

The Officer Tasked

ACT Planning System Review and Reform Project
Environment, Planning and Sustainable Development Directorate
480 Northbourne Avenue
DICKSON ACT 2602

Via online lodgement portal - EPSDDComms@act.gov.au

Dear Sir Madam,

RE: ACT PLANNING SYSTEM REVIEW AND REFORM PROJECT AMC ARCHITECTURE REVIEW

1. INTRODUCTION

AMC thanks the ACT Government for this opportunity to review and comment on the ACT Planning System Review And Reform Project.

We confirm that we have reviewed:

- 6 of the 9 draft District Strategies in reasonable detail and broadly reviewed the remaining District Strategies
- The new Draft Territory Plan including the District Policies, Zone Policies, District Strategies and Technical Specifications
- The explanation of the future Urban and Housing Design Guides

We understand that the aim of the ACT Planning System Review And Reform Project (The Project) is to *deliver a clear, easy-to-use planning system that encourages improved spatial and built outcomes across the Territory and continues to build on Canberra's strong reputation as a great place to live and work.*

We understand that this is an ambitious undertaking and that despite a desire to simplify the Territory Plan to a few pages, that this is a substantial document that will need to be refined.

We understand that the Project is *informed by existing and long-standing Government policy, with the integration of new concepts* and acknowledge that *in their entirety they do not represent a final Government position.*

We accept the ACT Government statement that *our commitment to you is that these strategies are developed in good faith, with the best available data, and are underpinned by modern planning methodology and practice. By their nature, the draft strategies include ideas, aspirations and potential opportunities for the districts of Canberra* and as a symbol of this look implore the ACT Government to allow time for meaningful dialogue in this next phase, to listen to the feedback provided and to show leadership about a new Territory Plan that will inform the next logical evolution of Canberra as the National Capital and a city that is "growing up" cognisant of fundamental issues of our times including housing affordability, social and environmental sustainability, viable public transportation systems, a stronger sense of community and an end to self-serving NIMBYISM in what is one of the luckiest places on earth.

Finally, we understand that the ACT Government has continued to refine the substantial volume of Project documentation released in early November 2022 and would ask that, notwithstanding any Legislative Assembly driven time frames, the Canberra community are given ample time to digest and respond to any updates as well as to consider the findings from consultation over the past 4 months.

2. AMC's APPROACH TO REVIEW

While the project was released in early November 2022, end of year pressures associated with AMC Architecture's projects and the Christmas shut down period have reduced the time frame to undertake a detailed review of such a significant proposed change to the Territory Plan. Nevertheless 4 members of the AMC Architecture (AMC) team have spent considerable time reviewing what is a substantial document and associated references. The approach to this review has been a collaborative between AMC Architecture (AMC) and DNA Architecture who have also provided their own response. Both organisations have had team members attend and contribute to various ACT Government driven Industry forums and workshops.

The response format tends to be dot points and have been collated from several different team members assigned various components of the new Territory Plan. Being commercial architects, AMC has not, at this point, focused on Subdivision or Lease Variation Policy or Rural / Non-Urban zones, although it intends to do so in due course.

3. BROAD RESPONSE TO THE PROJECT

We support the principles of the Project and the principle of a performance-based / outcomes focused planning system.

- We applaud key aspirations such as:
 - Sustainable neighbourhoods
 - Ageing in place
 - Urban consolidation
 - Affordable housing / housing choice / housing innovation
 - Encouraging development along transport corridors or in and around Local, Group and Town Centres
- A more determined approach to urban infill and a more "compact city" including further development rights associated with RZ1, RZ2 and CFZ Zoning
- We see the inherent potential in the District Strategies *as a collection of ideas, aspirations and potential opportunities for the various districts of Canberra as the population and city changes in the future*. They are in effect long-term "masterplan's" specific to that location and community. There is much to absorb in each District Strategy - too much for the available time for review. As such we implore the ACT Government to support these as long-term focus that will necessitate a sustained effort, strong leadership, ongoing refinement and indeed preparedness to change into the future
- We see the opportunity to improve the many frustrating provisions / oddities with the current Territory Plan through this process and while there are already improvements, we see room for further refinement to achieve an intuitive and efficient Territory Plan and associated supporting documentation without duplication. Once again we will need more time to review the documentation issued thoroughly to ensure that this opportunity is not wasted and simple changes are implemented that will support a less complicated planning system
- We see the logic in the District Strategies, Design Guides and Technical Standards sitting outside of the new Territory Plan to allow for an easier amendment process into the future and to separate these from the ACAT Tribunal review process. We are a little sceptical as to whether they will remain the case when it comes to a performance-based design solutions in conservative communities and any subsequent ACAT Hearings
- The Residential sector is a primary focus of these reforms and the key to a range of interconnecting principles of environmental and social sustainability, housing affordability, ageing in community, intergenerational housing, social housing, new housing typologies and appropriate urban infill. Given the importance of this issue we see the, yet to be released, Residential Guidelines as important. We also see the Community Facility Zoning and further refinement of the permissibility of sub-division and a broader definition of Community Housing that doesn't simply mirror the provisions of SUPPORTIVE Housing as key to this aspiration. We would also argue that there is opportunity for some underutilised Urban Open Space (PRZ1 and PRZ2) and interstitial land parcels which, are often an ongoing

maintenance obligation, to be considered for specific types of residential development such as Supportive Housing, Affordable Housing and Retirement Living.

- We support proposed changes to uses – Definitions and Zones including:
 - Community Housing as a new form of affordable rental in residential and community facility zones in conjunction with supportive housing or a place of worship
 - The addition of new uses to all zones
- We support the proposed changes to the planning provisions including:
 - Making site coverage provisions mandatory, but changing plot ratio to discretionary
 - Removing the dwelling replacement requirement, as this will be adequately covered by dwelling size requirements in the design guides. Proposed New Territory Plan – Supporting Report – Nov 2022 8
- We support the principle of Design Guides as fundamental instruments to support a new outcome-based approach to development assessment and as a basis for achieving high quality development outcomes while providing flexibility and allowing creativity and innovation in design solutions – but we need to see the Urban Design Guideline and the Housing Design Guide to fully comment and understand the interplay of these with the District and Zone Policies. From our experience in NSW we would respectfully suggest that there are many issues with SEPP65 Apartment Design Guidelines such that urge caution about how much this influences the new Urban Design and Residential Guidelines.

4. BROAD CONCERNS ABOUT THE PROJECT

AMC recognises the effort involved in pulling together a new Territory Plan and with limited resources and acknowledges the efforts of EPSDD personnel on top of other commitments including ongoing development assessment. Nevertheless, it is a little frustrating that not all documents have been finalised let alone made available which in turn raises questions about the veracity of the November 2022 issue and indeed how much work has continued on The Project which is not yet publicly available. We respectfully confirm the following broad concerns:

- The ultimate impact of ACAT and its ability/capacity to review planning decisions in a performance-based planning system
- We are concerned at the number / depth of EPSDD and other referral entities and other authorities staff to undertake development assessment in the proposed new paradigm
- The Residential and Urban Design Guidelines are not yet available to better / more fully understand the proposed Territory Plan reforms and the interplay between these and the District and Zone Policies
- There does not seem to be an allusion to transitional provisions / arrangements as to how the new Territory Plan will be applied
- The referral entities, TCCS, Environment ACT, Icon Water and Evoenergy need to align with a new performance-based development assessment system. Currently there is absolutely no room for flexibility or innovation or putting the wholistic outcome ahead of their often, by necessity, narrow prescriptive technical requirements. Moreover, ongoing dialogue with entities such as TCCS on, for example the Draft Waste Management Code, would suggest that these entities are not necessarily been taking on this journey to ensure an integrated development assessment system
- There is the opportunity to set the scene more strongly with the new Territory Plan – refer to PART C PLANNING PRINCIPLES AND STRATEGIES as below
- Significant information has, at face value, simply been transferred from the current Territory Plan, including the Precinct and Development Codes, into the new Territory Plan including Policy documents and Technical Specifications. Yet we note that quite often specific associated references are omitted for no apparent reason. In the absence of the new Urban Design Guidelines and Residential Design Guides, this is confusing and will require greater effort to fully understand and perhaps streamline in the context of these future Urban Design and Residential Design Guidelines
- The information informing the proposed Territory Plan reforms appear to be reliant on 2016 Census Data despite assertions it is based on up to date data. Does information need to be recalibrated to the 2021 Census



- Technical Specifications are nominated as possible solutions within the new planning framework. However, this seems to be a counter-intuitive name and suggests a definitive rule. Could the name change to, for example, *acceptable solutions* or something similar ?
- Having taken the time to read all documents, the new TP broadly seems to be a rehash of all of the old Territory Plan rules with very little change at a micro-level. Is this because they are seen to be effective as they stand or a resourcing issue?
- We acknowledge the potential freedom to explore innovation but can't see a way that we could have confidence in the system to take the professional or financial risks that it might deliver to us or our clients. Indeed, at this early stage, and the absence of more detail on process and the development assessment framework, we are concerned that the proposed changes mostly seem to make development harder and more expensive – There is a sense that they may add significant risk and time delays to pursue innovation which will discourage proponents who can't afford the associated costs to get projects approved. Innovation may need some incentives to build momentum with the new system
- The parameters outlined to promote the missing middle don't support viable or innovative proposals to achieve the infill development that is being sought. We expected more detail on this to respond to as perhaps the key issue given its impact across a broad component of the community from those aging in community to those trying to buy or rent a house in their community
- We are concerned that the new Coordinator General for Housing [REDACTED] has not been able to play a meaningful part in the review of the draft Territory Plan and particularly the opportunities around the new Community Housing provisions in CFZ zoning
- There is no clarity / information about what an acceptable DA submission should be either for compliant development or something more adventurous
- A holistic electricity network review and masterplan about how proposed changes to electricity requirements within developments has been addressed. The current system of a substation for each block (usually on grade) is a wasteful use of land given the shortage of it in the areas being developed when a cohesive solution is not being adapted to deal with the city's power requirement in the next 50-80 years.
- We would like the opportunity to further review, comment and refine the District and Zone Policies and the quantitative standards within these given these will be enshrined in the Territory Plan and given we do not as yet have visibility of the Urban Design and Residential Design Guidelines
- For all of the good words, the new Territory Plan somehow lacks a long-term vision and the boldness we were hoping to support innovation in the Nation's capital and a clear pathway for a more compact city and greater densification. It appears to be more of a rehash of the existing with perhaps more complication and risk. The unseen Residential Design and Urban Design Guidelines may yet surprise us.

5. BROAD QUESTIONS ABOUT THE PROJECT

- What will a DA submission look like? We are assuming it could be a lot more work to support an application that challenges the rules but there is no clarity / explanation to this end ?
- Will the use of the Design Guidelines to support / justify an innovative DA prompt EPSDD to start having a conversation with the applicant to work through the specifics of a project. The current DA process seems to shut the door in this regard and we are still looking for clarity on what the process will be with the new Territory Plan which will rely even more on early discussions with ESPDD.
- How will the new Territory Plan and associated process support an innovative / non-confirming application from being caught up in consultation with the community, DRP or other groups wanting to challenge the idea / frustrate the process? There doesn't seem to be any formal mechanism for supporting an innovative response in an efficient manner ?
- How will this process be resourced with experienced assessment offices ?
- What will be required with a DA submission under the new Territory Plan ?
- What will a Notice of Decision look like ?
- What will the process now be to lodge a DA – process, consultation, entities ?
- What level of skills and what level of interaction is assumed in a performance based approvals process

- Day 1 how does this document start to facilitate the *Missing Middle* without unacceptable planning risk or uncertainty noting the aging demographics, the opportunity for older Canberran's to downsize / right size and liberate older housing stock for renewal / densification to achieve more sustainable communities and ultimately the city
- Will a DA proposal that complies with the District and Zone Policies be exempt from 3rd party appeals and ultimately able to be assessed and approved through a private certification process along the lines of current exempt development assessments

6. BROAD REVIEW DISTRICT STRATEGIES SPECIFICATION AND POLICIES

6.1 GENERAL

- While we understand that the first 80 odd pages sets the scene in each District Strategy, it would be good in future issues to have this information just the once and allow the focus to be on each specific location
- It seems a shame not to touch on the history and key attributes physically, economically and socially currently of each District – get to the nub of the current and future character of each
- Should more be made of Canberra icons that have national significance – the Parliamentary Triangle amongst many others ?
- The canvas is so big that we need more time to truly analyse each district strategy and identify opportunities for rezoning, oddities or limitations – eg RZ2 – CFZ to facilitate retirement living
- How was each District Strategy arrived at accepting they are a long-term and indeed iterative project and noting that previous precinct codes / masterplans would have informed each in part ?
- *Party in too many rooms* - How does the ACT Government balance the opportunity implied in the new Territory Plan but also control such that each builds on its strengths and such that each retains its character or point of difference ?
- How do the district strategies identify / celebrate the individual character of each area – Reid with its unique heritage, East Lake and the shores of Lake Burley Griffin, the City as a vibrant attractive heart while Aranda in its bush setting. More broadly what differentiates Belconnen from Woden, Civic from Braddon or Kingston ?
- There still seems to be little to support Civic as the pre-eminent Town Centre and the heart of the National Capital
- How are key attributes of Canberra and its development to date, for example retention of landscape buffers between different Districts, preserved ?
- What stops new fronts opening up that cannibalise existing enterprises be that in terms of new development or new permissible uses ?
- Disbursement of employment and does this work against Civic and Town Centres being pre-eminent supporting a logical city hierarchy and, for example, efficient public transport networks ?
- Not a sophisticated approach to the missing middle opportunity– eg incentivising block consolidation, unravelling the residential subdivision pattern, better use of public realm (verges)?
- Some things that are significant don't appear in the relevant maps – for example Yowani Grounds in Lyneham
- Why does existing character (physical, nature, economic) and history does not form part of the Big Drivers of District Planning ?
- Reviewing each of the commentaries below it is clear that there are common themes across all districts and lessons learned from each's growth and character that may be applied to / be a reference point for others with a more detailed and holistic review

6.2 BELCONNEN

KEY OBSERVATIONS

- No links made to history of place – indigenous, natural or colonial
- Some poor cousins that are not afforded density and intersecting experiences – eg Charnwood
- Time frames are so broad development is not really encouraged buy in or iterative development – it's still “plonkism”



- Diagrams in strategy don't reflect the Key Directions identified in words.
- Key economic infrastructure such as UC, Calvary and UC Public, AIS, CIT get very little mention in terms of their place / potential contribution / future growth
- Why was the Strathnairn Suburb the only suburb identified in the Belconnen district specification ?
- Some Group and Local Centres may require targeted planning and non-planning interventions or new approaches to improve and maintain their viability over the long term
- Opportunity to utilise the Ginninderra Drive Corridor areas absent in a strategic application with a primary focus on the Southern Cross Drive / Belconnen Way corridor. This appears to leave the "Northern Suburbs" out of the densification picture and does not look to genuinely responded to such identified limitations such as access to inclusivity
- Using this excerpt from the Belconnen District Strategy, there are some areas of potential redevelopment which appear to be examples of "plonkism" where a high density development is suddenly a possibility in Aranda without a broader argument or logic over and above the light rail. There is a similar situation in Turner as below. I guess its trying to understand the depth of the thinking behind the plans and therefore industry / community needing more time to scrutinize each district strategy
- There is logic in the overall plan, densification, increasing facilities, amenity transport connections in existing centres, particularly Kippax and a less degree Macquarie / Jamison. However some of the finer grain strategy outcomes are less easy to "buy in to" as such or see consistency in application of examples are:

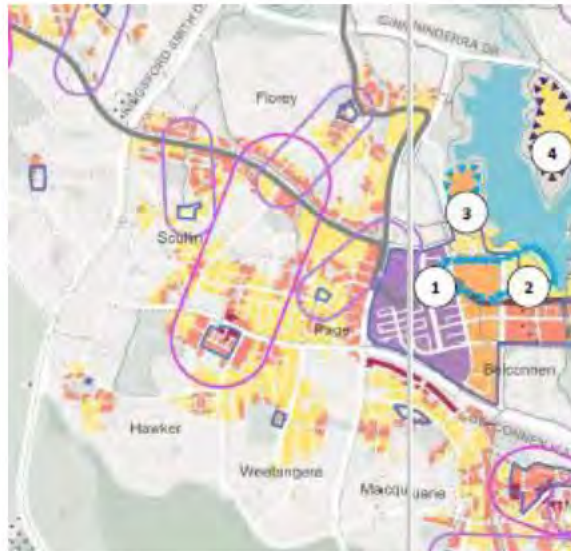
Belconnen, Bruce and Aranda

District Strategy shown growth areas for the Group Centre of Belconnen, The area of Aranda located within walking distance of the Old Shops, Primary School, Jamison and Calvary Hospital and the Innovation Precincts of UC, AIS and CIT as well as the Bruce Commercial hub



But the Neighbourhood plans for these areas show inconsistent application of future density such as:

- Urban Core in a remote part of Aranda, presumably due to the opportunity of light rail
- A salt and pepper mix of General Urban, Urban Centre and Urban Core in the Bruce centre
- And the Centre of Belconnen only identified in this context as Urban Centre



It is hard to reconcile the 400m Rapid Stop to Group Centre Connection such as this R2 to Hawker points 1.3km apart.



6.3 INNER NORTH AND CITY STRATEGY

KEY OBSERVATIONS

- The Inner North and City have the most diverse range of typologies / characters of all the District Strategies and as such needs the most work undertaken to bring together one cohesive Strategy / Policy and Specification. Watson has a vastly different character and purpose to the city whereas Woden is the group centre for Phillip, the City is the Centre for the whole of the ACT and as such tends to dominate the District Strategy and while Dickson is clearly identified as the group Centre, the Strategy is challenged in separating these two loci.
- With the above in mind, we wonder if **excising** the City from this District in to its own Standalone District may allow a level of flexibility / agility in a smaller, but more complex Policy seeing Civic take its special position for the Territory while leaving Dickson to be the focus of policy as a genuine Inner North Group Centre.
- Have the policies and principles of the **City Plan, City Precinct Renewal Program**, and the **City and Gateway Urban Design Framework** been incorporated in to the Strategy, Policy and Specification; this clause from the Strategy seems to imply no:

*As well as the district strategy, the **City Plan** and **City Precinct Renewal Program** provide important and more detailed principles and actions to guide development in the district. The ongoing implementation of the **City and Gateway Urban Design Framework** includes updates to building heights and other policies in the Territory Plan to be in line with the National Capital Plan. Updates will be made to the Inner North and City district policies to reflect block amalgamations and future initiatives from the **City Plan** and **City Precinct Renewal Program** respectively.*

- Limited genuine opportunity has been taken to streamline and refine the previous layering of the various **Suburb Precinct Codes**, the **Inner North Precinct Code** and the **Northbourne Avenue Corridor Precinct Code**. A significant portion of these have been uploaded into the current Policies and Specifications unmodified. This is exemplified by this layered map unique to the District.

