



Madison
...live more!

Ms Mary Porter MLA
Chairperson
Standing Committee on Planning, Public Works,
and Territory and Municipal Services.
Legislative Assembly for the ACT
GPO Box 1020
CANBERRA ACT 2601

Dear Ms Porter

**DRAFT VARIATION TO THE TERRITORY PLAN NO.298 – STRUCTURE
PLAN-CONCEPT PLAN AND ZONE CHANGES - HOLT SECTION 99 PART
BLOCK 11 BELCONNEN GOLF COURSE**

Introduction

1. Madison appreciates the opportunity to make this submission to the inquiry by the Standing Committee on Planning, Public Works and Territory and Municipal Services into the proposal to vary the Territory Plan to permit development of a residential estate on the former 19th to 27th holes of the Belconnen Golf Course (DVP 298).
2. Madison has been a developer of residential estates in the ACT for 24 years and has established a record of quality developments in the small to medium housing range. Madison is the majority shareholder in Woodhaven Investments Pty Limited, the registered proprietors of the Belconnen Golf Course.

Background

3. The Belconnen Golf Course consists of an 18 hole golf course and two residential estates (Woodhaven and Wiluna) located between Southern Cross Drive and Stockdill Drive in Holt. The land is situated west of Spofforth Street Holt and forms part of the urban fringe of West Belconnen. The Golf Course is leased to the Magpies Sports Club.
4. In 2003 the Magpies Club Group was forced to close the 19th to 27th holes of the course because they were economically unviable. The viability of this section of the course was affected by the high cost of water required to maintain fairways and greens which affected playing fees and the general changes in attitudes to golf with declining numbers of players, and a failure to attract new players, particularly younger players. All these factors, water costs, greens maintenance costs, declining numbers of players were being experienced on a national basis and the ACT experience reflected the national trends.
5. Since 2004 Madison has actively pursued a scheme to develop the land as a residential estate. Originally seen as an aged persons development, with a range

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to the Standing Committee on Planning, Public Works,
and Territory and Municipal Services – DVP 298
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of accommodation from independent living units to high level care, the proposal has been refined over time to meet planning requirements related to housing needs, community planning and locational concerns. Early consideration was given to alternative uses for recreation purposes; however the land was unsuitable for restricted access recreation because of the topography, adjacency to the golf course and existing residential areas and the closer location of potential commercial competitors to population centres.

Public Consultation

6. From March 2003 undertook continuing consultation with relevant authorities and agencies, special interest groups such as the Belconnen Golf Club, and with community groups and the community in general to ensure that all stakeholders and potential stakeholders were fully aware of its proposals for the site. Consultation also provided the opportunity for concerned groups and individuals to provide input to the evolution of plans by Madison for the development of the estate.
7. Consultation has included meetings with:
 - Planning and Infrastructure Committee of the Legislative Assembly of the ACT
 - Belconnen Magpies Golf Club;
 - West Belconnen LAPAC who proposed and unanimously adopted a resolution of support for the proposal;
 - Belconnen Community Council who “warmly welcomed” the proposal and who considered the ACT Government’s negative/cautious approach to the proposal as inappropriate;
 - Local Residents and the General Public;
 - Environment ACT
 - ActewAGL
 - ACT Rural Fire Service
 - ACT Sport and Recreation
 - Council of the Ageing (who saw no reason to oppose the development) and the
 - Morshead Retirement Village.
8. Consultation focussed on the special interests of the group, organisation or agency being consulted. For example, the Golf Club Committee was concerned to maintain and enhance the quality of the course following the Club’s decision to close the 19th to 27th holes in response to declining interest and rising maintenance and watering costs. Following consultation with the Magpies Management and its’ membership, the relocation of the clubhouse, upgrading of the holes, and general enhancement of facilities has been resolved to the satisfaction of the Club and the vast majority of its members.
9. In July 2004 Woodhaven made a submission to the then Planning and Infrastructure Committee Inquiry into the availability and provision of land for development of accommodation for the ageing population of Canberra. Woodhaven subsequently appeared before the Committee to provide evidence at its public hearing.

