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- All Assembly Members
- Residential Associations & Community Councils
- ACT Commissioner for the Environment
- ACT Government Architect
- ACT Heritage Council
- National Capital Authority
- Senators Gai Brodtmann and Katy Gallagher

HOUSING CHOICES - DISCUSSION PAPER

The National Trust of the ACT is a not for profit community organisation with over 1,400 members and is widely respected in the community. The Trust's role is to foster public knowledge about places and objects that are significant to our heritage, and promote their conservation

The direction of the Discussion Paper is for smaller, denser and higher residential developments. We are aware that other organisations and individuals are making substantive submissions on matters of detail. Our response is directed towards Heritage issues.

For our part the Trust fully understands that it is not possible to "freeze" a city's development and is not opposed to development provided it is done for the right reasons and the appropriate manner. While choice is possible for Canberra residents, the character that the community wants needs to be defined, understood and protected

We firmly believe such development must be complementary to the residential character and amenity of both the new and existing suburbs. Otherwise Canberra will suffer from becoming second rate and turned into a town like anywhere. Our city and its citizens deserve, and must have, a better outcome.

We suggest that the liveable, healthy character is represented by the Garden City ideal such as the heritage listed conservation areas but is not represented by the recent

development of Gungahlin and Molongolo. We believe this is why neighbourhood satisfaction with planning has declined in recent times and there needs to be a paradigm shift to redress the situation.

Healthy cities need space and soft landscaping for recreation and relief and individual houses need effective and sufficient open space. These values need to be included in any future housing choices if “high quality” outcomes and better design are to be achieved.

There can be choice and dual occupancies with separate titles in some locations is one means and with appropriate planning controls there can be other choices and the Garden City character can be maintained.

The Trust’s major concerns are that:

- The Garden City concept that is unique and fundamental to our city is being steadily subjected to “death by a thousand cuts”;
- The values (non-financial), rights and lifestyle of the existing residents, who form the majority of the existing population are being dismissed or subjugated by those of the smaller numbers of future incoming residents, who are yet to arrive and apparently all want to live in tall multi-storey apartment towers and the pecuniary interests of developers; and
- The intended battery-hen style of development does not properly take account of the inherent negative social, community, cultural and environmental impacts on all residents (current and future).

Garden City Concept - “Canberra Character”

The Discussion Paper refers to “character” (p29) but there is no detail.

All great cities have their own character – an individual style, the way they look and the feelings they evoke. Canberra is now 100 years old with third generation residents and a local sense of community spirit with its own identity. Contrary to some outside opinion the Garden City does have a soul and is the place where we all live work and play. In fact it is the reason why people come to Canberra and stay.

At the same time Canberra is more than our collective home, it is the Nation’s Capital. The original intent of the urban design of Canberra was to establish an aesthetic of balance, light and space – an aesthetic that evokes a desirable lifestyle for all Australians.

For more than 100 years Canberra has been assiduously planned, designed and developed as a Garden City. This has been achieved through the collective investment of Australia’s taxpayers and ACT rate payers, who have largely been collectively responsible for the delivery and maintenance of the Garden City concept.

The full wisdom and range of social and environmental benefits of this far sighted approach are only now becoming fully evident.

Canberra has established an enviable international reputation as a Garden City.

Canberra is a planned city of national institutions situated within an amphitheatre of hills and the environment created by the lake. Canberra's national character is enshrined by the ACT (Planning and Land Management) Act.

While both the Commonwealth and ACT Governments often make reference to the "**National Character**" of Canberra they fail to appreciate that the city through its citizens has also developed its own "**Canberra Character**".

The Garden City concept is a key element of this character and the continued application of this concept and the lifestyle it engenders should not just be limited to the established suburban areas but be strenuously applied to new areas as well.