6.4 INNER SOUTH DISTRICT STRATEGY, POLICY AND SPECIFICATION

KEY OBSERVATIONS

- The District Strategy starts off with East Lake as a future vision but seems not to acknowledge the significance historically and politically of this District nor its important relationship with Lake Burley Griffin and Red Hill all of which form integral parts of Griffins Plan for Canberra
- Future investigation areas are not considered along the majority of the length of the future light rail including West Deakin
- Future investigation areas are not considered along Canberra Avenue
- There is little mention of the significance of Parliament House, the national attractions such as the NGA or the Embassy Precinct in terms of economic drivers, access and opportunity across the city
- There is little mention of the potential associated with Lake Burley Griffin and water based / nature activities or the fine grain from the Kingston Markets, Kingston miniature Railway to Kingston Foreshore
- There is no mention of the significance of Red Hill, Weston Park, the Yarralumla Yacht Club or Royal Canberra Golf Course in terms of economic access and opportunity across the city and the green space network
- There is no allusion to water based public transport on Lake Burley Griffin as part of the Strategic Movement to Support City Growth
- Lake Burley Griffin has not been identified as being a potential contributor to a sustainable neighbourhood be that through water recycling, water purification, support to natural flora and fauna or other green initiatives
- Schools are not identified for the part that they play in communities and associated transport linkages
- The Fyshwick TAFE is not identified Economic Access And Opportunity Across The City or Inclusive Communities And Centres
- There is no focus on Deakin's as a Health Hub given this is a key attribute

- In some areas, like the Yarralumla Local and Deakin Group Centre, it appears priority has been given to proximity to an arterial road over proximity to / around these centres for possible planning policy change. This doesn't seem logical.
- Some group and local centres may require targeted planning and non-planning interventions or new approaches to improve and maintain their viability over the long term

6.5 TUGGERANONG DISTRICT STRATEGY, POLICY AND SPECIFICATON

KEY OBSERVATIONS

- Increasingly, our take on infill opportunities is that there are a wide range of opportunities and we should be doing a bit of all of them. We should allow some dual occupancy development within RZ1 but only on blocks that meet certain criteria – we could get 20,000 dwellings out of this without destroying the suburban amenity that people love. We should also be upping our expectations at local and group centres. Town Centres and the City are already underway
- The Tuggeranong District overall has a relatively small share of employment (8.7% of the ACT as of 2016) compared to its share of the population (20% of the ACT in 2021). Many people travelling outside the district for their jobs –bring jobs to Tuggeranong and the Light Rail. Bringing jobs at scale is typically a commonwealth government decision, the ACT Government should recognise this. Bringing light rail is years away
- Should Tuggeranong be playing more of a role as Canberra moves towards 500,000 ?
- At more than 20%, Tuggeranong has the 4th highest tree canopy cover compared to other districts. 4th of 9 districts puts it half way, neither good nor bad, but given the target of 30% coverage, it needs a 50% improvement to achieve this! Is this realistic?
- Parts of Tuggeranong Town Centre are an urban heat 'hotspot'. This is not surprising, the commercial and industrial areas are the most urbanised and would be expected to be hotspots compared to suburban areas - what is proposed/does it need to be addressed further in policy or just a reality! What part will Lake Tuggeranong play into the future?
- Tharwa village, at the south-western edge of the district, is a significant location for heritage, including cultural heritage for the Ngunnawal people. Really, we didn't know that and some of us get through Tharwa more than most, there is nothing in Tharwa identifying this other than one sign in the Tharwa recreation area with a photo of local aboriginal people. ACT Heritage Council Background Info on Tharwa Village Precinct - The area around Tharwa was utilised as a crossing point for Aboriginal groups as a part of the network of Aboriginal pathways across the country, with this area being a part of the pathway accessing the resources (particularly Bogong Moths) in mountain ranges to the west. Aboriginal people have continued to use the area through to modern times as an area of cultural education.
- The Hume industrial precinct may be a focus for future growth associated with development occurring across the border in NSW at South Jerrabomberra. More thought required, is there an opportunity at the southern end of Hume where there is both Industrial and Commercial (leisure and accommodation) Zoning.
- In contrast to some other districts, the road network in Tuggeranong is relatively unconstrained, with fewer existing road and traffic issues and surplus capacity in the system. It certainly provides the opportunity for some infill
- The fact that the age cohort is older warrants planning consideration for the next wave of children. Does it also mean Tuggeranong needs more aged care/Community zoned land?
- We find the Blue Green network to be confusing
- There is a strong assumption that light rail will come to Greenway, is this correct given we are not at Woden yet
- It shows that people who live in the deep south don't have great access to Community Facilities which is a common thread to some other districts. The new Ice skating rink is a rare example of good news for Tuggeranong - is this particular district worse off here and needs further investigation
- There is great untapped potential in Tuggeranong given the unconstrained road network and potential for increase jobs/reduced travel to work
- Broadly all the District Policies are so similar, why just not just make one and call it our new planning strategy?
- One of the key directions includes focusing new residential development in a future light rail corridor. Should this go to the next level of detail and identify more density around rapid transit nodes?

- The “Future Investigation Areas”. We count 10.. How are all these going to be resourced and completed by EPSDD with other pressures /a new Territory Plan
- Views to The Brindabellas and access to Natural Bushland on Ridges is not celebrated/acknowledged/identified commensurate with residents value of these attributes. Some choose to live in Tuggeranong because of the views and connection to Bush
- Future Investigation Areas is next to the Tharwa Pull out on the map, worth relocating/tidying up?

6.7 WODEN DISTRICT STRATEGY, POLICY AND SPECIFICATON

KEY OBSERVATIONS

- Like Tuggeranong there are a dozen areas for Further Investigation. We are concerned about the volume of future studies across all district strategies/time frame to get these done
- Woden has one of the lower %’s of rental households, something to fix, more rental opportunity/build to rent development needed?
- There is a lot for Future investigation and little district specific strategy that confidently demonstrates an understanding of what differentiates the district.
- The Planning Strategy has 5 Key Themes and then 5 Drivers for the Strategy. The 5 Drivers are similar to the 5 Key Themes. 5 Themes from the Planning Strategy would be simpler
- Pg 5 – “They will enhance and protect the defining characteristics of each district—the things we value most, such as natural space, liveability, diversity of lifestyle choice and more” District strategies identify matters of difference between the districts. Matters that are universal across Canberra should be addressed in the Planning Strategy. There is a lot common to the current District Strategies. “Deliver new community facilities aligned with urban improvement to address existing gaps in provision and support future residential growth” Again, common to all District Strategies?
- Could the “technical work” on page 2 referred to be provided for reference? Same for potential urban infill housing no’s (Pg11). Same for the employment forecasts that can be used to understand and plan for the type and amount of floorspace that may be needed in locations in future. Same for preliminary analysis for housing capacity (pg 76)
- “District Strategies have been prepared for nine districts in the ACT, based on five big drivers, 10 targets, and 12 implementation pathways”. Too complex, do they align with Territory Plan policies?
- Pg 8 - “More Active Transport” is a very open target/difficult to measure level of success. Could this be a more specific target?
- Delivering the district strategies – 12 implementation pathways:
 - i. 7 – Group and Local Centre Initiatives: Generic text. Ideally should be identifying specific/individual targets for the different centres?
 - ii. Should identify the relevant centres in Woden and what differentiates them/what they need.
 - iii. Woden Town Centre – Woden Masterplan initiatives, Callum Street, series of tall towers as precedent to higher density precinct
 - iv. Curtin Group Centre – Limited Land/expansion opportunities and low density. Time to increase height/density?
 - v. Mawson Group Centre – Better Pedestrian connection across Athlon and Higher Density residential adjacent. Future light rail hub?
 - vi. Canberra Hospital Precinct – Has been badly in need of a Masterplan and to identify expansion opportunities and appears as uncontrolled development with separate
 - vii. 6 – Establish New Innovation Pathways – Shouldn’t we have a structure that allows Innovation within it/allow others to innovate
- Strategic Public Transport - Car Share schemes, Uber, Taxis all contribute to the reduced dependence on car ownership/not referenced?
- Unfinished sentence on page 56 –“enhance public transport connectivity which respond to:”
- Could we quantify what “Sufficient floorspace for non-residential uses should” is?
- “Without meaningful additions to new social and affordable housing across the ACT economic productivity will be affected as labour market depth is eroded”
- Pg 64 - How can a new planning strategy based on Better outcomes not up the ante on improve street walkability, Address urban heat, Water sensitive urban design (WSUD). Will these policies be the same?

- “Recycled water systems to support extensive greening and zero sewer in large-scale developments that can connect to the broader neighbourhood for sewer mining (recycling of wastewater) and support enhanced greening” Fantastic, ACT Health on board?
- A district strategy should be predicting the future advising on the location and types of community facilities needed. Not there yet – many subject to further studies
- Table 10 Woden Initiatives – Excellent initiatives
- Note at the bottom of Fig 10 on Map Pg 33 – “Note: More detailed planning will determine where future development will be allocated. This is likely to depart from the future dwelling distributions shown here. Housing modelling has not been undertaken for East Canberra.” This makes Fig 10 redundant?
- Westfield Woden is a missing Destination on Figure 25.
- Is Mawson Group Centre better or additionally known as ‘Southlands’ in brackets
- ACT Infrastructure Plan being Updated so opportunity to plan for beyond 500,000 people

EAST CANBERRA DISTRICT STRATEGY

KEY OBSERVATIONS

- Limited potential for residential development and an employment focus will mean that transport linkages, particularly public transport, in to and out of the district will be diurnally lop sided.
- Light Rail to Airport becomes critical to not only providing a sophisticated transport network for arriving passengers, but also an opportunity to integrate the employment hub into those of the City and Barton
- Increased employment will place broader stress on the East West connections, particularly Parks Way west of Kings Ave
- Whilst the *Economic Activity* and *Future jobs* sections of the District Strategies talk to the future growth potential of employment associated with the Airport, there is a lack of depth of vision in the opportunity to embrace the Business Park which clearly meets a need and which is consistent with the provision of similar amenity in other cities globally.
- Hume remains isolated and subsequently reliant on private transport.
- It makes no sense to include the typical **City making and ‘urban improvement** subsection in this District as it has little opportunity for meaningful application.

7. DESIGN GUIDES

We are disappointed that the Urban Design and Residential Design Guides have not been completed / made available for this review noting their intention is to *act as supporting material to better define and illustrate the statutory provisions detailed in the Territory Plan and be written and developed* in a style and format that assists the interpretation of statutory policy, and provides clear guidance to proponents and statutory officers (including development assessment staff, Courts and Tribunals) within an outcomes based planning system paradigm

While the 6 themes all seem to make sense ,they imply a significant level of detail which may be interesting to reconcile (given they are not yet developed) against for example Part E1 Residential Zones Policy and the associated Technical Specification – Residential

Given the importance of the Design Guide we would implore EPSDD to allow time for consultation, review and feedback as part of the implementation of the new Territory Plan

8. DISTRICT POLICIES AND TECHNICAL SPECIFICATIONS

- Still too many specific requirements that are simply uplifted from previous codes – little seems to have been further refined through this process
- Too many specific numerical standards in the Policies
- Both the Policies and Technical Specifications have many numerical standards – why. Is there more scope to vary these in the Technical Specifications

PART A: ADMINISTRATION AND GOVERNANCE

No comment at this stage

PART B THE TERRITORY PLAN

No comment at this stage

PART C PLANNING PRINCIPLES AND STRATEGIES

C.1 Object of the Plan

- Should there be a clear statement about the ACT Planning Strategy as the higher order document that informs the new Territory Plan
- Should the fact that Canberra is the National Capital of Australia be mentioned
- Should Social and Environmental Sustainability be mentioned
- Should Regional Hub be mentioned
- Should Economic Growth be mentioned
- Should Cohesive Community be mentioned
- Should the intrinsic Landscape Qualities and Indigenous Heritage be mentioned

C.2 Statement of Principles of Good Planning

- Is there merit in a section called Building a National Capital which might talk to:
 - Acknowledging Canberra is the seat of Government
 - Acknowledging the Federal Government bureaucracy that supports the Government of the Day
 - Celebrates the National Institutions associated with a National Capital including but not limited to the High Court, AWM, NMA, NGA, AIASTIS, Questacon, AIS etc etc
- Is there merit in once again spelling out a little more the ACT Planning Strategy Vision so that its interwoven with the new Territory Plan
- Is there merit in a section ONE CANBERRA (something like this) or within Long-Term Focus which talks to the common aspirations of the city and in doing so to allude to a balance between appropriate development and avoiding NIMBYISM
- Is there merit in a section called REGIONAL HUB to build on Canberra's role in the broader context of its NSW neighbours
- Is there merit in a section that touches on all of the Districts that make up Canberra and a brief overview of each and their place in the City

C4 Relationship with the National Capital Plan

- Is there merit in a more positive statement about the relationship of the National Capital Plan with the new Territory Plan

PARTS D1 – D8

No comment at this stage

PART E1: RESIDENTIAL ZONES POLICY

- We are surprised that Co-Housing is not permissible in RZ1 in the Land Use / Development Type
- We suggest that block amalgamation should be encouraged in RZ2 – Suburban Zone
- 1. 2. 3. 4. Noting that the Project is looking to encourage the Missing Middle we are concerned that Site Coverage of 40% for Large Blocks and 45% for Multi-Unit Housing in RZ1 and RZ2 is too low to achieve at-grade accessible dwellings for aging in place
- It would be helpful to understand how the site coverage limits have been arrived at
- 9. Multi-Unit Housing Blocks in RZ2 – Minimum block sizes should be 500m² benchmarked against other jurisdictions and new subdivision development to achieve the destined outcome of densification. This then will allow a greater number of dwellings per block with 1 additional dwelling / 250m²
- 10. To achieve greater density street frontages should be allowed to be 6m in the context of rear lane access / carparking which is possible when blocks are amalgamated
- 18. RZ2 should now have a 3 storey height limit once again to achieve densification



- 19. Maximum Building Height for RZ3, RZ4 and RZ5 should all increase commensurate with an increase in height for RZ2 to facilitate urban densification in appropriate locations

TECHNICAL SPECIFICATIONS TS1 RESIDENTIAL

- 1.1.15 Dictating the mix of dwelling types for developments of 40 or more should be left to the market requirements for each specific development and its context and desired planning outcomes.
- 1.2 Generally confusing envelope requirements that need to be simplified
- 1.4 Amenity
 - 52 A person standing 1m above DGL with an eye level of 1.5m has general visibility over a boundary fence to well over half of a neighbouring block. This increases with sloping blocks. Windows are generally higher than ground level so would be in full sight. Any room except a bathroom with a single window would be designated a primary window so this would drive all housing back from the boundary. If the neighbouring house is set 1.5m off the boundary, the proposed house would need to be 10.5m off the boundary in question. For an average 15m wide block this would leave a strip of developable land that could have a window or terrace of 3m. Who determines the primary window? This requires internal knowledge of the neighbouring properties which is unlikely to be available to the applicant. It also requires increased documentation to include all surrounding houses external detail. On greenfield blocks neighbours details might not be known. This control is not practically achievable and should be deleted
 - 53 A person standing 1m above DGL with an eye level of 1.5m has general visibility over a boundary fence to well over half of a neighbouring block. This increases with sloping blocks. What is designated private open space required calculations and detailed knowledge of a neighbouring property. This is unlikely to be available to the applicant. It also requires increased documentation to include all surrounding houses external detail. On greenfield blocks neighbours details might not be known. This control is not practically achievable and should be deleted
- 1.5 Transport Parking and Movement
 - 86 This is confusing with reference to co-located parking location and distances.
 - 90 End of trip facilities. This is applied as a blanket over all development without consideration of likely need for servicing. It is most likely well over what is required to meet demand.

PART D4: INNER SOUTH DISTRICT POLICY

- Land Use Table for Deakin mentions CZ2 but doesn't seem to show up on Figure 10. Many of the prohibited uses would seem to be appropriate for Deakin. It then also mentions prohibiting all uses except health also in CZ2. This table needs reworking
- Land Use Table for Fyshwick. The prohibited table seems to be uses that belong in Fyshwick. The IZ2 notes seem to be repeated three times. This table needs reworking
- Land Use Table for Kingston. The CZ5 additional development seems to be repeated and Figure 14 doesn't show CZ5

PART D9: EAST CANBERRA DISTRICT POLICY

- The district boundary should be realigned to include Hume South so that all of Hume has the same policy.
- Land Use Table Beard. This allows for Restaurant and Take-Away but the reality is that the approval requirements from EPA preclude this from happening. The result is that an employment centre has no food outlets to service the area.
- Land Use Table Pialligo. The Figure 7 doesn't show NUZ1 with all of the prohibited development.

PART E2: COMMERCIAL ZONES POLICY

- Many empirical absolutes in the Policy – why. For example Zone CZ4 – how was 50% arrived at as a max reduction in commercial / retail purposes in lifted straight from the current Territory Plan
- Incentives / conditions need to be identified for Local and Group Centres to make better use of existing land assets including unleased land or carparks or urban open space to achieve integrated mixed use development on larger parcel of lands. This could include the provision of a % of Affordable or Social Housing

TECHNICAL SPECIFICATION TS2 : COMMERCIAL

- Many of the controls are highly specific once again and lifted straight from the current Territory Plan



- 1.2 Height Bulk and Scale – the use of building envelope limitations is inappropriate for Multi-Unit Housing. Height and Building form should respond to the Urban Design and Residential Design Guidelines only and prescriptive / quantitative absolutes should be deleted

PART E3: INDUSTRIAL ZONES POLICY

- 1.5 Assessment outcomes d) Reference to seeking advice from DRP. What is the trigger for this? Takes too long to get and gets in the way of simple assessment.

TECHNICAL SPECIFICATION TS3: INDUSTRIAL

- 42 EV ready. How is this defined? What infrastructure needs to be in place to be EV ready. We are having trouble getting enough power out of the network to have the capacity to add the additional load for EV chargers. This could possibly see every block having its own or multiple sub-stations.
- Who owns the charging infrastructure and how is the charging to be invoiced?
- How do we deal with designated car parks that belong to individual sub-leases. Is there a priority for visitors or staff parking?
- 52 End of trip facilities. The calculations for use seem to be well over the reality of possible take up for these areas. We have tried for many years to include a shower with each industrial unit as part of the accessible toilet. Not one of them is used as a shower and it is extremely rare to have riders as employees. In our own building in Braddon where we encourage riding, out of 22 employees, we have 3 riders and they share a single shower with the rest of the building, probably another 30 employees, some with riders. Our shower gets used regularly but the rules would require us to have 6 showers where 1 is more than enough and never has a wait even at peak arrival time. We agree with having these facilities but suggest that the usage generator needs to be adjusted much lower, particularly for industrial areas where the usage will be much lower again.

PART E4: COMMUNITY FACILITY ZONE POLICY

- Broader opportunity for development type – eg Community Housing
- Is it critical that all dwellings comply with Class C AS 4299 – Adaptable Housing
- Again, many numerical constraints that undermine the notion of performance based system
- Sites over 10,000m² (or a few other factors) need to have “Sufficient consideration of and response to the Urban Design Guide”.
 - Who determines what is sufficient?
 - Does this exclude other projects on sites less than 10,000m²

TECHNICAL SPECIFICATION TS4 : COMMUNITY

- Is it critical that all dwellings comply with Class C AS 4299 – Adaptable Housing? This may work against affordable housing and housing choice
- 20% carparks EV ready seems difficult at the moment
- Should we need to allow a RACF to be subdivided from ILU's for adaptive reuse noting subdivision is prohibited ?
- Should we be factoring in future subdivision as the aging population decline and adaptive reuse or repurposing is required ?

PART E7 : NON-URBAN ZONES POLICY

TECHNICAL SPECIFICATION TS 7: NON-URBAN

- 1.2 Building Height. Restricted to two storey. This should be just a height control of 10m or 12m. Buildings in these areas can have multiple basement storeys or due to their height can be deemed three storeys even though they are two. If a building can fit multiple storeys within the allowable bulk and scale limits then why should they be restricted?
- 52 End of trip facilities. The calculations for use seem to be well over the reality of possible take up for these areas. We have tried for many years to include a shower with each industrial unit as part of the accessible toilet. Not one of them is used as a shower and it is extremely rare to have riders as employees. In our own building in Braddon where we encourage riding, out of 22 employees, we have 3 riders and they share a single shower with the rest of the building, probably another 30 employees, some with riders. Our shower gets used regularly but the rules would require us to have 6 showers where 1 is more than enough and never has a wait even at peak arrival time. We agree with having

these facilities but suggest that the usage generator needs to be adjusted much lower, particularly for industrial areas where the usage will be much lower again.

TECHNICAL SPECIFICATION TS8: SUBDIVISION

- 1.1.2 Multi Unit Blocks enable all dwellings to front a road or public open space. This might be hard for larger blocks or for multilevel apartments that are not at ground level.
- 1.3.15 30% tree coverage for off street parking could be hard to achieve. Will make parking areas larger to meet requirements wasting usable area.

PART F1: SUBDIVISION POLICY

- 3. Should we not be building in the opportunity to subdivide community housing or retirement living in CFZ to future proof these assets for future sale if required
- 7. Should there be an opportunity for a secondary residence to be subdivided in the future
- 9. Should there be an opportunity for RZ1 to subdivide and do points 10,11, 12 and 12 build on Point 9

PART F2: LEASE VARIATION POLICY

No comment at this stage

PART G1 - DICTIONARY

Lower Floor Level

- Lower Floor level 1m or less above DGL
- It is reasonable to suggest that most blocks in the ACT have some level of slope and there is some level of cut and fill. This will have a significant negative impact on the reasonable ability for a purchaser to develop their block.
- Increasing setbacks for floor levels above 1m will severely limit the usable area of blocks. It will result in increased excavation to keep houses lower than 1m. This will result in a significant increase to the build cost with more extensive retaining walls and increased excavation costs. This will also increase the extent of overshadowing from within the block and impact from neighbouring buildings.
- Increasing setbacks for sloping sites will push buildings in further off the boundary. For the southern side of the block this will result in increased wasted open space on the cold shaded side of the block and reduced usable private open space on the sunny side of the block. This was a point that we stressed when consulting on the Solar Envelope. It is a bad outcome.
- On a 15m wide block it would leave a 3m wide strip of developable land for a single storey house.