10. Meetings were held with the Belconnen Community Council (2003); West Belconnen LAPAC (2003); and local residents and the general public (Jun 2003; December 2003; February 2007; March 2007, August 2009, and April 2010); providing opportunity for residents to raise concerns regarding perceived traffic problems; relocation of golf clubhouse and closing of the 19th -27th holes. Resolution of these concerns has been dealt with in proposals for traffic management in Spofforth Street and in the design of access and egress to and from the new clubhouse.
11. Consultation with government agencies and instrumentalities focussed on the provision of services on the basis that Woodhaven would as a model developer, particularly in respect to provision of housing for older people; water harvesting; sustainable development and best practice bush fire management,
12. There was a generally high level of support by community organisations for the proposal. Some isolated opposition was encountered with a small number of members of the Golf Club in relation to particular aspects of the golf course arrangements likely to be affected by the development. There was no opposition to the development *per se*. Following the expression of concerns by some members, further discussions were held that led to amendments of the original proposal to satisfy the dissenting members.
13. In addition to consultations with community and expert groups an independent survey was undertaken in May 2003 by Market Attitude Research Services to measure community opinion about the proposed multi unit dwelling complex.
14. Three hundred interviews were conducted randomly with households in Charnwood, Florey, Flynn, Hawker, Higgins, Holt, Latham, Macgregor, Page, Scullin and Weetangera. One hundred of these interviews were conducted with Holt residents.
15. Key findings of the survey were:
 - a general level of support for the closure of the 9 holes if that would improve the viability of the Belconnen Golf Club. Only 40% of respondents were previously aware of the closure, but when the proposal was explained to them, 87% gave a positive response, that is:
 - 61% supported retirement housing on the golf course;
 - Overall, 70% of respondents supported retirement and ecologically sustainable housing of the type proposed on the former golf course.
16. A public consultation exercise in the form of a 'drop in' information session was held on 25 August 2009. The event was notified in the Public Notices section of the Saturday edition of *The Canberra Times* on 15 August and 22 August 2009. Thirty two people attended the session, attendees either did not oppose the development or were interested in the relocation of the golf club and in matters relating to the golf club that were outside the proposal under review.
17. A final public consultation session was held on 27 April 2010. This session was conducted in conjunction with ACTPLA to provide an opportunity for the community to ask questions relating to the Draft Variation to the Plan and for Madison to respond to questions about the development that the Variation would

permit. Madison was able to confirm that the proposed development has not materially altered since 2006, when proposals for a full range of aged care accommodation were abandoned, and in all refinements to the proposal the overall principles relating to urban design, landscape and subdivision have remained unaltered.

Proposed Development

18. The proposed development will provide up to 350 dwellings of various types. Approximately two thirds of the dwellings are intended for residents who are potentially approaching retirement but are still fully active and wish to maintain a lifestyle that they might otherwise pursue in a normal suburban situation, but plan to age in place in an environment designed to provide high levels of amenity for older people. The remaining dwellings are intended to be self care units (Independent Living Units (ILU's)) arranged in precincts designed to provide opportunity for social interaction between residents. It is intended that there will be a community centre within the estate to foster that interaction and provide a venue for individual and group activities. It is intended that the ILU's will be offered for sale at a price that is consistent with the ACT Government's objectives of providing suitable affordable housing for Canberra's ageing population.
19. The overall proposal is to complete the golf course estate on Section 99 by the establishment of an Active Adult community with the potential to 'age in place' through the provision of adjacent independent living units. The estate currently comprises the Magpies Golf Club; club house and 18 holes golf course; and Woodhaven and Wiluna housing estates
20. Part of the proposal is the intention to reorientate the golf course by relocation of the Club House to new premises to be constructed on Spofforth Street. However, the relocation of the golf club house is not subject to any variation of the Territory Plan. The relocation of the club house represents a major shift in the centre of gravity of the golf course component of the estate with the club house moving from a peripheral location off Stockdill Drive with a limited catchment in the south west quadrant, to a position where the catchment is greatly extended to encompass the adjacent suburbs of Dunlop, Latham and Macgregor, and particularly the new West Macgregor estate, as well as other future urban areas. This proposed relocation of the Clubhouse is at the request of the Magpies Club through their Board of Directors.
21. A major focus of the proposal involves the improvement of the course proper, and the development of the club facilities as a social focal point for the district. It is intended to provide function centre facilities within the rebuilt Club for events such as weddings and conferences in addition to the normal leisure and recreation facilities offered by well appointed clubs.
22. The existing club house building will be demolished and replaced with a community centre building housing an assembly hall and meeting rooms, intended to serve as a local centre for all three residential estates on the golf course and may include personal services units, professional offices, and a small shop selling convenience goods.