Legislative Protection

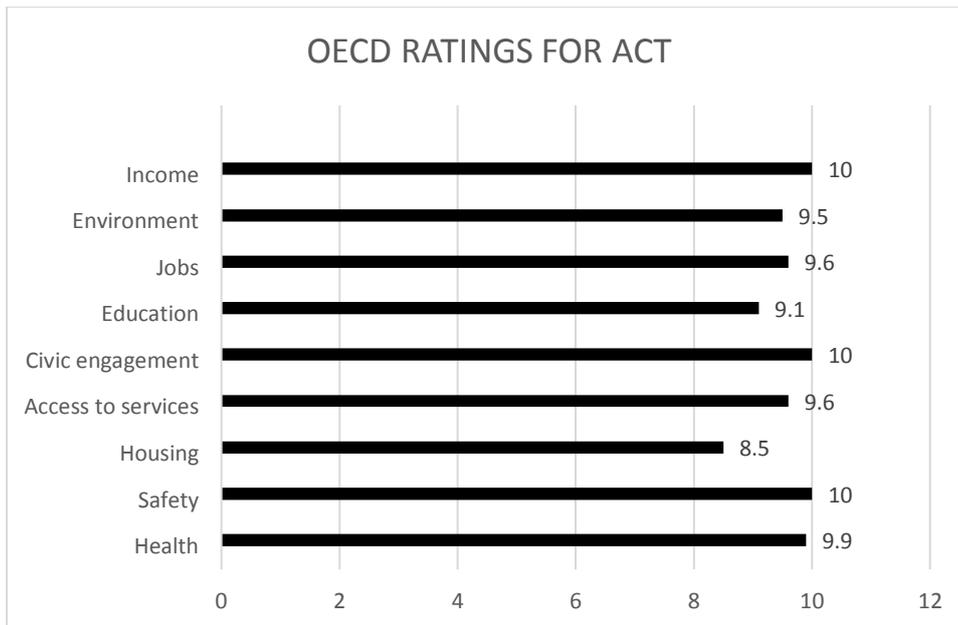
Figure 1 of the Discussion Paper, which details the Planning documents in the ACT is deficient in that it does not include the ACT Heritage Act 2004 or mention the associated guidelines which have statutory force and apply to residential development in ACT heritage-listed places or precincts. There should also be a Heritage Strategy which the Government has promised for several years but so far has not delivered.

Also there is no reference to the "*Garden City Values and Principles and Design Consideration for Residential Considerations*" detailed at:

http://www.planning.act.gov.au/__data/assets/pdf_file/0011/890993/gardencity_values.pdf

The success of the above planning philosophy and the local lifestyle it engenders is clearly demonstrated by reports by several prominent organisations eg:

- a. **numbeo.com** This organisation has the world's largest database of user-generated content. It has accorded Canberra the highest quality of living worldwide according and given it another number one ranking. The research website ranked the Australian capital first on its mid-year "quality of life" index, which takes into account purchasing power, pollution, house-price-to-income ratio, cost of living, safety, health care, traffic commute time and climate index
- b. **Lonely Planet** According to the largest travel guide book publisher in the world. Canberra is third in the world's top 10 cities to visit in 2018.
- c. **OECD** Organisation for Economic Co-operation and Development is an intergovernmental economic organisation with 35 member countries. OECD rankings have also confirmed what many Canberrans have long known; that our city is the best place to live in the world ie:



Canberra's Brand

Such rankings are not only important from social, cultural and community perspectives, they are also important from the economic perspective in terms of the opportunity to attract inward investment and create employment as well.

Although it is not explicitly mentioned in the material relating to the recently created Canberra brand "CBR", the city's Garden City design and associated environmental ambience is one of the key elements that sets Canberra apart from the other state capitals and most other cities in the world.

The strength and value of this element of the brand are so great that top priority should be given to obtaining National Heritage listing of Canberra. This will ensure heritage and environmental sustainability are respected and form the foundation for the continuation of Canberra's unique position in Australia. Unfortunately the current ACT Government refuses to take the necessary action.

Heritage Precincts

These precincts should not be viewed in total isolation. They are the core areas from which much of the urban design of the city gains its strength. These areas are subject to constant ongoing threat and their integrity must be preserved to the maximum possible extent. Unfortunately the precincts are not highly regarded by either the Government or developers and there is a creeping tendency by the ACT Government to not properly enforce the provisions of the legal guidelines which is eroding the heritage significance of these areas.

In part this is due to the fact that Heritage is no longer included in the ACT Territory Plan. Based on the planning policy and experience of other (Victorian) jurisdictions we believe Heritage should be made explicit in ACT Planning and could be achieved in one or more of several ways:

- a. **Territory Plan**: include a '*Heritage Overlay*' in the Plan which we understand the City of Ballarat in Victoria has relatively recently adopted, which was technically possible

through IT applications. Although some Planners may not favour this sort of initiative, Asset Managers are usually much more receptive. We believe the *Overlay* approach would address the situation where Heritage in the ACT needs to be considered in regard to the provisions of the *ACT Heritage Act 2004* but Heritage considerations are not formally treated in the Territory Plan. This lack of concordance results in Heritage often being ignored, either through ignorance or design, as Heritage is not explicitly mentioned in the current ACT Territory Plan.

- b. **Territory Plan:** create and include a new Zone (eg akin to RZ1: Residential Zone or CZ: Community Facility Zones – such as a 'Neighbourhood Residential Zone' – the latter having been adopted in Victoria by at least one Municipal Council.

The way the Zone works is that sitting underneath the Zone is a 'Schedule' that specifies what the local character objectives are in each place. That allows it to be flexible between each precinct it is applied to, e.g. heritage in one place versus big old eucalypts and bushland setting in another. In the ACT's case, what you might do is apply this Zone, then put the high-level heritage objectives and values in the Precinct Code.