Primary Window

- The main window in a habitable room
- Perhaps this should refer to a primary daytime living room.
- Bedrooms typically have single windows so would by default become the Primary Window.
- If a living room has multiple windows the largest or northern would become the primary window even though the secondary window might be the privacy issue.
- Who determines the primary window? This requires internal knowledge of the neighbouring properties which is unlikely to be available to the applicant. It also requires increased documentation to include all surrounding houses external detail.
- On greenfield blocks neighbours details might not be known.

9. RZ1 AND RZ2

Noting the aspirations in the ACT Planning Strategy 2018 for a *Compact and Efficient City* its impossible not to address the key issue / opportunity for further densification in all RZ1 and RZ2 Zones.

Key to this is:

- Accepting that Canberra needs to embrace urban infill that is more sophisticated than a front and rear dwelling typology with its inevitable extensive driveway access



- Building on the Mr Fluffy scheme which demonstrated that urban infill was possible in RZ1 zoning given that sub-division within an RZ1 was possible / successful
- Working with Canberra's suburban subdivision pattern which tends to:
 - Have large, long / deep blocks
 - Rear and Side Easements
 - Deep Verges
 - Corner Blocks with the opportunity for dual access points
- Facilitating block amalgamation to change the subdivision / block pattern and in turn allow medium density housing with street frontages, rear lane access and garaging and affordable surveillance units
- Accepting that there needs to be a new approach to such building typologies in terms of:
 - Minimum block size
 - Minimum frontage width
 - Site coverage
 - Setbacks
 - Number of Storeys
 - Basement parking
 - Parking provisions
- Well-conceived Urban Design and Residential Design Guidelines should then allow / facilitate high quality attractive medium density / missing middle housing to be developed on any site(s) In Canberra with confidence
- Refer to Attachment 3 as one example of this

10. INITIATIVES / OPPORTUNITIES NEEDING FURTHER CONSIDERATION

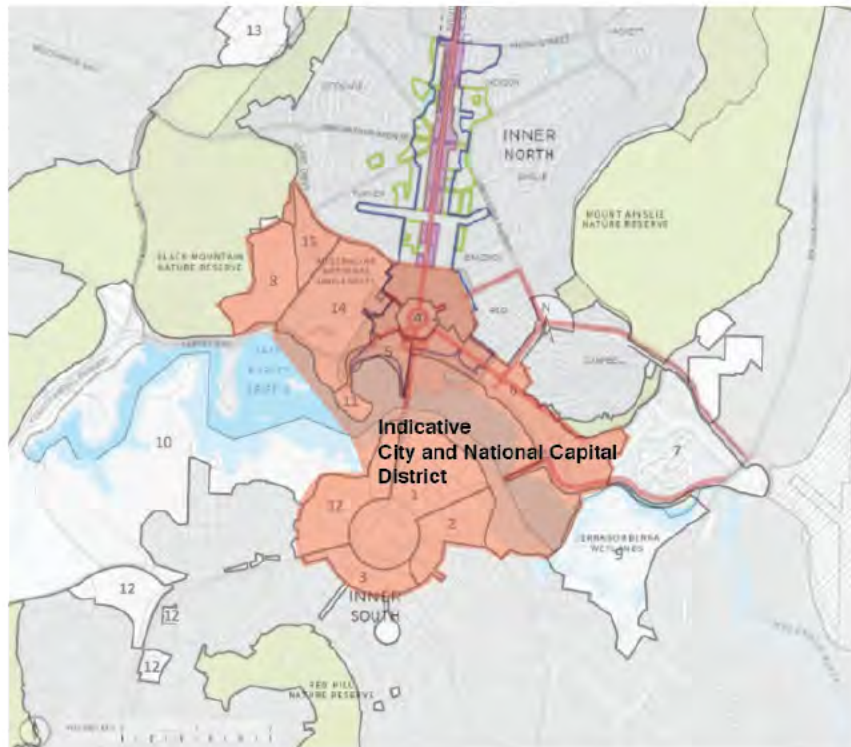
- Achieving Affordable / Community Housing in CFZ. A specific definition that does not draw from Supportive Housing
- Greater clarity on Retirement Living's place within Community Facility Zones
- CZ6 remains quite undefined and its opportunity unrealised
- Incentives to amalgamate both RZ1 and RZ2 blocks to achieve appropriate medium density / missing middle / housing choice
- Planning incentives for adaptive reuse of old office buildings which will need to be electrified in the future at great expense and therefore prime candidates for new housing options in Group Centres and Civic – Refer Attachment 1
- We need visibility of the Urban Design Guidelines and Housing Design Guidelines
- It is important that a more sophisticated appeals system is developed that filters out vexatious claims, obliges objecting parties to demonstrate real impacts, places a heavier cost burden on appealing a decision, provides a more sophisticated Mediation process with more time allocated and experienced mediators that can achieve consensus

11. INNOVATIONS & INCENTIVES

- A full restructure of the names of Zones to help the public dis-associate existing rules in that zone with proposed changes.
- RZ1 - To allow dual occupancies on all blocks over 700sqm
- RZ2 – To allow unit titling or subdivision of blocks 500sqm and larger and an additional storey. This still allows for two compact blocks which can have a high level of impact on the missing middle we are in desperate need of.
- RZ3&RZ4 – There needs to be a much higher level of density allowable in these zones if we're going to address our population growth and densification which has been forecast. There may be some innovative ways to address this through the five key principals outlined by international powerhouse WOHA Architects of Singapore:
- Green Plot ratio – The quantum of landscaped surfaces compared to development site area
- Community Plot ratio – The amount of community space allocated within a development's site area

- Civic Generosity index – The extent to which a development encourages and facilitates the public life of a city
- Ecosystem contribution index – The degree to which a development supplements a city's ecosystem
- Self-sufficiency index – A development's capacity to provide its own energy, food & water
- These indexes could somehow offset the density & height of a development in these zones to create living 7 breathing precincts which contribute positively to their neighbours, street & suburb.
- Removal of overall height restrictions so that other metrics such as solar access, privacy, site coverage etc... could dictate what the overall height may be on a block based on the amenity it provides to its surrounding
- Removal of all building envelope diagrams for Commercial Zones. The outcomes in Braddon should be a clear indication of the harm such envelopes can do to the fabric of the built environment. It highlights the lack of trust put in design professionals to address the **amenity** concerns that the envelopes are trying to resolve. Ideally this can be done without the negative visual impact such planning policy decisions are having on the streetscape for generations to come.
- Promote articulation vertically and not just on the face of a façade. The typical requirements to 'articulate' a façade by 2-3m only seems to add awkward construction details and dated design outcomes. Vertical articulation will help the city achieve more organic skyline which has been considered against amenity and aesthetic
- ACAT review and increasing the threshold for what constitutes an appealable decision and indeed the costs associated with appealing a decision – there needs to be a way to filter vexatious claims through increased costs to appeal a decision or a vetting process
- ACAT need to invest in good / experienced mediators to deal with a likely increased number of appeals in a performance based system and the mediation process needs to be more sophisticated to achieve a resolution
- Incentives for block amalgamation in RZ1 and RZ2 to achieve more sophisticated medium density development that makes sense of the Canberra subdivision pattern allowing for example rear lane access and garaging, active street frontages and additional surveillance units
- Incentives / conditions need to be identified for Local and Group Centres to make better use of existing land assets including unleased land or carparks or urban open space to achieve integrated mixed use development on larger parcel of lands. This could include the provision of a % of Affordable or Social Housing
- The use of building envelope limitations in Local and Group Centres and other Commercial Zones is inappropriate for Multi-Unit Housing. Height and Building form should respond to the Urban Design and Residential Design Guidelines only and prescriptive / quantitative absolutes should be deleted
- The proposed standards and indeed timing around EV charging stations in resident developments needs to be carefully considered against the Electricity supply available in the ACT and NCC and Fire provisions
- Incentives for Adaptive Reuse of existing buildings to residential, retirement living, business start-ups etc noting the sheer number of commercial office buildings in Canberra, the embodied energy in each, the costs to remove gas from mechanical plant and given their good locations in Civic and Town Centres near places of employment, public transport, community and entertainment facilities, recreation areas
- **A NEW City and National Capital District:**
 - As discussed to above in 6.BROAD REVIEW DISTRICT STRATEGIES SPECIFICATION AND POLICIES and our commentary on the Inner North and City District Strategy, there may have / be an opportunity to excise the City from the Inner North and couple it with the National Capital ... Parliamentary Triangle which has a similar somewhat nuanced place / status with in the Inner South.
 - This would allow these significant places to be managed in a focused way including fostering a more collaborative approach to how these two places are managed to the outward benefit of Canberra as a place
 - Specifically with regard to planning reform, it would allow for these additional planning policies to be more integrated in to the vision for the Heart of the City: City Plan, City Precinct Renewal Program, and the City and Gateway Urban Design Framework



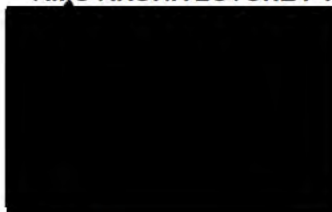


- AMC has through its involvement in the PCA, AIA and MBA been part of a number of initiatives that remain relevant to The Project and to this end include 3 attachments as follows:
 - Attachment 1 – Adaptive Reuse in Canberra (3rd May 2012)
 - Attachment 2 – PCA Demonstration Housing Project Submission (31st May 2018)
 - Attachment 3 – NEAT Design Competition (27th October 2014)

We are more than happy to meet with The Project team to further discuss our submission.

Yours sincerely,

AMC ARCHITECTURE PTY. LTD.



Director
FAIA

Other Contributors:
AMC Architecture



DNA Architecture

ATTACHMENT 1 – ADAPTIVE REUSE IN CANBERRA (3rd May 2012)

Themes

- Making use of Canberra significant number of Commercial Office Buildings many of which are quite old
- Noting gas removal these buildings may no longer be viable as Office Buildings
- Embodied Carbon is retained
- Expectations around office accommodation are changing
- Such buildings are usually in Civic or Town Centres in convenient locations for employment, public transport and recreation activities
- Incentives to allow repurposing including increased development rights / remissions
- Less reliance on motor vehicles
- Key opportunities include affordable housing, student accommodation, social housing, retirement living and start ups



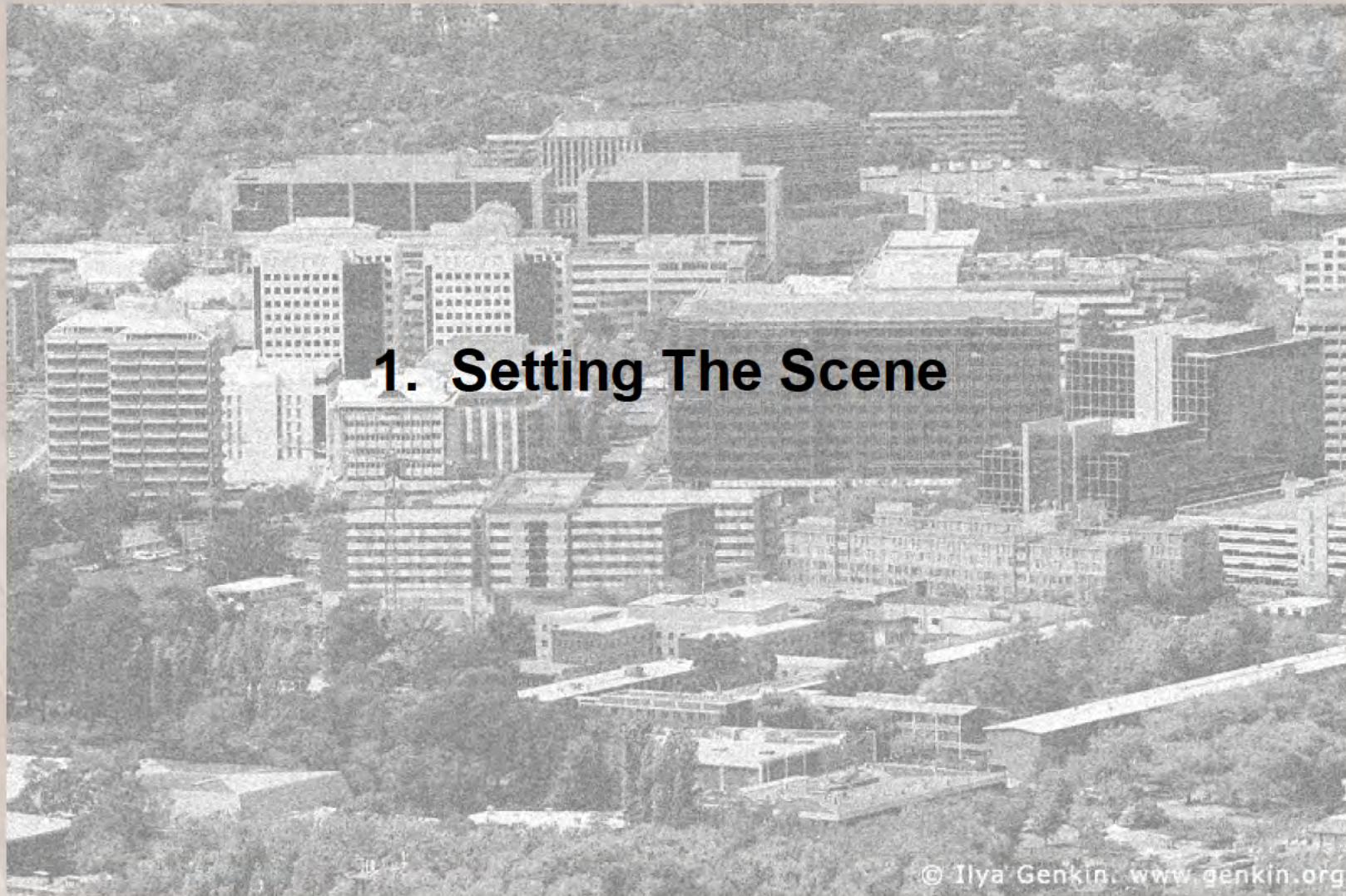
ADPATIVE REUSE IN CANBERRA



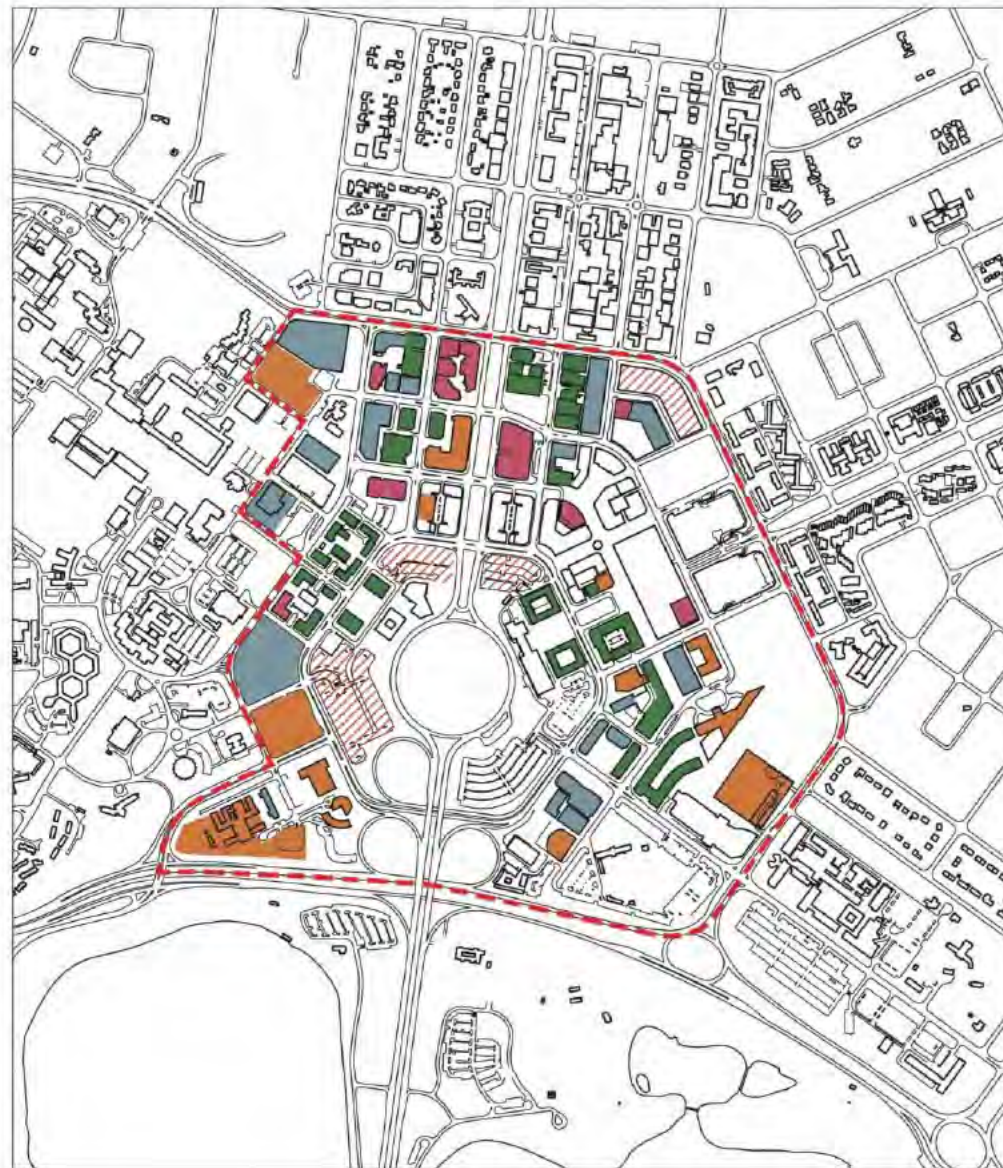

**PROPERTY
COUNCIL**
of Australia

**PARSONS
BRINCKERHOFF**

- 1. Setting the Scene – Civic**
- 2. The Benefits of Adaptive Reuse**
- 3. Recent Projects**
- 4. Territory Plan Challenges**
- 5. What Can ACT Government Do?**
- 6. What Can Building Owners / Property Owners Do?**



- With so many town and other commercial centres – Civic should be the primary focus
- ACT commercial vacancy rates are the highest in the country
- Increasing supply of new A-Grade office accommodation leaving B & C Grade in its wake
- Federal Government policy will likely see a further reduction in the Public Service
- Increasing demand for environmentally responsive buildings + BCA 2011 / DDA requirements – an increasing challenge for B and C Grade properties
- Civic has very limited useable green space
- The current program of verge improvements is viewed as very positive noting the sheer width of Civic verges make this a very expensive process
- Canberra lacks a *civic heart* – adaptive reuse represents a potential *win-win* in this regard
- EDD policy for 50% infill residential projects - Civic a less controversial way to go
- Canberra has an acute need for affordable housing – well documented in recent times and a potential need for student accommodation
- Critical that Civic remains a high priority for the ACT Government
- ACT Treasury expects that adaptive re-use (commercial → residential) will be viable without Government incentives (ACT 2011-12 Budget)