23. Subject to the proposed variation(s) it is intended to surrender the existing lease over the golf course in favour of the grant of separate leases over the golf course and the new residential estate and community centre. Under the new lease an estate of approximately 23ha will be developed to meet the housing needs of the Active Adult community and those persons wishing to reside in Independent Living Units. The land on which the present golf clubhouse stands will be developed to meet the social needs (health, leisure, recreation and convenience shopping) of the residential estate.
24. The Golf Course will be regarded as a major leisure facility for the residential estate, because of its proximity and the intended quality of the course and proposed new clubhouse. The same benefits will derive to the residents of the existing residential estates as well as residents in adjacent suburbs.

Residential Precinct

25. The proposed development represents a private enterprise response to the *Building for Our Ageing Community Strategy* (December 2003). The strategy reflects a goal of the ACT Social Plan which is to meet the diverse needs of the ageing community¹. The need for this type of development in North and South Belconnen was identified in the 2006 Demand and Supply Study (Howe)². The overall precinct will be developed in accordance the principles of the *Residential Subdivision Development Code* (RSDC) (February 2009).
26. The estate will comprise of four precincts containing a total of up to 150 Independent Living Units³, up to 200 blocks allocated to Active Adult dwellings, and common property containing a range of open spaces for the amenity of residents. Active Adult dwellings are intended to accommodate semi-retired and retired people who live normal, healthy independent lives but are no longer raising a family. The proposed layout of the residential estate including the community centre is shown at Figure 1 (below)
27. All dwellings will be designed to respect the principles of universal design conceived and developed by the North Carolina State University. The principles may be summarised as requiring designs that are equitable i.e. usable by persons with diverse abilities; simple and intuitive; perceptible i.e. understandable by the user; tolerant, i.e. designed to minimise hazards and accidents by unintended actions; require low physical effort; and are of a size and space to allow use regardless of the users body size, posture or mobility.⁴
28. Residents may have responsibilities for family members and other people and it is NOT intended to condition purchase of a property to exclude particular classes of people on the basis of age, family composition or other artificial constraints. However, house designs and facilities will be oriented towards people who are not rearing children.

¹ *Building Our Community – The ACT Social Plan* (Canberra 2004) at p. 11.

² *Retirement Accommodation and Residential Aged Care in the ACT 2006-2026 – Demand and Supply Study*. Howe A. July 2006

³ The term ‘independent living units’ is not defined in the Territory Plan 2008. In this report the term is used to refer to multi unit dwellings and dwellings on compact blocks designed for ease of management and located to meet the needs of older members of the community who do not require support services. The term does not include retirement complexes and supportive housing as described in the Territory Plan Table of Contents.

⁴ The *Principles of Universal Design* are the copyright of the North Carolina State University (1997) and are reproduced here for explanatory purposes only. References to the principles are not intended to imply endorsement or approval by the Centre for Universal Design of the adoption by Madison of the principles in its developments.

