remains residential low density (RZ2) in nature with policy outcomes that include:

- Development and redevelopment of a mix of low to medium density housing.
- Provision of a range of housing choices where the housing is low rise and contains a mix of single dwelling and multi-unit development.
- Opportunities for redevelopment by enabling a limited extent of change in density.

Albeit able to support the uses of residential care and retirement living within this land use policy, the assessment requirements stated for the RZ2 zoning are modest in character and include a 45% limit on site coverage, low dwelling density controls and low-rise height limitations (2 storeys maximum). Assessment outcomes focusses on precinct scale, urban structure and development following the housing design guideline are still to be released. It is clear that this zoning cannot deliver the intensification and demand



required to support the services and build outcomes needed to meet the growing demand and housing choices in this sector.

There appears to be a strong disconnect in the findings and aspirations of the District Strategy and proposed zoning for the subject site when considering the position and aspiration of the Strategy as outlined above and the statement policy expectation of a low density development opportunity on the edge of the Group Centre; that part of the District with the best services amenity, connectivity and access for older persons seeking retirement living opportunities.

RFB Development Concept

Based on their own investigations and in considering the data and direction expressed in the District Strategy, the Lessee commissioned an exploration of the opportunity to redevelopment of the subject site into a high quality, modern and fit for purpose retirement living complex. The historical context of the site (as retirement village use), the proximity of the Group Centre and services there-in, the Government's vision in the medium and longer term revitalization and renewal/additions to this centre coupled with the increasing demand from a growing and increasing discerning aging population is informing the aspiration to build a retirement living and care asset and offering to the Belconnen community now and into the future.

The proponent acknowledge its ongoing responsibility to continue the delivery of its service to the community and residents while exploring and developing the site and is investigating a development Master Plan to be delivered in a staged approach that allow decanting of services into new buildings as the redevelopment is progressed.

A further and key consideration in considering the redevelopment of the site is the changes resulting from the Royal Commissions into Aged Care findings and the new contemporary requirements within Assisted Living and Seniors Living housing and associated facilities. In responding to the findings and requirements proponents are now required to build "*for purpose*" accommodation types which promote safety, access and independence which this proposal aims to satisfy for communities within its locality.

The proposal stands to support the demand, need and planning outcomes outlined in the proponents Market Assessment and the Government's Draft District Strategy and, as discussed above, is in line with their on-the-ground experience day-to-day.

To inform this submission the lessee offer a concept Master Plan (included at Attachment 2) that detail the envisioned development opportunity that may be released in redevelopment of the site. Preparing this work will assist the community and policy makers to consider what the likely impacts of a re-development and densified modern retirement village complex may be. IT is imperative to understand that the Master Plan is not a Development proposal, but rather a tool that can be used to test ideas of building form, bulk and scale, development amenity and impact and inform appropriate policy limitations (such as height limits, setbacks etc. that may be needed to facility the desired development outcomes at the site. The proponent is amenable to the Master Plan to inform the site specific future policy provisions as may be necessary to facilitate the intended outcome while protecting the amenity and key matters of urban value on and around the site.

The Master Plan show an aspiration to develop a 3 storey to Powel Street and 4 storey internally facing Residential Aged Care facility at the "rear" of the site that fronts onto Powel Street with good amenity and views to the open space adjacent.

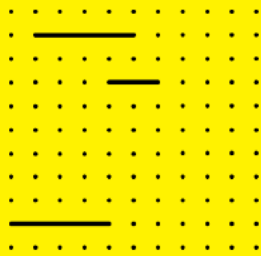


Independent living choices would be integrated with this building as well as delivered over the remainder of the site in a series of apartment style buildings ranging from 3 and 4 to 6 storeys in height.

All buildings to be positioned around a central village green area or connected by pathways to the rest of the precinct and adjoining Group Centre with opportunities for substantial landscape and vegetation plantings in between these buildings in a high quality and high amenity, integrated housing facility. Understanding the site constraints including, adjoining use profiles, slope, vegetation value and quality and the like allows the Master Plan to present a well-informed proposition in terms of building massing, positioning and aspect while protecting apparent site and neighbourhood values and amenities. Parking is proposed primarily as basement carparking, and a lower scale clubhouse, incorporated at the ground level of one of the apartment buildings, will provide services and amenity to the village and residents.