- CITY LIMITS
- GRADE A
- GRADE B
- GRADE C
- RESIDENTIAL / HOTEL
- REDEVELOPMENT SITE

Civic Commercial Buildings

Clusters of
C - Grade
Buildings

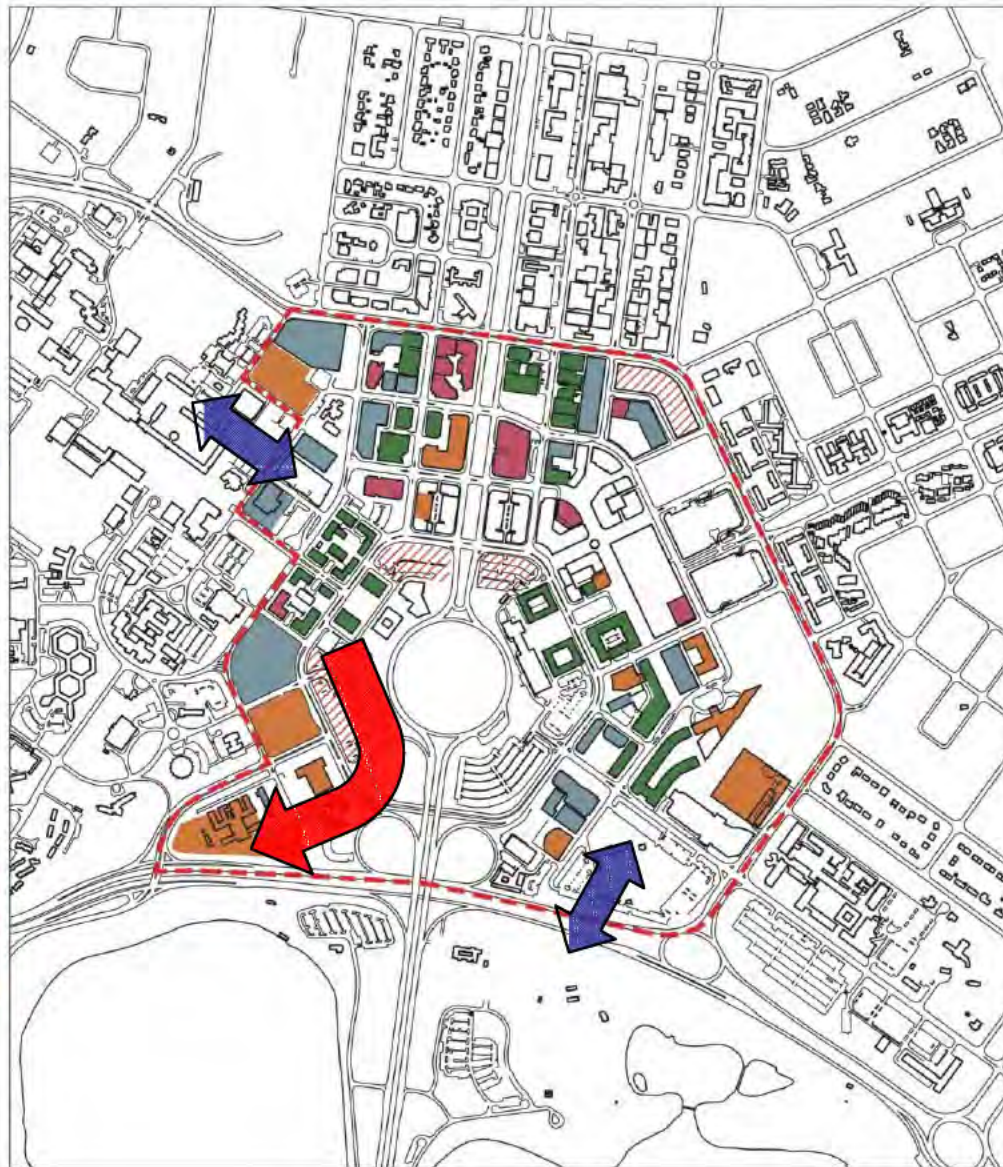


- CITY LIMITS
- GRADE A
- GRADE B
- GRADE C
- RESIDENTIAL / HOTEL
- REDEVELOPMENT SITE

Civic Commercial Buildings

Proximity
to ANU

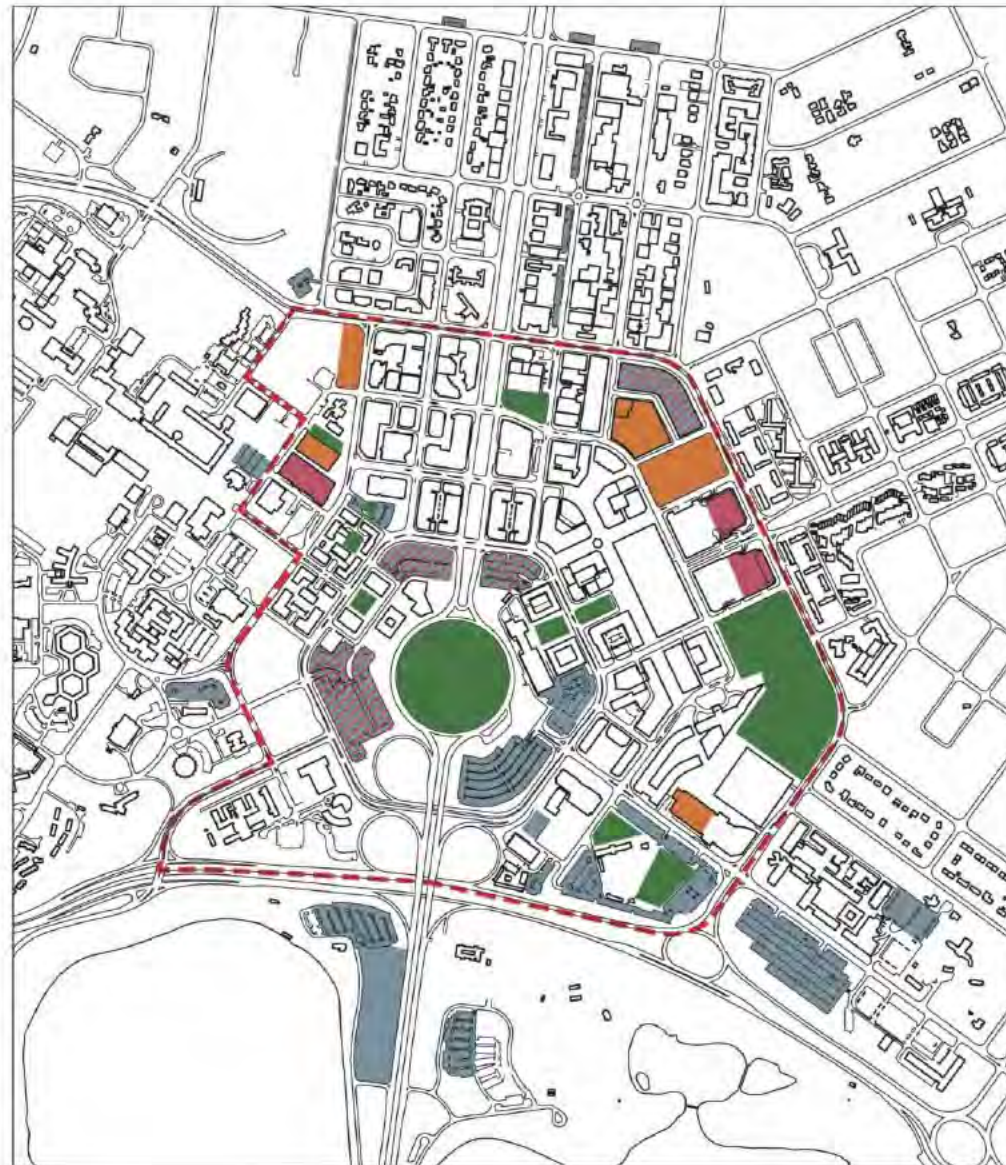
Development
Growth



- CITY LIMITS
- GRADE A
- GRADE B
- GRADE C
- RESIDENTIAL / HOTEL
- REDEVELOPMENT SITE

Proximity
to Lake

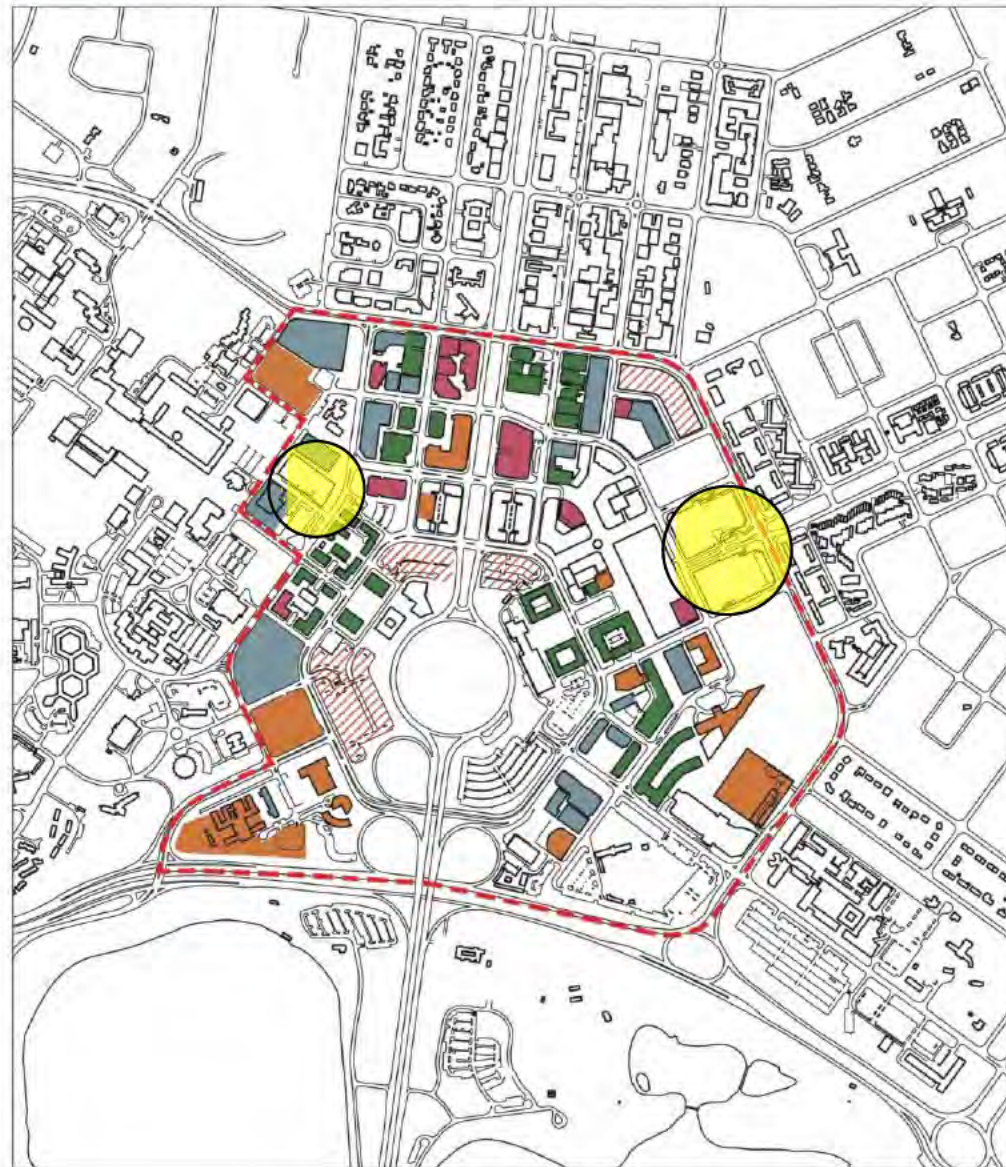
Civic Commercial Buildings



- CITY LIMITS
- STRUCTURED (PUBLIC)
- SURFACE
- UNDERGROUND
- PARK/OPEN AREAS
- REDEVELOPMENT SITE

Car Parking

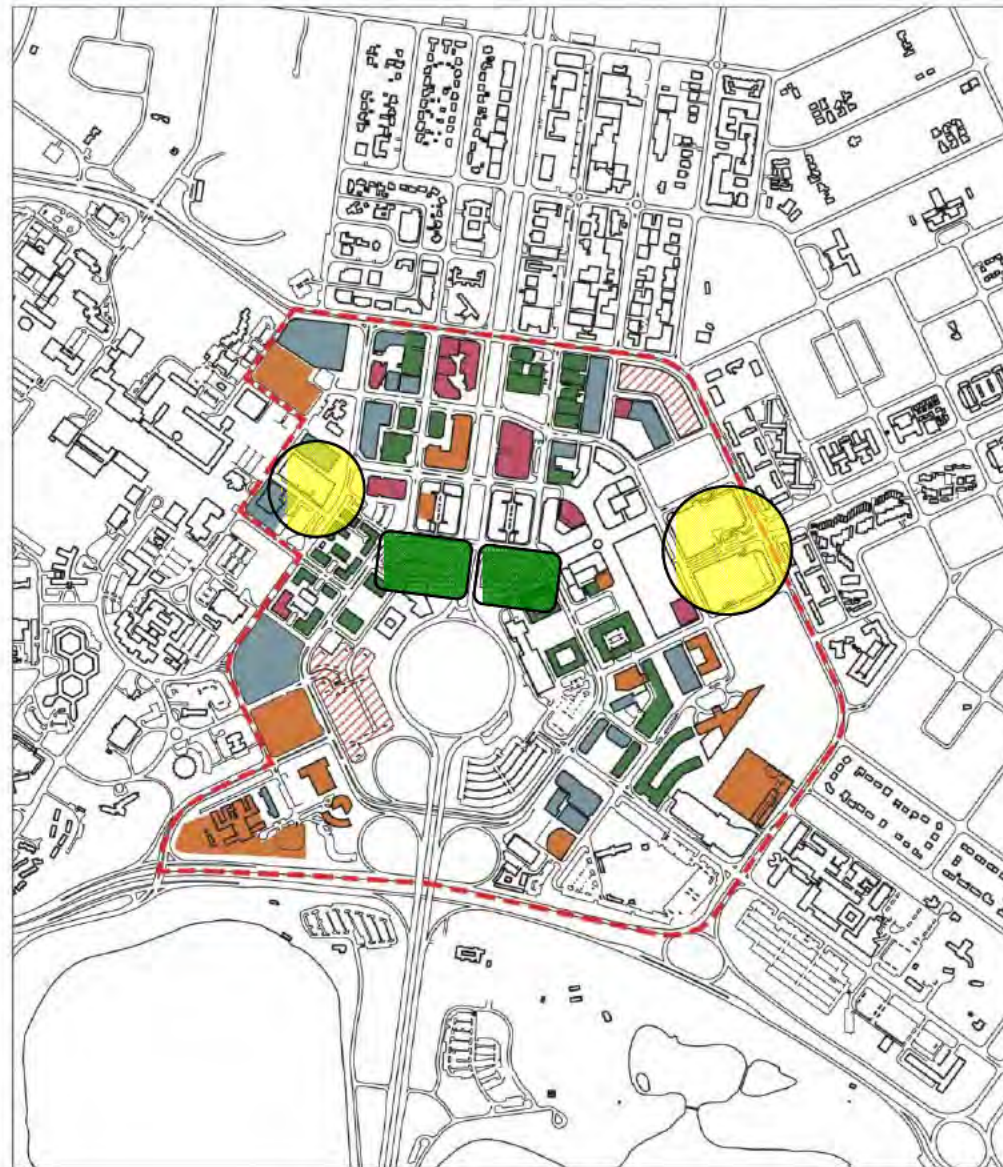
Structured
Carparks



- CITY LIMITS
- STRUCTURED (PUBLIC)
- SURFACE
- UNDERGROUND
- PARK/OPEN AREAS
- REDEVELOPMENT SITE

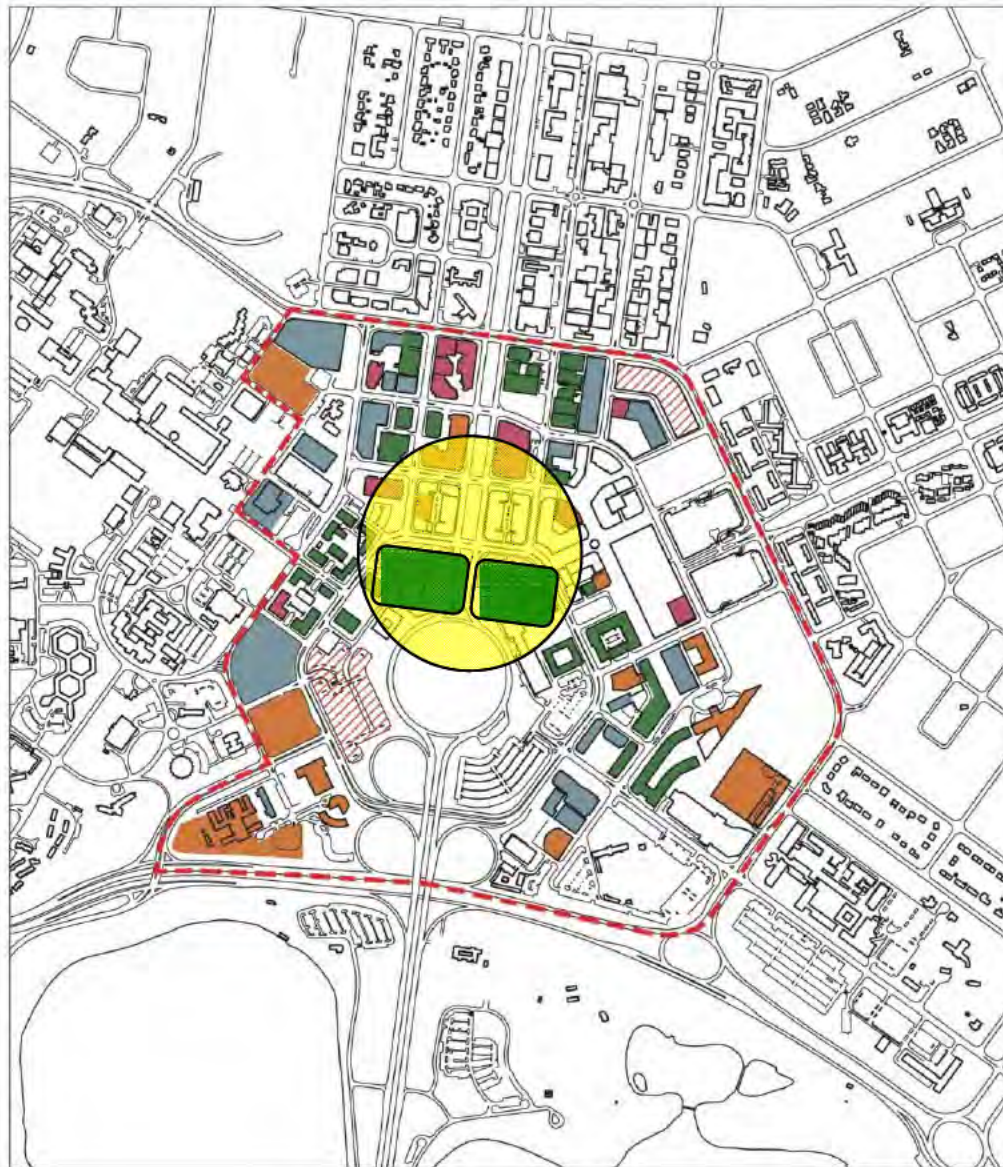
Structured
Car parks

Opportunity
for Green
Zones and
Structured
Carparks in
the *City Heart*



- CITY LIMITS
- STRUCTURED (PUBLIC)
- SURFACE
- UNDERGROUND
- PARK/OPEN AREAS
- REDEVELOPMENT SITE

Opportunity
for Green
Zone and
Structured
Car park at
City heart



- CITY LIMITS
- GRADE A
- GRADE B
- GRADE C
- RESIDENTIAL / HOTEL
- REDEVELOPMENT SITE

Create
Exciting
Central Heart
in Civic

2. The Benefits of Adaptive Reuse

Environmental

- Embodied Energy

- 40% of annual energy and raw materials consumption

- 25% of wood harvest

- 16% of fresh water supplies

- 44% of landfill

- 45% of carbon dioxide production

- Up to half of all greenhouse gas emissions

- Less reliance on motor vehicles

- AGO - Reuse of buildings saves 95% embodied energy

- Reduced demand for new infrastructure and services

Risks

Energy performance



Social

- Promotes urban infill and activates the *heart* of Canberra
- People can live close to work, entertainment, culture, night life and Lake Burley Griffin
- Affordable housing, student housing and more hotel accommodation
- Mixed-uses
- Populates the city – a safer more identifiable place for all
- Rebrand Canberra
- Commitment to public realm – lighting, landscaping, paving, street furniture, art

Risks

- If we don't promote adaptive reuse the city will have dead and dangerous pockets



Economic

- Expedient way to develop – minimal demolition, structure in place
- Embodied energy retention means savings under carbon tax model
- Cost effective way to develop
- Takes vacant commercial office space of the market
- Invigorates Civic as Canberra's CBD
- BCA 2011 and other changes are making many buildings redundant
- Side step mandatory energy performance targets less suited to older commercial buildings

Risks

- Consumer demand for a sometimes unusual product – parking key issue
- Change of Use Charge
- Real costs for refurbishment works

3. Recent Adaptive Reuse Projects

Weedon Lodge – Cameron Offices, Belconnen

- Formally Wing 5 – Cameron Offices
- Significant example of late 20th century structuralism
- Excellent location for student housing
- Cost effective way to deliver
- Creative solutions for imaginative client base – students
- Developed as part of \$4.3b NRAS / Affordable Housing initiative
- 159 units plus common facilities
- Limited car parking provided (17 basement car parks and 25 at grade)
- Cost - \$10.4m