29. The proposed development would reflect the experience of Madison who, between July 1997 and September 2006 completed thirteen developments in the style proposed for Block 11 (Part) Section 99 Holt. Three hundred and five dwellings were constructed in these developments of which 276 (90%) were occupied by persons over the age of 50 years.
30. Only nine dwellings (3%) were occupied by families with school aged children. In the previous developments, 66% of those nine families with school aged children moved into two storey townhouses. There are no two storey dwellings in the proposed development at Holt.
31. Active Adult housing and self care units will be designed as adaptable housing.⁵ Where applicable, dwellings will accord with the requirements of the *Access and Mobility General Code (Territory Plan 2008)*.

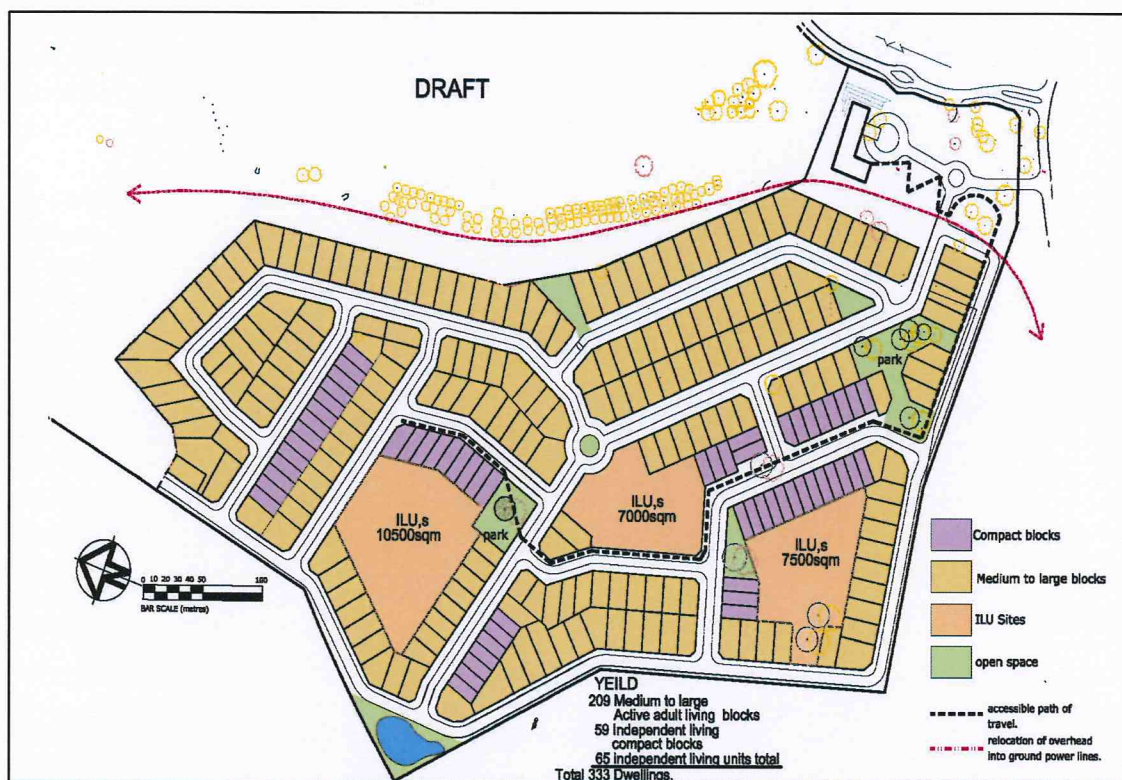


FIGURE 1: PROPOSED SUBDIVISION PLAN

32. Within the estate, the town house sites are intended to be a series of residential precincts each grouped around an internal access street to give an intimate individual character to the housing.
33. Precincts will be linked to a system of minor access roads running through the estate and separating the precincts within it.

