
Comment on Territory Plan Draft Variation 387

Greater Canberra Inc, 30 October 2022

Background

Greater Canberra is a community organisation working towards a more liveable, sustainable and affordable Canberra for everyone. We have a particular interest in ensuring that the ACT's planning system is well equipped to provide for Canberra's growing housing needs. We are strong supporters of urban infill and medium-density housing, which we believe is necessary to provide adequate housing supply while reducing our city's impact on the environment.

Our position

We strongly oppose this draft variation, and believe it should be withdrawn in its entirety.

Contrary to the assertions made (without supporting reasoning) by the Directorate in the Explanatory Statement, this draft variation is not consistent with the strategic directions of the 2018 Planning Strategy, nor the promotion of sustainable development as required by the object of the *Planning and Development Act 2007*.

We reject the notion, originally used to justify V350, that increased density results “in a built form that was not sensitive to the neighbouring blocks and the single dwelling streetscape character of the surrounding areas”.

The Planning Strategy promotes a “compact and efficient city” with “housing that is diverse and affordable” to deliver a liveable Canberra that is concentrated within our existing urban footprint to make Canberra more sustainable. The Strategy correctly identifies medium-density housing as an important aspect of diversifying our housing mix.

This draft variation further reduces the ability to deliver “missing middle” medium-density housing in RZ1. It is hard to see how it can be reconciled with the Planning Strategy's strategic directions. Actively downzoning and restricting housing supply in well located areas is directly contrary to the ACT Government's National Housing Accord commitment to do the precise opposite.

A compact and efficient city

Planning Strategy Strategic Direction 1.1 calls for the planning system to “support sustainable urban growth by working towards delivering up to 70% of new housing within our

existing urban footprint, and by concentrating development in areas located close to the city centre, town and group centres and along key transit corridors.”

As noted in chapter 4 of the 9th Assembly’s Standing Committee on Planning and Urban Renewal’s *Report No. 7 (Draft Variation 350 - Changes to the definition of ‘single dwelling block’)*, the Directorate only has a rough estimate (‘several hundreds’) of how many non-standard blocks there are. It is concerning that no further analysis allowing a more precise estimate appears to have been made available in the years since, and that therefore this draft variation is being considered without a proper understanding of its impacts.

Strategic Direction 1.1 specifically identifies “areas located close to the city centre, town and group centres and along key transit corridors” as focus areas for development - for obvious reasons, they are the best targets for increased housing density. It is impossible to determine, on the basis of publicly available data, exactly which blocks will be impacted by this draft variation, and therefore which areas are more or less affected.

However, we have manually identified (by looking for existing multi-unit housing using aerial imagery) a number of potentially-impacted RZ1 blocks in inner suburbs, such as Braddon, Barton and Forrest, that are in close proximity to town or group centres, public transport services and other urban amenities. These are the suburbs where additional medium-density housing is most useful. It is extremely concerning that this draft variation may close off medium-density development options in areas that are the best prospects for intensification.

This draft variation is directly contrary to the vision of a compact and efficient city.

Diverse and affordable housing

Planning Strategy Strategic Direction 4.4 identifies the need to “deliver housing that is diverse and affordable to support a liveable city”.

Housing supply has a major impact on housing affordability, and Canberra’s current housing affordability crisis is having a significant impact on our standard of living and economic prosperity.¹ It is critical that our planning system consider affordability as a priority.

Canberrans have also expressed a desire to see more medium-density housing options, of the kind that could potentially be delivered on non-standard RZ1 blocks.

This draft variation will add a further restriction on housing supply and delivery of a diversity of housing choices, with no compelling justification.

Subdivision restrictions

Proposed rule R38B bans subdivision under the *Planning and Development Act 2007* for non-standard blocks, and only permits unit titling for dual occupancies.

¹ See Greater Canberra’s [2022-23 ACT Budget Submission](#)

The built form and visual impact of a dual occupancy is identical whether it is held under a single title, unit titled or subdivided. It is therefore unclear to us how the restrictions on subdivision further the stated goal of upholding the character of the surrounding areas.

Conclusion

For the reasons we have outlined, this draft variation fails to advance the stated goals of the ACT planning system, and will simply further reduce the avenues for delivering medium-density housing in RZ1. It should be withdrawn in full, and the Directorate should investigate options for unlocking more housing choices and opportunities for medium-density housing in RZ1 rather than the opposite.