ADAPTIVE REUSE



ADAPTIVE REUSE



Abode at Juliana, Woden Town Centre

- Formally Juliana House – Constructed 1971
- 10 Storey Office Building with 800m² floor-plate and rear core arrangement
- Excellent location for Hotel – Woden, Canberra Hospital
- Cost effective way to deliver 153 bedroom hotel with other facilities
- Very limited car parking on site – created within ground floor of building
- Budget - \$12.5m
- Reliant on adjacent public car park
- Very positive reception from Woden Valley Community Council

ADAPTIVE REUSE



ADAPTIVE REUSE



ADAPTIVE REUSE







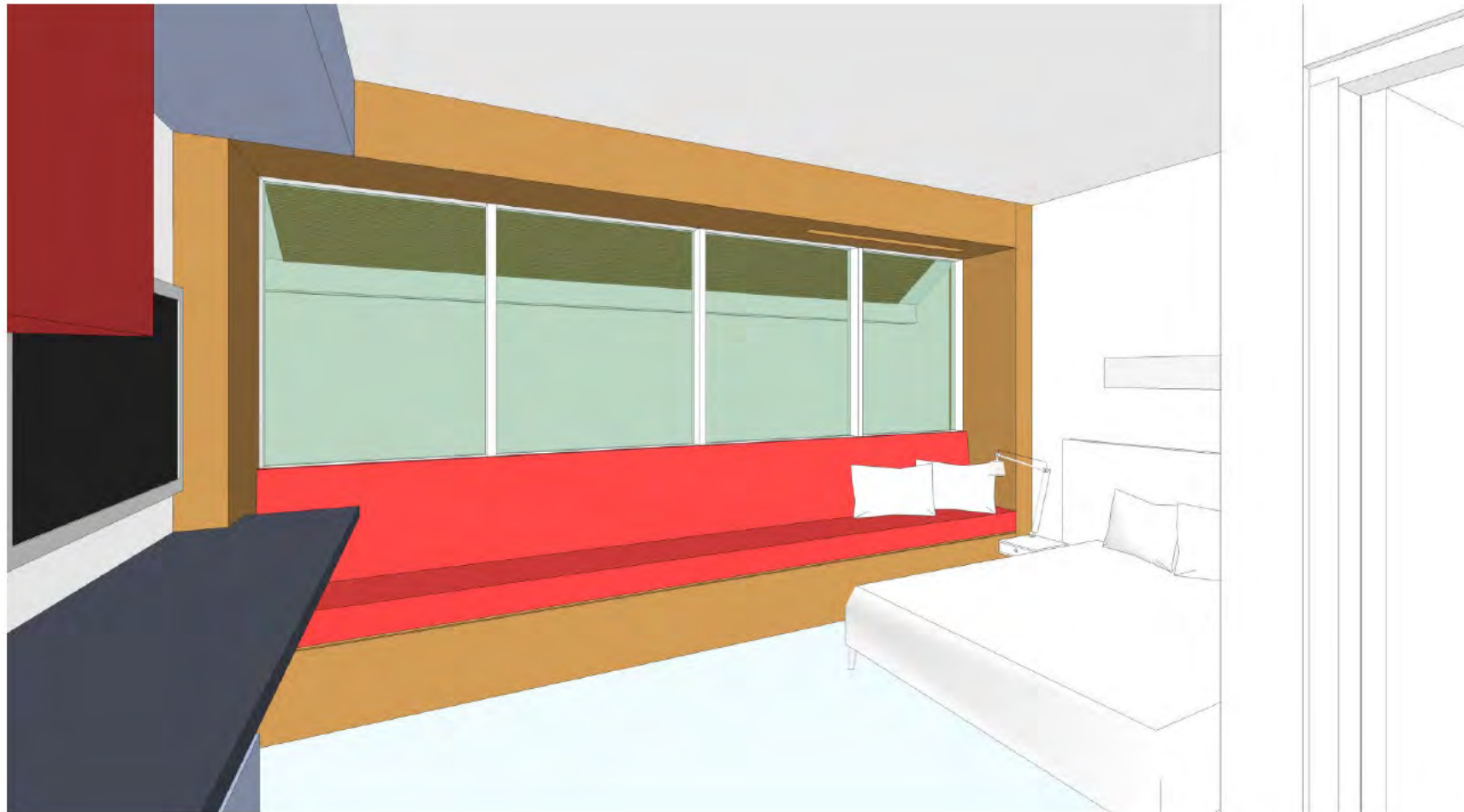
Total Rooms – 153
Hotel (22-29m²) - 81
Studio Apt (31-37m²) - 72

Typical Floor













4. Territory Plan Challenges

Residential Zones – Multi-Unit Housing Code

- C81 – Parking – Compliance with the Parking and Vehicular Access General Code
- R86 – Solar Access. Minimum of 3 hours of direct sunlight on 21st June between 9am – 3pm
- R's 88-92 – Private Open Space
- R96 – Site Facilities. External Storage
- R207 – Multiple Entries to Developments with setbacks less than 6m and 15m or greater frontages
- R210 – Interface
- R212 – Common circulation
- R217 – Visitor car parking
- R239 – Communal Open Space

Parking and Vehicular Access General Code

- Item 3.1.4 – Residential Use – Long Stay parking On Site
- 3.1.5 – Parking Provisions for Residential Zones
- Schedule 2 – Parking Provisions for Commercial Zones noting CZ1 – Residential Use No Minimum Requirement !

5. What Can the ACT Government Do ?

- *Tune-up* Canberra
- Provide policy that facilitates adaptive re-use, including Territory Plan considerations
- Significant reduction in car parking requirements / increased public transport
- Continue to encourage and invest in transit-oriented development, particularly in Civic
- Provide incentives to developers to undertake adaptive re-use
- Take a hands-on (leadership) role in initial developments in the CBD
- Invest in car parking structures
- Preserve limited green space as community asset - re-claim other areas
- Consider left of field ideas:
 - Roof-top gardens / common open space in lieu of balconies
 - Increased internal areas in lieu of external POS
 - Incentives for mixed-use development
 - Land swap to target car parking / recreation / park locations
 - Hire-out electric cars
 - Low cost office accommodation – innovation incubators
 - Give away *air-rights*
 - Buy-up of poor performing buildings



6. What Can Building Owners / Property Developers Do?

- Commit to the public realm works – pavement, trees and art
- Take the long term view – invest in Civic and indeed Canberra through adaptive reuse
- Make arrangements with car parking providers for residents in adaptive re-use buildings
- Develop linkages with affordable housing providers – eg. ANU
- Accept that they are not being offered a ‘free ride’ by the Government and they need to reinvest in their asset
- Work together in precincts / *Sections*



ADPATIVE REUSE IN CANBERRA




**PROPERTY
COUNCIL**
of Australia

**PARSONS
BRINCKERHOFF**

ATTACHMENT 2 – PCA DEMONSTRATION HOUSING PROJECT SUBMISSION (31st May 2018)

Themes

- Aging in community
- Revitalising local shops / mixed use development
- Urban intensification in an appropriate location
- Making better use of under-utilised ACT Government land assets in and around Local and Group Centres to achieve large development footprint
- Housing choice
- Urban consolidation
- Support local employment
- Less reliance on motor vehicles
- Support public transport system



Demonstration Housing Project Expression of Interest

PROPERTY COUNCIL OF AUSTRALIA (ACT Division)

ABN 13 008 474 422

Level 4, 10 Moore Street

Canberra ACT 2600

EOI Contact:

[REDACTED]

ACT Executive Director

[REDACTED]

[REDACTED]

31 May 2018

Prepared by:

Property Council of Australia (ACT Division)

AMC Architecture

Canberra Town Planning

Version Control

31.05.2018: Final for Submission

Contents

1	Executive Summary	4
2	Response to Project Brief.....	5
3	Demonstration Housing Concept.....	9
4	Project Objectives	10
5	Demonstration Precinct Proposal.....	14
6	Delivery Framework	16
7	Conclusion	18

1

Executive Summary

The Property Council of Australia (ACT Division) and its members are exploring new housing typologies. This has many potential benefits, including an increase in density to improve the efficient use of land and housing affordability close to existing services and public transport.

The Property Council of Australia welcomes the ACT Government's Demonstration Housing Project and the opportunity to provide an Expression Of Interest (EOI) to participate in this exciting Project.

The Property Council of Australia are investigating how innovative housing typologies can be delivered across a range of suburban precincts throughout the ACT. Suitable locations envisaged for the establishment of these precincts include Local Centres (zoned CZ4 under the Territory Plan) and smaller Group Centres.

This submission outlines a proposal for hypothetical Demonstration Housing Precincts across three such contexts.

The proposal meets all seven Objectives outlined in the ACT Legislative Assembly's June 2017 Resolution on Demonstration Housing.

This EOI document details the concepts of the proposed Demonstration developments and summarises key aspects of existing ACT planning laws against which the concepts are able or unable to comply.

It also demonstrates the anticipated costs and funding for the concepts, governance arrangements of participating entities, and the ability of the project team to deliver innovative projects.

This document is accompanied by an Expression of Interest Returnable Schedule for a Proposal where a specific site has not been identified.

2

Response to Project Brief

2.1 Introduction

The Property Council welcomes the ACT Government's Housing Choices initiative which signals a plan for the future. In line with the Housing Choices Discussion Paper, we are interested in understanding best practice models in other jurisdictions, exploring good building design, and examining opportunities to improve the objectives and controls of the Territory Plan to achieve better development outcomes for the built environment and the Canberra community.

We need to take a whole of life perspective, focussing on short, mid and long term housing solutions. Housing typologies need to meet the requirements of all generations by planning for both current and future generations.

Population and demographics

Canberra's population is ageing. According to the latest ACT population projections, it is estimated that the number of seniors (65+) will increase from 53,000 in 2018 to 95,000 by 2041¹. If this trend continues, the number of seniors will reach 120,000 by 2050, more than doubling over the next 30 years.

Our housing typology needs to reflect and meet the future needs of our city and a fuller understanding of the density that needs to be created – and where is critical to long term planning for our future residents.

ACT Government land release program

Suitable land needs to be released in the right places to enable housing objectives to be achieved. Affordable housing targets have been set by the Suburban Land Agency which have now been allocated to greenfield land releases, and we support affordable housing allocation to urban infill sites. We support both strategies in order to optimise housing choices.

The Government has the ability to shape the future of the city and influence housing typologies. Housing solutions need to be developed for the ageing population, as well as intergenerational housing and co-housing where older community members or people with disabilities can be supported by younger people.

¹ ACT Government Chief Minister, Treasury and Economic Development Directorate, 2018

Greenfield development and urban infill

The ACT Government has a long-standing policy of 50% greenfield and urban infill land release. It is important that the Government achieve balanced development across the city, providing a diversity of housing options for different household types and socioeconomic backgrounds.

Housing affordability

If Canberra is to remain a “cool little capital”, housing affordability for all should be a foremost consideration: we need and want to be an inclusive as well as a connected city. This includes ensuring affordable housing options are available throughout Canberra for key essential workers.

Housing affordability is a serious issue throughout Australian cities, and particularly so in Canberra. Over the last five years, land purchase and development costs have been rising, and this had a significant impact on housing affordability. This supported by analysis of recent residential vacant land sales, which indicate a reflect trend in land sale prices.

Planning controls and processes

Canberrans need the opportunity to do something different, and the planning system should support and encourage innovation. Planning needs to focus on design outcomes and outcomes for the community (including social, the cultural, arts) and provide more flexible development controls that enable innovation.

The Property Council is supportive of the principles of access and equity for members of our community to the Australian Capital Territory Civil and Administrative Tribunal (ACAT). We suggest that the alternative approvals pathways are applied to the demonstration projects as a trial or “demonstration” of an alternative process for all stakeholders to observe and review if desired outcomes are to be achieved. Any demonstration project will be put at risk – both perceived and financial – if third party appeals are lodged for new development typologies.

Urban renewal and density

There needs to be a focus on rejuvenating Civic and our town and group centres. Densification around these centres, including adaptive reuse, would provide opportunities to provide housing options conveniently located to public transport and services, key lifestyle decisions for our ageing population. To encourage redevelopment in established areas, there needs to be appropriate tax incentives (including concessions on rates, land tax and lease variation charges) that acknowledges the community benefits delivered by demonstration housing.

Sustainability and carbon neutrality

Demonstration housing provides an opportunity to achieve sustainability objectives including reduced greenhouse gas emissions associated with transport usage, providing more housing options in proximity to public transport and services to encourage active travel.

New housing typologies also provide opportunities to reduce energy consumption associated with building construction and ongoing operating costs such as for heating and cooling.

Liveability

Housing options need to consider the different lifestyle requirements of occupants. Liveable Housing Australia provide guidelines for the design of dwellings that support ageing and mobility impaired residents, and these guidelines have been endorsed by the Property Council. Canberra already ranks as one of the most liveable cities in the world. To maintain this liveability and shape our city's destiny, we need to plan for the future- and for the types of housing we need.

2.2 Demonstration Housing Brief

In response to the Demonstration Housing Project brief, this proposal explores a range of new housing typologies to increase density and improve the efficient use of land and housing affordability close to existing services and public transport.

Detailed in Appendix A are the characteristics of these housing typologies, and an analysis of how the typologies comply or in some cases do not comply with the ACT's Territory Plan as it currently stands. This particularly relates to the objectives of residential zones and compliance with residential development codes and considers aspects of existing commercial and community facility zoned land.

2.3 Property Council of Australia Interest in the Project

The Property Council of Australia (ACT Division) membership consists of local, national and international influencers and contributors to the development industry. These include experts in property development, finance, legal, property management professional services and consultants, certifiers, constructors, designers, valuation, institutions and superfunds, universities and community campuses, corporate and residential real estate, valuers, retail and commercial operators, retirement living and housing operators, planners and different tiers of government. Members have a positive impact on policy and the built environment as they deliver a broad range of different products across the building life cycle.

Members are personally and professionally invested in this city and have city pride.

Members care about the future of the city (for ours and of course future generations) in which we live, work, invest and play. Housing Choices represents an important opportunity in a maturing city, to explore new housing typologies to increase density and improve the efficient use of land and housing affordability close to existing services and public transport.

The Property Council of Australia has six key advocacy priorities including:

- Encouraging Urban Renewal vital to Canberra's economic and social wellbeing.
- Outcomes focused Planning and Sustainable Development policies.
- Transport Orientated Development delivering density and liveability in major transport corridors and town centres.
- Housing choice for all Canberrans including retirement living and affordable housing.
- Fair Taxes and charges administered efficiently and encourage development where it's needed.
- Long term infrastructure planning which will help transform our city.

It is against this backdrop that the ACT Government's Demonstration Housing Project provides an important opportunity for the Property Council and its member firms to contribute to the design and delivery of innovative housing typologies.

2.4 Proposal Overview

This project explores a group of housing typologies that:

- Allow residents to “downsize” or “right size” when they need to within their community to liberate capital to help subsidise their retirement and the support they may need as they age through the ‘Living Longer Better’ reforms;
- Make better use of land within established urban areas; and
- Allows the broader Canberra Community to live in convenient locations in terms of services, public transport and community activities which comprises in the main ‘RZ1 – Suburban’, ‘RZ2 – Suburban Core’ zoned land located around Local and Group Centres

Such an initiative allows a large proportion of housing stock within existing suburbs to be liberated for new families to move in and in rejuvenate established suburbs, supporting the viability of local shops, schools, parks and other community facilities.

This project supports the ACT Planning Strategy objectives of:

*(3) Providing more **cost effective and sustainable living options** by improving the existing housing stock and **establishing more choice in housing types in a variety of locations***

*(4) Ensuring everyone has convenient access to a range of facilities, services and opportunities for social interaction by **reinforcing the role of group and local centres as community hubs***

*(6) Invest in design that will ensure **urban change creates amenity, diversity and a more sustainable built form**, and adds to Canberra's landscape setting.*

3

Demonstration Housing Concept

3.1 Project Philosophy

The four Demonstration Concepts suggested by the Property Council of Australia, including three hypothetical locations including Hawker Village, Ainslie Shops and Monash Shops as well as a new approach to RZ2 zone development, are high-level integrated community proposals, which make suggestions about a range of housing typologies. Adaptive reuse is also highlighted as a final housing typology worth of consideration although this tends to be relevant to Town Centres and commercially zoned areas.

3.2 Development Design Framework

The design framework comprises a precinct-based approach which works with the opportunities and constraints for each locality, considers the relationship between recreational, residential and community uses.

3.3 Development Typologies

This submission includes a range of housing typologies that include the following:

- Micro Apartments
- Urban Garages
- Fonzie Studio Apartments
- Expandable Housing
- Duplex
- Single Storey Townhouses
- Two Storey Townhouses
- Three Storey Townhouses
- Shop Top / Home Office Apartments
- Co-Housing / Supportive Housing
- Mixed Use Commercial / Residential
- Apartments
- Residential Aged Care
- Adaptive Reuse

Refer to **Appendix A** - Residential Typologies Matrix which provides a full description of each typology.

4

Project Objectives

The ACT Legislative Assembly Resolution on Demonstration Housing outlines seven (7) key objectives to be achieved by demonstration proposals. Outlined below are the relevant objectives addressed by this proposal.

4.1 Objective i) - Excellence in design quality

The Property Council are committed to the design dividend and development outcomes which integrate with the broader community context, are sustainable and adaptable, are visually appealing and which contribute to the public realm. The Property Council believe that the following key design principals are a sound basis for an approach to the Housing Choices demonstration project opportunity:

1. Good design does not cost more when measured across the lifetime of the building or place;
2. Good design flows from the employment of skilled and multidisciplinary design teams;
3. The starting point of good design is client commitment, and in this case that is the ACT Government commitment implied in the Housing Choices initiative.

The Property Council have suggested in this submission a holistic and integrated approach to future residential development be that in and around Group Centres or Local Centres or across the extensive RZ1 and RZ2 zoned land pattern informed by a consultative community engagement and responsive to the specific site and context opportunities and constraints.

Some 14 different residential typologies have been suggested in this submission for consideration in the development of demonstration projects noting that Property Council member developers, consultants and other development industry professionals have been involved in each and every typology proposed in Canberra or indeed further afield in numerous award-winning projects.

Other design principles that form part of the Property Council's approach to innovative housing design include:

- Limit car use due to strong connections and integration with public transport, active travel networks
- Low energy construction and passive solar and thermal design
- Incorporate building construction and materials selection which create "healthy housing" and which stand the test of time
- Integrate housing design with a range of different public space arrangements
- Incorporate passive solar design principles and innovative low carbon energy technologies - e.g. solar PV and hot-water, and co- and tri-generation.
- Incorporate rainwater and stormwater collection and disposal within the site
- Incorporate inevitable changes in technology
- Explore pre-fabrication as a way of achieving interesting housing options in a timely manner which may help kick start the project and are later relocated
- Allow for aging in place and community
- Incorporation of social housing to engage with all socio-economic groups of the community
- Maximise reuse of waste water - grey water treatment and even black water treatment on site along with collection and treatment within urban watercourse and landscaping features.

4.2 Objective ii) - Carbon neutral buildings

Climate change is arguably the single most critical issue facing humanity. While as little as three years ago there was widespread scepticism regarding climate change, today there is almost a global consensus on the issue. Indeed, the fourth assessment review of the International Panel on Climate Change established an unprecedented scientific consensus that climate change is both real and man-made. Along with the scientific community, most Governments are also part of that consensus. This represents a critical paradigm shift that heralds an increasing impetus for Governments to aggressively pursue timely responses to climate change. Housing Choices, from the Property Council's perspective seeks to intensify development around existing Local and Group Centres and across the broader RZ2 and some RZ1 suburban areas to achieve walkable communities close to services, public transport, recreation areas and places to work.

The Property Council sees a strong alignment between the Housing Choices Initiative Objectives and the Greenstar Communities, which we would proposed be used as a design tool and ESD pathway or potentially to target a Greenstar Communities rating for Demonstration projects, noting the many Property Council members include Greenstar accredited professionals within their organisation.

4.3 Objective iii) - Medium density infill

The case for the missing middle has been well documented in the Canberra media in recent times. Indeed, for various reasons medium density townhouse redevelopment has all but ceased in existing suburbs and with recent changes to the LVC regime, there is even less incentive for developers to pursue medium density typologies in RZ2 zoning such that many appropriate redevelopment sites across Canberra are being developed as large-scale houses effectively negating the opportunity for a range of other much needed forms of housing.