⁵ See *Territory Plan 2008*, Access and Mobility General Code-Definitions

34. The main collector is intended to extend northwest from a roundabout on a knoll in the south east corner of the proposed estate. The knoll is the highest point of the estate and will be the site for a community centre that acts as a neighbourhood focal point and will provide high levels of amenity for residents.
35. The main collector will traverse the estate from the knoll to a formal open space on the western boundary. A vertical element will be contained within the open space to provide a landmark for people moving around the estate.
36. The estate will contain a mix of housing types each designed to respond to the sub-precinct context (upper slopes; lower slopes; plain areas etc).
37. The estate will have a low speed movement system providing for motor vehicle traffic, pedestrians, cyclists and motor scooters for disabled residents.
38. Roads and pathways are intended to visually link the precincts through common landscape themes and streetscapes and to provide visual clues about the neighbourhood character.

Neighbourhood Character

39. Street tree species will be chosen to reinforce the low speed nature of the movement system where road reservation width will be proportionate to the building setbacks, elevations and tree form. It is hoped to encourage a strong sense of community amongst residents through social interaction within each precinct assisted by the physical structure of movement spaces.
40. Carriageways will be sufficiently wide to permit vehicles to pass or for an emergency vehicle to pass or overtake a parked vehicle on one side of the carriageway.
41. The general intention of the layout is to take advantage of the topography to provide a mix of dwelling types for the Active Adult community ranging from elevated blocks with views to the distant ranges to more level blocks for less active residents. The Independent Living Units are located on the most level part of the estate for the comfort and convenience of residents.
42. A public open space network will be designed for the development and will incorporate extensive off-street pedestrian and cycle network to connect to existing networks in the surrounding area. This network will be designed to provide safe connections for all pedestrians, including disabled to the public open spaces, the community centre and adjacent areas.
43. Paths throughout the development will be designed with a width of 1.2m. The paths will be designed to be compliant with the requirements of the code and relevant Australian Standards. Tactile indicators will be incorporated where appropriate to assist with the movement of pedestrians with vision impairment and to conform to Australian standards.
44. It is not proposed to provide bicycle paths throughout the development; however speed control devices proposed will incorporate allowance for on-street cyclists. The traffic report discusses adding on street bicycle lanes to existing roads adjacent to the development (on Spofforth Street), to act both as bicycle lanes

45. The landscape plan for the estate reflects its location adjoining the Belconnen Golf Course to the north and east and broadacre land to the west. It also recognises its position on the urban fringe of Canberra and the need for appropriate response to the potential exposure to bushfire attack from the west. Bushfire protection is discussed below. The landscape plan for the Golf Course has been included to assist the reader in relating the estate landscape design to the overall design of Section 99 and surrounding areas west of Spofforth Street, which are generally broadacre in appearance surrounding clusters of low rise housing.
46. The proposed development does not include a formal retirement village as defined in the Territory Plan, and it is unlikely that one would eventuate at some later point in time. Restrictions on the unit titling of dwellings, and market place rejection of the system of loan and licence tenure relating to dwellings in retirement villages militate against the establishment of such a facility in this locality.



47. The proposed development has been subject of a number of environmental and engineering considerations arising largely from its location with respect to the urban fringe, traffic routes and existing public infrastructure. A comprehensive

range of studies have been carried out into all aspects of the development including traffic, water and sewerage, and electrical supply.