The concept Master Plan presented demonstrates the following merits:

- A good use of this valuable land asset with a history of retirement and aged care service delivery in its position adjacent to the Group Centre.
- Delivering on the aspiration of the Government to increase the service delivery and housing choice opportunity for the aged population in appropriate locations while revitalising the Group Centre and growing the resilience and sustainability of the community.
- Deliver an opportunity where local residents can age within their community in an appropriate facility comparable to many of the contemporary retirement living developments being progressed across Canberra and Australia as a whole.
- Provides the opportunity to renew the current housing stock in a manner that is sympathetic to the local context and environmental values of the site and surrounds and support a logical staging / decanting strategy. The opportunity to support the continuous delivery of this important service to residents and the community while improving and increasing the offering to the aging population in this key location is strongly underpinned in the presented plan.
- Is cognitive and addressed the significant slope across the site to achieve a walkable redevelopment with strong connections internally and externally to the Group Centre while also minimising impacts on adjoining residential development to the south of the site and retain visually important vegetation. The concept makes good use of the site characteristics and opportunities for a use of this nature while facilitating a pedestrian friendly environment with a controlled and contained on-site vehicular access network. The proponent is cognitive of the desire to preserve key parts of the on-site vegetation and valuable trees were possible noting substantial redevelopment proposed.
- Exploits the site geometry in a manner that will provide excellent northern solar aspect for all ILU apartments – a strong consideration in retirement living and residential care. The concept presents a gradation in scale from North to South and West to East to respond to the neighbouring context in which the new development sits and represent an opportunity to deliver a good mixture of housing typologies that will provide a range of housing choices to the aging community.
- The residential care facility is proposed to be centrally located to improve service delivery and access, promote aging in place and minimises operational costs; this is a strong integration opportunity with the overall on-site community.
- The community and wellness offerings situated at the ground level of the residential care facility are positioned to be the focal point for all residents while also delivering outreach services for the West Belconnen aged community externally to the site. Roof top terrace areas may be available in the



concept presented and will afford a variety of outdoor recreation opportunities including dementia gardens for future residents.

- A new central main vehicular access point from Hardwick Crescent addressing Kippax Group Centre supports integration to the Group Centre and limits adverse impacts on surrounding residential areas. All retirement living units benefit from their own street address and street appeal in a manner that integrates well with the surrounding current and anticipated future land use and development,
- All of the proposed retirement living units are to be designed to meet AS2124 and to be Adaptable Class C compliant.

Our investigations to date show that the Master Plan presented offers a superior and more appropriate facility that will support the need and expectations of the current and future aging community in Belconnen and Canberra. Albeit the provisions of the 'RZ2- Urban Core' zoning that permits the use for retirement village, the limited scale afforded under this zone prohibits the ability to deliver the vision, aspiration and need and expectations for the type and form of retirement village complex development expressed in the District Plan and demanded by the community of Canberra.

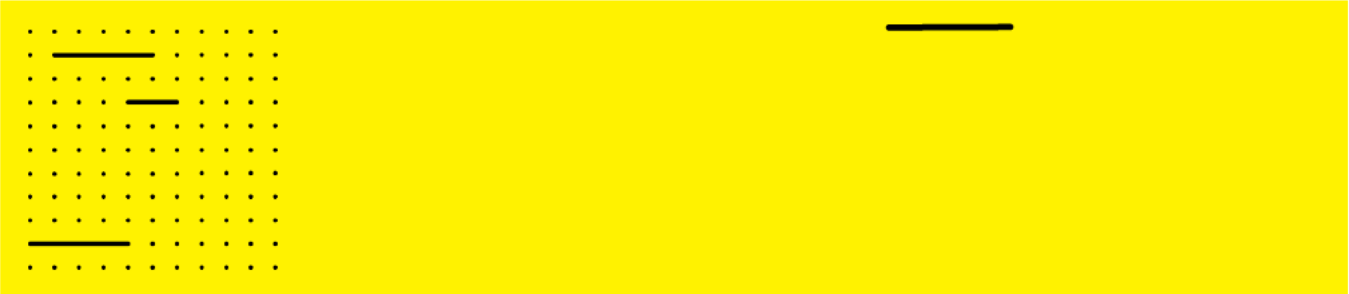
Suggested Amendments to District Strategy and Draft Territory Plan Documents pertaining to the subject site.

Noting that the land-take associated with Retirement Village complexes (both older low density villages and more, higher density offerings) are substantial. Considering that large sites are needed for these offerings (none are currently available in the Land Release Program) and considering the Government aspiration to contain redevelopment to 70% infill opportunities within the urban fabric it appears to be both logical and apparent that redevelopment of land such as the subject site be prioritized and supported in the Planning Reform.

This can be achieved by strengthen and specifying the aspirations of the District Strategy in relation to Residential Aged Care and Retirement Village use on the basis of the Demographic and housing choice information presented there-in. Clearly expressing the need for these services in the context of a growing and aging population and acknowledging the opportunity to redevelop some of the existing low density offerings such as the Proponent's land is of key importance. Given that existing retirement living and residential care facilities are already fully serviced, integrated and functions well with the urban fabric it follows that increasing the development opportunity within these sites are most likely to bring immediate relief to the demand and need in appropriate locations within the exiting community.