As outlined in this submission, the Property Council sees the Housing Choices initiatives as primarily an intensification of residential development in and around Local and Group Centres, however it is important to develop strategies that might work with the existing distinctive Canberra subdivision pattern of RZ1 and RZ2 zoned sites to achieve well-designed townhouse development. To this end, and on the back of work previously undertaken for the NEAT Housing Competition in 2014, the Property Council propose a strategy to incentivise block amalgamation at the short end of the typical Block and Section arrangement.

As outlined in **Appendix B**, if such blocks were amalgamated it would then become possible to introduce a rear lane arrangement to linking the existing roads on either side of the Section.

In turn, this would then allow for a rear lane garaging arrangement with the potential for affordable Fonzie Studio Apartment units above. In turn this would allow for a townhouse typology with a street address, making much better use of the existing land asset. This approach would then effectively bookend a typical Section and in doing so avoid a piece meal approach to medium density housing which has historically caused concern within the community. If this approach were adopted, it would be possible to incentivise medium density infill across every suburb in Canberra allowing more affordable housing choices while allowing local residents to downsize and age within their community.

Over and above this approach, this submission also outlines a broad range of medium housing typologies noting the Property Council includes in membership base developers, consultants and other property professionals with a wealth experience in innovative residential development in Canberra and across Australia.

4.4 Objective iv) - Innovative planning and engagement approaches

This project provides opportunities to explore best practice community engagement practices to explore community needs and aspirations specific to local areas.

Master plans are yet to be developed for many Local and Group centres within the ACT. The approach being suggested by the Property Council would provide an opportunity for industry and Government to lead an exercise for specific Local and Group Centres to establish the desired character for these areas by developing a community-based collaborative master plan outcome that meets the current and future needs and aspirations of the local population.

4.5 Objective v) - Innovative housing products and typologies

The Property Council have identified 14 housing typologies which are seen to have merit and application in the Canberra residential market. Within these typologies is a strong focus on intergenerational equity by providing housing options to support a range of life stages and lifestyle requirements, where older community members, people with disabilities and those that are disadvantaged can be supported by younger people who can enjoy the benefits of more affordable housing.

4.6 Objective vi) - Close partnership with industry bodies

Housing Choices represents an exciting opportunity for the ACT Government to work hand in hand with the development sector to harness industry knowledge and expertise and collectively develop best practice solutions specific to Canberra and its localities.

The private sector, as it stands, currently delivers much of the housing stock in Canberra and as such remains committed to working closely with policy settings to achieve the ACT Government's stated aims. The private sector is genuinely delivering the required (market driven) products with a consciousness for quality, efficiently and effectiveness.

4.7 Objective vii) - Options for public and affordable housing

The Property Council is committed to the concept of affordable housing as part of a more inclusive society. The Property Council includes members who deliver affordable housing in Canberra, such as CHC Australia and Village Building Company, who are committed to Housing Choices as an important opportunity.

The demonstration concepts, typologies and hypothetical locations within this proposal bring innovative design and fresh thinking to tackle the nation-wide challenge of delivering both public and affordable housing solutions in a financially sustainable manner. Coupled with certain other incentives or concessions from the ACT Government that would still be necessary, the proposal presents an opportunity for the ACT Government to be a national leader in partnering with developers and community housing providers in taking such an approach to close the supply and demand gap for appropriate, safe and secure public and affordable housing.

5

Demonstration Precinct Proposal

5.1 Precinct Identification

The Property Council strongly believe that a precinct-based approach to the redevelopment of Local and Group Centres and their immediate surrounds is the most effective way to achieve a range of new housing typologies which will have broader appeal to the market, which will secure community buy in and which will be transformational to the city, as new benchmarks in development. In this submission the Property Council have begun to explore three suburban centres as a canvas for the housing demonstration model precincts.

While all Canberra suburbs have a Precinct Map, many do not have an associated Precinct Code to guide future development. The Property Council see such suburbs as ideal opportunities for precinct-based master planning to facilitate a broad range of residential typologies and associated community facilities. To this end, we have selected three suburban centres as examples:

- Hawker Village as a Group Centre;
- Ainslie Shops as larger Local Centre; and
- Monash Shops as a smaller Local Centre

These locations provide commercial land, community facilities, carparks and urban open space all of which could support residential development. Also, such locations are typically located close to schools, public transport and services including Residential Aged Care to support an aging population who wish to age within their own communities. Finally, each is surrounded by RZ2 zoned residential areas which the Property Council suggest have potential to support a range of new housing typologies. This zone is found throughout Canberra and yields itself to a typology with broad appeal, as described in **Appendix B**.

In relation to the demonstration precincts identified above, the housing typologies under exploration in this project are likely to be smaller and more compact and therefore more reliant on essential services such as those provided in and around local centres and public transport routes. Each of these Centres faces a range of planning and development challenges towards realising their full redevelopment potential such as tree protection, areas of heritage significance and precinct specific planning controls.

5.2 Development Framework

While this submission explores the above centres, the intention is that the Demonstration Precinct could be applied to a number of Local and Group Centres and their immediate surrounds throughout the ACT.

We have adopted these centres to demonstrate how each has the potential to:

- Become more vibrant and viable community hearts;
- Offer greater variety in housing choice than can currently be realised under the Territory Plan;
- Facilitate mixed-use development to generate activity in these centres throughout the day and evenings;
- Achieve greater density in appropriate central locations to offer more choice, meet specific community needs and achieve more affordable and indeed community housing;
- Better utilise Territory land assets such as carparks and public open spaces;
- Achieve more useable and indeed attractive park, community and recreation areas; and
- Investigate rezoning of land in and around Group and Local Centres to achieve these outcomes.

Within this framework we see a broad range of new housing typologies being explored from traditional to innovative new models which could better meet the full range of housing needs across the Canberra community.

Concept Plans for the three precincts are included at **Appendix B**.

6

Delivery Framework

6.1 Development Program

Provided at **Appendix A** is a description of each housing typology against the requirements of Criteria 2 of the Expression of Interest schedule.

6.2 Project benefits to ACT Government

The Property Council have been actively engaged with the Government on what planning changes are needed to create the right conditions for development which increases density, provides greater housing choice, and delivers better community outcomes in our new and established suburbs. We hope this has been helpful to the Government in preparation of its Housing Choices discussion paper which contemplates the first review of residential zoning in the ACT since 2003.

- Affordable Housing
- 'Age in place' housing
- Efficient utilisation of public resources (green space, waste, transport etc)
- Additional taxation base for ACT Government
- Secure the future of local and group centres
- Social sustainability by integration of a variety of housing typologies supporting a diverse demographic (aged, the young, small families, large families, couples, singles)
- Environmental sustainability – through design, construction and operation of compact, walkable, pedestrian oriented mixed-use communities

We believe the Demonstration projects are a unique opportunity to foster collaborative working relationships between the private, public and community sectors which better meet the needs of our growing and ageing population.

As the number of Canberrans over the age of 65 doubles over the next decade, our retirement living sector is well placed to do much of the heavy lifting to meet the growing demand for housing choice. We continue to work in close partnership with the Government, industry and community sectors to ensure Canberrans get the right types of housing, when and where they need it.

6.3 Public Housing Design Guidelines

The Public Housing Design Guidelines have been considered in the development of this proposal, it is important that these reflect project viability. These will need to be reviewed to support delivery of the typologies included in this proposal.

Whilst the Property Council wants to ensure well designed, quality product delivered under the affordable housing scheme – we believe more consultation on the inclusions list would be beneficial for all parties. We note that often the best affordable housing stock is that which is delivered in a way that is consistent with the rest of the development and having no noticeable difference in quality and design.

There is concern that the finishes and inclusions not only do not line up with price point of affordable dwellings, but potentially of higher specification than would be delivered across others sold straight to the market. More importantly we have had some feedback that some inclusions will not meet compliance. We welcome a further discussion with builders and developers to ensure inclusions are achievable, feasible, and compliant.

6.4 Project Delivery and Staging

The returnable schedule at Section 4 provides indicative delivery timeframes for development of each of the housing typologies.

Recognising that this is an ambitious proposal, should the ACT Government shortlist this project we envisage taking the following next steps:

- The Property Council have connections with the subject sites explored in this proposal, and we are aware of retirement living providers within the local market looking for new housing typologies that are not necessarily part of a retirement village who would support specific projects.
- We would be looking for the ACT Government to offer land up to allow for an integrated approach to new housing typologies in Local and Group Centres or in RZ2 zoned areas. The Property Council will bring together relevant developers, design professionals and property professionals to develop more detailed proposals

6.5 Project Governance

The returnable schedule at Section 4 provides detailed information about the project governance framework that would underpin the delivery of this project.

7

Conclusion

The Property Council of Australia (ACT Division) and its members are pleased to provide our proposal submission for demonstration housing precincts in the ACT.


This proposal has addressed all seven objectives outlined in the ACT Legislative Assembly's June 2017 Resolution on Demonstration Housing, and outlined a range of housing typologies that could be delivered within these precincts.








The Property Council reiterates our commitment to the ACT Government's Housing Choices Initiative. We keenly anticipate your feedback on our proposal and welcome the opportunity to participate in the delivery of innovative housing options for the benefit of the ACT community.





Appendix A








Residential Typology Matrix

Residential Typology Matrix – Criteria 2 of Returnable Schedule
Sheet 1

Typology	Reference Image / Plan	Typical Size / Yield in Canberra Within Current Planning Framework	Project Example (In established suburbs)	Features	Location / Design Requirements / Housing Options Provided	Public Realm / Place Making Considerations / Benefits
1. Micro-Apartments		<ul style="list-style-type: none"> 35 – 40m² units in clusters of up to 20 or mixed-in with other apartment development 2-3 Storeys 	<ul style="list-style-type: none"> Concepts prepared for Ginninderry and for CHC at Gungaharra Homestead Harrison (CHC, Ginninderry, Village, AMC) 	<ul style="list-style-type: none"> New form of compact and affordable housing with apartment sizes of 35-40m² Shared common facilities including lounge and kitchen Reduced carparking demand Ideally located near public transport and places of employment 	<ul style="list-style-type: none"> Close proximity to public transport or employment options Larger standard residential blocks Urban Open Space Salt and Peppered into existing apartment developments Can be used for Co-Housing or NDIS Supported Housing or supported living Services could be provided by local aged care provider 	<ul style="list-style-type: none"> Could make use of unusual / underutilised parcels of land including urban open space or specific RZ1 or RZ2 sites where it can take advantage of parks or other recreation areas Could form part of a broader offering for a not-for-profit community or aged care provider
2. Urban Garages		<ul style="list-style-type: none"> 80-140m² 2 – 3 storeys Compact land requirements Single or tandem garage accommodation 	<ul style="list-style-type: none"> Lightsview, South Australia (Peet) The Bradfield, Downer (CHC) Weston Village (Village) 	<ul style="list-style-type: none"> Minimal floor plate size and associated land parcel size Affordable on account of small land holding Relies on adjacency to common open space areas 	<ul style="list-style-type: none"> Very limited land requirements Adjacent public open space for resident use given limited PPOS within each unit Affordable product given land costs are kept low given compact block arrangement 	<ul style="list-style-type: none"> Works on very compact sites Activates rear laneways Activates community park areas
3. Fonzie Studio Apartments		<ul style="list-style-type: none"> 40-50m² Single storey at upper level Single or no garage accommodation 	<ul style="list-style-type: none"> Eclipse Mixed Use Development (CHC) Denman Prospect Local Centre Mixed Use Development (Capital Estates) Weston Village (Village) 	<ul style="list-style-type: none"> Activates rear lane driveway / road Offers crime prevention / passive surveillance benefits Makes excellent use of garage footprint Facilitates active street frontage for townhouses 	<ul style="list-style-type: none"> Associated with rear lane arrangement for medium density / town-housing style developments Can be separate apartment or form part of a townhouse typology as detached additional self-contained area 	<ul style="list-style-type: none"> Activates at times anonymous rear lane access roads Provides casual surveillance of the street network Improves the character and appeal of rear lane roads
4. Expandable Housing		<ul style="list-style-type: none"> Expandable from initial compact house of 50m² which can grow over time as required by residents Up to 4 storeys to ensure initial block is compact to achieve an affordable initial sale prices 	<ul style="list-style-type: none"> 'Expandable House' City of Batam, Indonesia Quinta Monroy Lo Barnechea and Villa Verde Monterrey, Mexico City 	<ul style="list-style-type: none"> Capacity to grow with occupants needs New form of affordable housing which allows landowners to build the 'right size' home for 'now' and change this later as needs change 	<ul style="list-style-type: none"> Primarily suited to single residential or dual occupancy development or new subdivision typologies; Requires minor additional investment in footings and wall construction to facilitate additional levels Can provide an incredibly diverse range of housing based on inhabitants needs 	<ul style="list-style-type: none"> Ideally in urban open space areas that could be rezoned with housing affordability as the primary driver reflected in the land value itself Active street frontages important
5. Dual Occupancy		<ul style="list-style-type: none"> 50% Plot Ratio 65% if Accessible Class C 2 storeys + basement possible Carparking in accordance with code requirements 	<ul style="list-style-type: none"> Block 32 Section 31 Red Hill (AMC) Block 6 Section 24, Braddon (AMC) Block 10 Section 26 Yarralumla (AMC) Block 18, Section 16, Garran (Village) Block 13, Section 28, Chiefly (Village) Block 6 and 14, Section 12, Farrer (Village) 	<ul style="list-style-type: none"> Ideal for corner blocks or larger blocks over 1,000m² Easiest way to increase residential density in Canberra subdivision pattern 	<ul style="list-style-type: none"> Current RZ2 Zoning Consider allowing dual occupancy on appropriate blocks in RZ1 Zoning Active street frontages important 	<ul style="list-style-type: none"> Ideally both dwellings address the street to reinforce the existing residential except where blocks are large enough to successfully accommodate a battle axe arrangement Consider reduced setbacks for dwelling and front PPOS / courtyards
6. Duplex		<ul style="list-style-type: none"> 50% Plot Ratio 65% if Accessible Class C 2 storeys + basement possible Carparking in accordance with code requirements 	<ul style="list-style-type: none"> Block 3 Section 17 Campbell (AMC) Bloc 1 Section 29, Garran (AMC) 	<ul style="list-style-type: none"> Both dwellings from the street Zero setback / common party wall Already permissible in Mr Fluffy RZ1 Blocks 	<ul style="list-style-type: none"> RZ1 and RZ2 zones Consider making permissible across all RZ1 zones 	<ul style="list-style-type: none"> Active street frontages important Consider reduced setbacks for dwelling and front PPOS / courtyards
7. Townhouses including Accessible Class C Dwellings for Downsizers		<ul style="list-style-type: none"> 50% plot ratio 65% if Accessible Class C Single Storey + Basement Possible Carparking in accordance with code requirements 	<ul style="list-style-type: none"> Blocks 32 and 33 Section 13 Mawson (AMC) Block 7 Section 13 Weetangera (AMC) 7-9 Smith Street, Weetangera (Vitae Capital) Monash Green, (Goodwin) The Central, Crace (Goodwin / AMC) 	<ul style="list-style-type: none"> Usually appropriate with very large blocks or with block amalgamation Subject to block configuration, at least one dwelling should address the street 	<ul style="list-style-type: none"> RZ1 and RZ2 zones Close proximity to public transport and shops Small size blocks Suitable for ageing-in-place Suitable for aging in existing community High degree of adaptability/accessibility Services provided by local aged care provider 	<ul style="list-style-type: none"> Active street frontages important Consider reduced setbacks for dwelling and front PPOS / courtyards Consider 3 storey height limit in appropriate locations Affordable option for Downsizers to age in Community Social integration

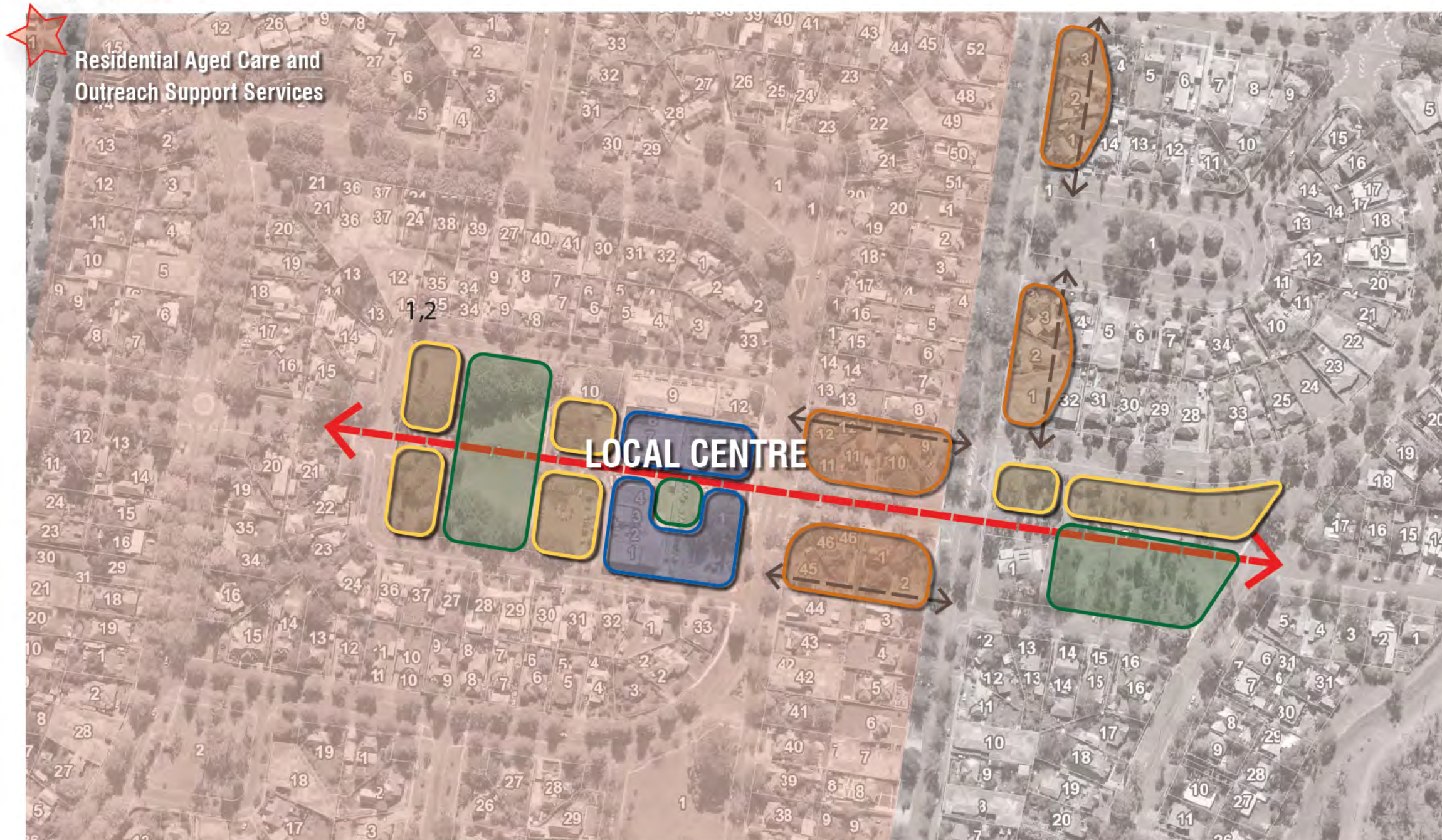
Typology	Reference Image / Plan	Typical Size / Yield in Canberra Within Current Planning Framework	Project Example (In established suburbs)	Features	Location / Design Requirements / Housing Options Provided	Public Realm / Place Making Considerations / Benefits
8. Shop Top / Home Office Apartments		<ul style="list-style-type: none"> 3 Storeys Retail – 100m² Tenancy Residential – 150m² Rear lane, basement or off-site parking provisions 	<ul style="list-style-type: none"> Mann Central, Wodonga (AMC / Riverview) 	<ul style="list-style-type: none"> Modular structural system enabling incremental construction of individual units according to demand Ground level can be commercial / retail or residential 	<ul style="list-style-type: none"> Along active street frontages Near Local or Group Centres 	<ul style="list-style-type: none"> Passive surveillance Site activation outside standard retail / office hours
9. Co-Housing / Supportive Housing		<ul style="list-style-type: none"> Usually associated with CFZ zoning No plot ratio 4 storey height limit Reduced carparking provisions 	<ul style="list-style-type: none"> Benambra Intentional Community (AMC) Project Independence, Harrison and Scullin (AMC) Abbeyfield House, Curtin (CHC) 	<ul style="list-style-type: none"> Compact housing form with attractive common areas Often a caretaker / home maker 	<ul style="list-style-type: none"> Services could be provided by local not for profit or aged care provider 	<ul style="list-style-type: none"> Ensures broader community base in close proximity to Local / Group Centres
10. Mixed-Use Commercial / Residential		<ul style="list-style-type: none"> Permissible in CZ4 Local Centres Zone No plot ratio 2 storey height limit with performance based additional provisions Carparking in accordance with code requirements 	<ul style="list-style-type: none"> Denman Prospect Local Centre Mixed Use Development (CE/AMC) Giralang Local Centre Mixed Use Development (ND/AMC) 	<ul style="list-style-type: none"> Creates more vibrant Local and Group Centres A24 hour usage affords captive audience and 24-hour surveillance Enlivens architectural form Promotes aging in community and ideal for Downsizers 	<ul style="list-style-type: none"> Local and Group Centres Townhouses, Apartments and Fonzie's are applicable here 	<ul style="list-style-type: none"> Active street frontages Communal park areas Retail, Community and Commercial uses
11. Apartments		<ul style="list-style-type: none"> Not permissible in RZ1 or RZ2 zones 	<ul style="list-style-type: none"> Aureus Apartments, Forrest (AMC) Block 1 Section 28 Narrabundah (AMC) Block 1 Section 13 Braddon (AMC) The Central @ Crace (Goodwin and AMC) 	<ul style="list-style-type: none"> Another layer of Housing Choice which should be made more readily available in Local and Group Centres Promotes aging in Community More affordable housing typology 	<ul style="list-style-type: none"> Local and Group Centres Some RZ2 Sites particularly where close to Local and Group Centres and where blocks can be amalgamated to achieve high quality design outcomes 	<ul style="list-style-type: none"> Appropriate housing form in and around Local and Group Centres Increased incentives around building height Reduced carparking provisions for Adaptable Class C Dwellings
12. Retirement Living		<ul style="list-style-type: none"> Usually associated with CFZ zoning No plot ratio 4 storey height limit with performance based additional provisions Reduced carparking provisions 	<ul style="list-style-type: none"> The Central @ Crace (Goodwin and AMC) Monash Green (Goodwin and AMC) Ainslie Village (Goodwin) Kangara Waters (IRT and May Russell) Farrer Village (Goodwin and AMC) 	<ul style="list-style-type: none"> Usually indistinguishable from other apartment developments Needs minimum 1.2Ha site to achieve viable yield for RL operator 	<ul style="list-style-type: none"> Close proximity to public transport and shops Small, medium and large size blocks(CFZ) Urban Open Space Suitable for ageing-in-place 100% adaptable Integrated/interconnected with local community 	<ul style="list-style-type: none"> Ongoing employment opportunities (post-development) Social integration Intergenerational concept
13. Residential Aged Care		<ul style="list-style-type: none"> Usually associated with CFZ zoning No plot ratio 4 storey height limit with performance based additional provisions Reduced carparking provisions 	<ul style="list-style-type: none"> Goodwin Ainslie and Farrer (AMC) Provetus Care, Deakin (AMC) Moran Health Cluster, Bruce (AMC) 	<ul style="list-style-type: none"> Important community services provided for end of life living including outreach services, meals and laundry May include Child Care Centre or Seniors Day Club facility 	<ul style="list-style-type: none"> Close proximity to public transport and shops Small, medium and large size blocks(CFZ) Needs-based services in local community 	<ul style="list-style-type: none"> Ongoing employment opportunities (post-development) Social integration Intergenerational concept
14. Adaptive Reuse		<ul style="list-style-type: none"> Usually associated with commercial zoning or some community zones Height limits prescribed with Territory Plan and National Capital Plan No plot ratio 	<ul style="list-style-type: none"> Mantra Hotel, Turner (HTI / AMC) Abode Hotel, Woden (Geocon, AMC) Civic Backpackers (Evri) Callam Offices, Phillip (PCA, CTP, AMC) 	<ul style="list-style-type: none"> If incentivised would allow for the re-purposing of many commercial office buildings that are beyond their operational life 90% embodied energy in the structure Application for affordable housing, social housing, retirement living and aged care 	<ul style="list-style-type: none"> Usually in Commercial Zones but also industrial zones 	<ul style="list-style-type: none"> Brings out of hours activities to Town Centres and Business Zones Part of city crime prevention strategy