- c. **3 Conservation Management Plans (CMPs):** This third option would involve development and seeking ACT Heritage Council approval for a CMP, adapted from a slightly expanded part of the existing Entry into the ACT Heritage Register for some 12 Residential Garden City Precincts in Inner North & Inner South Canberra. The relevant parts are set out in the Statement of Significance and the Specific Requirements for the Conservation of the Precinct. The latter include the Conservation Objectives and Discretionary and Mandatory Requirements for conservation of the place.

VALUES (NON-FINANCIAL), RIGHTS AND LIFESTYLE

The Trust fully appreciates change is part of life and occurs naturally over time. Change can occur either quickly or gradually and produce either desirable or undesirable outcomes. The Discussion Paper is largely predicated on:

- A growing and ageing population;
- Households changes; and
- Our ecological footprint

The ACT Population is projected to reach 500,000 by 2033. The Government's existing policy is to increase the population of inner Canberra by more than 20,000 over the next 5-10 years. Now an extra 37,000 new dwellings are being proposed along the first stage of the light rail route and out to Exhibition Park. Apparently this would involve "*height uplift opportunities*" from the generally prevailing 25m limit up to 48-50m on some sites.

The Government is pressing for smaller blocks, higher density and higher buildings. This ignores the fact that the Garden City concept is underpinned by values and principles that apply to:

- The Street;
- The Block; and
- The Dwelling.

It is the collective effect of these components that gives Canberra its unique character as one of the best garden cities in the world and also recognition as Australia's Bush Capital.

Loss of Amenity

The public realm and hence the street is a core element in Canberra's Garden City concept in establishing a place for social interaction and setting the environmental quality and character of the suburb. In the *Territory Plan* 'streetscape' is defined as 'the visible components within a street including the private land between facing buildings'. This encompasses the area of land between the building lines on either side of the street, and includes all that is visible from the public realm of the street: the form of the buildings, treatment of setbacks, fencing, trees, landscaping, driveway and street layout and surfaces, utility services and street furniture.

The size of blocks and the way of life existing residents and design of private dwellings in suburban areas is important and deserves respect but the interests and views of the existing communities is being totally ignored by the Government and developers.

Appearance Identity and Maintenance Smaller blocks, higher building and more traffic, by its mere presence, detracts from the appearance of a neighbourhood, be the vehicles parked or moving. The presence of traffic can detract from more positive features of a neighbourhood, aiding if not causing a reduction in neighbourhood identity and' cohesion, and reducing the incentive to maintain the neighbourhood's appearance.

Reduction of Street Activities and "Neighbouring" These are effects of traffic which are problems of communities as much as problems of individuals. When traffic noise is high, the desire to meet and converse on the street is reduced; where volumes are high, the ability of children to use the streets as play areas - often the only feasible location - is reduced. Other physical activities, such as walking and jogging, are also affected.

Impact on Land Use and Social Stability The presence of traffic can discourage residential land uses and encourage commercial activity; it can also lead to rapid population turnover and neighbourhood instability, though this is not always the case. There is also some evidence that streets with greater auto accessibility may be more susceptible to residential crime (e.g., burglaries).

Land Supply

The Discussion Paper does not properly address the issue of land supply and the impact on affordability. The former Chief Minister Mr Stanhope, has pointed out several times that data used to support this aspect is spurious and the ACT government is using the issue of housing to support an agenda to change the built form and plan of Canberra. He states that the "*conversation will be all but meaningless if the government refuses to be open and honest about its real intentions and continues to ignore its own research about community views*".

The two principal conclusions that can reasonably be drawn from the Canberra community survey on housing choices undertaken by Winton in 2015 is, first, that the housing choice most commonly denied to Canberra residents is an affordable house on a detached block and, secondly, that the ACT government has completely ignored the views of Canberra residents in relation to land supply and the built form of Canberra.

The fact that the overwhelming first choice of a detached dwelling is simply not realisable for thousands of Canberrans is in major part a result of decisions taken by the Labor/Greens government to strangle the supply of land and abandon the Affordable Housing Action Plan”.

At the same time we are concerned that in a subsequent report the former Chief Minister and former Executive Director, Policy Coordination and Development Division, ACT Treasury state:

“two agencies were created, according to the Government, to address the serious issues of lack of "transparency, accountability and rigour" identified by the auditor-general in their precursor organisation, the Land Development Agency. All of Canberra will be hoping that these agencies are able to deliver on their objectives, which include "promotion of inclusive communities", "providing a choice of housing products for people at all stages in their life", and "working towards providing all Canberrans an opportunity to own their own home". Unfortunately, the targets in the statements of intent give no confidence that any of these objectives will be achieved.....however, research conducted on behalf of government provides a clear indication of what the community wants. The Housing Choices Community Survey done by Winton Sustainable Research Strategies in 2014 showed that 91 per cent of Canberrans proposing to move want to move to a house on a detached block.