48. Part of the project will require the relocation of the existing 132kV overhead power line which will be undertaken at Madison's expense. There has been extensive liaison with ActewAGL on this matter to ensure that Madison's proposals are consistent with Actew requirements.
49. Extensions to the existing hydraulic system to provide water and sewerage are available to the proposed estate but it is proposed that the estate will be designed with an independent sewerage treatment system and a range of water sensitive urban design initiatives to provide recycled water for irrigation purposes.
50. The Traffic Impact Report prepared for the development concludes that the surrounding roads are of adequate capacity after completion of the development. The report also discusses installing Local Area Traffic Management measures along adjoining roads to help calm the traffic through the area.
51. The design of the development will incorporate speed reduction devices into the street environment. The design of the slow points will be part of a total integrated traffic management solution. The design will be in accordance with the Australian Standard requirements and will take account of the requirements of emergency vehicles.
52. An ecological assessment of the subject land was carried out to determine the potential impact of the proposed development on the natural ecological processes within and adjacent to the site, and in particular any impact on threatened species or their habitats. The assessment also examined possible management strategies to mitigate possible short term impacts of construction and longer term impacts associated with the operation and maintenance of the estate.
53. The ecological study concluded that the subject land and surrounding areas was of low conservation value because of its land use history. There was a low diversity of resources and limited habitat opportunity for most native plants and animals other than some disturbance tolerant species. The study also concluded that development on the land was unlikely to directly affect any area of high conservation values or population of rare or threatened plants or animal species.
54. The subject land is currently within the declared built up area that abuts the bushfire abatement zone shown in the Schedule to the Emergency (Bushfire Abatement Zone) Declaration 2006 (Notifiable Instrument NI 2006-226).
55. The proposed development lies in the same relationship to the general line of attack from bush fire as does West Macgregor.⁶
56. The development is to comply with the Planning Guideline – Planning for Bushfire Risk Mitigation for New Development and Redevelopment. An initial bushfire risk assessment has been undertaken in accordance with the guideline and has determined indicative setbacks, separation distances, and required

⁶ See *Strategic Bushfire management plan* DI 2005-1

protection zones. These setbacks and building requirements are to be finalised during the more detailed development planning phase.

57. Access for fire fighting vehicles will be provided by incorporating an edge road into the development along the western frontage.
58. Both ACTPLA and the Emergency Services Agency are proposing additional requirements for development in fire prone areas. The ACTPLA proposes to amend the Territory Plan by creating a mandatory requirement that buildings constructed in bushfire prone areas are to be constructed in accordance with the relevant Building Code of Australia bushfire provisions⁷. Construction on the new estate would be required to comply with the new Rule 18A of the Territory Plan which is a mandatory requirement.

Benefits of the proposed development

59. The proposed estate is targeted at persons who are semi-retired or retired but who are active and mobile and able to take advantage of a living in a residential estate in a golf course setting with views of and convenient access to rural areas beyond the urban fringe.
60. It is also aimed at persons, particularly older persons who fall in the mid to upper range of what is described by Davy ⁸ as low to moderate income (\$335.95-\$1232.40 per week). The proposed housing is Not *age specific housing*, i.e. accommodation specifically constructed for, or modified for or allocated to older people. Rather it is *Age Targeted* that will be private dwellings which are accessible or adaptable, designed into precincts intended to encourage social and community interaction, and where a significant percentage of the dwellings will be consistent with the objectives of the ACT Government's *Affordable Housing Plan* 2007.
61. Research figures show that 94% of all Australians over the age of 65 live in private dwellings. Of these, 92% of Australians aged between 65-74 and 94% of Australians between 75 and 84 live in private dwellings. Eighty percent of Australians in the 85+ age bracket live in private dwellings.
62. The estate is intended to facilitate ageing in place both by the design of precincts that encourage social interaction and house designs that, as indicated in paragraph 27 above, will utilise universal design principles requiring, inter alia, low physical effort; size and space dimensions that allow use regardless of the users body size, posture or mobility.⁹ While such principles might be said to be desirable generally, their use is not yet widespread or compulsory, making the proposed estate a design exemplar.
63. The estate is planned to contain approximately 200 freestanding villas intended for the Active Adult component; 150 townhouses intended as self care units

⁷ ACTPLA Proposed Technical Amendment to the Territory Plan Code Variation 2009-24 *Amendments to the Single Dwelling housing Development Code (August 2009)* (New Rule 18A)