Typology	Reference Image / Plan	Tenure	Finance	Affordability Considerations / Opportunities	Planning Rules that Prevent Development Outcome	Assistance That Government Can Provide
1. Micro Apartments		<ul style="list-style-type: none"> Community title Co-operative Lease 	<ul style="list-style-type: none"> Conventional loans (grants where eligible) banking societies/ mutuals, trusts cash, government rent assistance 	<ul style="list-style-type: none"> Affordable/low cost option Potential for rental and serviced by local affordable housing provider or aged care operator 	<ul style="list-style-type: none"> Mandatory Rules 7, 8, 9, 10, 11 and 12 of the Residential Zones Development Code (controls for the design of secondary residences) Mandatory Rule 17 of the Residential Zones Development Code (restricting subdivision) Mandatory plot ratios for RZ1, RZ2 and RZ3 zones Mandatory building height/storey limits for RZ1, RZ2 and RZ3 zones 	<ul style="list-style-type: none"> Reduction in LVC (both increased rights and block consolidation) to facilitate affordability Concessions on plot ratios and apartment sizes where new typologies are adopted Streamline planning approval processes- reduce regulatory burden which impacts on project viability Rates and land tax concessions for demonstration projects: recognition given to innovative developments that provide community benefits
2. Urban Garages		<ul style="list-style-type: none"> Unit title Lease agreement 	<ul style="list-style-type: none"> Conventional loans (grants where eligible) cash, government rent assistance 	<ul style="list-style-type: none"> Potential to contribute to affordable housing stock 	<ul style="list-style-type: none"> Rule/Criteria 55 of the Multi Unit Housing Development Code (minimum dwelling sizes) Mandatory plot ratios for RZ1, RZ2 and RZ3 zones Mandatory building height/storey limits for RZ1, RZ2 and RZ3 zones 	<ul style="list-style-type: none"> Reduction in LVC (both increased rights and block consolidation) to facilitate affordability Provide incentives for land owners to construct these typologies Rates and land tax concessions for demonstration projects Concessions on plot ratios where new typologies are adopted
3. Fonzie Studio Apartments		<ul style="list-style-type: none"> Unit title Lease agreement 	<ul style="list-style-type: none"> Conventional loans (grants where eligible) cash, government rent assistance 	<ul style="list-style-type: none"> Potential to contribute to affordable housing stock 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Provide incentives for land owners to construct these typologies Flexible development approval options which allow pre-approved additions to the initial construction/permit as exempt development Rates and land tax concessions for demonstration projects
4. Expandable Housing		<ul style="list-style-type: none"> Unit title Lease agreement 	<ul style="list-style-type: none"> Conventional loans (grants where eligible) cash, government rent assistance 	<ul style="list-style-type: none"> Eliminate wastage by deletion of 'under-utilised' or 'dead' space in new construction Reduce costs to property owners who need to upsize, by eliminating transaction costs (stamp duty, commissions, conveyancing, moving costs) 	<ul style="list-style-type: none"> Ability to achieve flexible approval with separable components allowing construction of individual elements throughout the properties lifespan Height/storey restrictions – three storeys provides greatest efficiency 	<ul style="list-style-type: none"> Provide incentives for land owners to construct these typologies Flexible development approval options which allow pre-approved additions to the initial construction/permit as exempt development
5. Dual Occupancy		<ul style="list-style-type: none"> Separate title Unit title Community title Lease License 	<ul style="list-style-type: none"> Conventional loans (grants where eligible) cash, government rent assistance ingoing contributions, deferred management fee 	<ul style="list-style-type: none"> Affordable/low cost option 	<ul style="list-style-type: none"> Rule/Criteria 36 of the Multi Unit Housing Development Code (building separation in RZ2) Mandatory plot ratios for RZ1, RZ2 zones Mandatory Rule 12 of the Multi Unit Housing Development Code (residential density RZ2) Restriction on unit title/subdivision in RZ1 	<ul style="list-style-type: none"> Reduction in LVC (both increased rights and block consolidation) to facilitate affordability Concessions on building design and plot ratios where new typologies are adopted Allow unit titling in RZ1 Concessions on plot ratios where retirement living / not for profit providers are providing support services / retain ownership
6. Duplex		<ul style="list-style-type: none"> Separate title Unit title Community title Lease License 	<ul style="list-style-type: none"> Conventional loans (grants where eligible) cash, government rent assistance ingoing contributions, deferred management fee 	<ul style="list-style-type: none"> Affordable/low cost option 	<ul style="list-style-type: none"> Rule/Criteria 36 of the Multi Unit Housing Development Code (building separation RZ2) Mandatory plot ratios for RZ1, RZ2 zones Mandatory Rule 12 of the Multi Unit Housing Development Code (residential density RZ2) Restriction on unit title/subdivision in RZ1 	<ul style="list-style-type: none"> Reduction in LVC (both increased rights and block consolidation) to facilitate affordability Concessions on building design and plot ratios where new typologies are adopted Allow unit titling in RZ1 Concessions on building design and plot ratios where retirement living / not for profit providers are providing support services / retain ownership

Typology	Reference Image / Plan	Tenure	Finance	Affordability Considerations / Opportunities	Planning Rules that Prevent Development Outcome	Assistance That Government Can Provide
7. Townhouses including Accessible Class C Dwellings for Downsizers		<ul style="list-style-type: none"> • Separate title • Community title • Unit title • Co-operative • Lease 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) • banking societies/ mutuals, trusts • cash, government rent assistance 	<ul style="list-style-type: none"> • Affordable/low cost option • Potential for rental and serviced by local RV operator 	<ul style="list-style-type: none"> • Rule/Criteria 36 of the Multi Unit Housing Development Code (building separation in RZ2) • Mandatory plot ratios for RZ1, RZ2 zones • Mandatory Rule 12 of the Multi Unit Housing Development Code (residential density RZ2) 	<ul style="list-style-type: none"> • Concessions on building design and plot ratios where new typologies are adopted • Concessions on plot ratios where retirement living / not for profit providers are providing support services / retain ownership
8. Shop Top / Home Office Apartments		<ul style="list-style-type: none"> • Community title • Unit title • Lease 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) • banking societies/ mutuals, trusts • cash, government rent assistance 	<ul style="list-style-type: none"> • Provide low cost start-up spaces for aspiring entrepreneurs 	<ul style="list-style-type: none"> • Most non-residential uses (such as shop, restaurant) not permissible in Residential Zones regardless of size 	<ul style="list-style-type: none"> • Facilitate planning policy for broader introduction of small scale commercial uses across residential zones
9. Co-Housing / Supportive Housing		<ul style="list-style-type: none"> • Community title • Unit title • Co-operative • Lease • License 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) • banking societies/ mutuals, trusts • cash, government rent assistance • ingoing contributions, deferred management fee 	<ul style="list-style-type: none"> • Affordable/low cost option • Potential for rental and service by local RV operator 	<ul style="list-style-type: none"> • Restrictions on subdivision in RZ1 zone 	<ul style="list-style-type: none"> • Allocating land and rezoning sites CFZ • Reduction in LVC (both increased rights and block consolidation) to facilitate affordability • Endorsement of a precinct plan that then allowed complying development to occur without further approvals • Rates and land tax concessions for demonstration projects • Provide fast track approvals to retirement living / community housing providers
10. Mixed Use Commercial / Residential		<ul style="list-style-type: none"> • Community title • Unit title • Co-operative • Lease • License 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) • banking societies/ mutuals, trusts • cash, government rent assistance • ingoing contributions, deferred management fee 	<ul style="list-style-type: none"> • Affordable/low cost option 	<ul style="list-style-type: none"> • Compliance with waste and noise management standards where there are conflicting entity requirements between residential and commercial uses • For 'CZ4 – Local Centres': • Rule 49 of the Commercial Zones Development Code (restricting the conversion of commercial GFA to residential GFA in local centres) • Rule 51 of Commercial Zones Development Code (residential use at ground levels) 	<ul style="list-style-type: none"> • Facilitate planning policy to broaden residential uses in local centres • Facilitate strategic resolution of site-specific issues of mixed use development such as utility servicing, waste management and car parking • Streamline planning approval/titling processes- reduce regulatory burden which impacts on project viability
11. Apartments		<ul style="list-style-type: none"> • Community title • Unit title • Co-operative • Lease 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) • banking societies/ mutuals, trusts • cash, government rent assistance 	<ul style="list-style-type: none"> • Affordable/low cost option 	<ul style="list-style-type: none"> • For 'RZ2 – Suburban Core': • Mandatory Rule 3 of the Multi Unit Housing Development Code (no apartments in RZ1/2) • Rule/Criteria 52 of the Multi Unit Housing Development Code (building design in RZ2) • Rule/Criteria 36 of the Multi Unit Housing Development Code (building separation RZ2) • Rule/Criteria 61 of the Multi Unit Housing Development Code: Private open space minimum size and location requirements 	<ul style="list-style-type: none"> • Facilitate planning policy to broaden residential uses in RZ2 zones and introduce greater flexibility in the provision of private open space • Streamline planning approval/titling processes- reduce regulatory burden which impacts on project viability
12. Retirement Living		<ul style="list-style-type: none"> • Community title • Unit title • Lease 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) • cash, government rent assistance 	<ul style="list-style-type: none"> • Affordable/low cost option • Potential for rental and serviced by local aged care operator 	<ul style="list-style-type: none"> • Narrow definitions of aged care uses 	<ul style="list-style-type: none"> • Allocating land and rezoning sites CFZ • Broaden definitions of aged housing uses in Territory Plan
13. Residential Aged Care		<ul style="list-style-type: none"> • Lease • License 	<ul style="list-style-type: none"> • cash, government rent assistance • ingoing contributions, deferred management fee 	<ul style="list-style-type: none"> • Potential for rental and serviced by local aged care operator 	<ul style="list-style-type: none"> • Narrow definitions of aged care uses 	<ul style="list-style-type: none"> • Allocating land and rezoning sites CFZ • Broaden definitions of aged housing uses in Territory Plan
14. Adaptive Reuse		<ul style="list-style-type: none"> • Community title • Unit title 	<ul style="list-style-type: none"> • Conventional loans (grants where eligible) 	<ul style="list-style-type: none"> • Affordable/low cost option 	<ul style="list-style-type: none"> • Potential precinct specific planning controls (depending on site) • Allow balcony encroachments over property boundary 	<ul style="list-style-type: none"> • Facilitate strategic resolution of site-specific issues affecting converted buildings such as utility servicing, waste management and car parking. • Allow additional height / plot ratio to assist project viability • LVC remissions for environmental benefits / performance

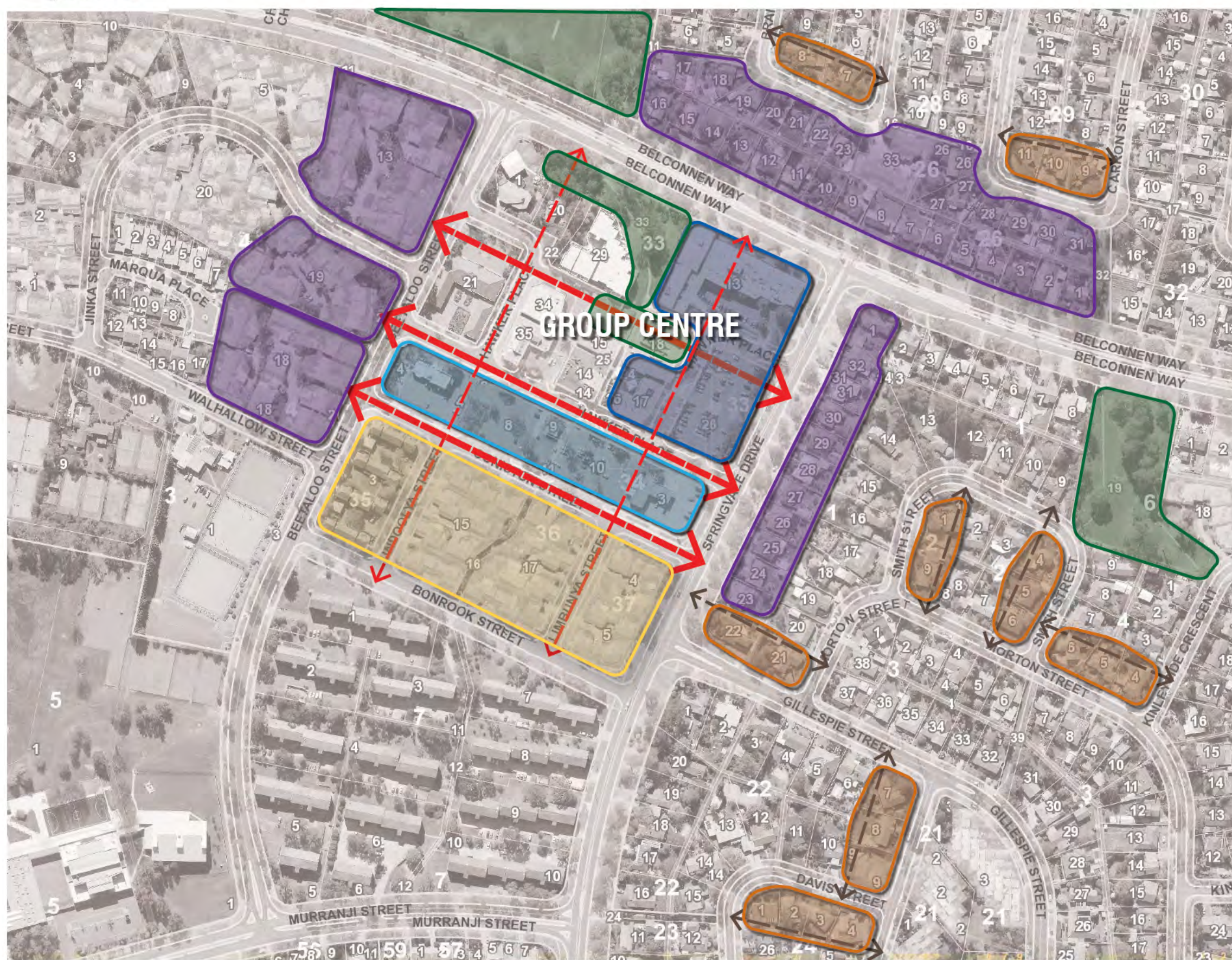
Appendix B

Demonstration Precinct Concept Plans



-  **Incentivised RZ2 Block Amalgamation**
 - ③ Fonzie Apartments
 - ④ Expandable Housing
 - ⑤ Dual Occupancies
 - ⑥ Duplexes
 - ⑦ Town Housing
-  **Affordable Innovative Housing / Retirement Living**
 - ① Micro- Apartments
 - ② Urban Garages
 - ⑨ Co-Housing
-  **Incentivised Local Centre Redevelopment**
 - ⑧ Shop-Top Housing
 - ⑩ Mixed-Use Commercial / Apartments
 - ⑫ Retirement Living
-  **Public Open Space**
-  **Strengthened linkages**
-  **New through-block driveway links**
-  **Other Considerations**
 - Respect Heritage Values

