

More reasonable alternatives to the proposed dwelling replacement policy could be:

- Change 3 bedroom requirement to 2 bedroom i.e. replace each demolished houses with at least one 2 or more bedroom dwelling
- Provide a threshold of a multi-unit development before some 3 bedroom dwellings are required

Affordability

ACT Government has through affordable housing policies identified the importance of addressing the problem of housing stress for low and medium income households. It introduced the *Affordable Housing Action Plan* in mid 2000s to allow and provide for all members of the Canberra community to access affordable and appropriate housing.

A large number of initiatives were identified in the Plan and have been progressively achieved. The release of more blocks and the introduction of compact blocks are an example of the assistance for new house buyers. The Plan noted that the reforms needed to be coordinated and driven across Government. One relevant objective was to ensure that planning legislation and requirements would facilitate the achievement of key government priorities in such areas as affordable housing and aged care. The requirements contained in DV306, especially in the RZ2 section, would appear to contradict this critical Government priority.

The case study analysis below suggests that only by significantly underutilising the GFA permitted could houses be provided that are "affordable" and that is unlikely to be feasible for any private developer and will significantly compromise the return to the community, in many senses, for land held by the government.

Hypothetical Development with 100% GFA Utilisation excluding LVC

Item	Value
Site Size (3 x 800 m2)	2,400
Dwellings permitted under DV306 MU Code Table A2	6
GFA permitted under DV306 for an amalgamated single dwelling block site @ 50% of site area	1200
Area per dwelling (including mandatory car park zone)	200
Construction cost per dwelling @ \$1500.00/sqm	\$300,000.00
Land cost based on a an estimated average detached house price; \$500,000 x 3 blocks	\$1,500,000.00
Land cost per dwelling	\$300,000.00
Cost to construct (land + dwelling + CUC)	\$622,500.00
15% profit (margin required by financiers to finance)	\$93,375.00
10% fees and charges	\$62,250.00
Average total cost per dwelling	\$778,125.00

Hypothetical Development with 50% GFA Utilisation excluding LVC

Item	Value
Site Size (3 x 800m2)	2,400
Dwellings permitted under DV306 MU Code Table A2	6
GFA permitted under DV306 for an amalgamated single dwelling block site @ 50% of site area	1200
Area per dwelling (including mandatory car park zone)/2	100
Construction cost per dwelling @ \$1500.00/sqm	\$150,000.00
Land cost based on an estimated average detached house price; \$500,000 x 3 blocks	\$1,500,000.00

Land cost per dwelling	\$300,000.00
Cost to construct (land + dwelling + CUC)	\$472,500.00
15% profit (margin required by financiers to finance)	\$70,875.00
10% fees and charges	\$47,250.00
Average total cost per dwelling	\$590,625.00

Can ACTPLA confirm the percentage of the RZ2 affected by the dwelling number restrictions, their distribution, the consequent loss of development potential in the existing urban area and the projected impact on objectives to achieve increased population density in inner suburban areas that provides opportunities for affordable development? In redefining RZ2 has ACTPLA considered whether there is a commensurate need to rezone some areas within 800 m of major infrastructure such as group centres?

The RZ2 fact sheet provided indicates that the previous controls meant RZ2 development for blocks over 1400m² was unlimited. What is now proposed for RZ2 sites which are not single dwelling blocks? Are they now open to unlimited development? If not, sites in existing multiple dwelling sites will not to contribute any increase in density unless they are amalgamations incorporating a large number of blocks

As noted above, nearly every local centre in Canberra established since the 1950's, has neighbouring medium density residential units, often in the form of apartments that sometimes extend up to 3 stories high. They have generous amounts of open space integrated into their layouts, and are both publicly and privately owned. They are regarded as providing a diversity of housing choice within the suburb, and are sustainability located next to services and public transport links. The aging of these complexes also means that renovations to improve access and sustainability, and even redevelopment will be considered in the future. Can ACTPLA confirm that the proposed codes ensure that in upgrading these developments, the density, diversity and opportunities for improved accessibility permitted are not reduced?

Within all zones the extension of the definition of single dwelling blocks to larger blocks created by amalgamation of several blocks reduces the developable GFA in RZ1 RZ2 and RZ3 zones. As in the application of tables limiting dwelling numbers there is no evidence provided as to why this is appropriate or an analysis of the impact on broader policy objectives.

The Institute recommends improvements to the planning codes for the Suburban Core Zones in order to improve neighbourhood acceptance and ensure a better product for new residents. Some suggestions include the following:

- Establish clear and unambiguous objectives for all planning use zones, which give progressive and logical connection to all of the zones. A logical progression of scale and density is required.
- An important part of the amended code would be to address the public open space criteria, streetscape characteristics and the interface between the public realm and residential dwellings.
- Make improvements to neighbourhood infrastructure (such as footpaths and lighting), not just at the local shopping centre.
- Improve the required quality of design and construction.

Alternatively, if RZ2 is effectively no longer to function as a suburban core zone, its removal and the opportunities for increasing population densities within RZ1 and the redefinition of the boundaries of RZ3 may be worthy of investigation. This would however remove the intended transitional zone.

Restrictive and Contradictory Rules and Criteria

As noted, a number rules are arbitrary with no evidence based reason provided for their inclusion.

Privacy Amenity and Built Form

The suite of controls around the issues of privacy, amenity, passive surveillance and street interface highlight the lack of detailed analysis of the interactive effect and consequences of prescriptive and contradictory rules.