⁸ Davy et al; *Age-specific housing for low to moderate income older people* Australian Housing and Urban Research Institute (August 2010)

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(otherwise described as Independent Living Units) for independent living. Because the estate is being developed privately on land already owned by the developer (but subject to an estate management plan under the Territory Plan), all dwellings will be single storey to maximise accessibility, as a reflection of the needs of older persons,

64. Madison considers this design principle extraordinarily important, and in contrast to land subject to Land Development Agency releases of similar land where lease and development conditions ordinarily require two storey construction. Madison believes that because of its emphasis on single storey dwellings, its proposed development is unmatched in Canberra and hence it is best positioned to satisfy the requirements of older Canberrans in the age/income bracket referred to in paragraph 61.
65. At an earlier stage of development some concern was expressed about the location of the proposed development on the urban fringe with respect to its relationship to shops, personal services and community facilities. The proposed estate is not a residential development that falls within the ambit of the *Community and Recreational Facilities Location Guidelines General Code 2008* set out in the Territory Plan, which generally provides that retirement accommodation should be within 400m of retail, health and community facilities.
66. People living in the new estate will require a degree of mobility dependent on their need for services. Limited convenience shopping, personal services and some social and community facilities will be available in the purpose built community centre replacing the existing club house when it is relocated. Roads and paths will be designed for disabled access to these facilities. However, trips to other centres will still need to be made by motor vehicle to satisfy the lifestyle requirements of residents of the estate. No difficulty is anticipated for residents routinely undertaking these trips
67. Commonwealth data indicates that use of private vehicles by older people is increasing. Between 2002 and 2006 the number of older persons with access to a motor vehicle to drive increased from 66% to 73%, with a 2003 VicRoads study indicating by 2031 99% of older men and 94% of older women will hold a drivers licence. In major Australian cities where there is good (public) transport availability, 90.6% of men aged 65-74; 80.6% of men aged 75-84; and 56.1% of men aged 85+ had access to motor vehicles to drive. In inner regional areas where there were less public transport facilities the numbers of male drivers were 10-20% higher. Female drivers had significantly lower rates but overall 55% of women aged 65+ drove in metropolitan areas and 70% in inner regional areas.
68. The 2006 Census indicated that 80% of persons aged 65+ can easily get to places as needed and there can be every confidence that statistics for residents of the proposed estate will be consistent with national responses.¹⁰ It is therefore reasonable to presume that residents of the new estate will not be disadvantaged by any purported lack of access to the retail, health and community facilities that

other older persons in retirement complexes close to major centres could expect to enjoy.

Summary

69. The proposal to Vary the Territory Plan to permit Block 11 (Part) Section 99 Holt to permit the land to be used for residential purposes *cannot* be shown to have an adverse impact on the potential residents, the existing residents of the Golf Course estate, golfers, or any other section of the community nominally affected by the proposal.
70. The proposed development will have beneficial effects for the implementation of the ACT Government's Affordable Housing Plan, and the ACT Social Plan, particularly with respect to the provision of housing for people aged 65 or over.
71. The proposal has been extensively tested and refined over a number of years to meet Government requirements with respect to bushfire protection, sustainability, environmental sensitivity, traffic and transport demands, urban design and a range of other matters covered in Madison's 2009 Planning Report to ACTPLA.
72. The proposed development will also allow the rationalisation and improvement of the golf course and club house, projects that will otherwise languish through lack of funds if the development cannot proceed.

Conclusion

73. The proposed development is consistent with the objectives of the Territory Plan and the overarching object of the Planning and Development Act 2007 at section 6 which is to provide for the orderly and sustainable development of the ACT consistent with the social, environmental and economic aspirations of the people of the ACT.
74. Madison respectfully commends the Variation to the Standing Committee and recommends that it reports favourably to the Minister on the Variation of the Territory as set out in Draft Variation No.298.

Yours sincerely

David O'Keeffe
Managing Director