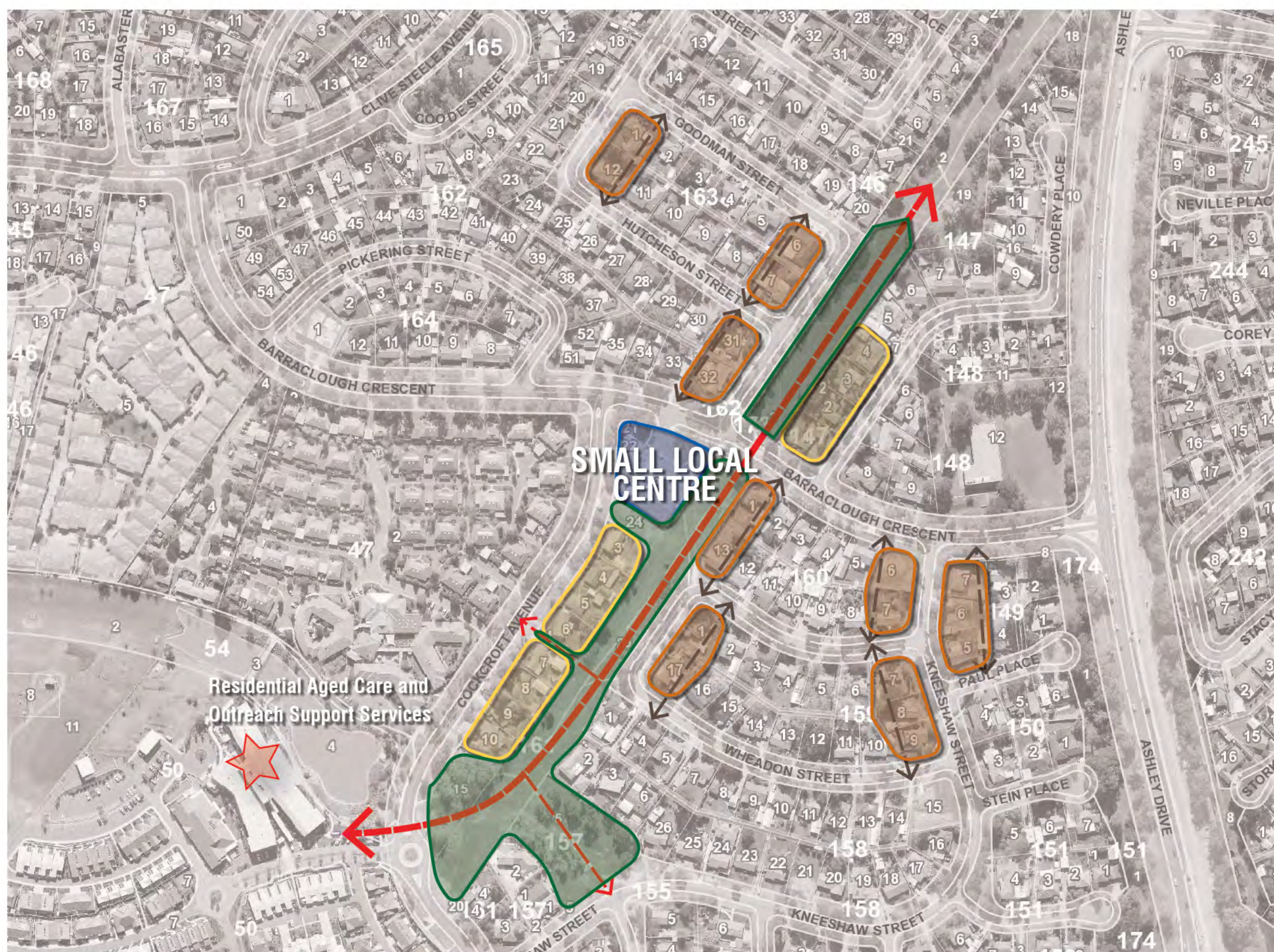









-  **Incentivised RZ2 Block Amalgamation**
 - ③ Fonzie Apartments
 - ④ Expandable Housing
 - ⑤ Dual Occupancies
 - ⑥ Duplexes
 - ⑦ Town Housing
-  **RZ3 Rezoning**
 - ⑧ Shop Top Housing
 - ⑨ Co - Housing
 - ⑪ Apartments
-  **Affordable Innovative Housing / Retirement Living**
 - ① Micro- Apartments
 - ② Urban Garages
 - ⑨ Co-Housing
 - ⑫ Retirement Living (Consolidated Site)
-  **Incentivised Local Centre Redevelopment**
 - ⑩ Mixed-Use Commercial / Apartments
 - ⑫ Retirement Living
-  **Mixed-Used Regeneration**
 - ⑧ Shop Top Housing
 - ⑩ Mixed-Use Commercial / Apartments
 - ⑬ Residential Aged Care
-  **Public Open Space**
-  Strengthened linkages
-  New through-block driveway links

Other Considerations

Establish new Village Green



-  **Incentivised RZ2 Block Amalgamation**
 - ③ Fonzie Apartments
 - ④ Expandable Housing
 - ⑤ Dual Occupancies
 - ⑥ Duplexes
 - ⑦ Town Housing
-  **Affordable Innovative Housing**
 - ① Micro- Apartments
 - ② Urban Garages
 - ⑨ Co-Housing
 - ⑫ Retirement Living
-  **Incentivised Local Centre Redevelopment**
 - ⑧ Shop Top Housing
 - ⑩ Mixed-Use Commercial / Apartments
-  **Public Open Space**
-  Strengthened linkages
-  New through-block driveway links
- Considerations**
Activate the green belt



ATTACHMENT 3 – NEAT DESIGN COMPETITION (27th October 2014)

Themes

- Aging in community
- Facilitating block amalgamation to make sense of Canberra's typical subdivision pattern – deep blocks that tend to lead to less desirable dual occupancy arrangements with a rear residence and significant driveway requirements and lack of street address / frontage
- Medium density housing that achieve active street frontages not dominated by garaging
- Making better use of under-utilised ACT Government land assets with potential zero setbacks to front boundary's
- Housing choice
- Urban consolidation
- Less reliance on motor vehicles
- Support public transport system



Historically

- The Garden City movement in the early 20th Century aimed to constrain urban sprawl and improve the layout of new estates.¹
- The Federal Capital Advisory Committee (FCAC) was appointed to implement Walter Burley Griffin's plan for Canberra, but within a decade its policies and decisions would lead to a city which Griffin considered "violated (his) aesthetic, social and economic principles in almost every act."²
- The houses within these 1920s precincts were predominantly detached and single storey. The densities were very low because of the generous open space and large allotments. There was a conscious aversion to alternative more economical forms. Only in 1929 did the FCAC relent, to permit flats in selected areas and to approve some semi-detached 2 storey residences in Reid and Ainslie to test public opinion³. This reluctance to increase densities continues today.

References ¹ ² ³ – The Early Canberra House. Living In Canberra 1911-1933.
Compiled and Edited By Peter Freeman, Federal Capital Press of Australia Pty Ltd, 1996

As It Stands...

- Canberra suffers from urban sprawl beyond compare for its population base.
- At the same time land tenure and block boundaries are real and can't be ignored.
- The Canberra subdivision pattern is similar across most suburbs developed before the 1990s. We need to find a way to work with it.
- Deep verges combined with large setbacks are wasted land, a maintenance-drain and lack meaning and purpose.
- Current rules, combined with block proportions, work against meaningful subdivision.
- Canberra's low density conspires against public transport and enshrines the car. It fails to fully support Local and Group Centres.
- There is an abundance of open space areas, parklands and potential pocket parks waiting to be better-utilised, supporting for greater housing density.
- Well-crafted townhouse and duplex typologies already exist, which should be promoted.
- RZ2 is ineffective and unsympathetic apartment buildings have been constructed in inappropriate locations.
- Building setbacks are simplistic, waste precious land resources and adversely impact on higher density residential typologies.
- An aging population, working parents, children living at home longer and construction costs are driving a more collective approach to residential development and home businesses.
- Housing affordability is at an all-time low.
- The NCDIS will facilitate new housing typologies and tenure arrangements for people with disabilities.

Opportunities

- Many RZ1 areas could become RZ2 and RZ2 become RZ3, and so on...
- Performance-based solar envelope design and high Energy Ratings are a better planning measure, allowing smarter design by architects.
- Affordable housing is more likely to be delivered through group housing, as studios over garages, on smaller parcels of land and with modular housing.
- Small land parcels end up with dominant garage forms unless rear lanes are introduced.
- Canberra is ready for change... but incremental change which responds to changing demographics, expectations and needs – not just developer driven with no long term commitment to the place, and to quality outcomes.
- Downsizers are increasingly going to drive housing typologies encouraged by combined with the Living Longer Better legislation and Aging In Community principles.

Our Ideas

- Positive change should not become a political football.
- Incremental change can be achieved using existing block boundaries to inform new subdivision patterns, which in turn facilitate new housing typologies.
- Single frontage blocks can be divided into two or three land parcels while retaining front and rear setbacks and a 3-storey height limit.
- Amalgamated corner / end-blocks in many Sections can be used to incentivise higher density, facilitate new housing typologies, rear-lane access, zero setbacks, up to 4 storeys height. End-blocks that are subdivided to accommodate townhouses are given enhanced development rights (subject to solar access and energy ratings achieved) if they provide rear lane access to garages. Enhanced development rights would allow studio and 1 bed units over garages.
- Licenses can be granted to use the verge in appropriate locations.
- Rear easements can become a right of way, pedestrian access or even roadways.
- Modular housing has come of age, driven by sustained high construction costs, skills shortages and the potential to incorporate incremental change in dwellings through modular additions.
- These ideas reinforce the original intent of Griffin vision for Canberra, to constrain urban sprawl and prioritise beautiful tree lined streets as the primary focus of the city.

Location

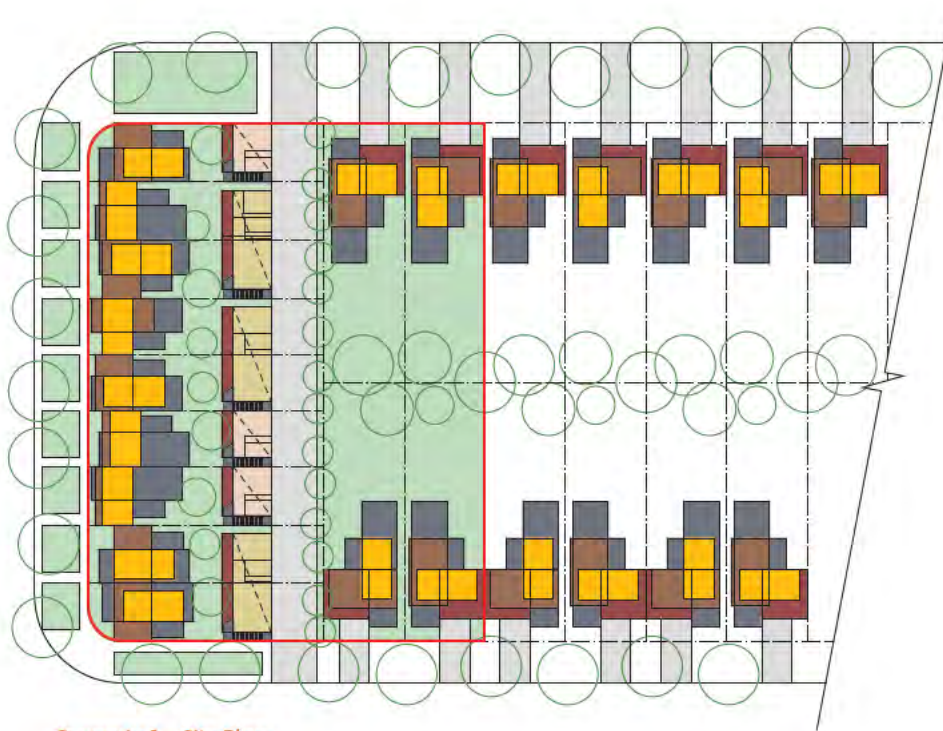
RZ1 and RZ2 zones in any Canberra suburbs built before the 1990s.

Planning Rules To Be Challenged

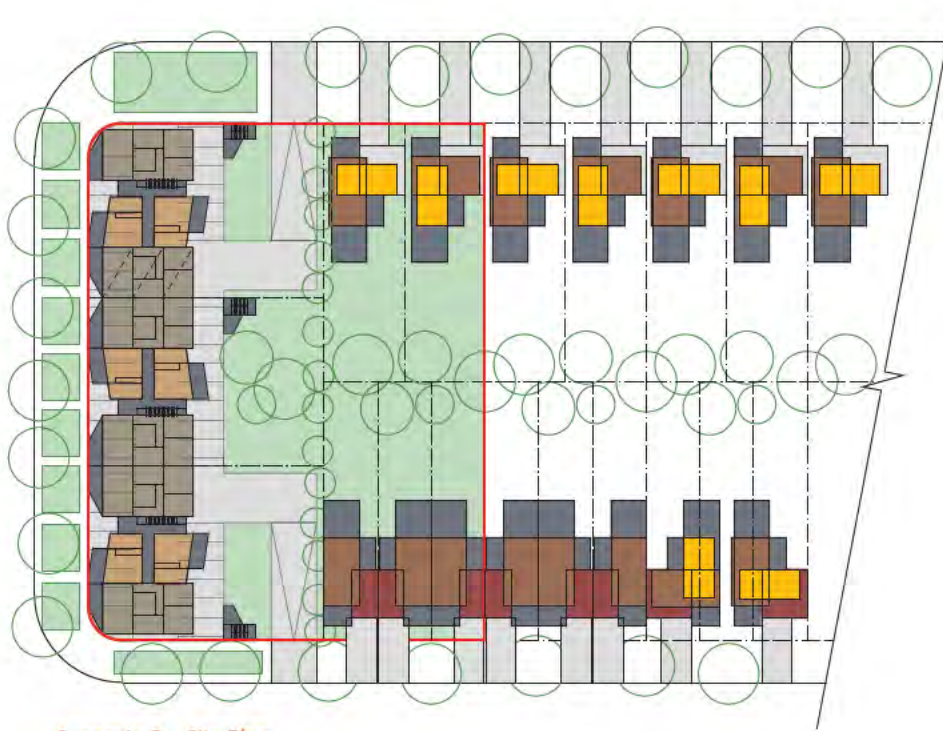
- Single Dwelling Code (RZ1) would no longer be relevant for select sites / Sections to be determined by proximity to shops, facilities and services, and for specific subdivision patterns and demographics.
- Multi-Unit Housing Development Code (RZ2 and RZ3, RZ4 and RZ5 - even though currently not permitted in RZ2):
 - » Elements 1,2, 3, 4, 7,10 are no longer relevant;
 - » Element 5 to remain other than revisiting R55 to accommodate new forms of affordable or special purpose housing;
 - » Element 6 to remain other than R61, R62, R63;
 - » Elements 8,9,12,13 and 14 to remain.

Modular Housing Costs

- Current rates for modular house building, with standard finishes, as provided by a reputable modular housing supplier:
- Approximately \$2,100-\$2,300 per square metre, for house with screw pile footings. The structural frame of each modular building has the strength to be used in multi-storey situations, where they can be stacked to two, three or more storeys.
 - Costs for apartment buildings are more difficult to estimate as it depends on the extent of public areas, stairs, travel distances and other factors specific to each building; however, the rate of \$2,100-\$2,300 per square metre is applicable to the residential apartment areas.



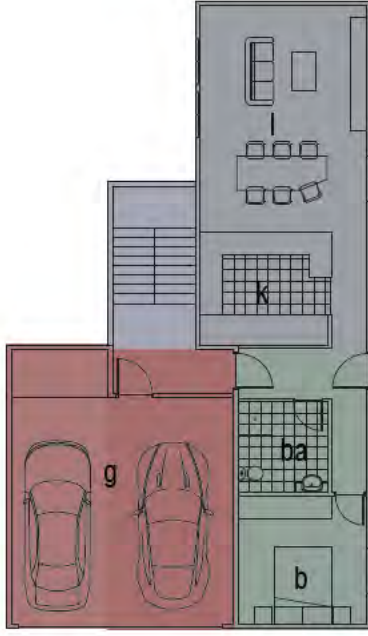
Scenario 1 – Site Plan
End Blocks - Townhouses with rear lane access to garages.
Studio/1 bed units over the garages, accessed off rear laneway.
Single Frontage Blocks subdivided, suitable for duplexes, or townhouses



Scenario 2 – Site Plan
End Blocks - Apartments (up to 4 storeys) with rear access to basement parking.
Single Frontage Blocks subdivided, suitable for duplexes, or townhouses

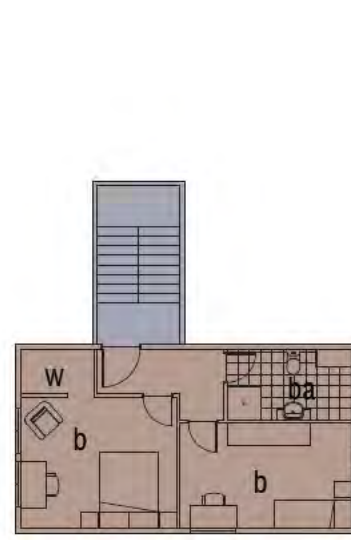


Scenario 3 – Site Plan
End Blocks - Apartments (up to 4 storeys) with a combination of group housing and 1 or 2 bedroom units.
Rear lane access to on-grade parking.
Single Frontage Blocks subdivided, suitable for duplexes, or townhouses

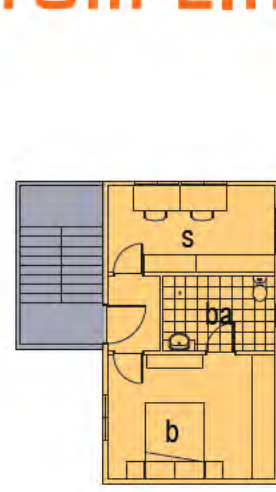


Modular Housing
Ground Floor Modules -
Living, Ensuite + Garage

b = bedroom
k = kitchen
g = garage
l = living
s = studio
ba = bathroom
w = wardrobe



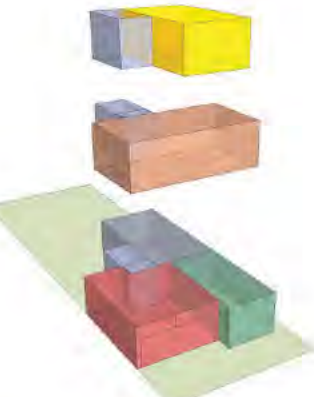
First Floor Module -
2 Bedrooms + Bathroom



Second Floor Module -
Bedroom + Study



Modular Housing - Kit of Parts
From L - R: Stair module; Garage (double or single) module;
Living Area module, Main Bedroom module; Bedroom
module; Bedroom + Study module



Modular Housing - Flexible growth
Modules can be stacked, to allow the house to grow (or downsize) as the occupants' needs change over time



Modular Housing - Flexible arrangements
Modules can be mixed and matched to form different combinations of accommodation. From L - R: 1 storey, 1 bedroom + single garage; 2 storey 3 bedroom + double garage; 3 storey 4 bedroom + study + double garage.



Modular Townhouses (images by Ausco Modular, Garrison Architects, Systembuilt Homes)



Single Dwelling, Duplex and Townhouses, Melbourne



Townhouses, Canberra



Duplex, Melbourne, with rear lane access, shared parking



Planning Guidelines

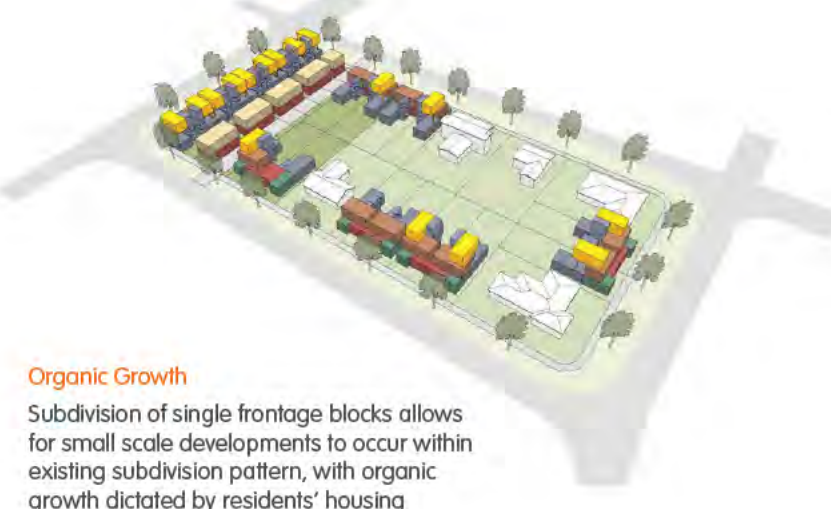
From Little Things Big Things Grow

Paul Kelly and the Messengers 1991



Current Subdivision Pattern

Low density, single dwellings on large blocks.



Organic Growth

Subdivision of single frontage blocks allows for small scale developments to occur within existing subdivision pattern, with organic growth dictated by residents' housing requirements and aspirations.



End-block Consolidation

End-blocks are consolidated to provide higher density apartment developments, with the fine grain of duplexes and townhouses in the single frontage blocks.



Group Housing

Flexibility in block sizes and housing typologies respond to the needs of the community, to provide group housing, apartment units, townhouses, duplexes and single family large homes (4 bed + study), with different levels of affordability.