Density and Building Heights

Through 100,000 years of evolution human individuals and groups are hardwired to enjoy nature and mass high density mass urbanisation is still a new phenomenon in Australia - less than 100 years.

Comparisons in the Discussion Paper about the numbers of dwellings in the various Districts are misleading as they do not properly take account of the differences in area, population and numbers of dwellings:

District	Area k²	No of Suburbs	Population	Dwellings	Density	% ACT Population
North Canberra	37	14	53,002	21,555	1,405.9/km ²	13.3%
South Canberra	35	20	27,007	13,781	780.5/km ²	6.8%
Woden	29	12	34,760	15,225	1,215.4/km ²	
Western Creek	16	8	22,746	9,490	1,440/km ²	6.4%
Belconnen	77	25	96,049	39,092	1,247/km ²	24
Tuggeranong		19	85,154	33,362		21.4%
Gungahlin	90	18	70,871	26,149	782.2/km ²	13%

Wikipedia/2016 Census

According to the Discussion Paper the industry claims that only greenfield developments and apartments of greater than six storeys are economically viable. There is no evidence that this claim has been properly tested. Why are lower level developments viable in all cities across Australia and indeed the world? Is it because of the higher yield for land owners and developers or are there other valid reasons?

The Discussion Paper and other concurrent Government publications are pushing to dramatically increase the building height in many areas to 25m and up to 48-50m or 15 storey. Given the Winton Sustainable Research Strategies in 2014 showed that 91 per cent of Canberrans proposing to move want to move to a house on a detached block, is this what the community really wants and needs?

How is it that the NCA only applies a 25m height limit in the Parliamentary Triangle? Why can't this limit be applied throughout the city?

Is this battery-hen style of development that does not properly take account of the inherent negative social, community, cultural and environmental impacts on all residents (current and future) really driven by developers seeking maximum possible yields?

SOCIAL, COMMUNITY, CULTURAL AND ENVIRONMENTAL IMPACTS

The Discussion Paper is heavily focused on increased urban density and economics but does not give sufficient attention to quality of life or environmental considerations or outcomes.

In other more congested parts of the world Garden cities – or ‘eco cities’ or ‘green cities’ as they are sometimes branded – are the rage in environmental circles. Unlike here they are actually going the other way and replacing concrete high-rises and log-jammed roads with energy-efficient buildings, green spaces and car-free zones promises cleaner air and lower greenhouse gas emissions.

Global warming and climate change is the biggest threat facing humanity. The CSIRO heat maps clearly demonstrate the dramatic differences between the older and newer areas of Canberra in terms of environmental warming:



This temperature differential is attributable to small blocks, higher plot ratios, almost no trees or residential gardens, darker roofs, driveways and streets without foliage shelter, more synthetic surface materials and less urban open space. The effect of the Discussion Paper would be to propagate these negative impacts more widely across the City.

Probably the simplest and most low tech, way to reduce the impact of a hotter and dryer climate would be to plant more trees and increase green spaces. Trees lower temperatures by not only providing shade but by transpiring water. However trees only grow well where there is access to water and their roots are not too cramped. Trees do not flourish in high density living spaces. Wide verges and large front and back yards not paved over provide

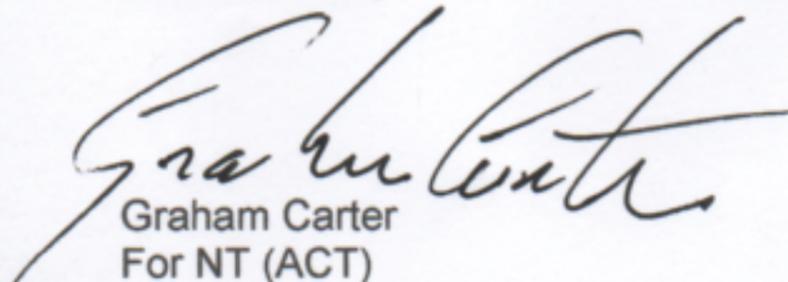
good scope for the growth of large trees. Increased densification of the remaining garden city suburbs of Canberra reduces further the scope for climate improving large spreading trees.

What is good for the planet is also good for our local communities. The studies referred to earlier, and many others besides, clearly prove that Garden City design and the associated green spaces really provide huge social, community, cultural benefits, which do bring health and happiness.

According to research by global engineering firm Arup, green cities are healthier, more prosperous and safer. A 17-year study by Exeter University found that UK householders living in greener urban environments are likely to have lower levels of mental distress and higher levels of wellbeing. Exercise too is a big factor that generates significant personal and economic benefits in terms of reduced sick days and residents' medical costs.

We request the above views be taken into consideration.

Yours faithfully



Graham Carter
For NT (ACT)
9 March 2018