



LEGISLATIVE ASSEMBLY

FOR THE AUSTRALIAN CAPITAL TERRITORY

STANDING COMMITTEE ON PLANNING, TRANSPORT AND CITY SERVICES

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Submission No 2 -

Co-housing Canberra

Inquiry into DV 365 -

Housing Choices

Received - 20/04/21

Authorised subject to

contact details being

provided - 06/05/21

Cohousing Canberra



Submission re the Inquiry into the Recommended Draft Variation No 365 *Housing Choices - Boarding Houses and Co-Housing*

Cohousing Canberra Inc. appreciates the opportunity to make a submission to the Inquiry into the Recommended Variation 365, as we were quite disturbed by some of the revisions to the original Draft, however it should be noted that we were not informed of the Inquiry, and only came across it by accident. As a stakeholder organisation who had made a submission to the Draft Variation, it would have been appropriate to notify Cohousing Canberra of the Inquiry.

Draft Variation 365 deals with proposed changes to boarding house provisions and the inclusion of cohousing as a housing type in the Territory Plan. These provisions are being addressed in response to Recommendation 7 that arose from the Collaboration Hub as part of the Housing Choices program.

***Theme 4 – Lifestyle and diversity** – The current housing options driven by market do not provide flexibility for varying lifestyles in both physical space and possible procurement methods.*

Recommendation 7 – For both infill* and new developments, government should require and/or incentivise developers to deliver an increase in: 1. Mix of dwelling sizes and diversity of dwelling types. 2. The set proportion (%) of new dwellings that meet universal design standards: whilst taking into account different Precincts and changes over time.

Note that cohousing and boarding houses are very different types of housing and addressing them together in a Draft Variation has possibly led to confusion and a perception that they are similar.

It is important to address the fact that planning controls are only a part of the needed framework for addressing housing choices. Simply limiting the scope of housing choice cannot achieve the desired outcome of *'flexibility for varying lifestyles in both physical space and possible procurement methods'*. In order for housing options like boarding houses and cohousing to provide both flexibility in living space and procurement options, as well as neighbourhood amenity, additional policy framework that is referenced by the planning code needs to be developed. Otherwise, there will continue to be avenues for unscrupulous landlords and developers to take advantage of both low income earners and planning provisions that are designed to increase affordability or flexibility but can be used instead to increase profitability without delivering affordability or security of tenure or a safe place to live.

Regarding Boarding Houses

Cohousing Canberra is pleased that boarding houses have been retained in RZ1, as we believe they can form an important part of affordable housing within the right regulatory framework. However we don't support the proposed reduction in number of bedrooms for a boarding house in RZ1 to 4 bedrooms, as this doesn't address the problem of unscrupulous landlords and developers, and disincentivises those who are prepared to create quality housing for low income earners; rather we support a larger number of bedrooms being permitted in accordance with plot ratio and site provisions to address the amenity of the neighbourhood as is currently the case, with a separate policy and regulatory framework that addresses the rights and amenity of residents. With the experience gained from COVID, we believe that the provision of ensuite bathrooms and kitchenettes for each bedroom as well as a communal kitchen should be encouraged as self-contained accommodation provides the capacity for vulnerable people to self-isolate.

It should be noted that under the Building code there are two kinds of boarding house: Class 1b boarding houses with up to 12 bedrooms and under 300m² in size, and Class 3 boarding houses larger than this, with additional building requirements. Boarding houses can also comprise self-contained micro apartments (with bathroom and kitchenette) along with communal areas, without becoming Class 2 units (as is the case with New Gen boarding houses in NSW). These should be treated differently by definition and regulation, to permit more flexibility in living arrangements while ensuring that both resident and neighbourhood amenity is maintained. Other

jurisdictions require that larger boarding houses be registered, and that a proportion of rooms/suites be accessible or adaptable.

Cohousing Canberra recommends that definitions and parameters be developed to cater for different types of boarding house developments; that boarding houses be permitted in RZ1 with number of bedrooms limited by plot ratio and site provisions as currently; that self-contained units within boarding houses be encouraged/incentivised, and that a separate body such as The Minister's Affordable Housing Consultative Group be responsible for the development of appropriate policy regarding the management of boarding houses, in consultation with EPSDD.

We note the statement in the Report on Consultation that:

Most of the submissions expressed an interest in increasing housing choices across the residential zones and relaxing provisions to increase viability of boarding houses and co-housing. However, some submissions called for greater limitations and control of boarding houses and co-housing, particularly in the Residential RZ1 Suburban and the Residential RZ2 Suburban Core Zones.

We don't understand why, if most of the submissions expressed interest in *increasing* housing choices and relaxing provisions, the recommendations are to apply *greater controls*, taking into consideration the responses of the smaller number of submissions received.

Regarding Cohousing

Cohousing Canberra was particularly disappointed with the revised provisions for cohousing in the recommended Draft Variation.

The original Draft Variation 365 *Housing Choices – Boarding Houses and Co-Housing* proposed **no limit on the number of dwellings for cohousing, but that the number of dwellings be limited by plot ratio/site coverage provisions**. Given the varying sizes of dwellings likely in a cohousing development catering to a diverse community, with significant shared facilities and minimum private living area requirements, this is an appropriate approach to take – permitting diversity of dwelling size and type to facilitate build to rent and age in-place. The revised version however refers to Element 3 of the Multi Unit code to determine dwelling number permitted, which removes the capacity for cohousing to provide affordable options as part of a mix of dwelling sizes. This is a

significant step in the wrong direction, essentially removing the only innovative provision for cohousing in the Draft Variation.

Our submission (and others) also recommended that cohousing be permitted in RZ1, under the same provisions that currently apply to boarding houses, being no more than one per section. We reiterate that this is a suitable approach given the limited number of blocks over 1050m² available in all zones, and that permitting an increased density of this nature in RZ1 is in keeping with the Planning Strategy 2018 goal of up to 70% of new housing within the existing urban footprint. Further, we believe that using plot ratio and site provisions is the appropriate way to address housing density, and that limiting cohousing to blocks larger than 1050m² significantly restricts the provision of affordable housing options and doesn't allow for innovative dwelling design that can meet the requirements of neighbourhood character and amenity while providing better housing choice to more people.

Cohousing Canberra also strongly supports development of separate policy to ensure that cohousing developments are permitted only to residents controlled groups, to retain the intent of cohousing.

Cohousing Canberra recommends that there be no arbitrary limit on block size for cohousing, and that cohousing be permitted in all residential zones with a limit of one development per section; that number of dwellings be limited only by plot ratio and site provisions, and that policy be developed and referenced in the planning code to restrict cohousing to resident-controlled groups.

Further, we don't find the proposed definition of cohousing to be entirely adequate and as the association representing cohousing in Canberra we would welcome the opportunity to discuss this further with the Department prior to its adoption into the Territory Plan.

Finally Cohousing Canberra thanks the ACT government for engaging with the community to develop better housing options and looks forward to engaging further with the government and other stakeholders to refine both planning and housing policy.