



28 Collie Street
Fyshwick ACT 2609
t (02) 6285 7300
f (02) 6280 0333
hia.com.au

13 August 2015

Standing Committee on Planning Environment and Territory and Municipal Services
Committee Secretary Mr Hamish Finlay
PO Box 1020
CANBERRA ACT 2601
committees@parliament.act.gov.au.

Dear Mr Hamish Finlay

DV-343

HIA supports the proposals with some suggested modifications provided in our original submission (see attached).

The proposed modifications to the Government proposal put forward by HIA is that the current sitting, height and site coverage rules should apply to the surrendered Mr Fluffy Blocks.

The reason for this modification is that with a 30% site coverage this will not allow the construction of a reasonable sized home (i.e. 3 bedroom house).

Other reasons why the Governments proposal should proceed with slight modifications are:

- Offer more housing types/choices for seniors downsizing wanting to live in their existing suburb.
- New townhouses could be designed minimising steps and trip hazards.
- Provide young people wishing to start a family an alternative housing choice (than an apartment) in inner suburbs.
- By increasing site coverage in the proposal to match current rules will enable the Government to recover more income from the sales of land because projects would be more viable.
- Individual titles will be a good concept to remove the body corporate arrangement that add ongoing costs and administration for the life of the development.

Please don't hesitate to contact me if you require any additional information.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED

Neil Evans
Executive Director
ACT & Southern NSW



SUBMISSION BY THE
Housing Industry Association

to the

**ACT Environment & Planning Directorate
Territory Plan Unit**

on

Draft Variation No. 343

25 May 2015

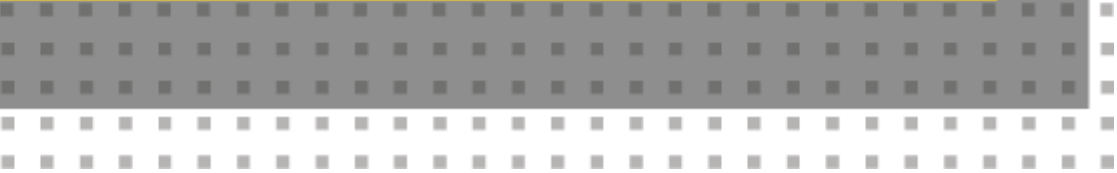



HIA ::

Neil Evans
Housing Industry Association
28 Collie Street
Fyshwick ACT 2609
Phone: 02 6285 7300
Email: n.evans@hia.com.au

HIA is the leading industry association in the Australian residential building sector, supporting the businesses and interests of over 40,000 builders, contractors, manufacturers, suppliers, building professionals and business partners.

HIA members include businesses of all sizes, ranging from individuals working as independent contractors and home based small businesses, to large publicly listed companies. 85% of all new home building work in Australia is performed by HIA members.





1 Introduction

This submission has been prepared in response to the *Draft Variation 343 to the ACT Territory Plan 'Residential blocks surrendered under the loose fill asbestos insulation eradication scheme'*.

The Scheme will play an important role in removing any doubt about the safety of home owners and neighbours of affected properties in the future.

HIA has expressed our support for the intent of Draft Variation 343 as a practical way to create renewal and promote new housing supply on properties affected by the Scheme. The promotion of well designed dual occupancy dwellings on lots in both residential zones affected by the Scheme is considered appropriate and given the limited number of lots affected by the variation it is considered the amendments are consistent with the objectives of the zones.

Based on the other design criteria that currently apply to dual occupancy dwellings under the "Multi Unit Housing Development Code", it may be difficult in some circumstances to achieve the objectives of this amendment. Therefore HIA would encourage the Government to review these supporting requirements as part of this process.

2 Comments on proposed changes

2.1 Proposed Changes

HIA would like to make the following comments on proposals in Draft Variation 343.

Variation to Territory Plan

Amendment 1 New Definition

This insertion of the new definition is supported.

Variation to Single Dwelling Code

Amendment 2 Subdivision of single dwelling blocks RZ1

This change is supported.

Dual occupancy developments in RZ1 zone meet the current zone objectives and are permitted development. The proposed lot size reduction is considered practical and does not alter the overarching zone objectives, therefore allowing subdivision of dual occupancy as occurs in RZ2 zones is considered appropriate.

Variation to multi-unit housing development code

Amendment 3 Dual occupancy housing – single dwelling blocks

This change is supported.

Dual occupancy dwellings are already permitted in RZ1 zones and adopting the same minimum lot size as currently applies in RZ2 is considered appropriate.

However HIA is concerned that other existing planning controls in the multi-unit housing development code for RZ1 zones may limit the ability for building designs to be prepared that meet all other criteria for that zone. This includes setbacks and solar envelopes. These criteria should be reviewed to ensure that dual occupancy developments can be appropriately designed on these blocks without the need to vary the rules.



Amendment 4 & 5 Plot ratios for dual occupancy – single dwelling blocks

The 35% plot ratio for dual occupancy not fronting the street is not supported. This should be increased to 50% with appropriate building envelope requirements.

The suggested changes do favour corner allotments that will lend themselves better to dual occupancy designs with each dwelling facing the street. However we do believe that single fronted blocks should have equal ability to utilise the altered provisions. Currently these lots will have difficulties in meeting the design criteria on 700m² with only a 35% plot ratio.

Amendment 6 Number of storeys – single dwelling blocks RZ1

This amendment should be altered to remove the single storey limitation for dual occupancy required to meet a 35% plot ratio. Two storey dual occupancy should be permitted with appropriate building envelope requirements in the same manner as permitted in RZ2 zones.

Amendment 7 Building design – surrendered blocks

This change is supported in principle. However it is unclear why this new requirement should be introduced when the same dwellings can be designed in RZ2 zones currently on 700m² lots and in RZ1 currently on 800m² lots without this principle being stated.

The proposed criteria give no guidance and therefore create a wholly arbitrary planning principle which is impossible for an applicant to discern and equally impossible for the Government to apply consistently.

3 Suggested changes to the current planning criteria

In considering the opportunity presented by this amendment, there are other potential adjustments to the Multi unit housing development code that could be considered to promote better design and built outcomes.

HIA would support a review of current rules to allow and encourage appropriate redevelopment of our suburbs with a view to the future of how the city can regenerate existing suburbs whilst maintaining the hierarchy of zones and the character of areas.

One example would be considering permitting large blocks in RZ1 (1400m² or more) to have rules that allow more than two dwellings to be built.

The minimum frontage restriction should also be removed, or at least reduced, to allow wedge shaped allotments and large rear battle axe allotments to be developed for dual occupancy.

There needs to be some consideration to amending the Tree Act. The current legislation needs to continue to protect substantial trees on government and private land in front of the existing or proposed dwellings, however it should allow for trees to be removed in private backyards and have a replacement program put in place to offset any removal by placing two or three trees of suitable species for rear yards to be replanted in appropriate locations. This is affecting both renovations and rebuilding projects.

4 Conclusion

HIA supports the proposed amendments in principle. However these comments have been provided to stimulate further discussion about the opportunity to better utilise large blocks in RZ1 zones to support the growth of Canberra and create much need new and smaller housing solutions across the City.