In particular, with the subject site located immediately adjacent to the Group Centre, the synergies in co-location, opportunity to integrate scale, increase in population bring vitality and vibrancy to the Centre and proximity assisting with social sustainability and walkability opportunities these is simply no better use of this site than what is presented in the Master Plan.

In looking at the available planning policies in the Territory Plan and considering the most current development offerings built in Canberra we suggest that, along with a clear statement supporting increased development of existing Retirement Village land and marking opportunities such as the subject site, the Territory Plan Zoning for the subject land use changed to the E4- Community Facility Zoning.



Considering the Draft Community Facility Zone policy, it is clear that the permissible uses for the zone not only include the target uses associated with Retirement and Residential Care Facility but also include a broad range of uses that natively support and are often associated with retirement and care uses.

The CFZ policy outcomes clearly expresses the requirements for development to focus on the characteristics and outcomes associated with these uses including:

- facilitate social sustainability and inclusion through providing accessible sites for key government and non government facilities and services for individuals, families and communities.
- Provide accessible sites for civic life and allow community organisations to meet the needs of the territory's various forms of community.
- Protect these social and community uses from competition from other uses.
- Enable the efficient use of land through facilitating the co-location and multi-use of community facilities, generally near public transport routes and convenience services appropriate to the use.
- Encourage adaptable and affordable housing for persons in need of residential support or care.
- Safeguard the amenity of surrounding residential areas against unacceptable adverse impacts including from traffic, parking, noise or loss of privacy.
- Promote active living and active travel.
- Provide safe pedestrian and cycling access to community facilities to promote active living.

Assessment Requirements for Retirement village dwelling the zone are limited to only require developments to comply with Class 'C' of Australian Standard AS4299 – Adaptable Housing – again a very sensible and important requirement for an aging population.

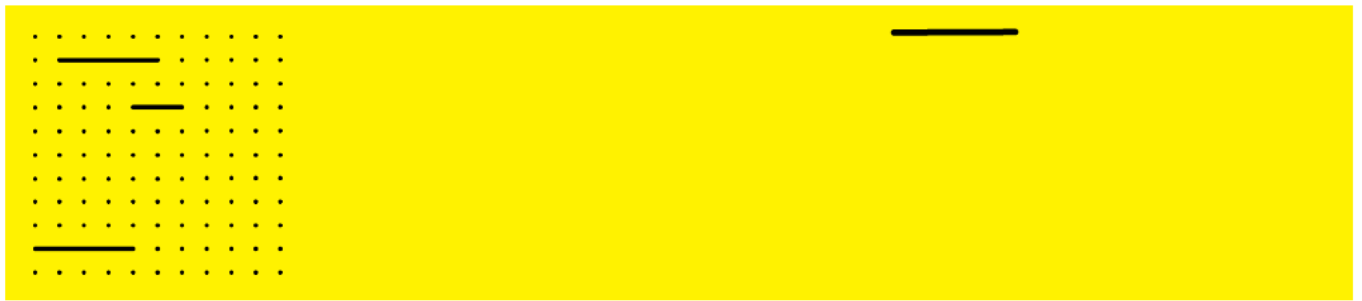
Noting that this policy is structured and generally accepted as the most appropriate for delivery of Retirement Village and Residential Care Accommodation uses this would be consistent with the implementation of this policy across Canberra. The delivery of recent development such as the Goodwin Farrer, Goodwin Crace, and recent approval of the 6 storey ILU development for the RSL Lifecare development at Section 85 in Kaleen, demonstrate that this zoning can deliver appropriate outcomes in terms of scale and amenity with good integration and amenity to surrounding use. Noting that these are best tested in the Development Application process we perceive little risk to the community from a change like this while it will substantially increase the ability of the land and planning policies to deliver the vision of the District Strategy and need of the community.

In short we request your consideration:

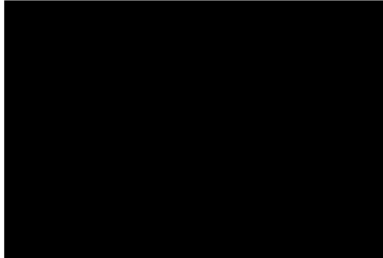
- to update the District Strategy to identify Blocks 2, 7 and 8 Section 74 Holt specifically as a redevelopment opportunity for the delivery of Residential care Accommodation and Retirement Village uses to meet the demand and need for this use identified, revitalise the Group Centre and meet the other objectives as set out above, and
- Change the Land use Policy of Blocks 2, 7 and 8 Section 74 Holt to be E4- Community Facility Zoning.

We are available at any time to meet with you or the authority to discuss any matter relating to this submission as may be required. Should you have any further queries, please do not hesitate to contact [REDACTED]

[REDACTED]



Kind Regards



Attachments:

1. Retirement living and residential aged care assessment
2. AMC Architecture Development Concept for the subject lands
3. Harris Hobbs Landscapes Plans